

# Market Insights from Transparency in Coverage Reimbursement Data

Washington-Alaska HFMA Spring Conference  
Speaker: Nicholas Newsad, MHSA, CPCV, VP, Coker

April 16, 2026

*Coker*



# Agenda

- I. What is the Transparency in Coverage Rule?
- II. Washington Commercial Reimbursement
  - I. Physician Medical Group Rates
  - II. Ambulatory Surgery Center Rates
  - III. Hospital Rates
- III. Observations in Other States
- IV. Use Applications



# What is the Transparency in Coverage Rule?

*Coker*

# Transparency in Coverage Rule

- Fully Effective January 1, 2024


CMS-9915-F

2

**SUMMARY:** The final rules set forth requirements for group health plans and health insurance issuers in the individual and group markets to disclose cost-sharing information upon request to a participant, beneficiary, or enrollee (or his or her authorized representative), including an estimate of the individual's cost-sharing liability for covered items or services furnished by a particular provider. Under the final rules, plans and issuers are required to make this information available on an internet website and, if requested, in paper form, thereby allowing a participant, beneficiary, or enrollee (or his or her authorized representative) to obtain an estimate and understanding of the individual's out-of-pocket expenses and effectively shop for items and services. The final rules also require plans and issuers to disclose in-network provider negotiated rates, historical out-of-network allowed amounts, and drug pricing information through three machine-readable files posted on an internet website, thereby allowing the public to have access to health coverage information that can be used to understand health care pricing and potentially dampen the rise in health care spending. The Department of Health and Human Services (HHS)

- All commercial contract rates are now public info including full-insured, self-insured, & individual plans:

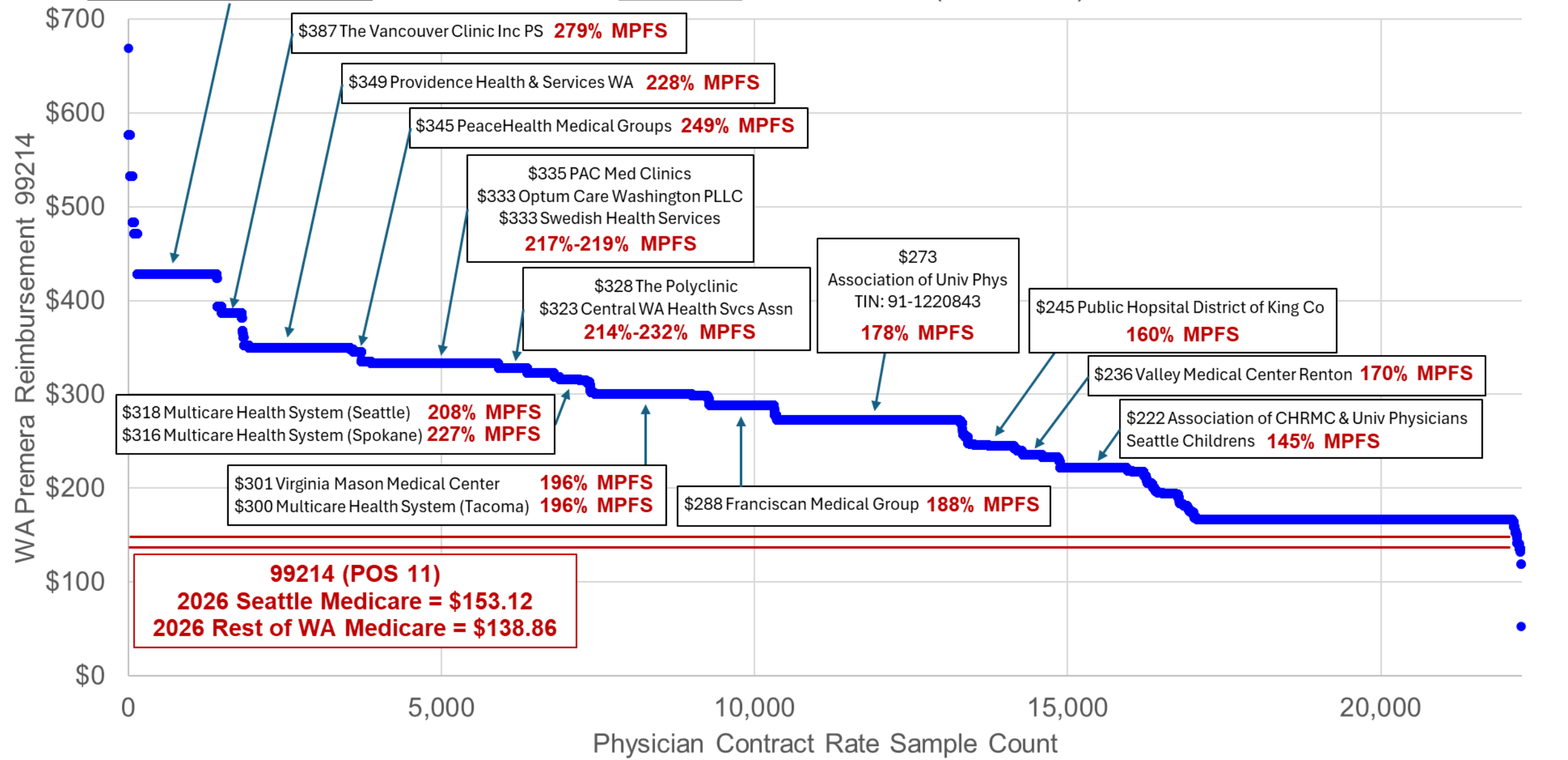
- UHC: <https://transparency-in-coverage.uhc.com/>
- Aetna: [https://health1.aetna.com/app/public/#/one/insurerCode=AETNACVS\\_I&brandCode=ALICSI/machine-readable-transparency-in-coverage](https://health1.aetna.com/app/public/#/one/insurerCode=AETNACVS_I&brandCode=ALICSI/machine-readable-transparency-in-coverage)
- CIGNA: <https://www.cigna.com/legal/compliance/machine-readable-files>
- Kaiser: <https://healthy.kaiserpermanente.org/colorado/front-door/machine-readable>
- BlueCross:
  - Elevance: <https://www.anthem.com/machine-readable-file>
  - HCSC: <https://www.hcsc.com/who-we-are/transparency-in-coverage>
  - Guidewell: <https://www.floridablue.com/members/tools-resources/transparency/machine-readable-files>



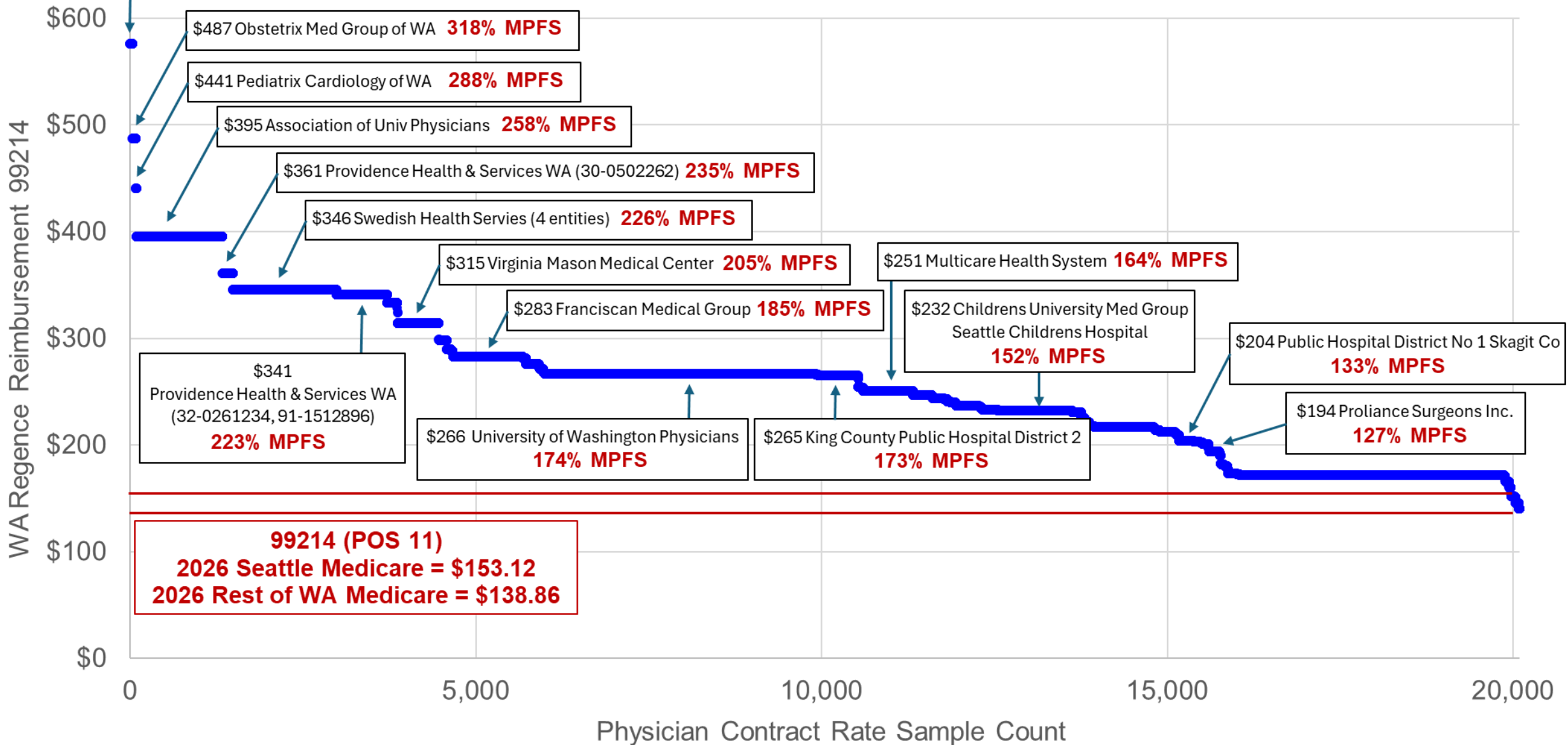
# Washington Commercial Reimbursement: Physician Services

