

Hospital Price Transparency Posting Evaluation Report Spring 2024

June 2024



COLORADO

Department of Health Care
Policy & Financing

I. Key Findings

The Department of Health Care Policy and Financing (HCPF) developed a Good, Fair, Poor rating system to measure the quality of adherence to federal and state price transparency rules. From April to May 2024, HCPF reviewed 101 of Colorado's general, critical access, 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 criteria was met or "N" if the criteria was not met. These prices posted by hospitals are used to populate tools, such as one created by HCPF, that make it easier for consumers, policy makers and purchasing organizations to compare hospital prices, identify outlier opportunities to be addressed and advance shared affordability goals that save people money on health care.

- Overall, 84.2% of all Colorado hospitals have an overall price transparency quality rating of Good or Fair, an increase from 73.5% in November 2022.
- Independent critical access hospitals' overall quality rating had the largest percentage points increase of Good rated hospitals, improving from 14.3% to 53.6%, which equates to an increase of eleven hospitals. Independent critical access hospitals also had the largest percentage points decrease of Poor rated hospitals, improving from 39.3% to 21.4%, a decrease of five hospitals.
- Since HCPF began reviewing adherence to price transparency rules in October 2022, hospitals have shown great improvement in meeting the criteria for the machine-readable file requirement.
 - In November 2022, only 63.9% of hospitals met the individual plans category requirement. As of May 2024, 86.1% meet the requirement.
 - Currently, nine out of the eleven machine-readable file categories have at least 92.1% of hospitals meeting the criteria.
- Due to the updated methodology that now includes state price transparency requirements from Senate Bill (SB) 23-252, HCPF saw a reduction in Good

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 review but during the review period.

and Fair quality ratings.² Twenty-one hospitals' overall quality ratings fell from Good to Fair and two hospitals' overall quality ratings fell from Fair to Poor, due to not fulfilling the price transparency requirements specific to SB23-252.

- Long-term acute care, rehabilitation, and psychiatric hospitals had the lowest overall quality ratings, with 43.8% having an overall quality rating of Poor.

Although HCPF's evaluation is limited to Colorado hospitals, other evaluations show Colorado hospitals are better than national benchmarks when comparing the quality of federal price transparency postings. Specifically, Turquoise Health's recent study by state indicates that 65.4% of Colorado hospitals had the highest rating of five, which ranks 8th highest compared to all other states.³ Additionally, the Sixth Semi-Annual Hospital Price Transparency Report by Patient Rights Advocate states that only 34.5% of hospitals nationally are compliant with federal price transparency, while the same report shows that 50% of Colorado hospitals reviewed are compliant.⁴

II. Introduction

In 2022, hospital care accounted for the largest component of overall health care spending nationally, \$1.355 billion, which accounts for 30.4% of all health care spending.⁵ Hospital price transparency contributes to a more open and competitive market, while providing greater awareness across communities as to the comparative prices their local hospitals charge. Together, these emerging price transparency insights help drive down hospital prices paid by employers and consumer purchasers and ultimately the prices paid for health care coverage. However, for price transparency policy to be effective, hospitals must be compliant with federal and state hospital price transparency rules.⁶

² Medical Price Transparency, Senate Bill 23-252, 2023 Regular Session, (2023).

<https://leg.colorado.gov/bills/sb23-252>

³ Moving into 2024: State of Price Transparency. (2024, January 4). Turquoise Health Blog.

<https://blog.turquoise.health/moving-into-2024-state-of-price-transparency/>. State percentages calculated from downloaded data for comparison.

⁴ Sixth Semi-Annual Hospital Price Transparency Report. (2024, February). PatientRightsAdvocate.org.

<https://www.patientrightsadvocate.org/semi-annual-report-feb2024>

⁵ American Medical Association. (2024, April 25). Trends in health care spending. American Medical Association.

<https://www.ama-assn.org/about/research/trends-health-care-spending>

⁶ Hospital Price Transparency, 45 CFR Part 180 (2019). <https://www.ecfr.gov/current/title-45/part-180>

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 hospitals are compliant. Hospital compliance with the federal price transparency rule is the purview of the federal Centers for Medicare and Medicaid Services (CMS). This report is to help hospitals identify if they may not be compliant with state or federal rules, allows for hospitals to complete an internal review and make any necessary changes to ensure they are in line with these rules. Ultimately, this price transparency report better enables all hospitals to do their part to be part of the health care affordability solution to the betterment of all Coloradans, taxpayers, the state budget, employers, and municipalities. HCPF evaluates hospitals' price transparency postings and produces this report twice per year to achieve the above shared goals as well as the Polis-Primavera Administration's overarching objective of saving people money on health care.

HCPF regularly reaches out to hospitals that are rated Poor to provide technical assistance to ensure Colorado hospitals are meeting federal requirements.

For the downloadable file, HCPF's primary focus is to evaluate hospital's files compared to current requirements, including the more recent requirement to include Medicare reimbursement rates per SB 23-252. Additionally, HCPF 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.⁷ Prices for third-party payers were not factored in the shoppable services criteria because the majority of 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 has been updated to reflect the addition of Medicare reimbursement rate requirements. In 2024, new CMS guidelines will require hospitals to incorporate the following changes in the machine-readable file: the use of a CMS template, additional hospital information, the method used to establish the rate, whether the rate is a dollar amount or based on a percentage or algorithm, and payer plans may be indicated as categories. A full

⁷ 0 Steps to Making Public Standard Charges for Shoppable Services. (n.d.).
<https://www.cms.gov/files/document/steps-making-public-standard-charges-shoppable-services.pdf>89

list of changes and implementation timelines can be found on CMS V2.0 CMS Template and Data Dictionary webpage.⁸ HCPF will revise our evaluation methodology accordingly at that time and will revise our evaluation criteria as needed in future reports to reflect the most recent federal and state price transparency requirements.

