INDEPENDENT REGULATORY COMPLIANCE ASSESSMENT

# HOSPITAL PRICE TRANSPARENCY AUDIT

Independent Diagnostic Gap Analysis & Regulatory Exposure Assessment (45 CFR Part 180)

DATE: November 18, 2026

STANDARD: Hospital Price Transparency (45 CFR 180)

AUDITED HEALTHCARE FACILITY

## Cook Hospital

Audited Source: Price-Transparency-CSV-for-CookHospital-1-8-2021.csv [->]

**NON-COMPLIANT: DEFECTS DETECTED**

**Mandatory Statutory Remediation Required (45 CFR Section 180)**

| SCANNED ROWS | FLAGGED VIOLATIONS | SAFETY SCORE |
|---|---|---|
| 1,859 | 1,858 | 59.0% (Grade F) |
| Machine-Readable CDM Records | Non-Compliant Data Coordinates | Compliance Benchmark (>=90%) |

### EXECUTIVE DIAGNOSTIC SUMMARY : STATUTORY FINDINGS

An algorithmic diagnostic inspection of the public Machine-Readable File (MRF) published by Cook Hospital revealed critical structural, syntax, and pricing irregularities that deviate from federal price transparency standards (45 CFR Section 180). The audit identified 1,856 statutory compliance defects (cataloged in the Remediation Error Ledger) alongside 1 internal commercial yield duplicate rate entries (cataloged in the Revenue Yield Recovery Ledger) across 1,859 scanned chargemaster records, yielding a calculated statutory safety score of 59% (Grade F).

Hospitals are mandated to maintain published standard charge data that is complete, accurate, and free of placeholder records. The systemic defect patterns observed across this file leave the facility vulnerable to automated CMS crawler audits, mandatory Corrective Action Plans (CAP), and compounding daily civil monetary enforcement liabilities.

| CMS SCHEMA INTEGRITY | PAYER RATE COMPLETENESS | ENFORCEMENT LIABILITY |
|---|---|---|
| CRITICAL DEFECTS | UNMAPPED / $0.00 RATES | ACTIVE CMP EXPOSURE |
| 45 CFR Section 180.50 | Standard Charge Completeness | 45 CFR Section 180.90 |

PUBLIC AUDIT NOTICE: This independent technical diagnostic report evaluates publicly available hospital standard charge datasets pursuant to federal Hospital Price Transparency mandates (45 CFR Part 180).

SECTION I : REGULATORY RISK ASSESSMENT

# Statutory Validation Failure & Enforcement Risk

Our automated Price Transparency Compliance Engine executed an algorithmic inspection of your facility's published Machine-Readable File (MRF). The published dataset failed statutory HPT V3.0 schema and data integrity benchmarks mandated under federal hospital price transparency rules.

### STATUTORY CIVIL MONETARY PENALTIES (45 CFR SECTION 180.90)

The Centers for Medicare & Medicaid Services (CMS) strictly enforces MRF compliance through automated crawlers and targeted regulatory audits. Hospitals that fail to publish complete standard charge data face daily administrative fines scaled by licensed facility bed count:

**Base Fine (<= 30 beds): $300 / day ($109,500 / year)**

**Scaled Fine (> 30 beds): $300 to $5,500 / day ($10 / bed / day) | Max: $2,007,500 / year**

SECTION II : COMPLIANCE DEFECT LEDGER

# Categorical Defect Breakdown

A granular inspection of your published dataset identified multiple categories of structural and pricing non-conformity. Missing gross charges, zero-dollar ($0.00) placeholder values, unmapped payer contracts, and schema omissions represent immediate points of regulatory exposure under federal price transparency mandates.

TOTAL DETECTED DEFECTS

**1,858**

Rule Violations

DEFECT FREQUENCY RATIO

**99.95%**

Defect Rate Across Inspected Rows

### STATUTORY ENFORCEMENT & ADMINISTRATIVE ESCALATION TIMELINE (45 CFR SECTION 180.70 - 180.90)

CMS administrative enforcement protocols triggered upon non-compliance detection:

**1. Written Warning Notice | 30-Day Statutory Opportunity to Cure**

CMS issues formal written notice specifying non-compliant chargemaster records and missing schema attributes.

**2. Mandatory Corrective Action Plan (CAP) | Formal Remediation Protocol**

Hospital must submit a detailed CAP within 30 to 90 days outlining technical remediation steps, validation gates, and milestones.

**3. Formal CMP Notice of Imposition & Non-Compliance Public Registry**

Issuance of formal Notice of Imposition of CMP with statutory 60-day Departmental Appeals Board (DAB) hearing deadlines under Part 180 Subpart C, accompanied by immediate, permanent adverse listing on the official public CMS Hospital Price Transparency Non-Compliance Registry under 45 CFR Section 180.90.