*Coker*

# 99214 Physician Reimbursement (Place Service 11) WA Premera March 2026 (n=22,237)

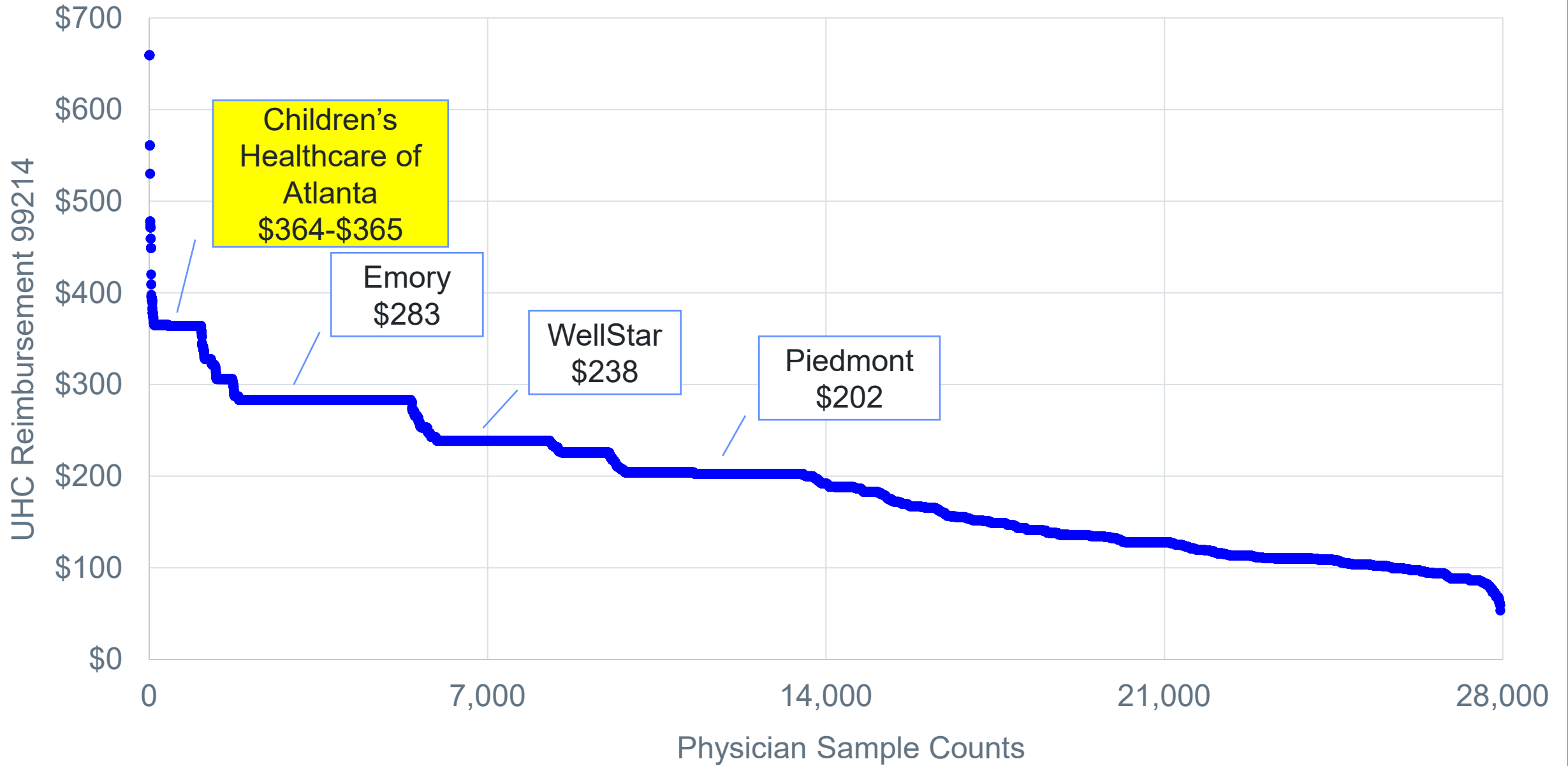


# 99214 Physician Reimbursement (Place of Service 11) WA Regence March 2026 (n=20,137)



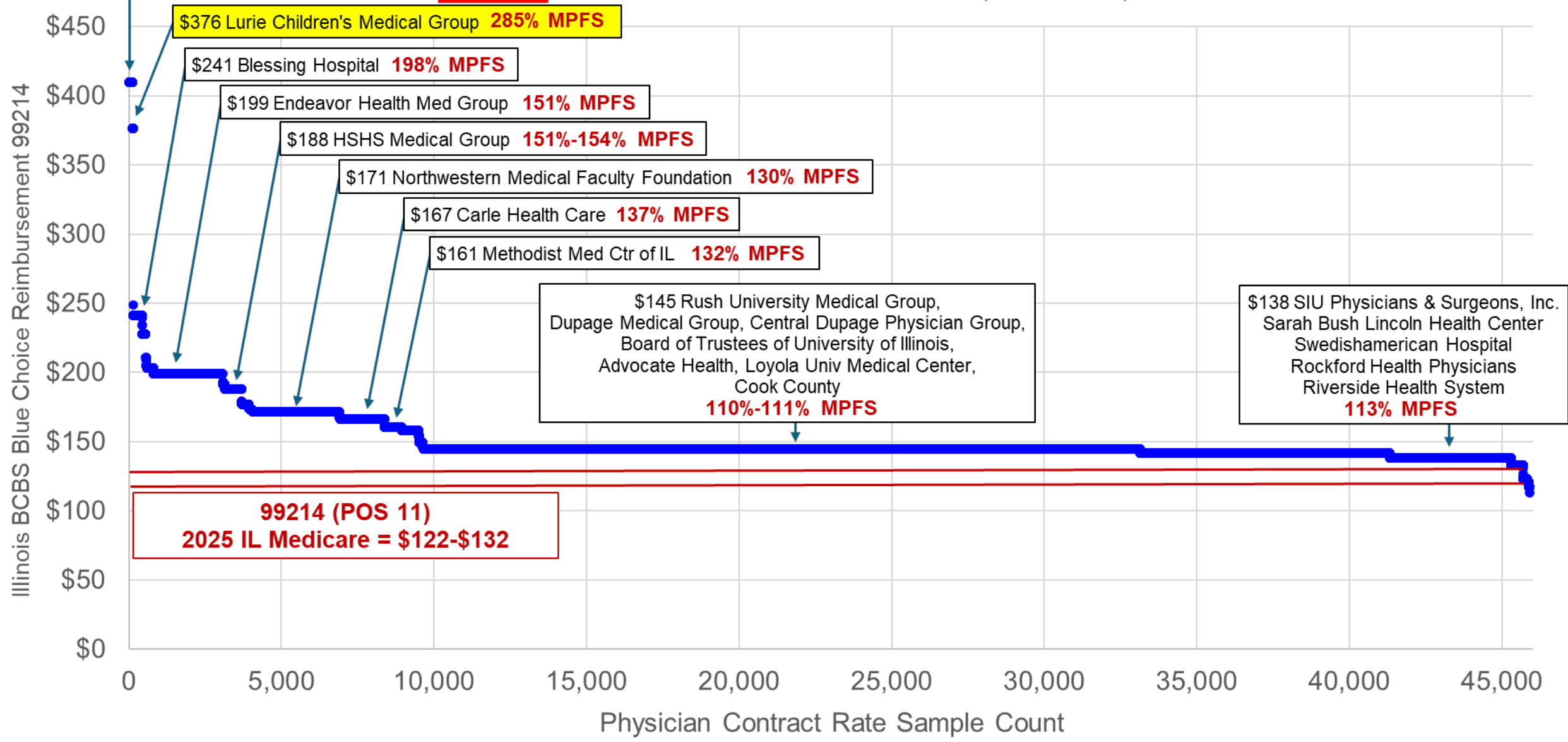
**99214 (POS 11)**  
**2026 Seattle Medicare = \$153.12**  
**2026 Rest of WA Medicare = \$138.86**

99214 Physician Reimbursement (Place of Service 11)  
UHC PPO Georgia 2025 (n=27,948)



# 99214 Physician Reimbursement (Place of Service 11)

## Illinois BCBS Blue Choice Dec 2025 (n=45,916)



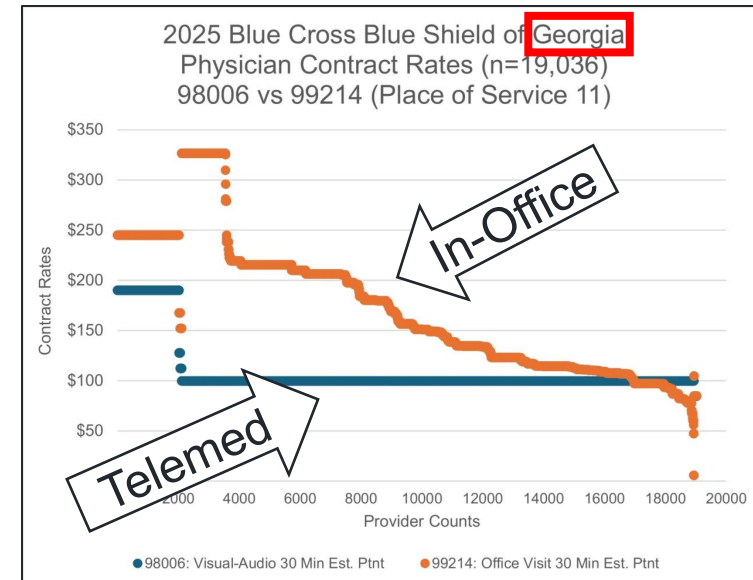
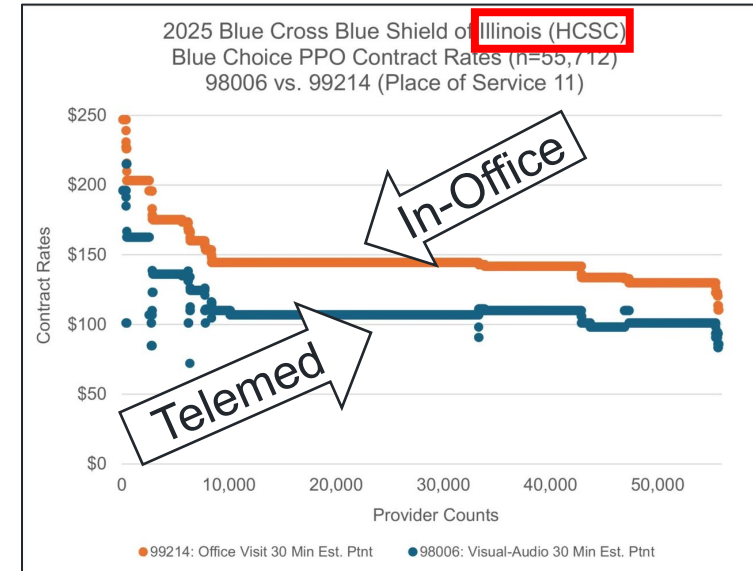
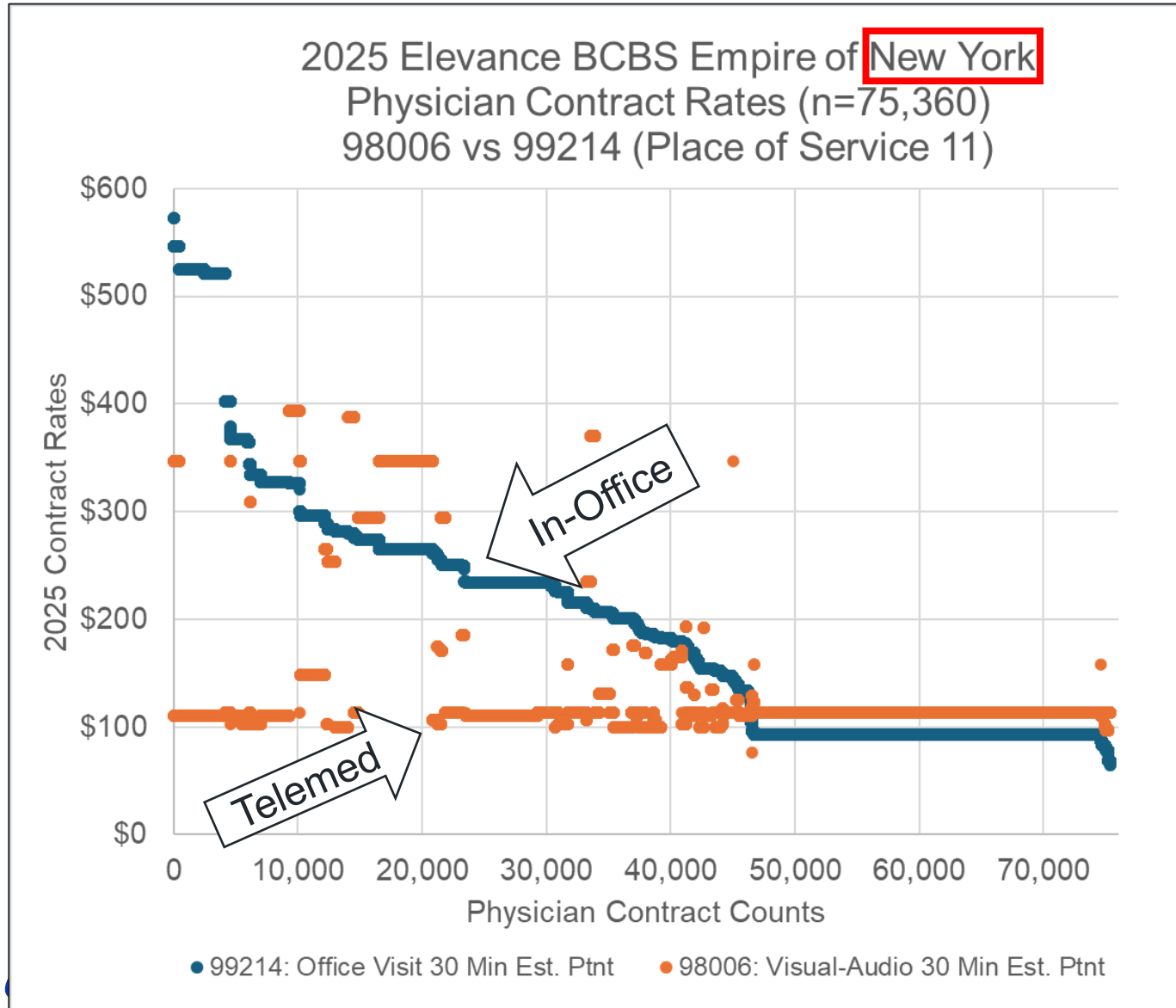
---

## Some States Experiencing Profound Difference in Telemedicine Reimbursement

- 2025 commercial reimbursement for the 16 brand new telemedicine service codes.
- While Medicare has a statutory requirement to reimburse telemedicine at in-office rates, commercial carriers like UnitedHealthcare are not required to follow Medicare's mandate.