⁸ CMS.gov/hospital-price-transparency. (2024, June 10). GitHub. <https://github.com/CMSgov/hospital-price-transparency>



III. Scorecards

Table 1: Scorecard by Hospital May 2024

Marketed Name	System	Hospital type	2024 May Overall Quality Rating	Downloadable File Quality Rating	Shoppable Service Quality Rating	SB23-252 Medicare Rates 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
AdventHealth Avista	AdventHealth	General	Fair	Good	Good	Fair	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
AdventHealth Castle Rock	AdventHealth	General	Fair	Good	Good	Fair	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
AdventHealth Littleton	AdventHealth	General	Fair	Good	Good	Fair	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
AdventHealth Parker	AdventHealth	General	Fair	Good	Good	Fair	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
AdventHealth Porter	AdventHealth	General	Fair	Good	Good	Fair	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Animas Surgical Hospital	Independent	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	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	Display	Y
Aspen Valley Hospital	Independent	Critical Access	Poor	Poor	Good	Good	Y	N	N	Y	Y	Y	Y	Y	Y	Y	Y	Display	Y
Banner Fort Collins Medical Center	Banner Health	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Both	Y
Boulder Community Health	Independent	General	Poor	Poor	Good	Fair	Y	Y	Y	Y	Y	Y	Y	N	N	Y	Y	Both	Y
Broomfield Hospital	UCHealth	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Both	Y
Cedar Springs Hospital		Psychiatric	Fair	Good	Good	Poor	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Centennial Peaks Hospital		Psychiatric	Fair	Good	Good	Poor	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Children's Hospital Colorado	Childrens	Children	Fair	Good	Good	Fair	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Children's Hospital Colorado Springs	Childrens	Children	Fair	Good	Good	Fair	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Colorado Acute Long Term Hospital		Long Term Acute Care	Fair	Good	Good	Poor	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Display	Y
Community Hospital	Independent	General	Fair	Good	Good	Poor	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Craig Hospital		Long Term Acute Care	Poor	Poor	Good	Poor	Y	N	N	Y	Y	Y	Y	Y	Y	Y	N	Tool	Y
Delta Health	Independent	General	Poor	Poor	Good	Fair	N	N	N	Y	Y	Y	Y	N	N	Y	N	Tool	Y
Denver Health Medical Center	Independent	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Both	Y
East Morgan County Hospital	Banner Health	Critical Access	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Both	Y
Estes Park Health	Independent	Critical Access	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Family Health West	Independent	Critical Access	Fair	Fair	Good	Good	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Display	Y
Good Samaritan Medical Center	Intermountain Health	General	Fair	Good	Good	Fair	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Grand River Hospital District	Independent	Critical Access	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Grandview Hospital	UCHealth	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Both	Y
Gunnison Valley Health	Independent	Critical Access	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y

Screenshot of a spreadsheet, with a link to a Sheets version of the spreadsheet.

Marketed Name	System	Hospital type	2024 May Overall Quality Rating	Downloadable File Quality Rating	Shoppable Service Quality Rating	SB23-252 Medicare Rates 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
Haxtun Hospital District	Independent	Critical Access	Poor	Poor	Good	Poor	Y	N	N	Y	Y	Y	N	N	N	N	N	Tool	Y
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	Fair	Good	Good	Poor	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Johnstown Heights Behavioral Health		Psychiatric	Poor	Poor	Poor	Poor	Y	N	N	Y	N	N	Y	Y	Y	Y	N	None	N
Keefe Memorial Health Service District	Independent	Critical Access	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Kindred Hospital - Aurora		Long Term Acute Care	Fair	Fair	Good	Good	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Kindred Hospital - Denver		Long Term Acute Care	Fair	Fair	Good	Good	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Kit Carson County Health Service District	Independent	Critical Access	Fair	Fair	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Display	Y
Lincoln Community Hospital	Independent	Critical Access	Poor	Poor	Poor	Poor	N	N	N	Y	Y	N	N	N	N	N	N	None	N
Longmont United Hospital	CommonSpirit	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Longs Peak Hospital	UCHealth	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Both	Y
Lutheran Medical Center	Intermountain Health	General	Fair	Good	Good	Fair	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
McKee Medical Center	Banner Health	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Both	Y
Medical Center of the Rockies	UCHealth	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Both	Y
Melissa Memorial Hospital	Independent	Critical Access	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Memorial Hospital Central	UCHealth	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Both	Y
Memorial Regional Health	Independent	Critical Access	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Mercy Hospital	CommonSpirit	General	Poor	Poor	Good	Good	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Tool	Y
Middle Park Health - Kremmling	Independent	Critical Access	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Montrose Memorial Hospital	Independent	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Mt. San Rafael Hospital	Independent	Critical Access	Fair	Fair	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Tool	Y
National Jewish Health	Independent	General	Fair	Good	Good	Poor	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Display	Y
North Colorado Medical Center	Banner Health	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Both	Y
North Suburban Medical Center	HealthONE	General	Fair	Fair	Good	Good	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Northern Colorado Long Term Acute Hospital		Long Term Acute Care	Poor	Poor	Poor	Poor	Y	Y	Y	Y	Y	Y	N	N	N	Y	Y	Display	N
Northern Colorado Rehabilitation Hospital		Rehabilitation	Poor	Poor	Poor	Poor	Y	Y	Y	Y	Y	Y	N	N	N	Y	Y	Display	N
OrthoColorado Hospital	CommonSpirit	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y

