Hospital Price Transparency Posting Evaluation Report Fall 2023

February 2024

COLORADO
Department of Health Care
Policy & Financing

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I. Key Findings

Health Care Policy and Financing (HCPF) has developed a Good, Fair, Poor rating system that measures the quality of adherence to federal price transparency rules. From Aug.15, 2023 through Sept. 11, 2023, HCPF reviewed 101 of Colorado's short-term acute care (general, critical access and children's), long-term acute care, rehabilitation and psychiatric hospitals' downloadable price transparency files and shoppable service estimator tools or displays.[1] Each was evaluated using a scorecard and marked "Y" if the criterion or "N" if the criterion was not met. This scorecard includes long-term acute care, rehabilitation, and psychiatric hospitals which were not included in our previous report.[2]

- Overall, 59.4% of all Colorado hospitals have a quality rating of Good. This is a 32.9% increase from the price transparency data retrieved in November of 2022.
- Additionally, Colorado acute care *system* hospitals have increased the number of hospitals with a quality rating of Good by twenty-two hospitals.
- Critical access hospitals rated Good rose from 15.6% in November 2022 to 53.1% in September 2023.[3]
- There was an increase of 25 hospitals improving their rating from Fair to Good. However, there were also 31 hospitals with a rating of Poor; of the 31 hospitals, HCPF conducted targeted outreach to 21 hospitals through the end of November 2023.
- In Colorado, recently passed legislation, House Bill (HB) 22-1285 and Senate Bill (SB) 23-252, have already had noticeable effects on the quality of price transparency in Colorado.
- The biggest improvement from hospitals compared to the November 2022 Price Transparency Posting Evaluation Report was the addition of all contracted payer network products (sometimes referred to as plans), with a cumulative increase of twenty additional hospitals including contracted payer network products.

II. Introduction

Given that hospital prices represent the largest component of overall health care costs, hospital price transparency will contribute to a more open and competitive market, which will help drive down hospital prices paid by

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[1] The evaluation reflects what was currently available at the time of the review and HCPF is aware that hospitals may have updated their transparency postings after our review but during the review period.
[2] Hospital Price Transparency Posting Evaluation Report 3/15/2023, https://hcpf.colorado.gov/sites/hcpf/files/Price%20Transparency%20Postings%20Evaluation%20Report.pdf
[3] Critical access hospitals became subject to Prohibit Collection Hospital Not Disclosing Prices House Bill (HB22-1285) requirements in February 2023.

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employers and consumer purchasers and ultimately the prices paid for health care coverage. For this policy to be effective, hospitals must be compliant with the federal hospital price transparency rule.[4] On June 8, 2022, the Governor signed into law HB22-1285, which provides a greater incentive for federal hospital price transparency rule compliance. The law went into effect on Aug. 10, 2022, for all hospitals, except for critical access hospitals which were allowed until Feb. 15, 2023, to comply.[5] The bill prohibits Colorado hospitals from initiating or pursuing collection of debt from a patient if a hospital's postings were not in compliance with the federal hospital price transparency rule for the specific procedure performed on the day the patient's service was provided. To be compliant with the federal rule, hospitals must post a machine-readable file containing a list of all standard charges for all items and services and a list of standard charges for a limited set of shoppable services in the form of a display or estimator tool.[6,7]

On June 2, 2023, the Governor signed into law SB23-252, which builds upon HB22-1285 in several ways. SB23-252 requires hospitals publicize their Medicare reimbursement rates, requires HCPF to conduct performance assessments and maintain a public list of hospitals with Poor results that are updated annually, and makes violations a deceptive trade practice.[8]

Scorecard Information

The following performance assessment has a quality scale with three different ratings: Good, Fair and Poor. This scale measures the conformity of the hospital's price transparency postings, *not* if the hospital is compliant. The federal Centers for Medicare and Medicaid Services (CMS) determines whether hospitals are compliant with the federal regulations. The goal of this scorecard is to help hospitals identify if they *may be* flagged for non-compliance under CMS regulation.

HCPF's role is to review hospitals' postings compared to the federal requirements and provide technical assistance to improve their postings. HCPF is currently reaching out to hospitals who are rated Poor to provide such technical assistance. HCPF's primary focus for the downloadable file is to

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[4] The Federal Hospital Price Transparency Rule,
https://www.ecfr.gov/current/title-45/subtitle-A/subchapter-E/part-180
[5] State of Colorado House Bill 22-1285, https://leg.colorado.gov/bills/hb22-1285
[6] 45 CFR §180.50 machine-readable file requirements,
https://www.ecfr.gov/current/title-45/subtitle-A/subchapter-E/part-180/subpart-B/section-180.50
[7] 45 CFR §180.60 display or estimator tool requirements,
https://www.ecfr.gov/current/title-45/subtitle-A/subchapter-E/part-180/subpart-B/section-180.60
[8] State of Colorado Senate Bill 23-252, https://leg.colorado.gov/bills/sb23-252

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evaluate if all the required items were present. Additionally, HCPF is focused on the availability of a shoppable services tool or display that allows consumers to obtain a service price when shopping for one of the 70 CMS-specified shoppable service codes.[9] Prices for third-party payers were not factored in the shoppable services criteria because most Colorado hospitals utilize an estimator tool, which can require specific insurance information to receive a price or quote. The complete scorecard criteria and rating details are in Appendix A: Methodology. The methodology remains the same as the previous Scorecard released in March 2023. Please note that our methodology will change in early 2024 to reflect the addition of Medicare reimbursement rates in the machine-readable file and new CMS guidelines.