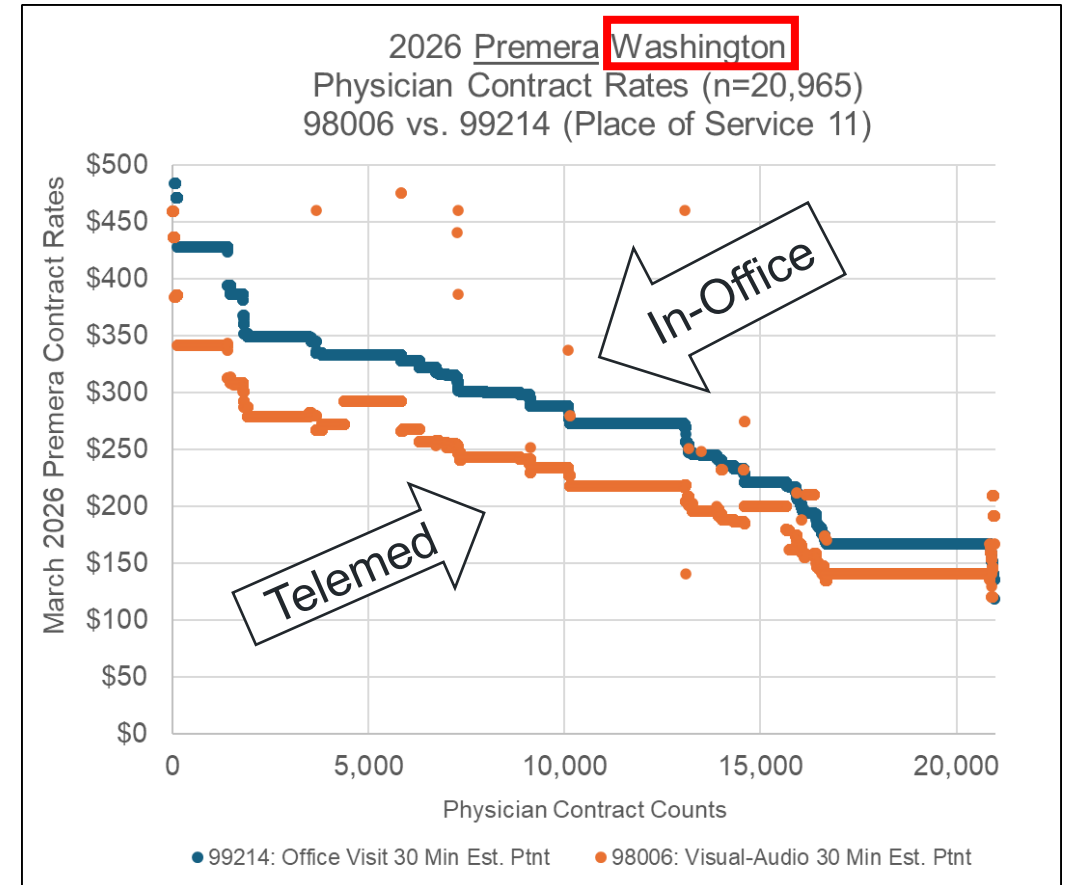
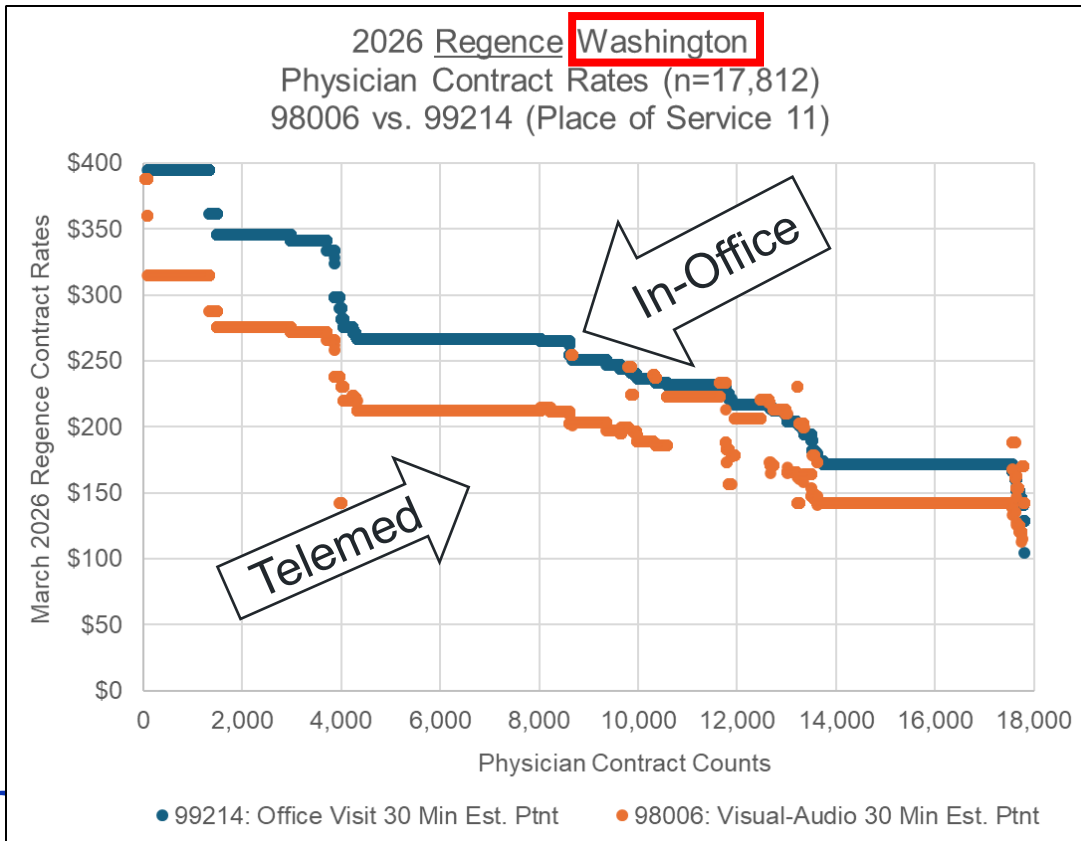
# Most States Experiencing Profound Difference in Telemedicine Reimbursement



## Telemedicine: Washington Commercial Rates

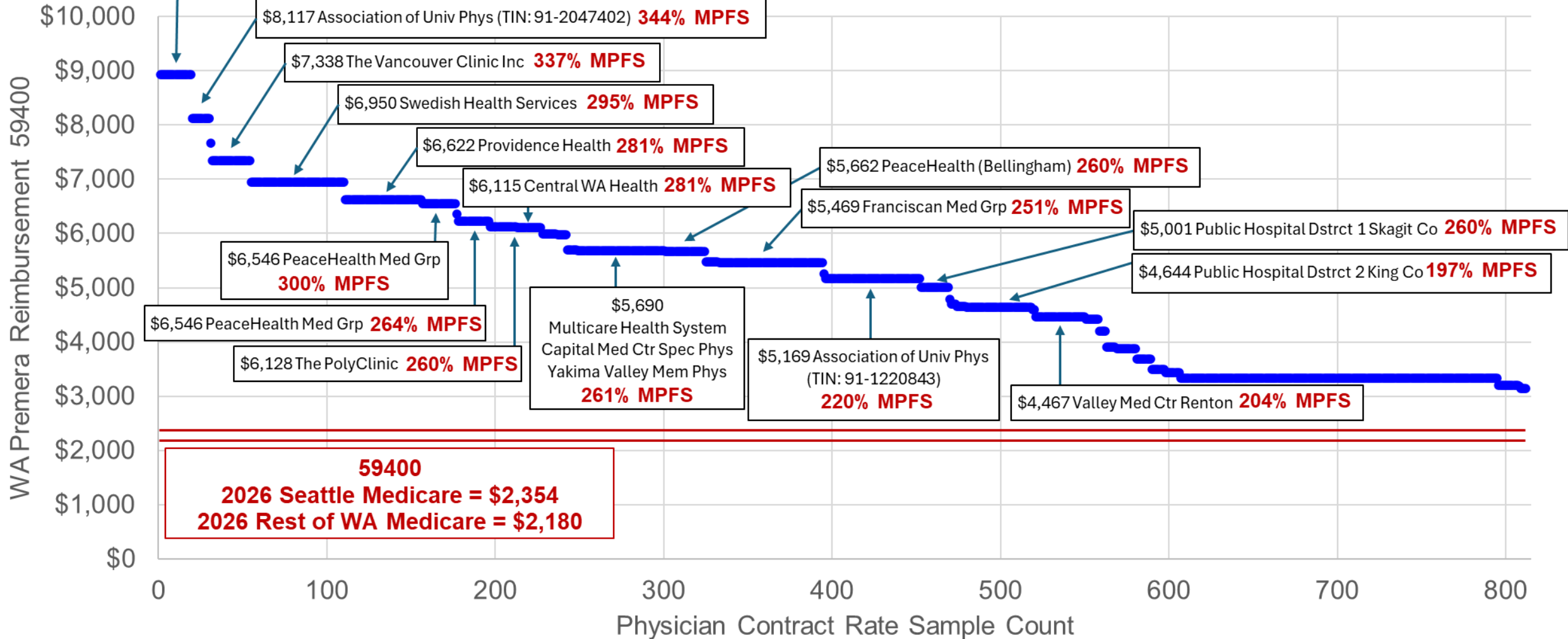
- 2026 commercial reimbursement for the 16 brand new telemedicine service codes.
- While Medicare has a statutory requirement to reimburse telemedicine at in-office rates, commercial carriers like UnitedHealthcare are not required to follow Medicare's mandate.

## Groups that Have Separate Rates



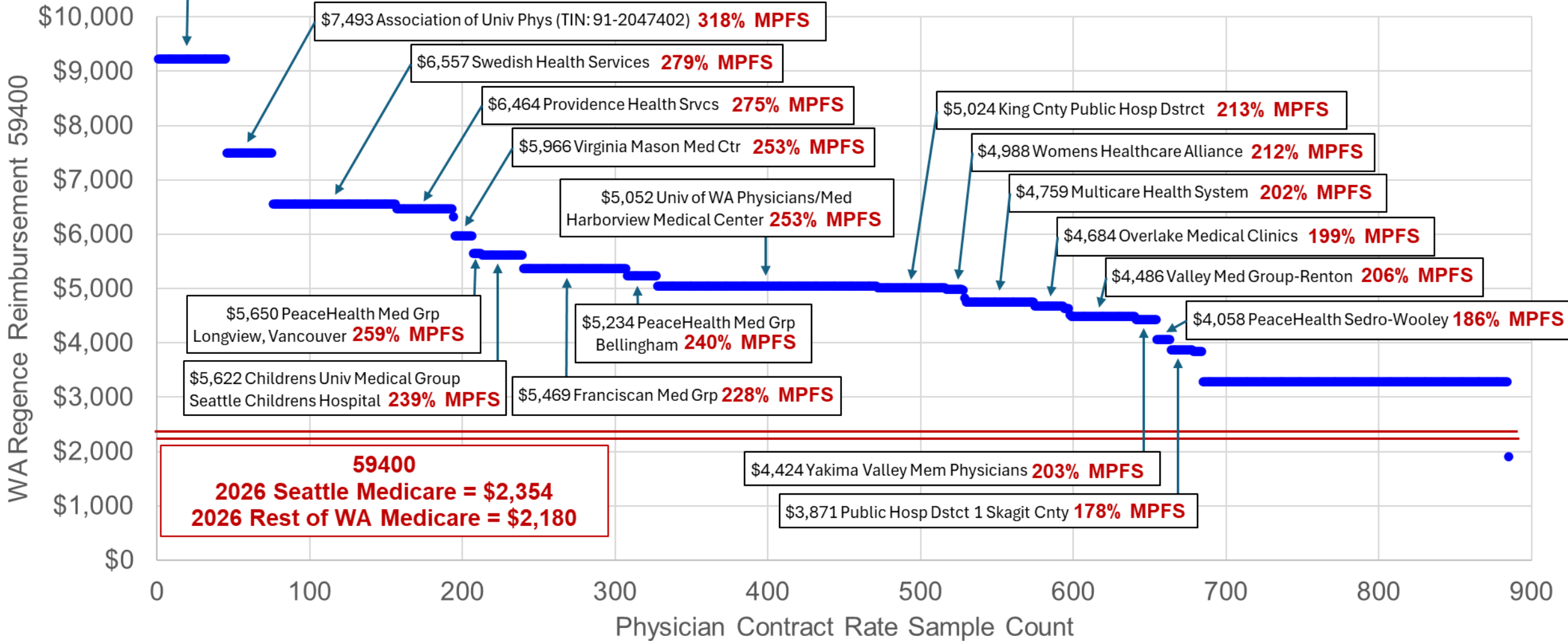
# OBGYN (Professional)