Marketed Name	System	Hospital type	2024 May Overall Quality Rating	Downloadable File Quality Rating	Shoppable Service Quality Rating	SB23-252 Medicare Rates 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
Pagosa Springs Medical Center	Independent	Critical Access	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Both	Y
Parkview Medical Center	UCHealth	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Peak View Behavioral Health		Psychiatric	Poor	Poor	Poor	Poor	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	None	N
Penrose Hospital	CommonSpirit	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Pikes Peak Regional Hospital	UCHealth	Critical Access	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Both	Y
Pioneers Medical Center	Independent	Critical Access	Fair	Fair	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Both	Y	
Platte Valley Medical Center	Intermountain Health	General	Fair	Good	Good	Fair	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Poudre Valley Hospital	UCHealth	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Both	Y
Presbyterian/St. Luke's Medical Center	HealthONE	General	Fair	Fair	Good	Good	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Prowers Medical Center	Independent	Critical Access	Poor	Fair	Good	Poor	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Tool	Y	
Rangely District Hospital	Independent	Critical Access	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Rehabilitation Hospital of Colorado Springs		Rehabilitation	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Display	Y
Rehabilitation Hospital of Littleton		Rehabilitation	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Display	Y
Rio Grande Hospital	Independent	Critical Access	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Both	Y
Rose Medical Center	HealthONE	General	Fair	Fair	Good	Good	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
San Luis Valley Health Conejos County Hospital	San Luis Valley	Critical Access	Fair	Good	Good	Fair	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
San Luis Valley Health Regional Medical Center	San Luis Valley	General	Fair	Good	Good	Fair	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Sedgwick County Health Center	Independent	Critical Access	Poor	Poor	Poor	Poor	N	N	N	N	N	N	N	N	N	N	N	Display	N
Sky Ridge Medical Center	HealthONE	General	Fair	Fair	Good	Good	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Southeast Colorado Hospital District	Independent	Critical Access	Fair	Fair	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Tool	Y	
Southwest Health System, Inc.	Independent	Critical Access	Fair	Fair	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Tool	Y	
Spalding Rehabilitation Hospital	HealthONE	Rehabilitation	Fair	Fair	Good	Good	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Spanish Peaks Regional Health Center	Independent	Critical Access	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Both	Y
St. Anthony Hospital	CommonSpirit	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
St. Anthony North Hospital	CommonSpirit	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
St. Anthony Summit Hospital	CommonSpirit	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
St. Elizabeth Hospital	CommonSpirit	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y

Marketed Name	System	Hospital type	2024 May Overall Quality Rating	Downloadable File Quality Rating	Shoppable Service Quality Rating	SB23-252 Medicare Rates 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	
St. Francis Hospital	CommonSpirit	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
St. Joseph Hospital	Intermountain Health	General	Fair	Good	Good	Fair	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
St. Mary-Corwin Hospital	CommonSpirit	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
St. Mary's Hospital & Medical Center, Inc.	Intermountain Health	General	Fair	Good	Good	Fair	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
St. Thomas More Hospital	CommonSpirit	Critical Access	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
St. Vincent General Hospital District	Independent	Critical Access	Fair	Good	Good	Poor	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Sterling Regional MedCenter	Banner Health	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Swedish Medical Center	HealthONE	General	Fair	Fair	Good	Good	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
The Medical Center of Aurora	HealthONE	General	Fair	Fair	Good	Good	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
UCHealth Greeley	UCHealth	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
UCHealth Highlands Ranch	UCHealth	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
University of Colorado Hospital	UCHealth	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Vail Health Hospital	Independent	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Valley View Hospital	Independent	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Vibra Hospital		Long Term Acute Care	Poor	Poor	Poor	Poor	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	None
Weisbrod Memorial County Hospital	Independent	Critical Access	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Both
West Springs Hospital		Psychiatric	Poor	Poor	Poor	Poor	Y	N	N	Y	Y	Y	Y	Y	Y	Y	N	N	N	None
Wray Community District Hospital	Independent	Critical Access	Poor	Fair	Good	Poor	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	N	Tool	
Yampa Valley Medical Center	UCHealth	General	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Both
Yuma District Hospital	Independent	Critical Access	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Both

Table 2: Scorecard by System May 2024⁹

System	2024 May Overall Quality Rating	Downloadable File Quality Rating	Shoppable Service Quality Rating	SB23-252 Medicare Rates 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
AdventHealth	Fair	Good	Good	Fair	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Banner Health	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Both	Y
Childrens	Fair	Good	Good	Fair	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
CommonSpirit	Poor	Poor	Good	Good	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Tool	Y
HealthONE	Fair	Fair	Good	Good	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
Intermountain Health	Fair	Good	Good	Fair	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
San Luis Valley	Fair	Good	Good	Fair	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Tool	Y
UCHealth	Good	Good	Good	Good	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Both	Y

⁹ CommonSpirit Poor rating is due to one hospital, Mercy Hospital, rated Poor for not posting discounted cash rates, which was previously rated Good in the February 2024 report. All other CommonSpirit hospitals have overall quality ratings of Good in all elements.

IV. Scorecard Ratings over time

Table 3: November 2022-May 2024 Overall Quality Rating by Hospital

Marketed Name	System	Hospital type	2024 May Overall Quality Rating	2023 September Overall Quality Rating	2022 November Overall Quality Rating
AdventHealth Avista	AdventHealth	General	Fair	Good	Good
AdventHealth Castle Rock	AdventHealth	General	Fair	Good	Good
AdventHealth Littleton	AdventHealth	General	Fair	Good	Good
AdventHealth Parker	AdventHealth	General	Fair	Good	Good
AdventHealth Porter	AdventHealth	General	Fair	Good	Good
Animas Surgical Hospital	Independent	General	Good	Poor	Fair
Arkansas Valley Regional Medical Center	Independent	Critical Access	Good	Good	Good
Aspen Valley Hospital	Independent	Critical Access	Poor	Poor	Poor
Banner Fort Collins Medical Center	Banner Health	General	Good	Poor	Fair
Boulder Community Health	Independent	General	Poor	Poor	Fair
Broomfield Hospital	UCHealth	General	Good	Good	Fair
Cedar Springs Hospital		Psychiatric	Fair	Good	
Centennial Peaks Hospital		Psychiatric	Fair	Good	
Children's Hospital Colorado	Childrens	Children	Fair	Good	Poor
Children's Hospital Colorado Springs	Childrens	Children	Fair	Good	Poor
Colorado Acute Long Term Hospital		Long Term Acute Care	Fair	Poor	
Community Hospital	Independent	General	Fair	Good	Good
Craig Hospital		Long Term Acute Care	Poor	Good	
Delta Health	Independent	General	Poor	Poor	Poor
Denver Health Medical Center	Independent	General	Good	Poor	Good
East Morgan County Hospital	Banner Health	Critical Access	Good	Good	Fair
Estes Park Health	Independent	Critical Access	Good	Good	Poor
Family Health West	Independent	Critical Access	Fair	Good	Poor
Good Samaritan Medical Center	Intermountain Health	General	Fair	Good	Fair
Grand River Hospital District	Independent	Critical Access	Good	Good	Poor
Grandview Hospital	UCHealth	General	Good	Good	Fair
Gunnison Valley Health	Independent	Critical Access	Good	Good	Fair
Haxtun Hospital District	Independent	Critical Access	Poor	Poor	Poor
Heart of the Rockies Regional Medical Center	Independent	Critical Access	Good	Good	Good
Highlands Behavioral Health System		Psychiatric	Fair	Good	
Johnstown Heights Behavioral Health		Psychiatric	Poor	Poor	
Keefe Memorial Health Service District	Independent	Critical Access	Good	Poor	Poor
Kindred Hospital - Aurora		Long Term Acute Care	Fair	Poor	
Kindred Hospital - Denver		Long Term Acute Care	Fair	Poor	
Kit Carson County Health Service District	Independent	Critical Access	Fair	Good	Poor