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[9] 70 CMS-specified shoppable services code list,
https://www.cms.gov/files/document/steps-making-public-standard-charges-shoppable-services.pdf

III. Scorecards

Table 1: Scorecard by Hospital September 2023[10]

Marketed Name	System	Hospital type	September 2023 Overall Quality Rating	November 2022 Overall Quality Rating	Downloadable File Quality Rating	Shoppable Service Quality Rating	Machine Readable	Data Extract Date Within 365 Days	Posted or Updated Date Within 365	Code	Description	Gross Charges	Discounted Cash	De-Identified Minimum	De-Identified Maximum	Negotiated Rates	Individual Plans	Display or Estimator Tool	Cash Price
Animas Surgical Hospital	Independent	General	Poor	Fair	Poor	Good	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Tool	Y
Arkansas Valley Regional Medical Center	Independent	Critical Access	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Aspen Valley Hospital	Independent	Critical Access	Poor	Poor	Poor	Good	Y	N	N	Y	Y	Y	Y	Y	Y	Y	Y	Display	Y
Avista Adventist Hospital	AdventHealth (formerly Centura Health Adventist)	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Banner Fort Collins Medical Center	Banner Health	General	Poor	Fair	Poor	Good	N	N	N	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Boulder Community Health	Independent	General	Poor	Fair	Poor	Good	N	Y	Y	Y	Y	Y	Y	N	N	Y	N	Tool	Y
Broomfield Hospital	UCHealth	General	Good	Fair	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Castle Rock Adventist Hospital	AdventHealth (formerly Centura Health Adventist)	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Cedar Springs Hospital		Psychiatric	Good		Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Centennial Peaks Hospital		Psychiatric	Good		Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Children's Hospital Colorado	Childrens	Children	Good	Poor	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Children's Hospital Colorado Springs	Childrens	Children	Good	Poor	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Johnstown Heights Behavioral Health		Psychiatric	Poor		Poor	Poor	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	N	None	N
Colorado Acute Long Term Hospital		Long Term Acute Care	Poor		Poor	Good	Y	Y	Y	N	Y	N	Y	Y	Y	Y	Y	Tool	Y
Colorado Canyons Hospital and Medical Center	Independent	Critical Access	Good	Poor	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Community Hospital	Independent	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Craig Hospital		Long Term Acute Care	Good		Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Delta Health	Independent	General	Poor	Poor	Poor	Good	N	N	N	Y	Y	Y	Y	N	N	Y	N	Tool	Y
Denver Health Medical Center	Independent	General	Poor	Good	Poor	Good	Y	Y	Y	Y	Y	Y	Y	Y	N	N	Tool	Y
East Morgan County Hospital	Banner Health	Critical Access	Good	Fair	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Estes Park Health	Independent	Critical Access	Good	Poor	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Good Samaritan Medical Center	Intermountain Health	General	Good	Fair	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Grand River Hospital District	Independent	Critical Access	Good	Poor	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Grandview Hospital	UCHealth	General	Good	Fair	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Gunnison Valley Health	Independent	Critical Access	Good	Fair	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Haxtun Hospital District	Independent	Critical Access	Poor	Poor	Poor	Poor	Y	N	N	Y	Y	Y	N	N	N	N	N	Tool	N
Heart of the Rockies Regional Medical Center	Independent	Critical Access	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Highlands Behavioral Health System		Psychiatric	Good		Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Keefe Memorial Health Service District	Independent	Critical Access	Poor	Poor	Poor	Good	Y	Y	Y	Y	Y	Y	N	N	N	N	N	Tool	Y
Kindred Hospital - Aurora		Long Term Acute Care	Poor		Poor	Good	Y	Y	Y	Y	Y	Y	N	N	N	N	N	Display	Y
Kindred Hospital - Denver		Long Term Acute Care	Poor		Poor	Good	Y	Y	Y	Y	Y	Y	N	N	N	N	N	Display	Y
Kit Carson County Health Service District	Independent	Critical Access	Good	Poor	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Display	Y
Lincoln Community Hospital	Independent	Critical Access	Poor	Good	Poor	Good	Y	N	N	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Littleton Adventist Hospital	AdventHealth (formerly Centura Health Adventist)	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Longmont United Hospital	CommonSpirit (formerly Centura Health CHI)	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y

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[10] CommonSpirit St. Francis Hospital - Interquest was not a part of this evaluation because they are in the process of opening the hospital and will be included in future evaluations.

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Marketed Name	System	Hospital type	September 2023 Overall Quality Rating	November 2022 Overall Quality Rating	Downloadable File Quality Rating	Shoppable Service Quality Rating	Machine Readable	Data Extract Date Within 365 Days	Posted or Updated Date Within 365	Code	Description	Gross Charges	Discounted Cash	De-Identified Minimum	De-Identified Maximum	Negotiated Rates	Individual Plans	Display or Estimator Tool	Cash Price
Longs Peak Hospital	UCHealth	General	Good	Fair	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Lutheran Medical Center	Intermountain Health	General	Good	Fair	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
McKee Medical Center	Banner Health	General	Good	Fair	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Medical Center of the Rockies	UCHealth	General	Good	Fair	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Melissa Memorial Hospital	Independent	Critical Access	Fair	Fair	Fair	Good	N	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Display	Y
Memorial Hospital Central	UCHealth	General	Good	Fair	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Memorial Regional Health	Independent	Critical Access	Fair	Fair	Fair	Good	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Mercy Hospital	CommonSpirit (formerly Centura Health CHI)	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Middle Park Health - Kremmling	Independent	Critical Access	Good	Poor	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Montrose Memorial Hospital	Independent	General	Fair	Fair	Fair	Good	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Mt. San Rafael Hospital	Independent	Critical Access	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
National Jewish Health	Independent	General	Poor	Good	Poor	Good	Y	N	N	N	Y	Y	Y	Y	Y	Y	N	Display	Y
North Colorado Medical Center	Banner Health	General	Good	Fair	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
North Suburban Medical Center	HealthONE	General	Poor	Poor	Poor	Good	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Tool	Y
Northern Colorado Long Term Acute Hospital		Long Term Acute Care	Poor		Poor	Poor	Y	Y	Y	Y	Y	Y	N	N	N	Y	Y	Display	N
Northern Colorado Rehabilitation Hospital		Rehabilitation	Poor		Poor	Poor	Y	Y	Y	Y	Y	Y	N	N	N	Y	Y	Display	N
OrthoColorado Hospital	CommonSpirit (formerly Centura Health CHI)	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Pagosa Springs Medical Center	Independent	Critical Access	Good	Fair	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Parker Adventist Hospital	AdventHealth (formerly Centura Health Adventist)	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Parkview Medical Center	Independent	General	Fair	Good	Fair	Good	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Peak View Behavioral Health		Psychiatric	Poor		Poor	Poor	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	None	N
Penrose Hospital	CommonSpirit (formerly Centura Health CHI)	General	Good		Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Pikes Peak Regional Hospital	UCHealth	Critical Access	Good	Fair	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Pioneers Medical Center	Independent	Critical Access	Good	Poor	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Platte Valley Medical Center	Intermountain Health	General	Good	Fair	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Porter Adventist Hospital	AdventHealth (formerly Centura Health Adventist)	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Poudre Valley Hospital	UCHealth	General	Good	Fair	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Presbyterian/St. Luke's Medical Center	HealthONE	General	Poor	Poor	Poor	Good	N	Y	Y	N	Y	N	Y	Y	Y	Y	Y	Tool	Y
Prowers Medical Center	Independent	Critical Access	Fair	Fair	Fair	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Tool	Y
Rangely District Hospital	Independent	Critical Access	Fair	Fair	Fair	Good	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Rehabilitation Hospital of Colorado Springs		Rehabilitation	Good		Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Display	Y
Rehabilitation Hospital of Littleton		Rehabilitation	Good		Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Display	Y
Rio Grande Hospital	Independent	Critical Access	Good	Fair	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Rose Medical Center	HealthONE	General	Poor	Poor	Poor	Good	N	Y	Y	N	Y	N	Y	Y	Y	Y	Y	Tool	Y
San Luis Valley Health Conejos County Hospital	San Luis Valley	Critical Access	Poor	Fair	Poor	Good	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Tool	Y