## Routine Obstetrics (59400) OBGYN Professional Reimbursement WA Premera March 2026 (n=812)



# OBGYN (Professional)

## Routine Obstetrics (59400) OBGYN Professional Reimbursement WA Regence March 2026 (n=885)



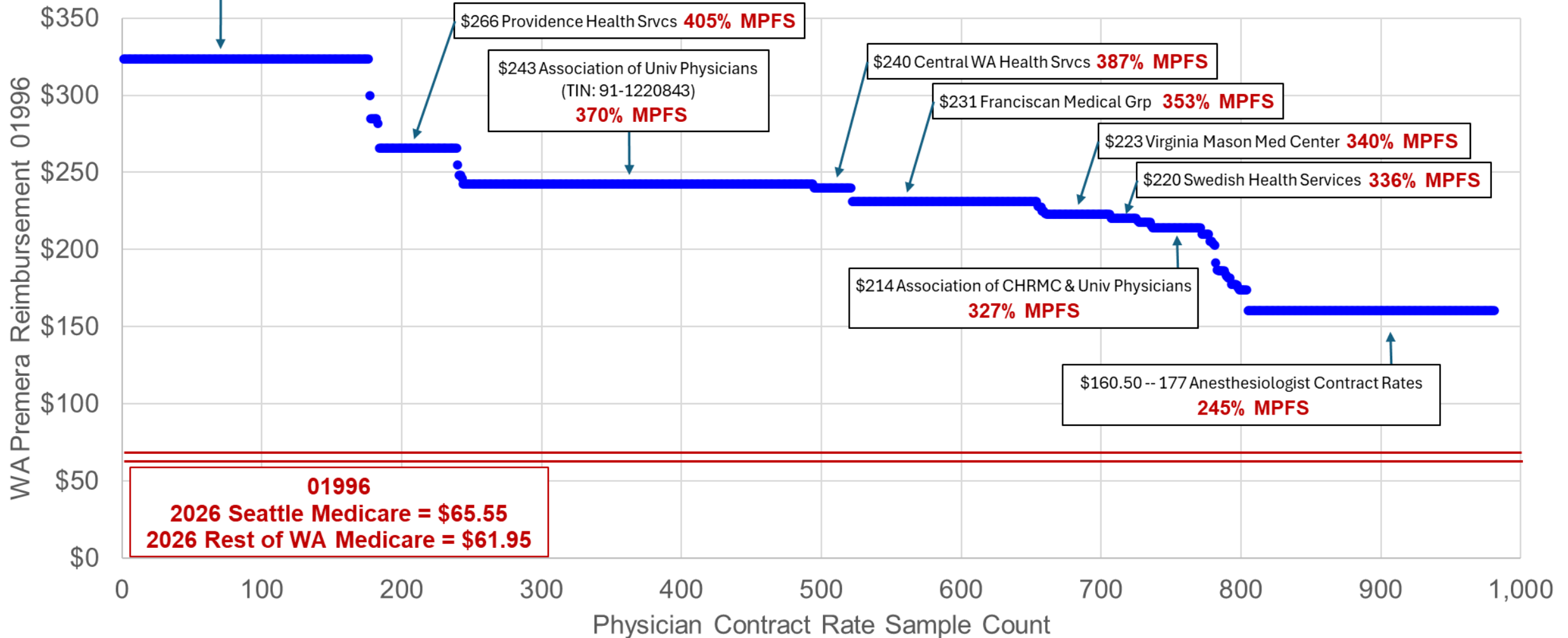
---

# Want Digital Copy of All 60+ Slides?



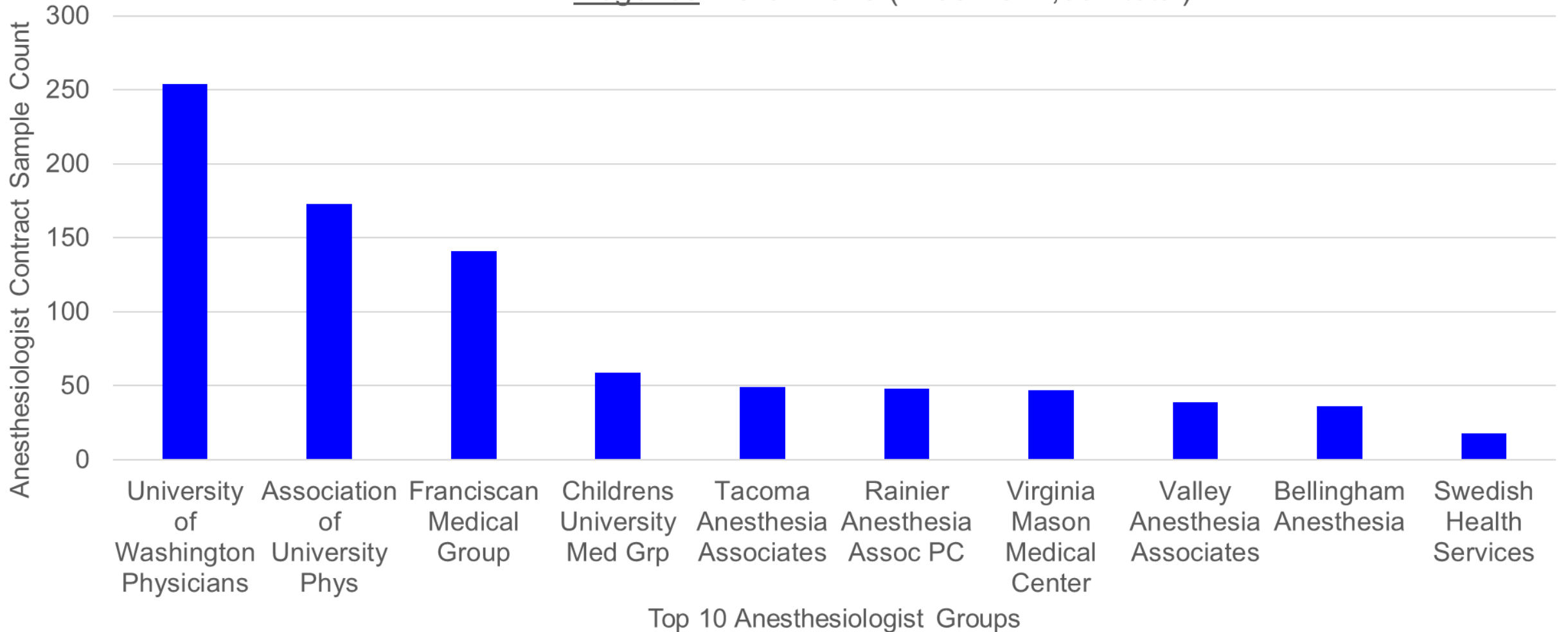
# Anesthesiology (Professional)

## Daily Epidural Management (01996) Anesthesiology Professional Reimbursement WA Premera March 2026 (n=981)



## Anesthesiology (Professional)

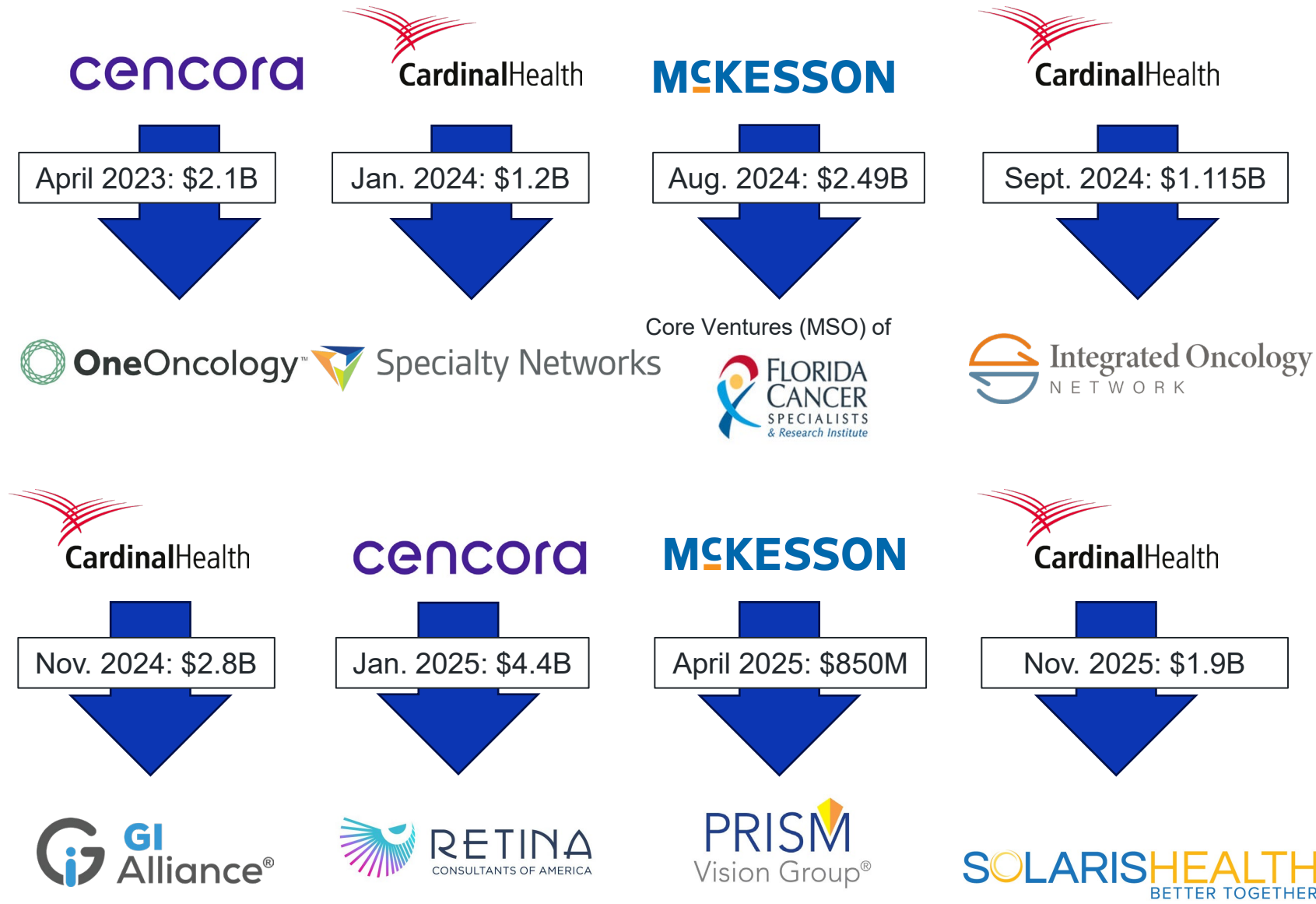
Daily Epidural Management (01996) Anesthesiology Professional Reimbursement  
Top 10 Anesthesiologist Groups All Paid \$160.50 (245% MPFS)  
WA Regence March 2026 (n=864 of 1,082 total)



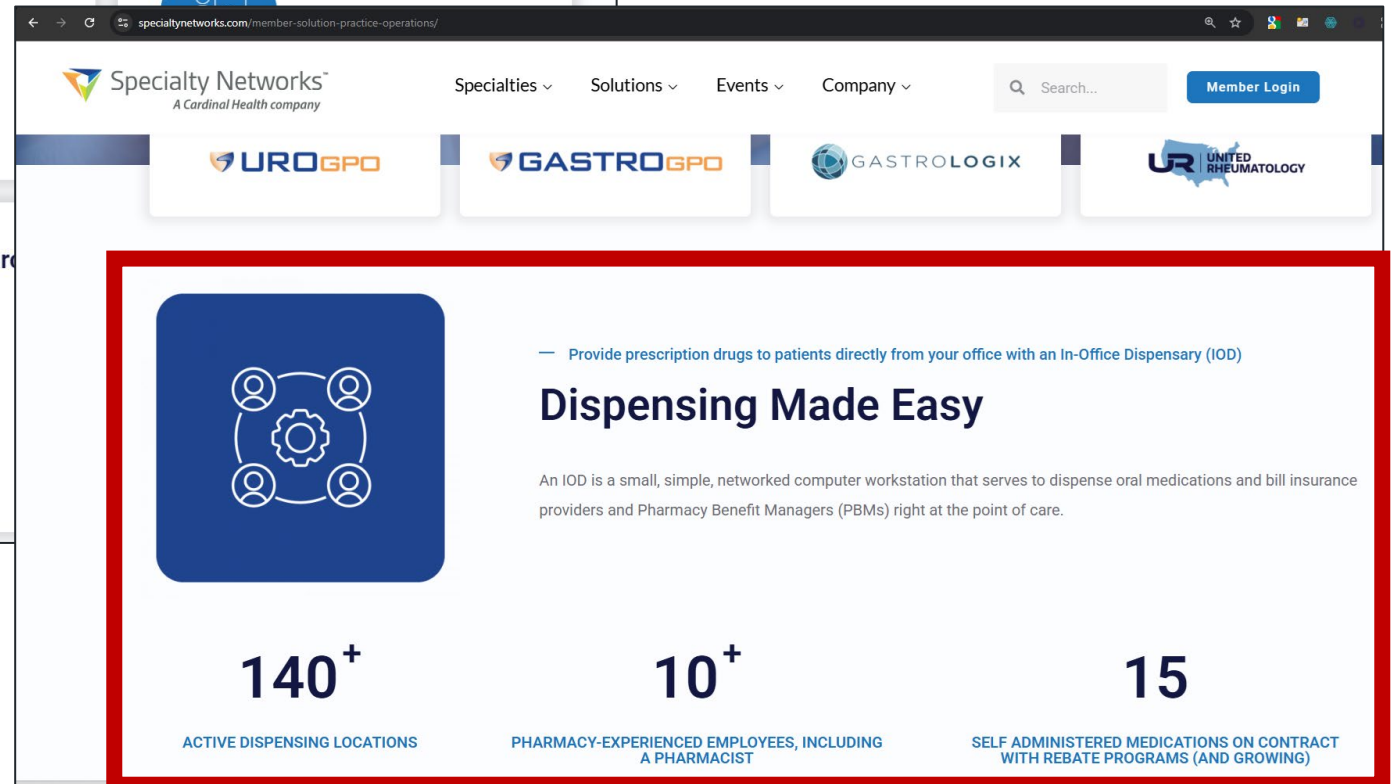
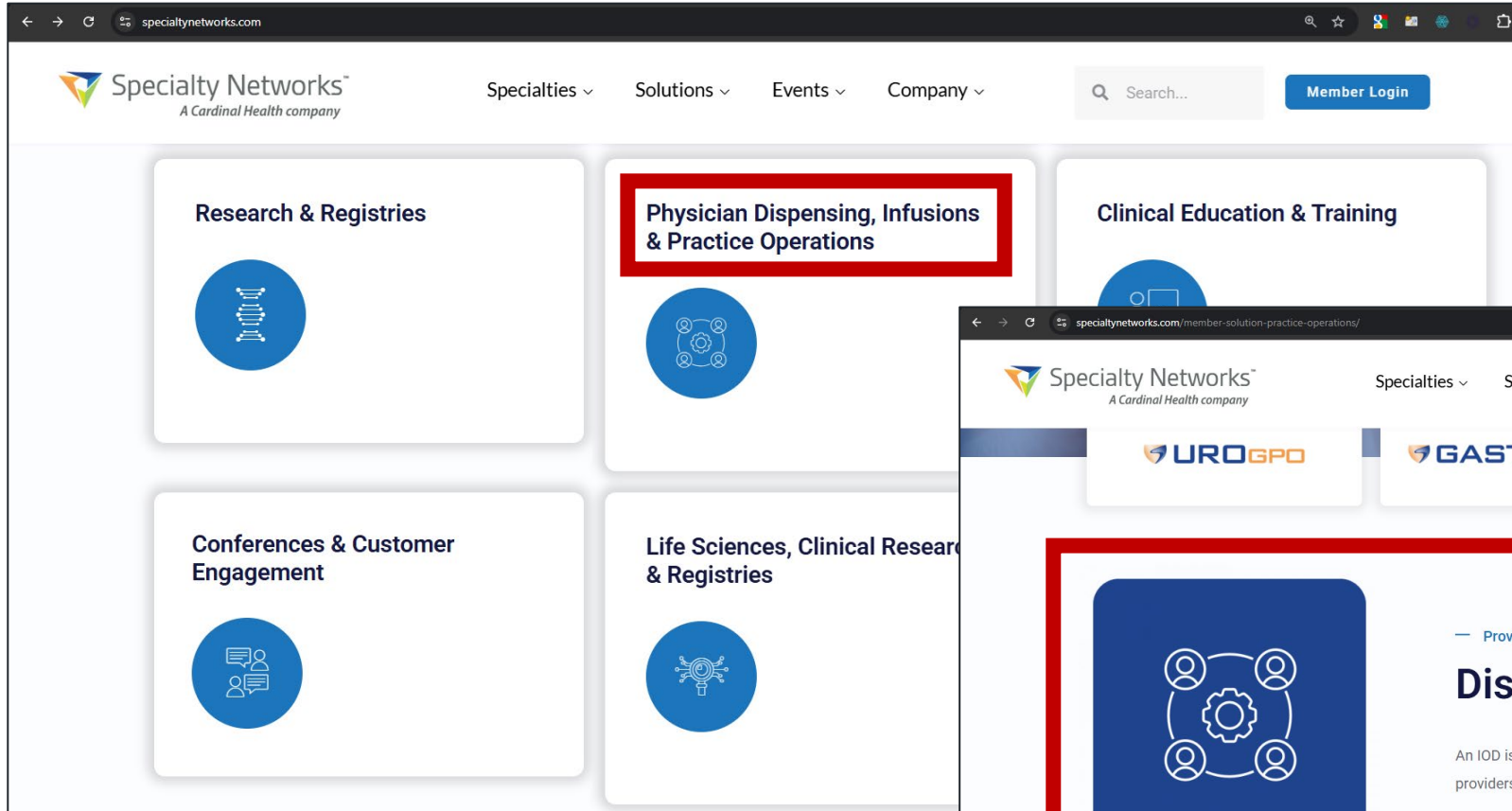
# Market Analysis: \$17 Billion in Doctor Deals Done by Drug Distributors