Marketed Name	System	Hospital type	2024 May Overall Quality Rating	2023 September Overall Quality Rating	2022 November Overall Quality Rating
Lincoln Community Hospital	Independent	Critical Access	Poor	Poor	Good
Longmont United Hospital	CommonSpirit	General	Good	Good	Good
Longs Peak Hospital	UCHealth	General	Good	Good	Fair
Lutheran Medical Center	Intermountain Health	General	Fair	Good	Fair
McKee Medical Center	Banner Health	General	Good	Good	Fair
Medical Center of the Rockies	UCHealth	General	Good	Good	Fair
Melissa Memorial Hospital	Independent	Critical Access	Good	Fair	Fair
Memorial Hospital Central	UCHealth	General	Good	Good	Fair
Memorial Regional Health	Independent	Critical Access	Good	Fair	Fair
Mercy Hospital	CommonSpirit	General	Poor	Good	Good
Middle Park Health - Kremmling	Independent	Critical Access	Good	Good	Poor
Montrose Memorial Hospital	Independent	General	Good	Fair	Fair
Mt. San Rafael Hospital	Independent	Critical Access	Fair	Good	Good
National Jewish Health	Independent	General	Fair	Poor	Good
North Colorado Medical Center	Banner Health	General	Good	Good	Fair
North Suburban Medical Center	HealthONE	General	Fair	Poor	Poor
Northern Colorado Long Term Acute Hospital		Long Term Acute Care	Poor	Poor	
Northern Colorado Rehabilitation Hospital		Rehabilitation	Poor	Poor	
OrthoColorado Hospital	CommonSpirit	General	Good	Good	Good
Pagosa Springs Medical Center	Independent	Critical Access	Good	Good	Fair
Parkview Medical Center	UCHealth	General	Good	Fair	Good
Peak View Behavioral Health		Psychiatric	Poor	Poor	
Penrose Hospital	CommonSpirit	General	Good	Good	
Pikes Peak Regional Hospital	UCHealth	Critical Access	Good	Good	Fair
Pioneers Medical Center	Independent	Critical Access	Fair	Good	Poor
Platte Valley Medical Center	Intermountain Health	General	Fair	Good	Fair
Poudre Valley Hospital	UCHealth	General	Good	Good	Fair
Presbyterian/St. Luke's Medical Center	HealthONE	General	Fair	Poor	Poor
Prowers Medical Center	Independent	Critical Access	Poor	Fair	Fair
Rangely District Hospital	Independent	Critical Access	Good	Fair	Fair
Rehabilitation Hospital of Colorado Springs		Rehabilitation	Good	Good	
Rehabilitation Hospital of Littleton		Rehabilitation	Good	Good	
Rio Grande Hospital	Independent	Critical Access	Good	Good	Fair
Rose Medical Center	HealthONE	General	Fair	Poor	Poor
San Luis Valley Health Conejos County Hospital	San Luis Valley	Critical Access	Fair	Poor	Fair
San Luis Valley Health Regional Medical Center	San Luis Valley	General	Fair	Poor	Fair
Sedgwick County Health Center	Independent	Critical Access	Poor	Fair	Poor
Sky Ridge Medical Center	HealthONE	General	Fair	Poor	Poor
Southeast Colorado Hospital District	Independent	Critical Access	Fair	Fair	Fair
Southwest Health System, Inc.	Independent	Critical Access	Fair	Good	Fair



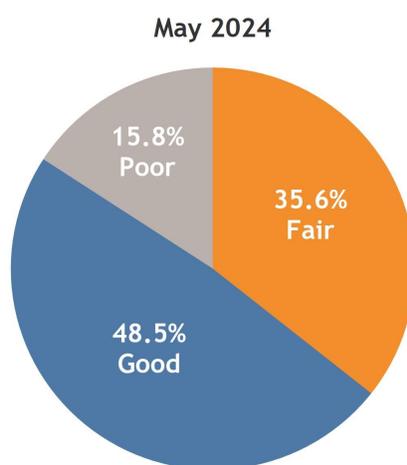
Marketed Name	System	Hospital type	2024 May Overall Quality Rating	2023 September Overall Quality Rating	2022 November Overall Quality Rating
Spalding Rehabilitation Hospital	HealthONE	Rehabilitation	Fair	Poor	
Spanish Peaks Regional Health Center	Independent	Critical Access	Good	Fair	Fair
St. Anthony Hospital	CommonSpirit	General	Good	Good	Good
St. Anthony North Hospital	CommonSpirit	General	Good	Good	Good
St. Anthony Summit Hospital	CommonSpirit	General	Good	Good	Good
St. Elizabeth Hospital	CommonSpirit	General	Good	Good	
St. Francis Hospital	CommonSpirit	General	Good	Good	Good
St. Joseph Hospital	Intermountain Health	General	Fair	Good	Fair
St. Mary-Corwin Hospital	CommonSpirit	General	Good	Good	Good
St. Mary's Hospital & Medical Center, Inc.	Intermountain Health	General	Fair	Good	Fair
St. Thomas More Hospital	CommonSpirit	Critical Access	Good	Good	Good
St. Vincent General Hospital District	Independent	Critical Access	Fair	Poor	Poor
Sterling Regional MedCenter	Banner Health	General	Good	Good	Fair
Swedish Medical Center	HealthONE	General	Fair	Poor	Poor
The Medical Center of Aurora	HealthONE	General	Fair	Poor	Poor
UCHealth Greeley	UCHealth	General	Good	Good	Fair
UCHealth Highlands Ranch	UCHealth	General	Good	Good	Fair
University of Colorado Hospital	UCHealth	General	Good	Good	Fair
Vail Health Hospital	Independent	General	Good	Good	Poor
Valley View Hospital	Independent	General	Good	Poor	Poor
Vibra Hospital		Long Term Acute Care	Poor	Poor	
Weisbrod Memorial County Hospital	Independent	Critical Access	Good	Fair	Fair
West Springs Hospital		Psychiatric	Poor	Poor	
Wray Community District Hospital	Independent	Critical Access	Poor	Poor	Fair
Yampa Valley Medical Center	UCHealth	General	Good	Good	Fair
Yuma District Hospital	Independent	Critical Access	Good	Good	Fair