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Marketed Name	System	Hospital type	September 2023 Overall Quality Rating	November 2022 Overall Quality Rating	Downloadable File Quality Rating	Shoppable Service Quality Rating	Machine Readable	Data Extract Date Within 365 Days	Posted or Updated Date Within 365	Code	Description	Gross Charges	Discounted Cash	De-Identified Minimum	De-Identified Maximum	Negotiated Rates	Individual Plans	Display or Estimator Tool	Cash Price
San Luis Valley Health Regional Medical Center	San Luis Valley	General	Poor	Fair	Poor	Good	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Tool	Y
Sedgwick County Health Center	Independent	Critical Access	Fair	Poor	Fair	Good	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Display	Y
Sky Ridge Medical Center	HealthONE	General	Poor	Poor	Poor	Good	N	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Tool	Y
Southeast Colorado Hospital District	Independent	Critical Access	Fair	Fair	Fair	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Tool	Y
Southwest Health System, Inc.	Independent	Critical Access	Good	Fair	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Spalding Rehabilitation Hospital	HealthONE	Rehabilitation	Poor		Poor	Good	N	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Tool	Y
Spanish Peaks Regional Health Center	Independent	Critical Access	Fair	Fair	Fair	Good	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
St. Anthony Hospital	CommonSpirit (formerly Centura Health CHI)	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
St. Anthony North Hospital	CommonSpirit (formerly Centura Health CHI)	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
St. Anthony Summit Hospital	CommonSpirit (formerly Centura Health CHI)	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
St. Elizabeth Hospital	CommonSpirit (formerly Centura Health CHI)	General	Good		Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
St. Francis Hospital	CommonSpirit (formerly Centura Health CHI)	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
St. Joseph Hospital	Intermountain Health	General	Good	Fair	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
St. Mary-Corwin Hospital	CommonSpirit (formerly Centura Health CHI)	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
St. Mary's Hospital & Medical Center, Inc.	Intermountain Health	General	Good	Fair	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
St. Thomas More Hospital	CommonSpirit (formerly Centura Health CHI)	Critical Access	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
St. Vincent General Hospital District	Independent	Critical Access	Poor	Poor	Fair	Good	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	N	Tool	Y
Sterling Regional MedCenter	Banner Health	General	Good	Fair	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Swedish Medical Center	HealthONE	General	Poor	Poor	Poor	Good	N	Y	Y	N	Y	N	Y	Y	Y	Y	Y	Tool	Y
The Medical Center of Aurora	HealthONE	General	Poor	Poor	Poor	Good	N	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Tool	Y
UCHealth Greeley	UCHealth	General	Good	Fair	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
UCHealth Highlands Ranch	UCHealth	General	Good	Fair	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
University of Colorado Hospital	UCHealth	General	Good	Fair	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Vail Health Hospital	Independent	General	Good	Poor	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Valley View Hospital	Independent	General	Poor	Poor	Poor	Good	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Tool	Y
Vibra Hospital		Long Term Acute Care	Poor		Good	Poor	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Display	N
Weisbrod Memorial County Hospital	Independent	Critical Access	Fair	Fair	Fair	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Tool	Y
West Springs Hospital		Psychiatric	Poor		Poor	Poor	Y	N	N	Y	Y	Y	Y	Y	Y	Y	N	None	N
Wray Community District Hospital	Independent	Critical Access	Poor	Fair	Poor	Good	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Tool	Y
Yampa Valley Medical Center	UCHealth	General	Good	Fair	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Yuma District Hospital	Independent	Critical Access	Good	Fair	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y

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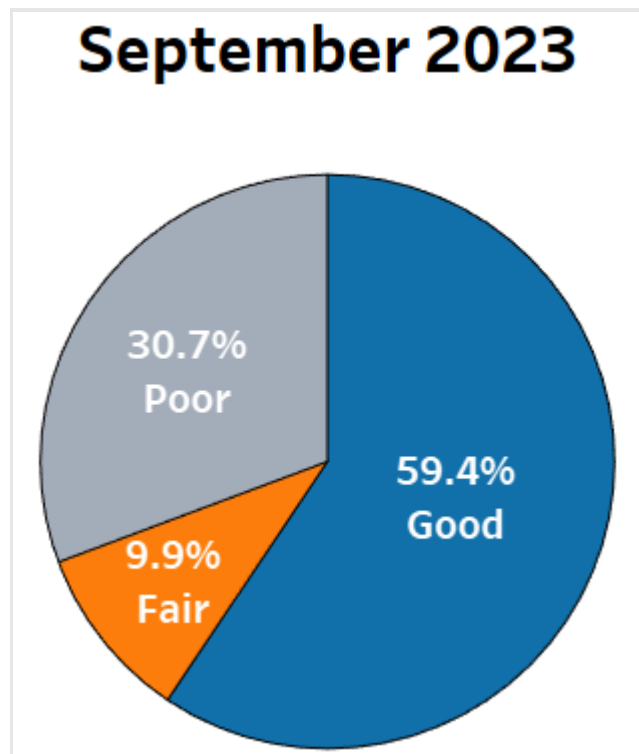Department of Health Care Policy & Financing