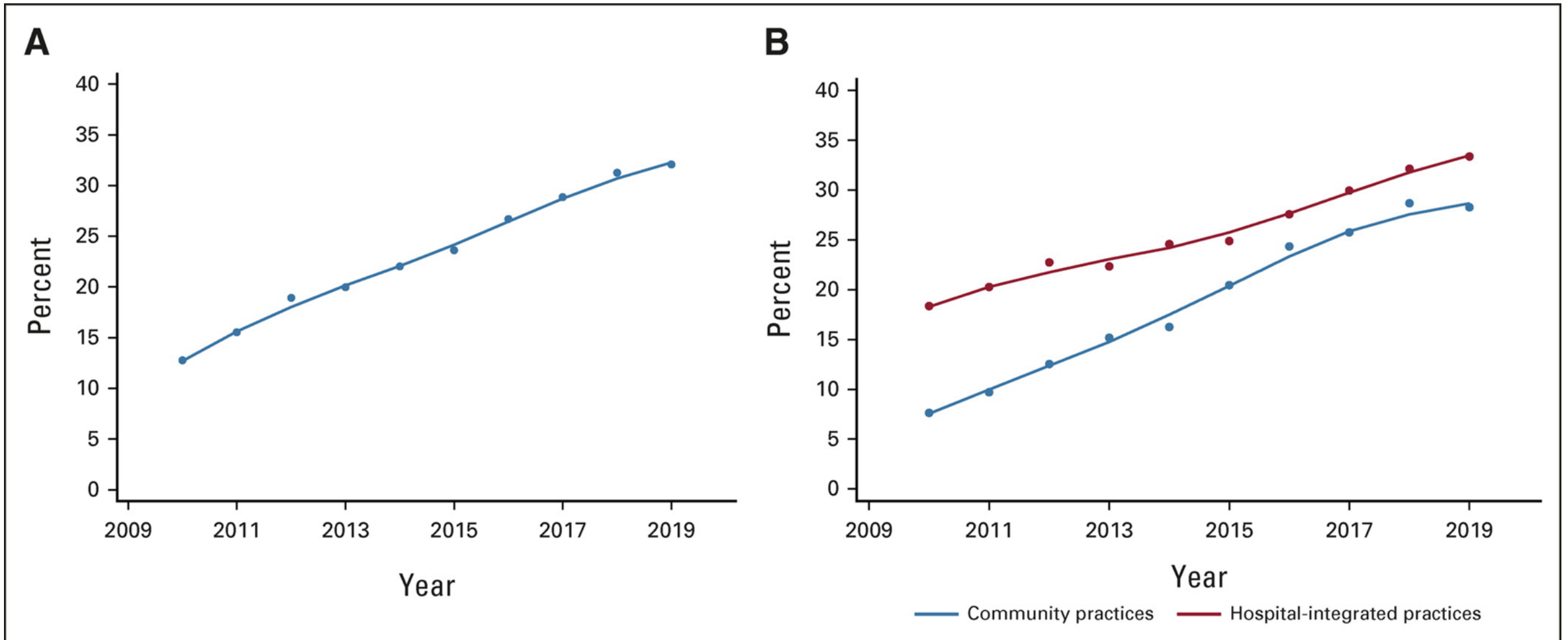
Coker



# Drugs Obviously Part of Cardinal's Acquisition Strategy



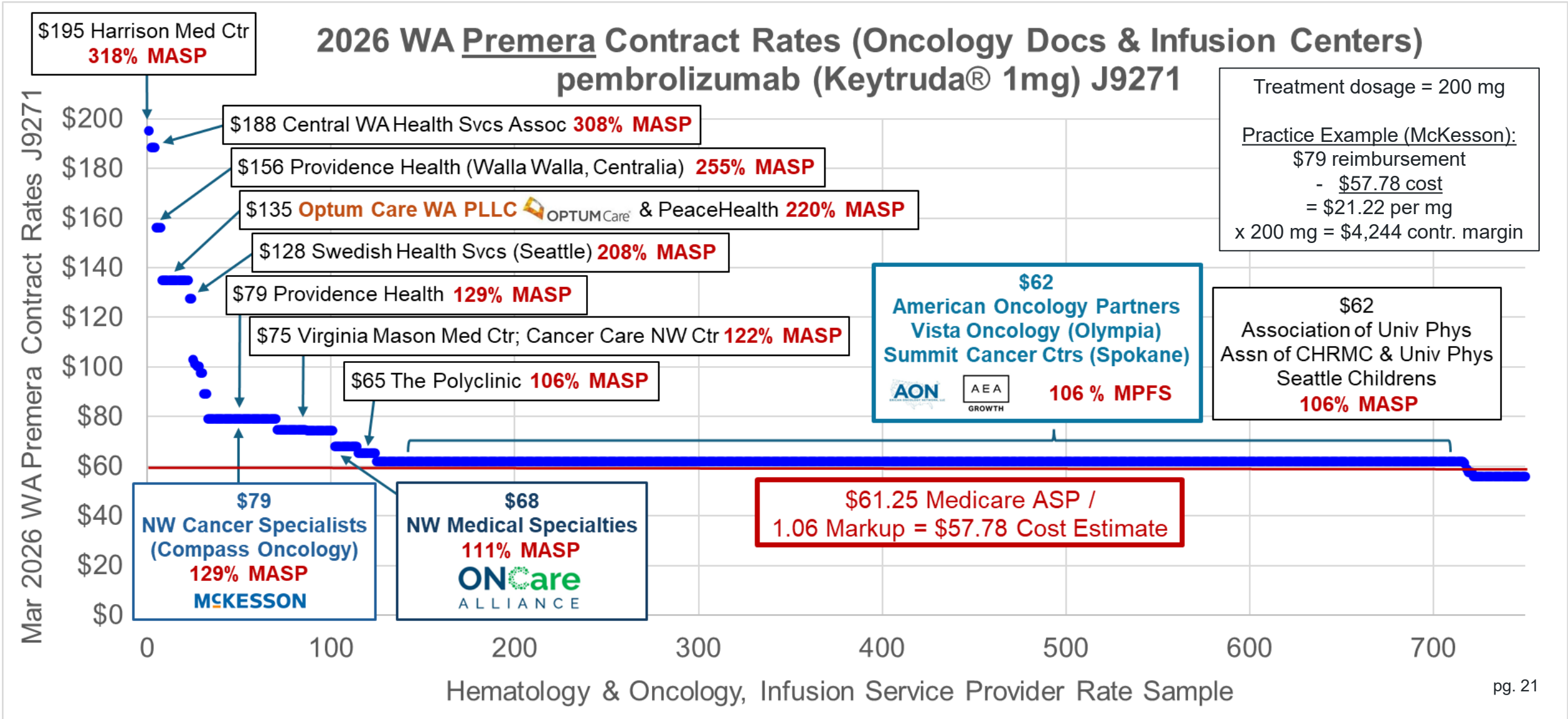
## % of Oncologists in Practice with Drug Dispensing



*Trends in Medically Integrated Dispensing Among Oncology Practices. Genevieve P. Kanter et al. JCO Oncology Practice 2022 18:10, e1672-e1682*

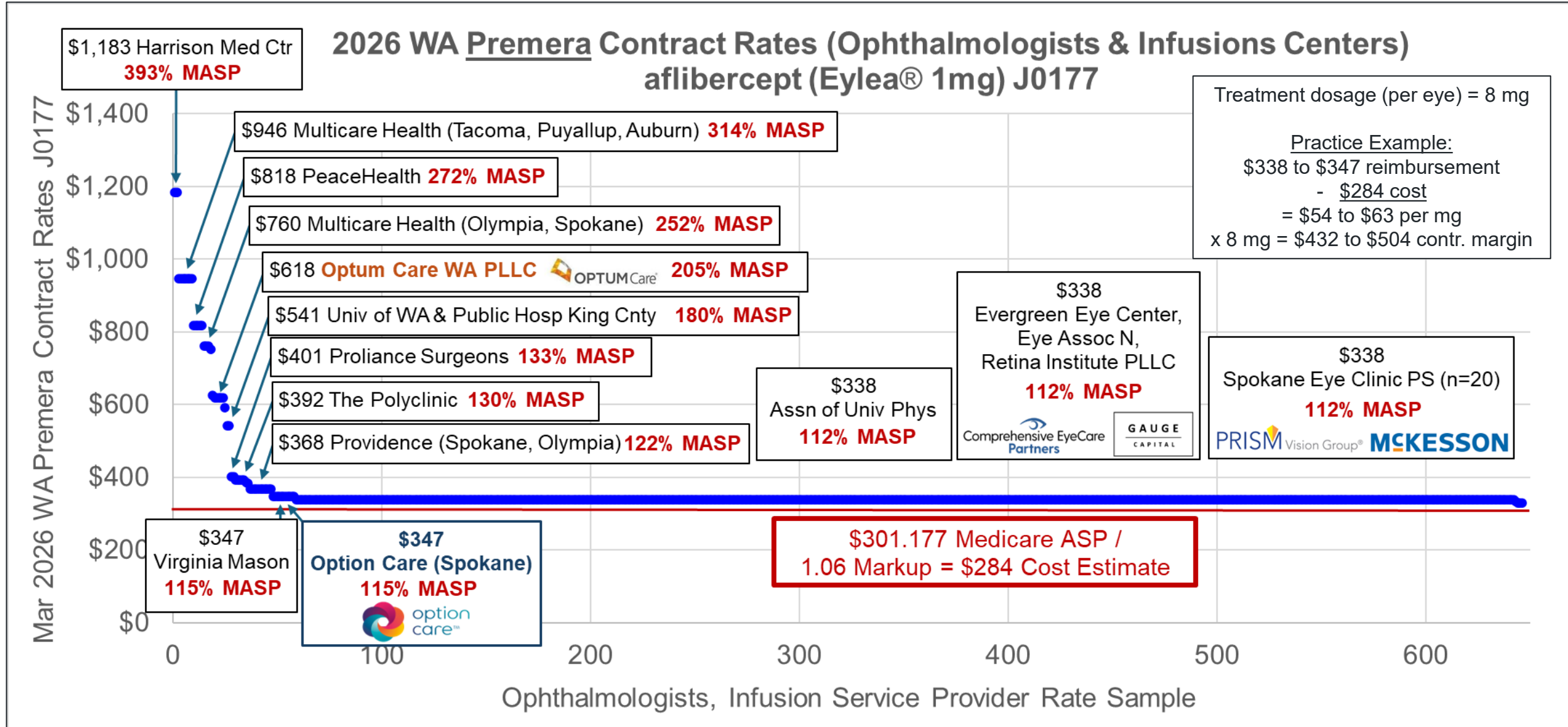
# WA Oncology Example: In-Office Drug Infusion