V. Evaluation

This Price Transparency Evaluation Report expands upon the previous reviews completed in September 2023 and November 2022.¹⁰ This report reviews the same 101 short-term acute care and long-term Colorado hospitals but incorporates SB 23-252 Medicare reimbursement rates posting requirements into the overall quality rating. As seen in **Figure 1**, 48.5% of hospitals had an overall quality rating of Good, while 35.6% had a rating of Fair, and 15.8% had a rating of Poor.

Figure 1: Overall Quality Rating All Hospitals

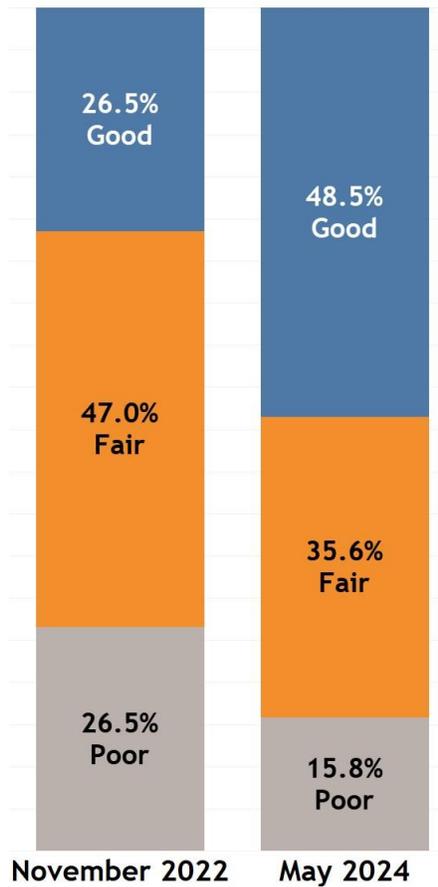


Colorado’s hospitals have a smaller percentage of Poor overall quality ratings compared to the initial November 2022 evaluation. However, and importantly, there still remains a portion of hospitals that may be out of compliance with federal price transparency rules more than 3 years after introduction.

Figure 2 shows how overall ratings have changed from November 2022 to May 2024. Initially, 26.5% of hospitals reviewed had an overall quality rating of Good and 26.5% had an overall quality rating of Poor. As of May 2024, new ratings show hospitals' improvement with 48.5% receiving a rating of Good and only 15.8% of hospitals receiving a rating of Poor.

¹⁰ Hospital Price Transparency | Colorado Department of Health Care Policy & Financing. (n.d.). Hcpf.colorado.gov. <https://hcpf.colorado.gov/hospital-price-transparency>

Figure 2: Overall Quality Rating All Hospitals



The improvement in quality ratings visualized in **Figure 2** reflects the increase in downloadable file criteria hospitals met as seen in **Table 4**.¹¹

Table 4: Downloadable File Criteria Met by Category by All Hospitals

Downloadable File Category	November 2022	May 2024	Hospital Improve/(Decline)
Machine Readable	72.3%	87.1%	14.8%
Data Extract Date	80.7%	92.1%	11.4%
Posted or Updated Date	91.6%	92.1%	0.5%
Code	100.0%	99.0%	(1.0%)
Description	100.0%	98.0%	(2.0%)
Gross Charges	100.0%	96.0%	(4.0%)
Discounted Cash	94.0%	93.1%	(0.9%)
De-Identified Minimum	88.0%	93.1%	5.1%

¹¹ The November 2022 evaluation did not include long-term acute care, rehabilitation, and psychiatric hospitals.

