

Publications

June 25, 2025 • Updates

CMS Issues Request for Public Input on Hospital Pricing Transparency

Key Takeaways

1. Centers for Medicare & Medicaid Services (CMS) Aims to Strengthen Enforcement

The agency is evaluating how to better enforce hospital price transparency rules under the Executive Order.

2. Definitions and Data Quality Are Under Review

CMS is considering how to define and ensure the accuracy and completeness of pricing data.

3. Stakeholder Input Will Shape Policy

Hospitals, payors and others are invited to submit comments by July 21, 2025.

Earlier this year, President Donald Trump issued an Executive Order titled “Making America Healthy Again by Empowering Patients with Clear, Accurate, and Actionable Healthcare Pricing Information.” In the EO, President Trump ordered the Secretary of the Treasury, the Secretary of Labor, and the Secretary of Health and Human Services to take action within 90 days to enforce the health care price transparency regulations currently in effect. Specifically, the Departments were required to take action which would: (a) require the disclosure of the actual prices of items and services, not estimates; (b) issue updated guidance or proposed regulatory action ensuring pricing information is standardized and easily comparable across hospitals and health plans; and (c) issue guidance or proposed regulatory action updating enforcement policies designed to ensure compliance with the transparent reporting of complete, accurate, and meaningful data.

On May 22, 2025, in what appears to be one of the first steps in complying with this White House’s February Order, CMS issued a Request for Information (RFI) seeking public input on how to boost hospital compliance and enforcement and ensure hospital price transparency (HPT) data is accurate and complete. In particular, CMS has posed six questions about which it would like public input:

1. Should CMS specifically define the terms “accuracy of data” and “completeness of

Related People

- Stephen M. Angelette
- Elizabeth J. Tucker

Related Capabilities

- Health Care

- data” in the context of HPT requirements, and, if yes, then how?
2. What are your concerns about the accuracy and completeness of the HPT MRF (Machine-Readable File) data? Please be as specific as possible.
 3. Do concerns about the accuracy and completeness of the MRF data affect your ability to use hospital pricing information effectively? For example, are there additional data elements that could be added, or others modified, to improve your ability to use the data? Please provide examples.
 4. Are there external sources of information that may be leveraged to evaluate the accuracy and completeness of the data in the MRF? If so, please identify those sources and how they can be used.
 5. What specific suggestions do you have for improving the HPT compliance and enforcement processes to ensure that the hospital pricing data is accurate, complete, and meaningful? For example, are there any changes that CMS should consider making to the CMS validator tool, which is available to hospitals to help ensure they are complying with HPT requirements, so as to improve accuracy and completeness?
 6. Do you have any other suggestions for CMS to help improve the overall quality of the MRF data?

More details on the RFI are available [here](#), which includes the web-based form by which comments should be submitted. The deadline to submit comments is 11:59 p.m. Eastern Time on July 21, 2025. If you are interested in submitting comments and would like assistance in preparing a submission, please contact Stephen Angelette, Elizabeth Tucker or a member of your Polsinelli team.