SECTION III : SAMPLE VIOLATION AUDIT

# Verified Sample Violation Coordinates

Below are 5 verified sample error coordinates extracted from your published Machine-Readable File (MRF). Each entry identifies the exact source row index in your raw data file, the clinical procedure code (CPT/HCPCS), the violation taxonomy, and the statutory justification under Section 180.50.

| ROW # | CPT / CODE | VIOLATION TYPE | DESCRIPTION & STATUTORY JUSTIFICATION |
|---|---|---|---|
| **Row 69**<br>MRF Record | **0300**<br>CPT / HCPCS | **Compliance Failure** | **URINE DRUG SCREEN C&H, DOT**<br>Missing Billing Code (CPT/HCPCS): Procedure 'URINE DRUG SCREEN C&H, DOT' is billed under Revenue Code '0300' but lacks required national CPT/HCPCS code under 45 CFR Section 180.50(b)(2)(iv). |
| **Row 10**<br>MRF Record | **90672**<br>CPT / HCPCS | **Missing Code Type** | **FLU SP ADMIN**<br>Billing code '90672' is listed but its billing_code_type is missing or empty. |
| **File Level**<br>Dataset Scope | **FILE_LEVEL**<br>Scope | **Empty Standard Charge** | **Column 'de_identified_min' has mostly empty/zero values**<br>De-identified Minimum Rate column is 53.1% empty or zero (988/1,859 rows). CMS requires actual pricing data. |
| **File Level**<br>Pre-Ingestion | **N/A**<br>Scope | **Compliance** | **Invalid CMS Naming Convention**<br>Filename 'Price-Transparency-CSV-for-CookHospital-1-8-2021.csv' does not follow CMS mandatory naming syntax (<EIN>_<hospital-name>_standardcharges.[csv\|json]) per 45 CFR Section 180.50(d)(5). |
| **Row 142**<br>MRF Record | **0301**<br>CPT / HCPCS | **Compliance Failure** | **ARTERIAL BLOOD GAS**<br>Missing Billing Code (CPT/HCPCS): Procedure 'ARTERIAL BLOOD GAS' is billed under Revenue Code '0301' but lacks required national CPT/HCPCS code under 45 CFR Section 180.50(b)(2)(iv). |

## ADDITIONAL FLAGGED VIOLATIONS IN ERROR LEDGER

The 5 coordinates above represent a diagnostic cross-section of your file's defects. A total of 1,851 additional non-compliant records (from 1,856 cataloged offline records, out of 1,858 total detected violations) are cataloged in the complete Line-by-Line Remediation Error Ledger (Remediation_Error_Ledger.csv).
Each offline ledger record includes: exact raw row index, billing code (CPT/HCPCS/DRG/NDC), clinical description, payer contract tag, published price, and regulatory justification under Section 180.50.

| CATALOGED DEFECTS | DELIVERABLE FORMAT | DIAGNOSTIC ATTRIBUTES |
|---|---|---|
| **1,851 Records** | **Standard CSV (.csv)** | **6 Diagnostic Fields** |
| In Error Ledger CSV | RFC 4180 Delimited Format | Row, CPT, Payer, Price & Justification |

*Data Governance Notice: Complete row-level defect workpapers are provided directly to hospital compliance leadership and are not published in public web indices.*

SECTION IV : REMEDIATION WORKPAPERS

# Technical Remediation Workpapers & Diagnostic Data Access

To remediate the compliance defects identified in this diagnostic audit and restore full statutory alignment, Elite Data Solution maintains complete line-by-line violation workpapers available for facility revenue cycle leaders and technical teams.

## DELIVERABLE: COMPLETE LINE-BY-LINE REMEDIATION ERROR LEDGER

**Remediation_Error_Ledger.csv**

- Exhaustive line-by-line audit documenting 1,856 cataloged violations (from 1,858 total detected)
- Exact row coordinates mapped directly to your facility's published MRF line items
- Full clinical billing taxonomy (CPT, HCPCS, MS-DRG, NDC) & standard description fields
- Payer-specific contract discrepancy tags, zero-dollar rate flags, and statutory compliance citations
- Statutory 45 CFR Part 180 legal justification citing specific CMS price transparency mandates
- Standard RFC 4180 CSV export for hospital billing, IT, and revenue cycle analysis

| DELIVERABLE FORMAT | AUDIT COVERAGE | COMPLIANCE STANDARD |
|---|---|---|
| **CSV (.csv) / UTF-8** | **100% Scanned (1,859 Records)** | **45 CFR Part 180** |

## TECHNICAL WORKPAPER REQUISITION & AUDIT CUSTODY

Authorized facility compliance officers and revenue cycle leaders may request formal transmission of workpapers:

**Direct Outreach:** audit@elitedatasolution.net **Web Portal:** https://elitedatasolution.net

**Reference ID:** [MRF Remediation Workpapers] - Cook Hospital

- **Transmission:** Delivered via email directly to authorized facility compliance leadership.
- **Defensibility:** Engineering workpapers structured pursuant to 45 CFR Part 180 statutory standards.
- **Confidentiality:** Defect workpapers are kept strictly confidential; restricted to authorized facility leadership.