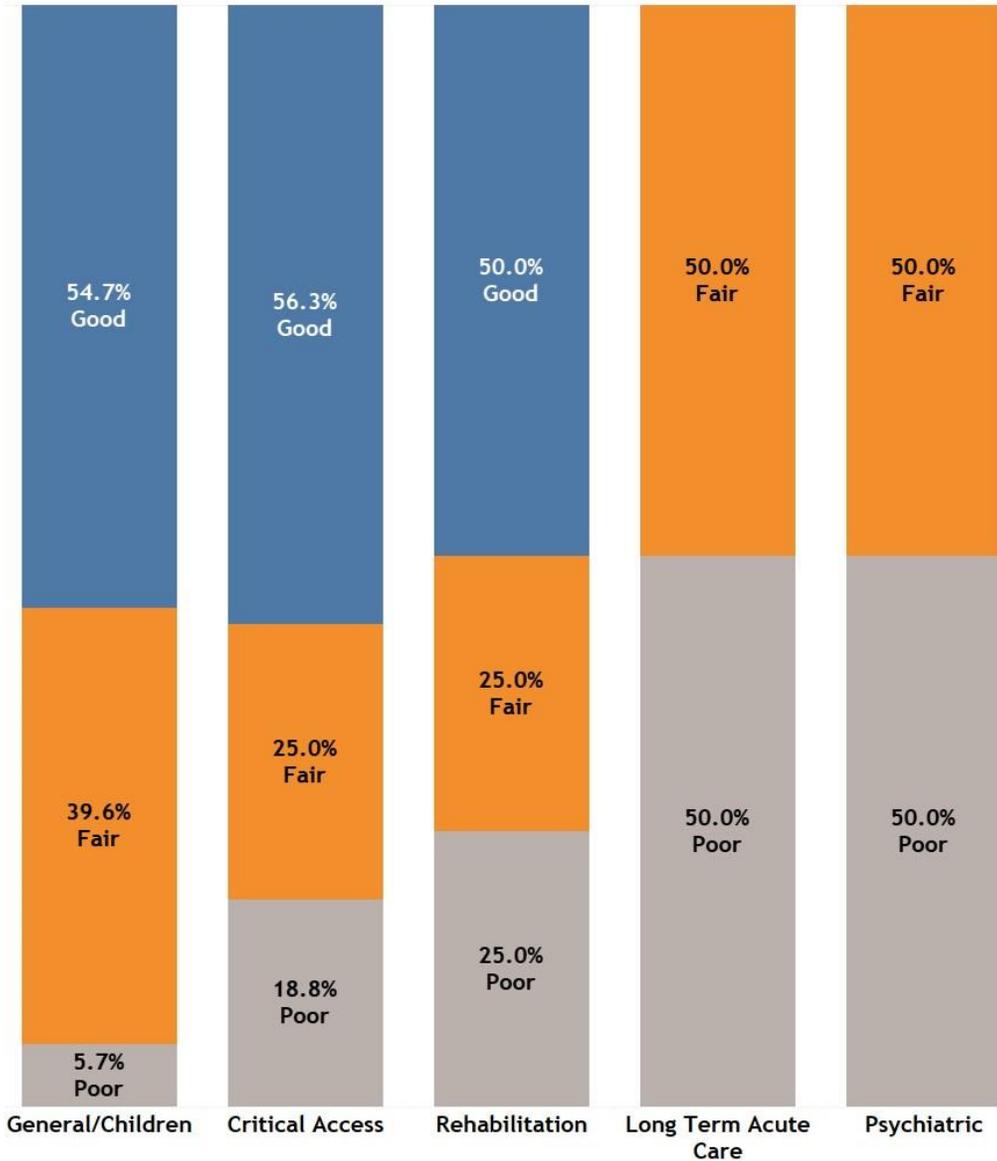
Downloadable File Category	November 2022	May 2024	Hospital Improve/(Decline)
De-Identified Maximum	88.0%	93.1%	5.1%
Negotiated Rates	91.6%	97.0%	5.4%
Individual Plans	63.9%	86.1%	22.2%

Table 4 shows that hospitals improved in seven of the eleven downloadable file categories, with the largest improvement seen in the individual plans category. In November 2022, 63.9% of hospitals met the individual plans category requirement; in May 2024, 86.1% now meet the requirement. Although there has been improvement in the majority of categories, there was a slight decrease in four of the categories, which is attributed to the addition of long-term acute care, rehabilitation, and psychiatric hospitals in current reports. Downloadable file criteria met by hospital types for May 2024 can be found in **Appendix B: Additional Tables**.



Figure 3: Overall Quality Rating by Hospital Type

May 2024



Long-term acute care, rehabilitation, and psychiatric hospitals have lower quality ratings than other hospital types, with 43.8% of these hospitals having an overall quality rating of Poor. **Figure 3** identifies overall quality ratings for each hospital type and demonstrates that seven of the sixteen long-term acute care, rehabilitation, and psychiatric hospitals had an overall rating of Poor and only two rehabilitation hospitals had an overall rating of Good. Comparatively, at least half of the general, critical access, and children’s hospitals had an

overall rating of Good, and only 5.7% of general and children’s hospitals had an overall rating of Poor.