Table 2: Scorecard by System September 2023

System	September 2023 Overall Quality Rating	November 2022 Overall Quality Rating	Downloadable File Quality Rating	Shoppable Service Quality Rating	Machine Readable	Data Extract Date	Posted or Updated Date	Code	Description	Gross Charges	Discounted Cash	De-Identified Minimum	De-Identified Maximum	Negotiated Rates	Individual Plans	Display or Estimator Tool	Cash Price
Banner Health	Poor	Fair	Poor	Good	N	N	N	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
AdventHealth (formerly Centura Health Adventist)	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
CommonSpirit (formerly Centura Health CHI)	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Childrens	Good	Poor	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
HealthONE	Poor	Poor	Poor	Good	N	Y	Y	N	Y	N	Y	Y	Y	Y	Y	Tool	Y
San Luis Valley	Poor	Fair	Poor	Good	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Tool	Y
Intermountain Health	Good	Fair	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
UCHealth	Good	Fair	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y

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IV.   Evaluation

This Price Transparency Evaluation Report reflects on the quality of hospitals' price transparency postings from September 2023 and expands upon the previous review of November 2022 postings published in March 2023. The report includes the addition of long-term acute care, psychiatric and rehabilitation hospitals as well as one additional acute care hospital, St. Elizabeth hospital, which were not included in the previous report.[11] Overall, 101 Colorado hospitals were reviewed. As seen in Figure 1, 59.4% of the 101 hospitals had an overall quality rating of Good, while 9.9% had a rating of Fair and 30.7% had a rating of Poor.

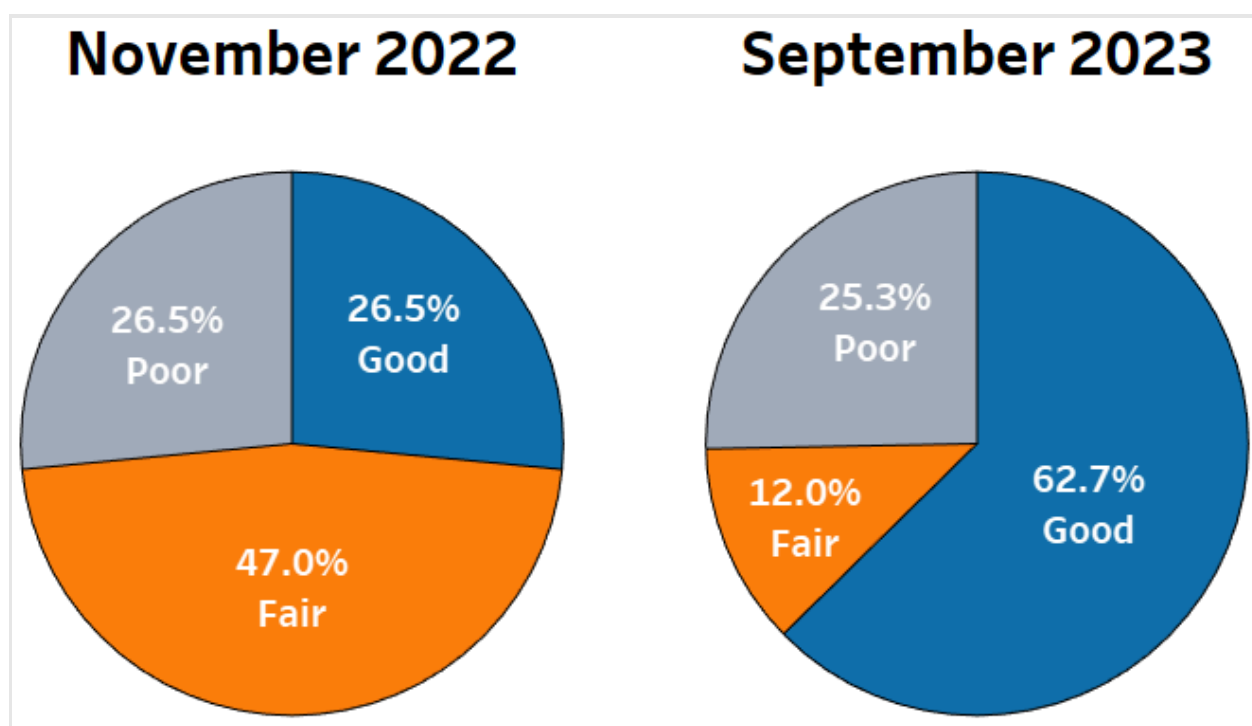*Figure 1: Overall Quality Rating All Hospitals*

This evaluation shows Colorado's hospitals have a larger percentage of Good quality ratings compared to the previous review, but there remains at least 30.7% of hospitals that may not conform and be out of compliance with federal price transparency rules more than two years after introduction, which is similar to the national average of 30% identified by CMS in their study.

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[11] In March 2023, HCPF published the first of what will be a series of Price Transparency Evaluation Reports. This report included results from a Nov. 2022 review of 83 short-term Colorado hospitals' downloadable files and shoppable service estimator tools or displays. Another notable change from last year's methodology is that this evaluation reviews St. Francis Hospital and Penrose Hospital separately. The prior year's review was of St. Francis Hospital alone.

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Figure 2 shows how overall ratings have changed from November 2022 to September 2023 for only the 83 hospitals reviewed in the first report. Previously, 26.5% of these hospitals had an overall quality rating of Good and 26.5% had an overall quality rating of Poor. Our new ratings, as of September 2023, show hospitals' improvement with 62.7% now receiving a rating of Good. Unfortunately, the most recent review shows that 25.3% of these 83 hospitals still have a Poor rating, which is similar to November 2022.

Figure 2: Overall Quality Rating for the 83 Hospitals Reviewed Previously

The reduction of the Fair category and the similar Poor category in Figure 2 may appear to indicate that there is a group of hospitals that continuously fail to meet price transparency rules. However, this is only partially true; out of the 22 originally Poor rated hospitals, only 12 did not improve. The remaining 10 improved to either Good or Fair ratings, meanwhile, 9 hospitals downgraded from Good/Fair to a Poor rating.