- Keytruda is the #1 top selling drug globally during 2024 and 2025



# WA Ophthalmology Example: In-Office Drug Injection

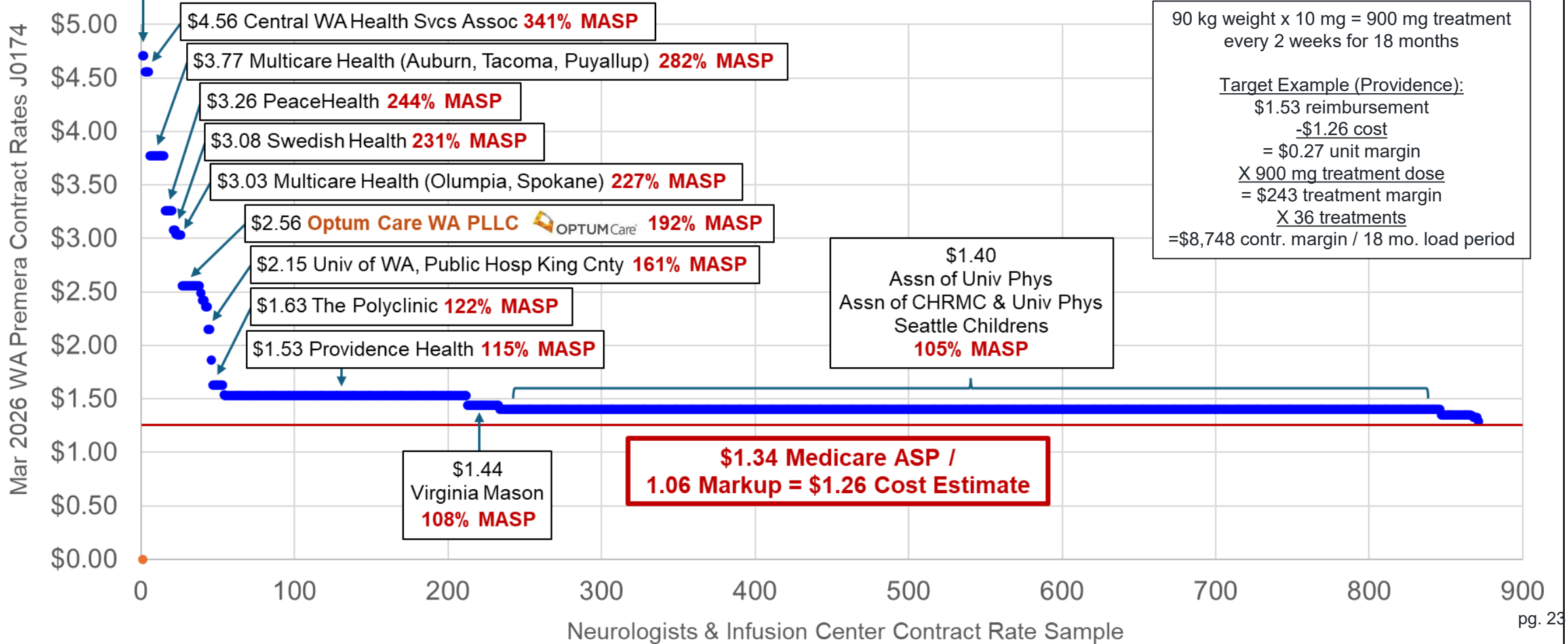
- Eylea is the #1 top selling drug administered in ophthalmologists' offices



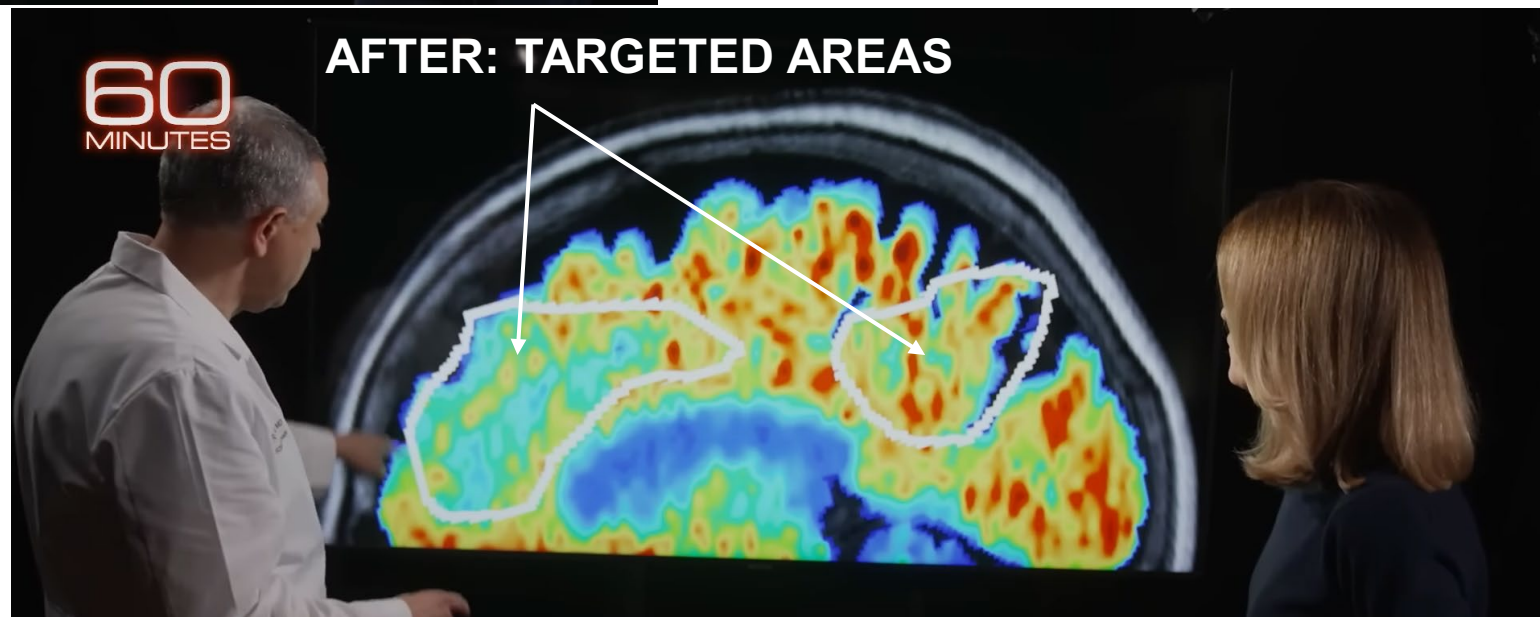
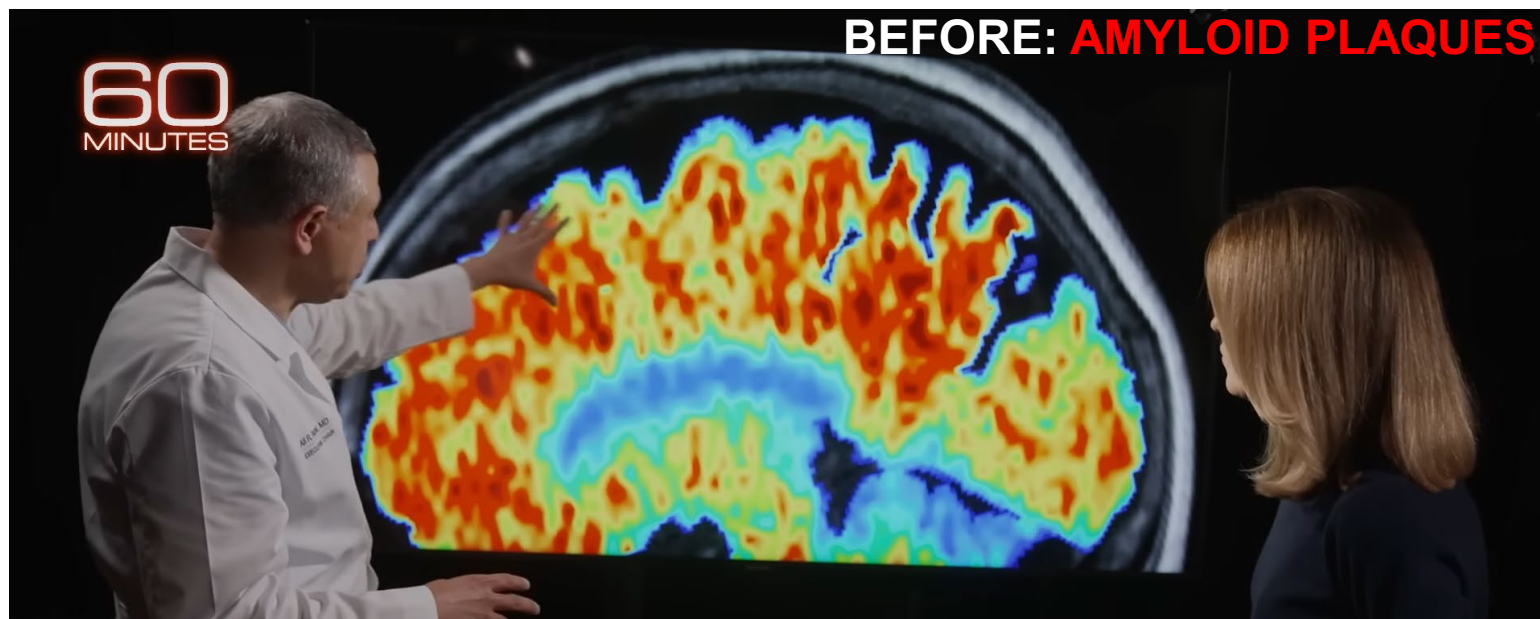
# WA BCBS Neurology Example: In-Office Drug Infusion

- Leqembi is a new Alzheimer's Disease drug administered in neurologists' offices

**Mar 2026 WA Premera Contract Rates (Neurologists & Infusion Centers)  
Icanemab (Leqembi® 1mg) J0174**



## Antibody Infusion Therapy + MRI-Guided Low Frequency Ultrasound



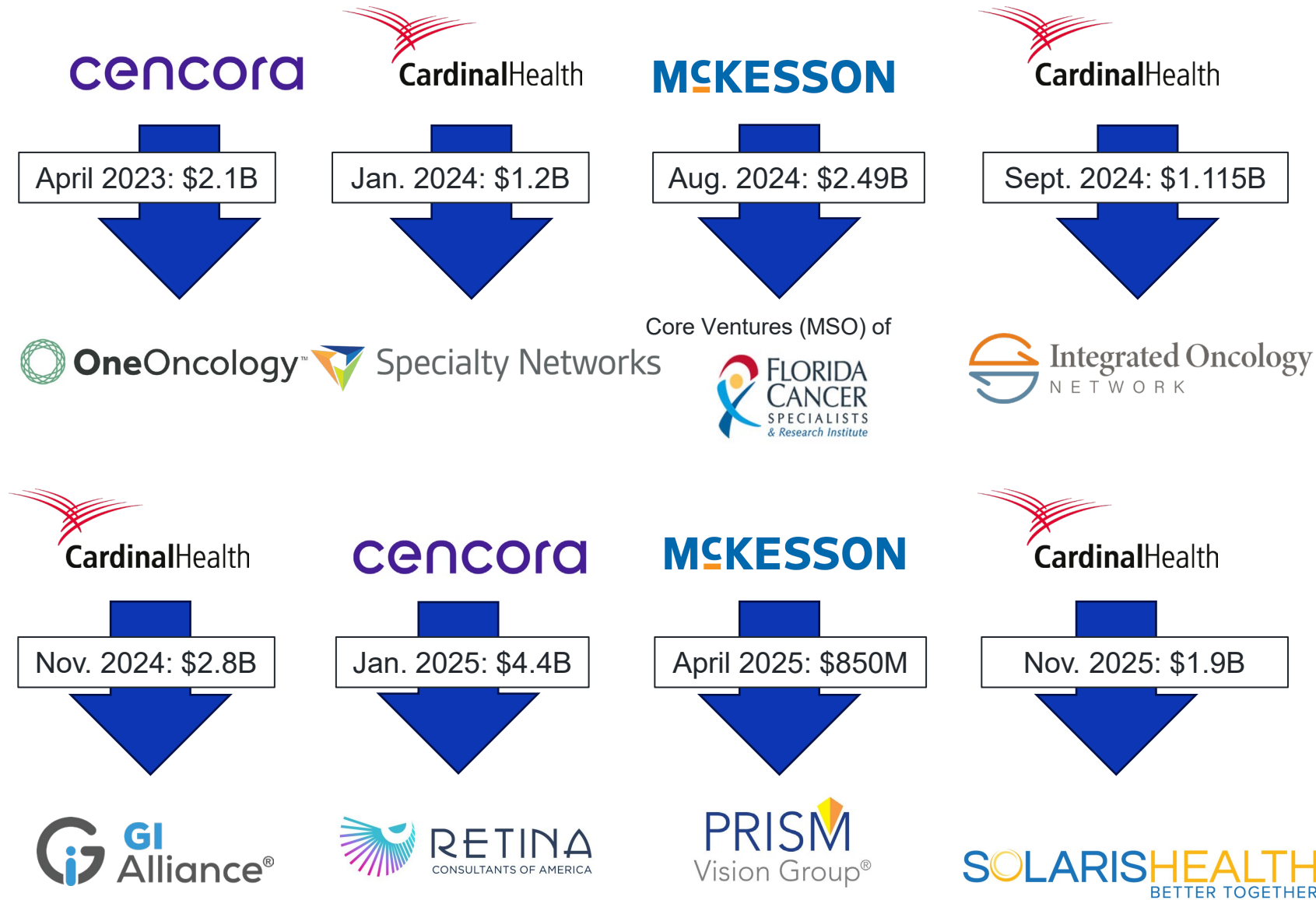
Source:


<https://www.youtube.com/watch?v=7BGtVJ3IBdE>

# Market Analysis: \$17 Billion in Doctor Deals Done by Drug Distributors



*Coker*



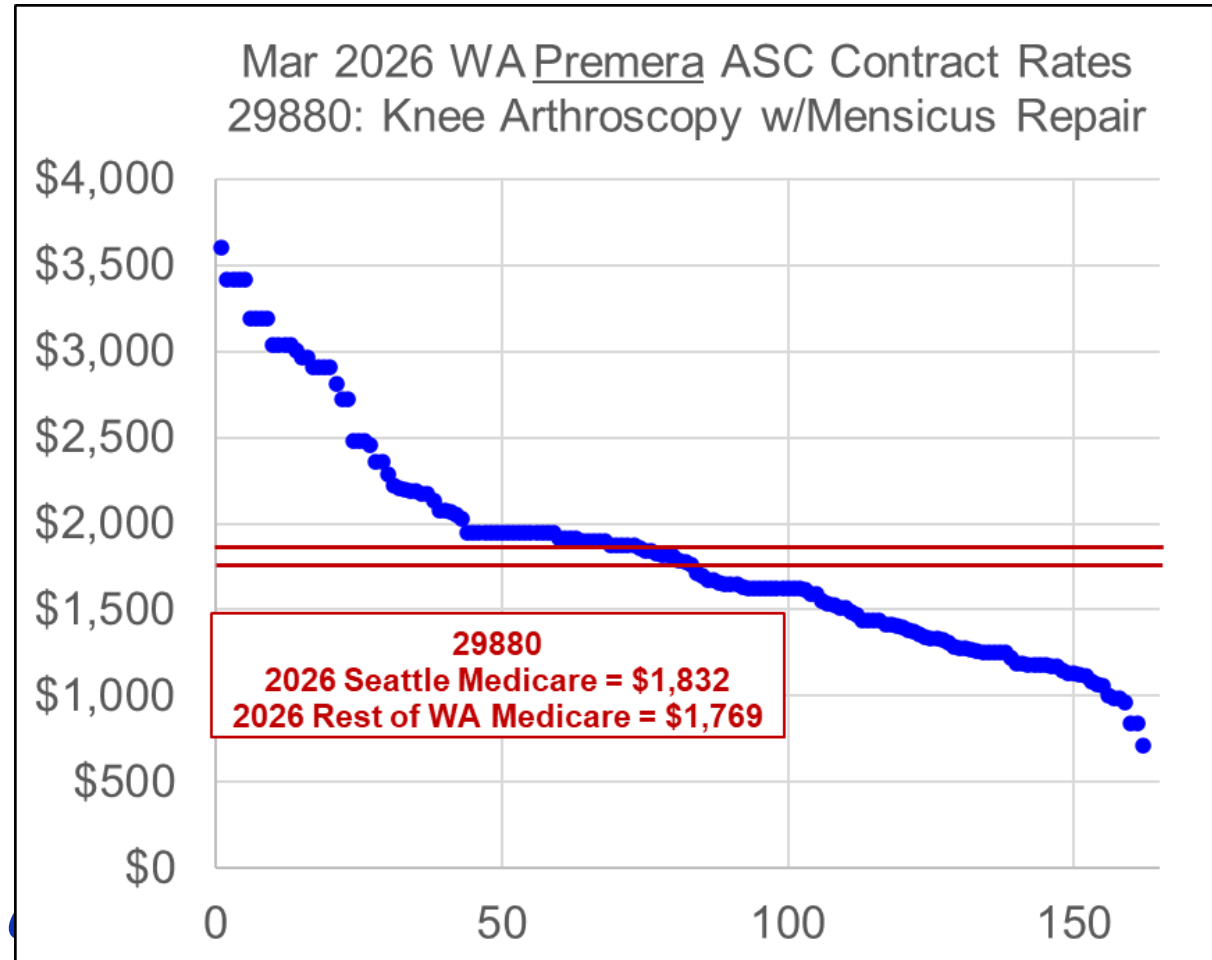


# Washington Commercial Reimbursement: Surgery Centers

*Coker*

## Ambulatory Surgery & Endoscopy Center Rates (Facility)

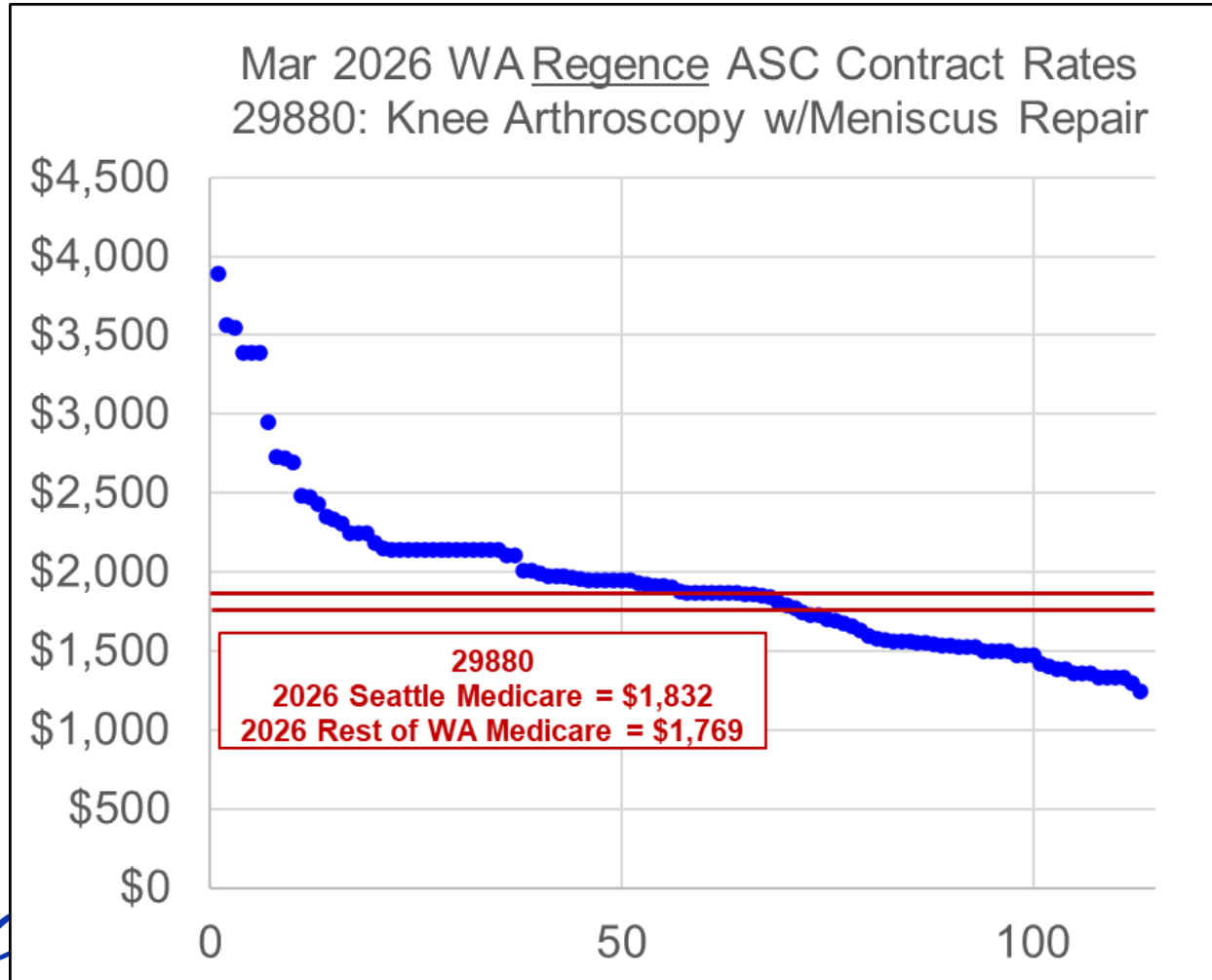
- 2026 Premera WA reimbursement for orthopaedic knee arthroscopy (29880) varies widely among ASCs. The 2026 Washington Medicare ASC reimbursement rate is about \$1,800.



% Mdcr	Rate	ASC Name (City) (TIN)
196%	\$3,598	First Hill Surgery Center LLC (Seattle) (47-2066485)
193%	\$3,418	MYASC LLC (Yakima) (99-0765004)
193%	\$3,418	Neospine Puyallup Spine Center LLC (Puyallup) (20-3395071)
193%	\$3,418	Puyallup Ambulatory Surgery Center LLC (Puyallup) (93-1376698)
193%	\$3,418	Vp Surgery Center of Auburn LLC (Auburn) (37-1668651)
180%	\$3,190	Kadlec Regional Medical Center (Richland) (91-0655392)
180%	\$3,190	Redmond Ambulatory Surgery Center LLC (Redmond) (81-3558711)
180%	\$3,190	Tri-City Regional Surgery Center (Richland) (91-1728399)
172%	\$3,038	Columbia Surgery Center LLC (Spokane) (88-1259570)
166%	\$3,038	PAC Med Clinics (Seattle) (56-2290878)
172%	\$3,038	Providence Health and Services Washington (Spokane Valley) (88-1232814)
172%	\$3,038	Providence Health and Services Washington (Spokane Valley) (91-1491167)
170%	\$3,003	Multicare Health System (Spokane) (91-1352172)
167%	\$2,961	The Vancouver Clinic Inc PS (Vancouver) (91-0851599)
164%	\$2,906	Virginia Mason Medical Center (Bellevue) (91-0565539)
164%	\$2,906	Virginia Mason Medical Center (Federal Way) (91-0565539)
164%	\$2,906	Virginia Mason Medical Center (Issaquah) (91-0565539)
164%	\$2,906	Virginia Mason Medical Center (Lynnwood) (91-0565539)
159%	\$2,813	Washington Orthopedic Center (Centralia) (91-0905625)
154%	\$2,722	Central Washington Health Services Association (Moses Lake) (91-0171250)
154%	\$2,722	Central Washington Health Services Association (Omak) (91-0171250)
140%	\$2,480	Optum Care Washington PLLC (Arlington) (91-0214500)
140%	\$2,480	Optum Care Washington PLLC (Edmonds) (91-0214500)
140%	\$2,480	Optum Care Washington PLLC (Everett) (91-0214500)
139%	\$2,455	Olympia Orthopaedic Associates PLLC (Olympia) (91-1674528)
133%	\$2,362	Sound Pain Alliance PLLC (Bellingham) (82-3663428)
133%	\$2,362	Sound Pain Alliance PLLC (Tukwila) (82-3663428)
129%	\$2,289	Spokane Urology PS (Spokane) (91-1043589)
126%	\$2,221	Pacific Northwest Urology Specialists PLLC (Bellingham) (47-3036836)
125%	\$2,204	Privia Medical Group Washington PLLC (Walla Walla) (91-0862542)
124%	\$2,194	Peacehealth (Bellingham) (91-0565889)
119%	\$2,186	The Polyclinic (Seattle) (91-0369070)

## Ambulatory Surgery & Endoscopy Center Rates (Facility)

- 2026 Regence WA reimbursement for orthopaedic knee arthroscopy (29880) varies widely among ASCs. The 2026 Washington Medicare ASC reimbursement rate is about \$1,800.