Figure 4: Overall Quality Rating by Hospital System Classification and Type

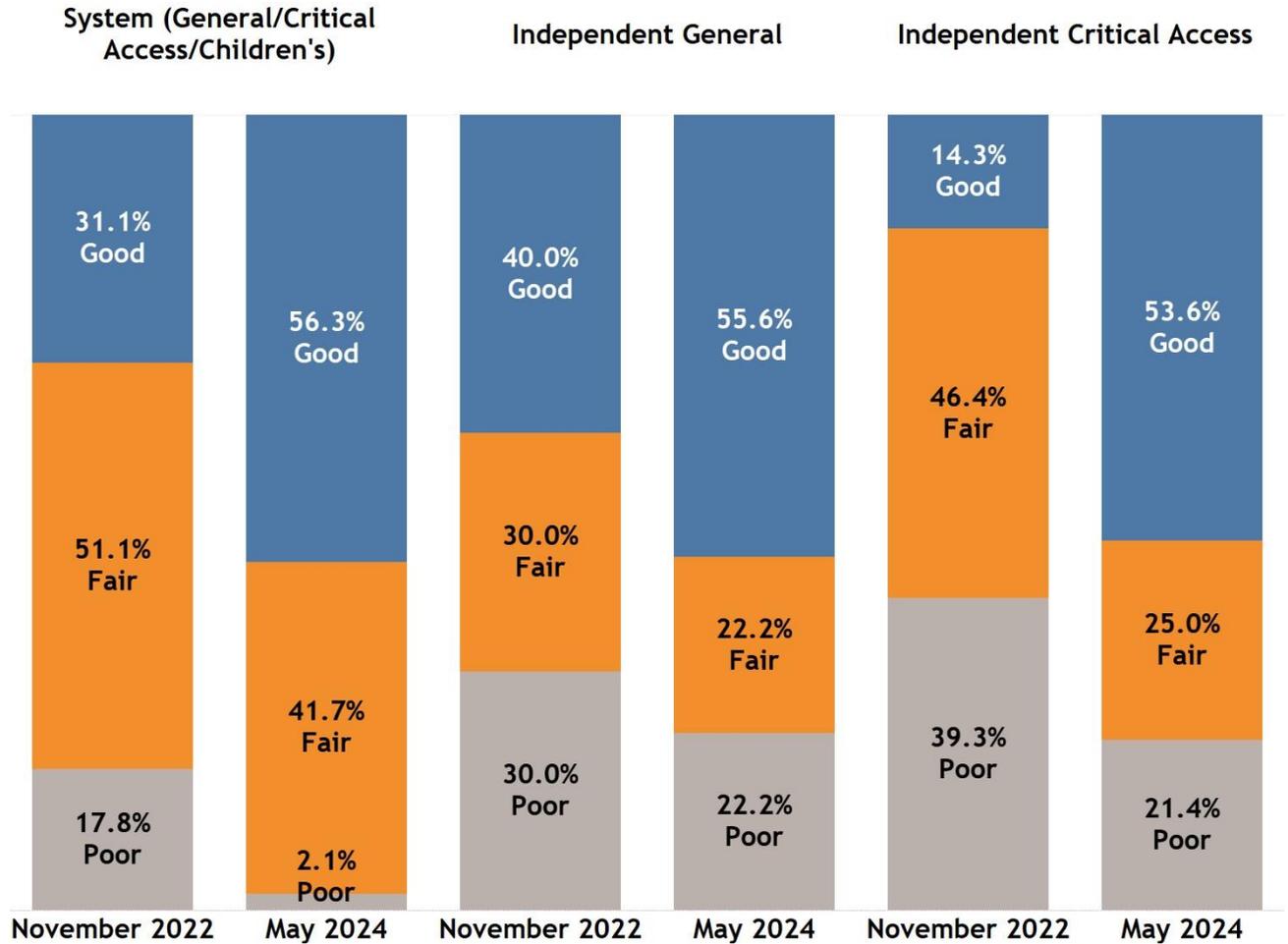
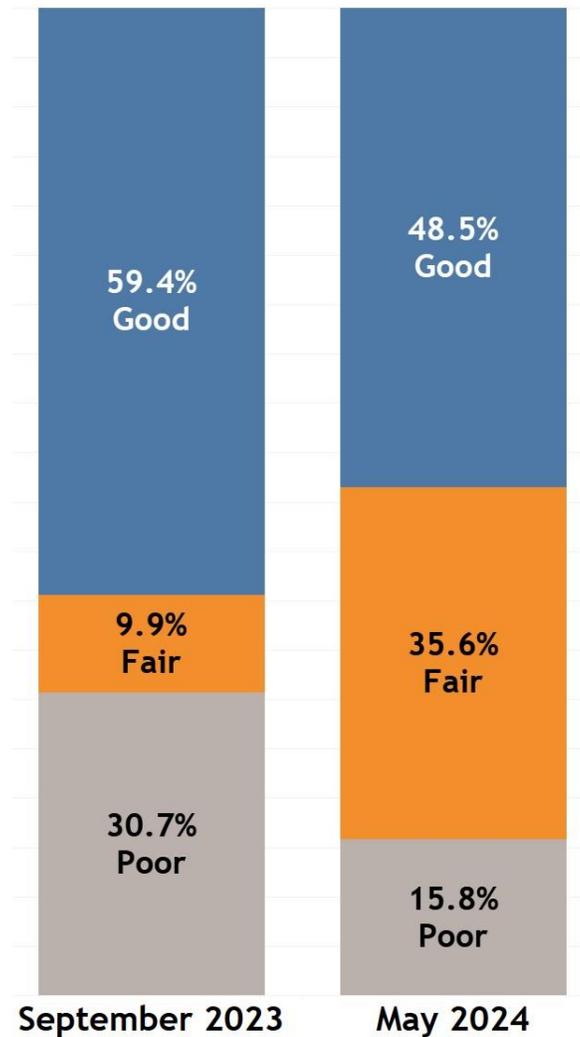


Figure 4 shows overall quality ratings for general, children’s, and critical access hospital system classifications and types. System hospitals had the lowest percentage of hospitals with an overall quality rating of Poor, only 2.1%. The greatest overall improvement from November 2022 to May 2024 were the independent critical access hospitals. Independent critical access hospitals’ overall quality rating had the largest increase of Good rated hospitals, improving from 14.3% to 53.6%, an increase of eleven hospitals. Additionally, independent critical access hospitals had the largest decrease of Poor rated hospitals; they improved from 39.3% to 21.4%, a decrease of five hospitals. All hospital system classifications for general, children’s, and critical access

hospitals had an overall quality rating increase in Good rated hospitals and a decrease in Poor rated hospitals.

Figure 5: Overall Quality Rating All Hospitals



Even though hospitals overall quality ratings have improved from November 2022 to May 2024, **Figure 5** shows that there was a 10.9% decrease in hospitals with an overall quality rating of Good from September 2023 to May 2024.¹² The decrease can be attributed to the additional effect that Medicare reimbursement rate postings required per SB 23-252 had on the overall quality ratings.

¹² Both the September 2023 and May 2024 evaluations include long-term acute care, rehabilitation, and psychiatric hospitals.