Figure 3: Change in Overall Quality Rating, for the 83 Hospitals Previously Reviewed

November 2022 Overall Quality Rating	September 2023 Overall Quality Rating		
	Good	Fair	Poor
Good	18	1	3
Fair	25	8	6
Poor	9	1	12

Legend:
- Red: Decrease in Overall Quality Rating
- Green: Increase in Overall Quality Rating
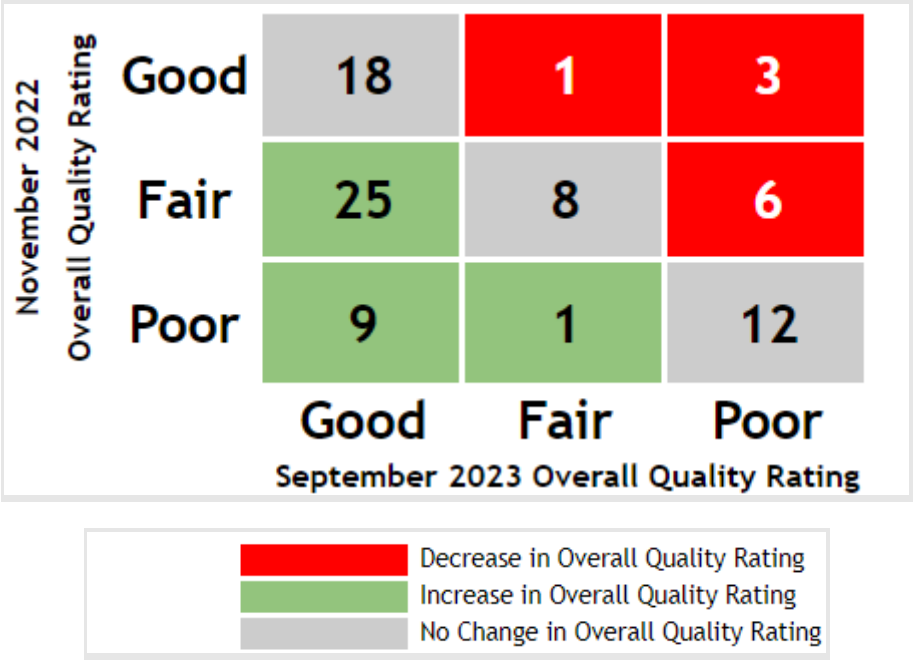- Gray: No Change in Overall Quality Rating

Figure 3 shows that of the 83 hospitals previously reviewed, 35 of those improved their rating from November 2022, while 10 hospitals' ratings declined. Please see Table 3 to view the improvement or decline of quality ratings across various categories.

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Table 3: Downloadable File Criteria Met by Category, 83 Comparison

Downloadable File Category	November 2022	September 2023	Hospital Count Improve/(Decline)
Machine-Readable	72.3%	79.5%	6
Data Extract Date	80.7%	91.6%	9
Posted or Updated Date	91.6%	92.8%	1
Code	100.0%	94.0%	(5)
Description	100.0%	100.0%	0
Gross Charges	100.0%	89.2%	(9)
Discounted Cash	94.0%	95.2%	1
De-Identified Minimum	88.0%	95.2%	6
De-Identified Maximum	88.0%	95.2%	6
Negotiated Rates	91.6%	96.4%	4
Individual Plans	63.9%	88.0%	20

In Table 3, of the 83 hospitals previously reviewed, many hospitals continue to not meet the standards for the machine-readable file criterion, although there has been improvement in areas like posting dates of data extraction and Individual plan listing. Hospitals' listing of gross charges has worsened, but through stakeholder engagement, some hospitals and systems have demonstrated that these issues and others were already in the process of being fixed or the hospital will be instituting changes. These changes will be reflected in the next update to this report and scorecard.[12] HCPF will continue to communicate with hospitals and encourage hospitals to share CMS communications or otherwise collaborate to ensure an accurate reflection of price transparency postings.

Figure 4 also shows that 53.1% of critical access hospitals now have a quality rating of Good, while 21.9% have a rating of Poor; both are improvements from November 2022. Meanwhile, general and children's hospitals show an increase in the percentage of hospitals rated Good, but also show an increase in hospitals rated Poor.

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[12] HCPF is actively communicating with and providing technical assistance to hospitals as part of the Governor's Wildly Important Goals, available for review on the Governor's Dashboard.

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Figure 4: Overall Quality Rating by Hospital Type, for the 83 Hospitals Previously Reviewed

Critical Access

General/Children's

Critical Access — November 2022
Good 5 Hospitals (15.6%)
Fair 16 Hospitals (50.0%)
Poor 11 Hospitals (34.4%)

Critical Access — September 2023
Good 17 Hospitals (53.1%)
Fair 8 Hospitals (25.0%)
Poor 7 Hospitals (21.9%)

General/Children's — November 2022
Good 17 Hospitals (33.3%)
Fair 23 Hospitals (45.1%)
Poor 11 Hospitals (21.6%)

General/Children's — September 2023
Good 35 Hospitals (68.6%)
Fair 2 Hospitals (3.9%)
Poor 14 Hospitals (27.5%)

