

# CORONAVIRUS DISEASE 2019 (COVID-19)

## COVID-19 Self-Pay Price



**Audience:** Patient Access, PBS, Hospital Site Operations, MGPS, Laboratory, Marketing & Communications, CDM, ICOs

**Revision Date:** 12/02/2020

**Version :** 2

**COVID-19 Response Team Owner:** Finance

**Date of Last Review:** 12/3/2020

**What's Changed:** Added CMS Definition of cash price expanded instructions for Health Ministry Leaders to become compliant with regulatory requirements for Price Transparency of COVID-19 diagnostic testing.

### Background

On November 6, 2020, The Health and Human Services, Centers for Medicare and Medicaid Services (CMS) published Interim Final Rule number 4 (IFC-4). As part of this Ruling, CMS is requiring all providers of COVID-19 diagnostic testing to make public their "cash prices" for these services along with other specific details related to Price Transparency. This ruling was effective on the date of publication.

CMS states "the "cash price" would be the maximum charge that may apply to a self-pay individual paying out-of-pocket."

It is critical that our Trinity Health Ministries continue to work with System Office COVID-19 Revenue Sub-Committee to ensure we are compliant with CMS rules and regulations. In addition to fulfilling these requirements, it is important that we have a standardized approach in setting the cash prices. To understand this recommendation, we have provided some context around some of the most critical requirements, as well as the overall guidance:

### Price Transparency Requirements for COVID-19 Tests

IFC-4 includes the following requirements for posting COVID-19 diagnostic testing Price transparency on provider websites.

- COVID-19 price transparency information must be displayed on the provider's public website in an "easily accessible manner, without barriers"
- Information must be accessible free of charge
- Cannot require patients to create a user account or password
- Cannot require patients to submit personal identifiable information

In addition, CMS is requiring that the provider's homepage contain certain keywords that they believe will increase the likelihood that the public will be able to locate the information using a "search engine". The following term's must be included on the provider's homepage:

- The provider's name
- "Price"
- "Cost"

- “Test”
- “COVID”
- “Coronavirus”

CMS requires the following to be posted for each COVID-19 diagnostic test:

- A plain language description of each COVID-19 test the facility or clinics offers
- The corresponding cash price for each test
- The corresponding billing code (CPT/HCPCS Code) for each test
- Any additional information necessary for the public to be certain of the cash price for a COVID-19 test when pricing varies between **locations of the same Health Ministry**

### Trinity Health Guidance:

It is important for Trinity Health to adhere to these specific CMS requirements. It is also important that Trinity Health include certain standardized information so that the public can understand the relationship between the posted cash price and the COVID-19 diagnostic test(s) offered.

Trinity Health System Office COVID-19 Revenue Sub-Committee has provided the following tools and instructions to assist Health Ministries with this effort.

- A table (Exhibit A) has been created which lists all currently available approved COVID-19 diagnostic lab tests, as of December 2, 2020. This table (Exhibit A) contains the CPT/HCPCS billing code, the plain language consumer friendly description, the standard price and column for populating the HM’s cash price.
  - Trinity Health System Office will maintain columns A – D, when the facility accepts the “standard price” recommended by System Office in column D.
- The following statement may be used on Trinity Health Ministry Home Pages along with a link to the accompanying template in Exhibit A for posting cash prices. Statement:
 

**Insert Hospital or Testing Facility Name here**, a Health Ministry of Trinity Health, presents the following COVID-19 (Corona Virus) test price information for consumers to consider the cost of testing in our facility(ies).

### Health Ministry Responsibility

Each Health Ministry is responsible for adding the following information to Exhibit A

- If a facility has price variations by location or test, insert the CDM price into column D.
- If a facility does not offer a particular test listed in the template, please indicate N/A for that line item in columns D and E.
- Add the HM’s cash price in column E
- Update column E as new codes are published by AMA (CPT) and/or CMS (HCPCS).

The cash price is derived from the Health Ministry’s Financial Assistance Policy. Based on the above requirements, all **Health Ministries should follow their existing discounts offered today which is in alignment with the Trinity Health Financial Assistance policy and 501r guidelines.** The discounts, also known as “Amounts Generally Billed (AGB)”, are currently published within the Financial Assistance section on each Ministry’s website. Health Ministries are encouraged to avoid separate and distinct cash pricing for COVID testing.

It is the responsibility of each Health Ministry to coordinate with their local Marketing and Communications colleagues to ensure required information is posted on the website.

### References

CMS COVID-19 IFC #4 pages 33-52: <https://www.cms.gov/files/document/covid-vax-ifc-4.pdf>.