Figure 6: Effects of SB23-252 on Overall Quality Rating

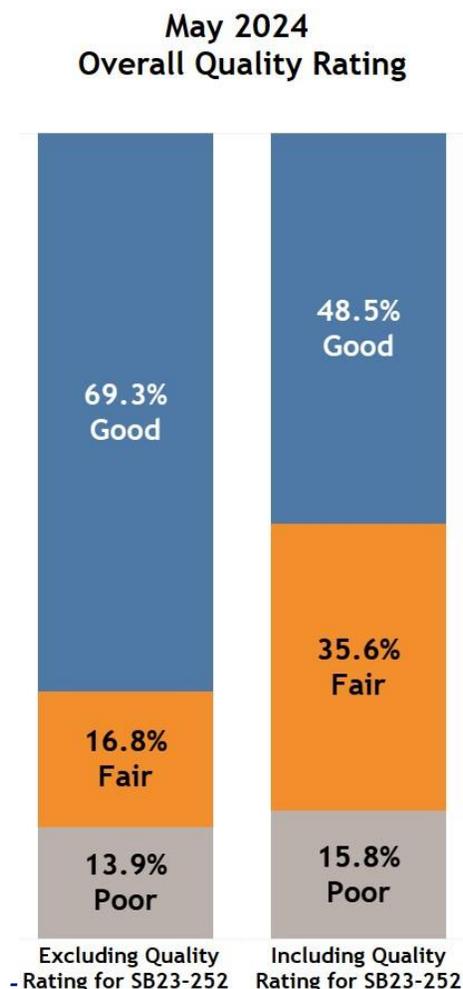


Figure 6 shows that the inclusion of the Medicare reimbursement rates requirement decreased hospitals with an overall quality rating of Good by 20.8%. In all, twenty-three hospitals were affected by using the new evaluation requirement. Twenty-one of these hospitals' overall quality rating went from Good to Fair while two hospitals' overall rating went from Fair to Poor. Even though hospitals' ability to post Medicare reimbursement rates (per SB 23-252) had an effect on overall quality ratings, HCPF found that 81.2% of hospitals did post Medicare reimbursement rates by item or service.

Conclusion

Based on HCPF's review, Colorado hospitals and health systems have shown a strong level of engagement and desire to be in compliance with federal and

state price transparency rules, which is visible in the overall increase in quality ratings. HCPF found **84.2%** of all Colorado hospitals have an overall quality rating of **Good or Fair**, an increase from **73.5%** in November 2022. Additionally, all general, children's, and critical access hospitals had an overall quality rating increase in Good rated hospitals and a decrease in Poor rated hospitals compared to November 2022. Seven of the sixteen hospitals that had an overall quality rating of poor were long-term acute care, rehabilitation, or psychiatric hospitals. HCPF will continue collaborating, providing technical guidance, and encouraging Colorado hospitals to utilize the resources on [CMS's Hospital Price Transparency Website](#) to help improve their price transparency postings and to help ensure they stay up to date on changes to the federal price transparency rules.



VI. Appendix A: Methodology

The rating methodology is composed of three elements: the downloadable file review, the shoppable service review, and the SB23-252 Medicare rates review.

A. Downloadable File Review

Only hospitals know if they disclose 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 and converted if necessary.

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.
- 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 noncash 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, HCPF reviewed the tool 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. SB 23-252 Medicare Reimbursement Rates Review

SB 23 -252 required hospitals to post Medicare reimbursement rates by Oct. 1, 2023, and by Feb. 1, 2024, Medicare reimbursement rates needed to be incorporated into the hospitals federally required machine-readable files per the guidelines in the Medicare Rates Clarification document.¹³

1. Quality Rating

- Good - Medicare reimbursement rates are available for download, posted by item and service, and incorporated in the hospital's required federal price transparency machine-readable file as a payer.
- Fair - Medicare reimbursement rates are available for download, posted by item and service, but are listed in a separate table in the hospital's required federal price transparency machine-readable file or available in a separate downloadable file.
- Poor - Medicare reimbursement rates are unavailable or not posted by item and service.

D. Overall Quality Rating

Determined by quality ratings of the downloadable file, the shoppable service tool or display, and SB 23-252 Medicare reimbursement rates

¹³ Medicare Rates Clarification - November 2023. (2023) <https://hcpf.colorado.gov/sites/hcpf/files/SB23%20-%20252%20Medicare%20Rates%20Clarification%20Updated%2011.1.2023.pdf>

- Good - Quality rating of Good in all three areas, the downloadable file, the shoppable service display or tool, and SB23-252 Medicare reimbursement rates.
- Fair - Meets one of the following requirements
 - The SB 23-252 Medicare reimbursement rates quality rating is Fair or Good, and the downloadable file and the shoppable service display or tool have at least one quality rating of Fair but do not have a quality rating of Poor.
 - The SB 23-252 Medicare reimbursement rates quality rating is either Poor or Fair, and both the downloadable file and the shoppable service display or tool have quality ratings are Good.
- Poor - At least one quality rating of Poor in one of the three areas, but when the only Poor quality rating is for SB23-252 Medicare reimbursement rates, the downloadable file and the shoppable service display or tool have at least one quality rating of Fair.

E. 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 to the entire network. For example, 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.

VII. Appendix B: Additional Tables

Table 5: Downloadable File Criteria Met by Children’s, General, and Critical Access System Classification May 2024

Downloadable File Category	Total	System	Independent General	Independent Critical Access
Machine Readable	88.2%	87.5%	88.9%	89.3%
Data Extract Date	94.1%	100.0%	88.9%	85.7%



Downloadable File Category	Total	System	Independent General	Independent Critical Access
Posted or Updated Date	94.1%	100.0%	88.9%	85.7%
Code	98.8%	100.0%	100.0%	96.4%
Description	98.8%	100.0%	100.0%	96.4%
Gross Charges	97.6%	100.0%	100.0%	92.9%
Discounted Cash	95.3%	97.9%	100.0%	89.3%
De-Identified Minimum	94.1%	100.0%	77.8%	89.3%
De-Identified Maximum	94.1%	100.0%	77.8%	89.3%
Negotiated Rates	96.5%	100.0%	100.0%	89.3%
Individual Plans	87.1%	100.0%	88.9%	64.3%

Table 6: Downloadable File Criteria Met by Category by Long-Term Care Rehabilitation, and Psychiatric Hospitals May 2024

Downloadable File Category	Total	Long-Term Acute Care	Psychiatric	Rehab
Machine Readable	81.3%	66.7%	100.0%	75.0%
Data Extract Date	81.3%	83.3%	66.7%	100.0%
Posted or Updated Date	81.3%	83.3%	66.7%	100.0%
Code	100.0%	100.0%	100.0%	100.0%
Description	93.8%	100.0%	83.3%	100.0%
Gross Charges	87.5%	100.0%	66.7%	100.0%
Discounted Cash	81.3%	66.7%	100.0%	75.0%
De-Identified Minimum	87.5%	83.3%	100.0%	75.0%
De-Identified Maximum	87.5%	83.3%	100.0%	75.0%
Negotiated Rates	100.0%	100.0%	100.0%	100.0%
Individual Plans	81.3%	83.3%	66.7%	100.0%