November 2022   September 2023   November 2022   September 2023

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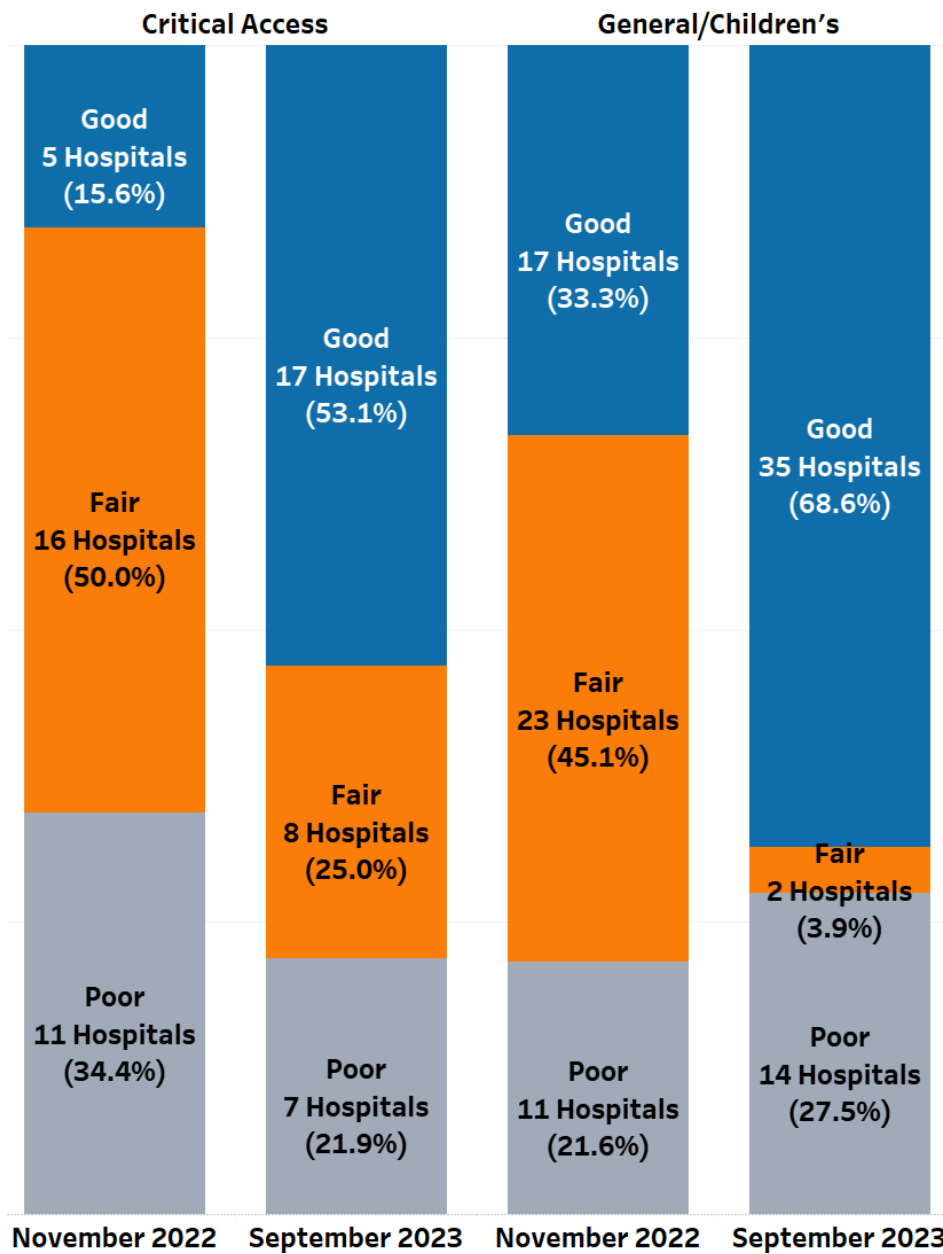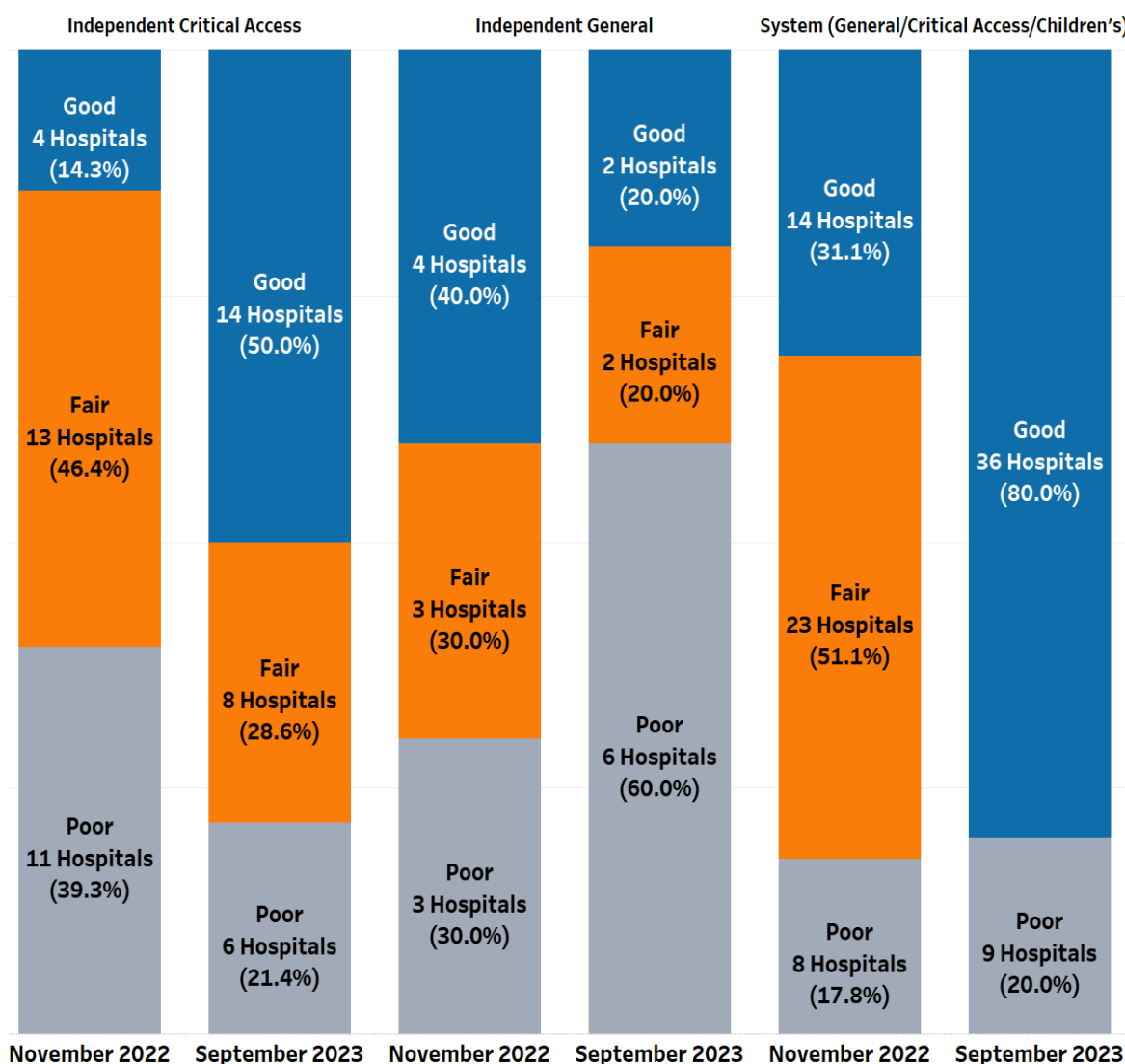Department of Health Care
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Figure 5 shows hospitals' changes by system affiliation and indicates that independent general hospitals regressed in hospital posting quality ratings. As of September 2023, independent general hospitals have three fewer hospitals who are rated Good or Fair, and three additional hospitals who are rated Poor.

Figure 5: Overall Quality Rating by Hospital System Classification and Type, for the 83 Hospitals Previously Reviewed
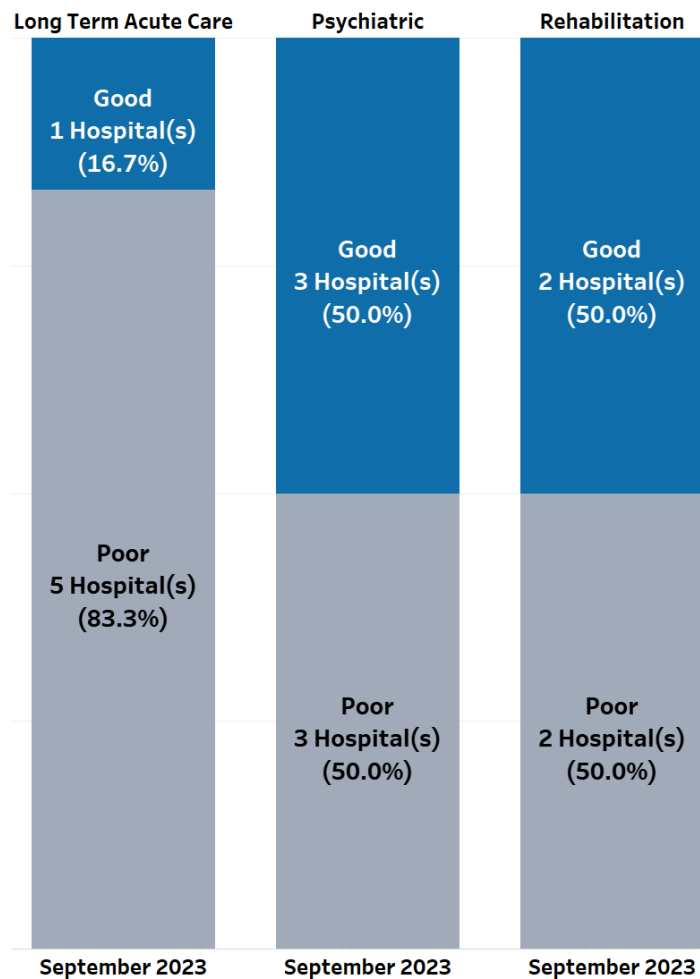

Independent Critical Access

November 2022:
- Good — 4 Hospitals (14.3%)
- Fair — 13 Hospitals (46.4%)
- Poor — 11 Hospitals (39.3%)

September 2023:
- Good — 14 Hospitals (50.0%)
- Fair — 8 Hospitals (28.6%)
- Poor — 6 Hospitals (21.4%)

Independent General

November 2022:
- Good — 4 Hospitals (40.0%)
- Fair — 3 Hospitals (30.0%)
- Poor — 3 Hospitals (30.0%)

September 2023:
- Good — 2 Hospitals (20.0%)
- Fair — 2 Hospitals (20.0%)
- Poor — 6 Hospitals (60.0%)

System (General/Critical Access/Children's)

November 2022:
- Good — 14 Hospitals (31.1%)
- Fair — 23 Hospitals (51.1%)
- Poor — 8 Hospitals (17.8%)

September 2023:
- Good — 36 Hospitals (80.0%)
- Poor — 9 Hospitals (20.0%)

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Table 4 displays which downloadable file categories are driving the quality for hospitals affiliated or owned by a hospital system, independent general and critical access hospitals. Independent general hospitals represent the two lowest categories — machine-readable and individual payer plans — where only 60% of hospitals met the necessary criteria.

Table 4: Downloadable File Criteria Met by Category by Short Term Acute Hospital Type Sept. 11, 2023

Downloadable File Category	Total	System	Independent General	Independent Critical Access
Machine-Readable	80.0%	85.1%	60.0%	78.6%
Data Extract Date	91.8%	97.9%	80.0%	85.7%
Posted or Updated Date	92.9%	97.9%	80.0%	89.3%
Code	94.1%	93.6%	90.0%	96.4%
Description	100.0%	100.0%	100.0%	100.0%
Gross Charges	89.4%	83.0%	90.0%	100.0%
Discounted Cash	95.3%	100.0%	90.0%	89.3%
De-Identified Minimum	95.3%	100.0%	80.0%	92.9%
De-Identified Maximum	95.3%	100.0%	80.0%	92.9%
Negotiated Rates	96.5%	100.0%	90.0%	92.9%
Individual Plans	88.2%	100.0%	60.0%	78.6%

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HCPF has included long-term acute care, rehabilitation, and psychiatric hospitals in our most recent review. CMS requires these hospitals to comply with the same price transparency rules as other general and critical access hospitals. Figure 6 shows that these hospitals have a higher proportion of Poor quality ratings compared to other hospital types. Overall, 50% of long-term acute care, psychiatric and rehabilitation hospitals have an overall Poor quality rating.[13]

Figure 6: Overall Quality Rating for Long-Term Acute Care, Psychiatric, and Rehabilitation Hospitals by Type Sept. 2023

Long Term Acute Care	Psychiatric	Rehabilitation
Good 1 Hospital(s) (16.7%)	Good 3 Hospital(s) (50.0%)	Good 2 Hospital(s) (50.0%)
Poor 5 Hospital(s) (83.3%)	Poor 3 Hospital(s) (50.0%)	Poor 2 Hospital(s) (50.0%)
September 2023	September 2023	September 2023

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[13] This is the first review of long-term acute care, psychiatric and rehabilitation hospitals. HCPF is reaching out to these hospitals to discuss their current scorecard rating and ways to improve for the next Hospital Price Transparency Posting Evaluation Report.

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Table 5 displays which downloadable file categories are driving the quality for long-term acute care, psychiatric and rehabilitation hospitals. At least one third of long-term acute care, rehabilitation, and psychiatric hospitals are lacking in five of the six standard charges categories.[14]

Table 5: Downloadable File Criteria Met by Category by Long-Term Acute Care, Psychiatric, and Rehabilitation Hospital by Type September 2023

Downloadable File Category	Total	Long-Term Acute Care	Psychiatric	Rehabilitation
Machine-Readable	93.8%	100.0%	100.0%	75.0%
Data Extract Date	93.8%	100.0%	83.3%	100.0%
Posted or Updated Date	93.8%	100.0%	83.3%	100.0%
Code	93.8%	83.3%	100.0%	100.0%
Description	100.0%	100.0%	100.0%	100.0%
Gross Charges	75.0%	83.3%	66.7%	75.0%
Discounted Cash	75.0%	50.0%	100.0%	75.0%
De-Identified Minimum	75.0%	50.0%	100.0%	75.0%
De-Identified Maximum	75.0%	50.0%	100.0%	75.0%
Negotiated Rates	87.5%	66.7%	100.0%	100.0%
Individual Plans	75.0%	66.7%	66.7%	100.0%

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[14] Standard charges are gross charge, payer-specific negotiated charge, de-identified minimum negotiated charge, de-identified maximum negotiated charge and discounted cash price, Per 45 CFR 180.20 "Standard charge".

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Conclusion

Colorado's recent passage of HB22-1285 and SB23-252 has already had noticeable effects in hospitals price transparency quality overall. Colorado hospitals have largely moved toward better quality of price transparency postings. However, there is still room for Colorado hospitals to improve. HCPF found that 40.6% of Colorado hospitals do not meet the Good overall rating in their quality of price transparency postings in the September 2023 review of 101 hospitals. HCPF will continue collaborating with Colorado hospitals and encourage them to utilize the resources on the [CMS website.](#) In addition, between HCPF's last Price Transparency Postings Report in March 2023, and this report, HCPF has communicated or reached out to 5 hospitals[15,16], for a total of 40 hospitals. These hospital systems have shown a strong level of engagement and desire to be compliant with price transparency rules, and HCPF continues to offer technical guidance and support to any hospital that may have questions.

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[15] Grand River Hospital District, Haxtun Hospital District, Pagosa Springs Medical Center, Vail Health Hospital and Valley View Hospital.
[16] Banner Health, CommonSpirit (formerly Centura Health CHI), Childrens, HealthONE and UCHealth.

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V.   Appendix A: Methodology

The rating methodology is composed of two elements: the downloadable file review and the shoppable service review.

A. Downloadable File Review

Only hospitals are aware if they disclosed all requirements in their price transparency postings. For example, it is difficult to determine what a blank cell means and how many specific third-party payers or individual payer plans a hospital should list. For this evaluation, HCPF reviewed all downloadable files in excel format, converted if necessary and required for each category to be densely present with data in the downloadable file, not for each item or service.

1. Scorecard

"Y" meets and "N" does not meet the defined requirements:

- Machine-Readable – Must be in a machine-readable format (e.g., XML, .JSON, .CSV) and contain only one master table.

- Data Extract Date – Data within the file must be within 365 days from the day of the review. If a separate extract date is not listed, the posted or updated date was used.

- Posted or Updated Date – The file must have been posted or updated within 365 days from the day of the review.

- Code – A specific code must be listed for items or services.

- Description – A description must be listed for items or services.

- Gross Charges – A gross charge must be listed for items or services.

- Discounted Cash - List a discounted cash price for multiple codes.

- De-Identified Minimum – De-identified minimum category for items and services and must be present for several codes.

- De-Identified Maximum – De-identified maximum category for items and services and must be present for several codes.

- Negotiated Rates – Must have at least one third party payer listed with negotiated rates for multiple items or services.

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- Individual Plans – Must have at least one individual plan for a third-party payer listed with negotiated rates for multiple items or services.

2. Quality Rating

- Good – "Y" in all categories.

- Fair – "Y" in Posted or Updated Date Within 365, Code, Description, Gross Charge, Discounted Cash, De-Identified Minimum, De-Identified Maximum, and Negotiated Rates, but has at least one "N" in any other category.

- Poor – Does not meet Good or Fair requirements.

B. Shoppable Service Review

HCPF was limited in testing hospitals' estimator tools because of the tools' designs. Several estimator tools required specific insurance information to generate a non-cash price or quote. To check functionality, HCPF searched for several of the CMS-required shoppable service codes for each hospital's cash price, including those that were listed with a discounted cash price on the hospital's downloadable file. If a hospital utilizes two separate estimator tools, the tool HCPF reviewed for the scorecard was the one located under the hospital's price transparency webpage and was labeled in some form as "Estimate," "Quote," etc. In addition, since 94% of Colorado hospitals utilize an estimator tool, HCPF decided the criteria for tools and displays would be the same.

1. Scorecard

"Y" meets and "N" does not meet the defined requirement:

- Cash Price – Obtained a self-pay cash price or quote for multiple codes from the 70 CMS-specified shoppable services codes.

2. Quality Rating

- Good - "Y" for Cash Price.

- Poor – "N" for Cash Price.

C. Overall Quality Rating

Determined by quality ratings of the downloadable file and the shoppable service tool or display

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- Good – Quality rating of Good in both the downloadable file and the shoppable service tool or display.

- Fair – Has at least one quality rating of Fair and cannot have any quality ratings of Poor.

- Poor – At least one quality rating of Poor in either.

D. By System Ratings

Networks follow the same criteria as individual hospitals, but hospitals within the network are factored together. Therefore, the lowest grade or rating is applied for the entire network. Examples are: if only one hospital within a network has an "N" for a specific category, the category is marked "N" for the network; if one hospital within a network has a Poor-quality rating, the network has a Poor rating.

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