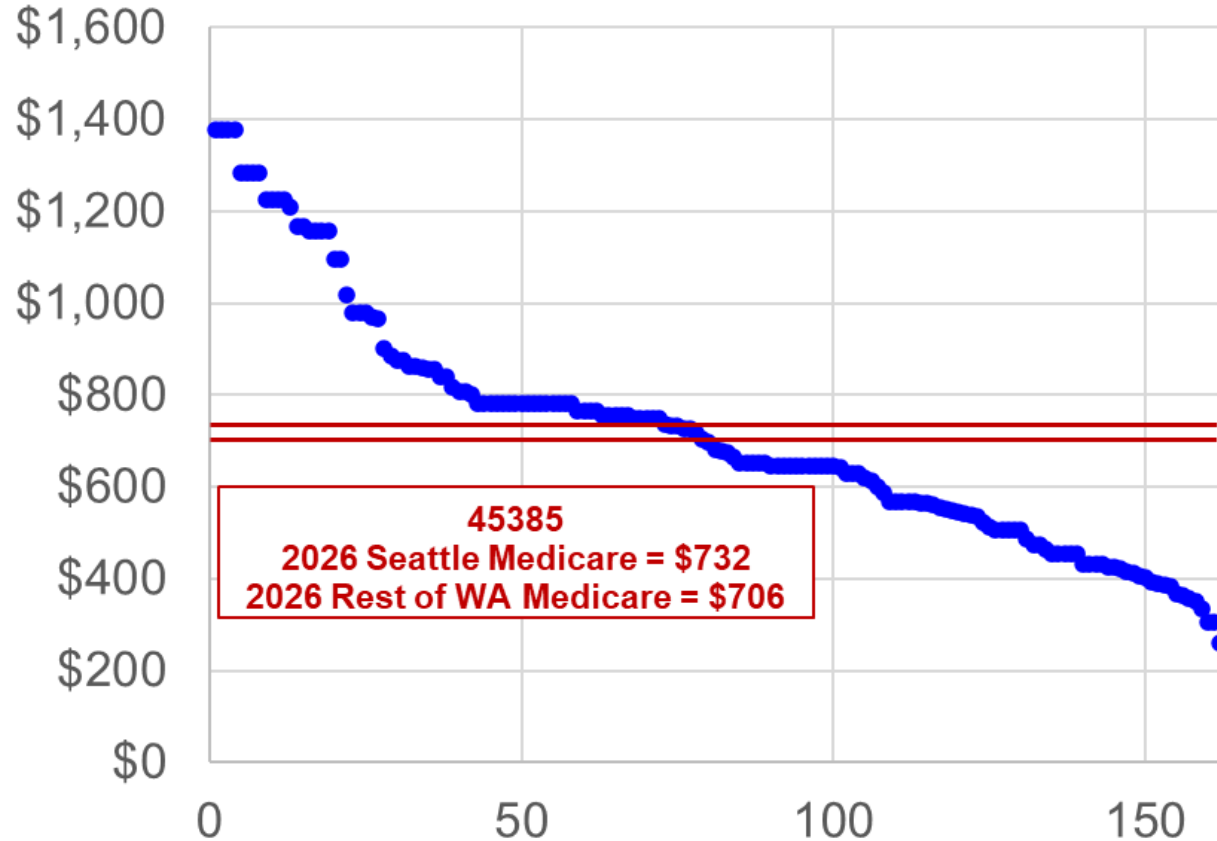


% Mdcr	Rate	ASC Name (City) (TIN)
220%	\$3,891	Peacehealth ASC Bellingham (Bellingham) (92-3072163)
195%	\$3,566	Pacmed Clinics (Seattle) (56-2290878)
201%	\$3,548	Redmond Ambulatory Surgery Center LLC (Redmond) (81-3558711)
185%	\$3,390	Virginia Mason Medical Center (Bellevue) (91-0565539)
192%	\$3,390	Virginia Mason Medical Center (Issaquah) (91-0565539)
192%	\$3,390	Virginia Mason Medical Center (Lynnwood) (91-0565539)
167%	\$2,954	Peacehealth Medical Group (Bellingham) (91-0565889)
155%	\$2,734	Vp Surgery Center of Auburn LLC (Auburn) (37-1668651)
154%	\$2,723	Olympia Orthopaedic Associates PLLC (Olympia) (91-1674528)
152%	\$2,696	Northwest Endoscopy Center LLC (Bellingham) (91-1919202)
141%	\$2,488	Whatcom ASC LLC (Bellingham) (99-4469411)
140%	\$2,476	Fourth Corner Neurosurgical Associates Inc PS (Bellingham)
133%	\$2,428	The Retina Surgery Center LLC (Bellevue) (85-3784941)
133%	\$2,348	Privia Medical Group Washington PLLC (Walla Walla) (91-0862542)
132%	\$2,331	Pacific Northwest Urology Specialists, PLLC (Bellingham)
126%	\$2,310	Seattle Hand Surgery Group (Seattle) (91-1652268)
127%	\$2,243	Puget Sound Gastroenterology PLLC (Edmonds) (91-1123468)
127%	\$2,243	Puget Sound Gastroenterology PLLC (Kirkland) (91-1123468)
122%	\$2,243	Puget Sound Gastroenterology PLLC (Seattle) (91-1123468)
124%	\$2,189	Gastroenterology Associates PLLC (Olympia) (91-2104493)
121%	\$2,149	Surgery Center of Silverdale (Silverdale) (20-2974934)
121%	\$2,145	Proliance Surgeons Inc PS (Burien) (91-1606533)
121%	\$2,145	Proliance Surgeons Inc PS (Edmonds) (91-1606533)
121%	\$2,145	Proliance Surgeons Inc PS (Everett) (91-1606533)
121%	\$2,145	Proliance Surgeons Inc PS (Issaquah) (91-1606533)
121%	\$2,145	Proliance Surgeons Inc PS (Kirkland) (91-1606533)
121%	\$2,145	Proliance Surgeons Inc PS (Lakewood) (91-1606533)
121%	\$2,145	Proliance Surgeons Inc PS (Mount Vernon) (91-1606533)
121%	\$2,145	Proliance Surgeons Inc PS (Mountlake Terrace) (91-1606533)
121%	\$2,145	Proliance Surgeons Inc PS (Puyallup) (91-1606533)
121%	\$2,145	Proliance Surgeons Inc PS (Renton) (91-1606533)
117%	\$2,145	Proliance Surgeons Inc PS (Seattle) (91-1606533)
121%	\$2,145	Proliance Surgery Center At Valley LLC (Renton) (84-2108616)
115%	\$2,108	Eastside Endoscopy Center (Bellevue) (91-1665997)
119%	\$2,108	Eastside Endoscopy Center (Issaquah) (91-1665997)
110%	\$2,013	Overlake Ambulatory Surgery Center (Bellevue) (91-1925618)
110%	\$2,013	Howard S Barnebey (Bellevue) (91-1357221)
113%	\$1,995	Ear Nose and Throat Associates Southwest Inc PS (Olympia)
111%	\$1,972	Evergreen Eye Center, PLLC (Federal Way) (91-1628032)
108%	\$1,972	Evergreen Eye Center, PLLC (Seattle) (91-1628032)

## Ambulatory Surgery & Endoscopy Center Rates (Facility)

- 2026 Premera WA reimbursement for colonoscopy w/lesion removal (45385) varies widely among ASCs. The 2026 Washington Medicare ASC reimbursement rate was about \$700.

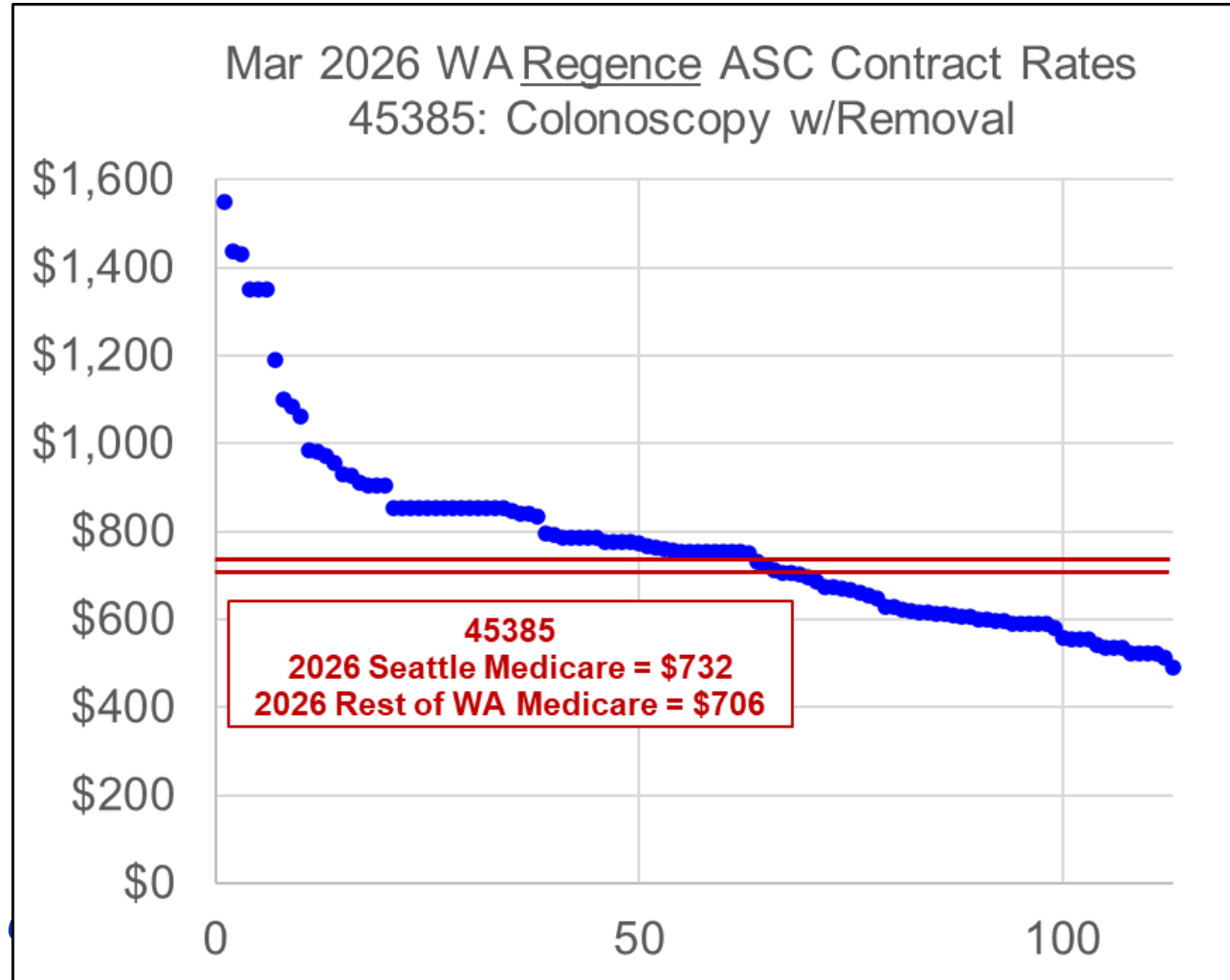
Mar 2026 WA Premera ASC Contract Rates  
45385: Colonoscopy w/Removal



% Mdcr	Rate	ASC Name (City) (TIN)
195%	\$1,377	MYASC LLC (Yakima) (99-0765004)
195%	\$1,377	Neospine Puyallup Spine Center LLC (Puyallup) (20-3395071)
195%	\$1,377	Puyallup Ambulatory Surgery Center LLC (Puyallup) (93-1376698)
195%	\$1,377	VP Surgery Center of Auburn LLC (Auburn) (37-1668651)
182%	\$1,285	Kadlec Regional Medical Center (Richland) (91-0655392)
182%	\$1,285	Redmond Ambulatory Surgery Center LLC (Redmond) (81-3558711)
182%	\$1,285	Tri-City Regional Surgery Center (Richland) (91-1728399)
173%	\$1,224	Columbia Surgery Center LLC (Spokane) (88-1259570)
167%	\$1,224	Pac Med Clinics (Seattle) (56-2290878)
173%	\$1,224	Providence Health and Services Washington (Spokane Valley) (88-1232814)
173%	\$1,224	Providence Health and Services Washington (Spokane Valley) (91-1491167)
171%	\$1,210	Multicare Health System (Spokane) (91-1352172)
165%	\$1,168	The Vancouver Clinic Inc PS (Vancouver) (91-0851599)
158%	\$1,158	Virginia Mason Medical Center (Bellevue) (91-0565539)
164%	\$1,158	Virginia Mason Medical Center (Federal Way) (91-0565539)
164%	\$1,158	Virginia Mason Medical Center (Issaquah) (91-0565539)
164%	\$1,158	Virginia Mason Medical Center (Lynnwood) (91-0565539)
155%	\$1,097	Central Washington Health Services Association (Moses Lake) (91-0171250)
155%	\$1,097	Central Washington Health Services Association (Omak) (91-0171250)
144%	\$1,019	Washington Orthopedic Center (Centralia) (91-0905625)
138%	\$978	Optum Care Washington PLLC (Arlington) (91-0214500)
138%	\$978	Optum Care Washington PLLC (Edmonds) (91-0214500)
138%	\$978	Optum Care Washington PLLC (Everett) (91-0214500)
137%	\$969	Olympia Orthopaedic Associates PLLC (Olympia) (91-1674528)
132%	\$967	First Hill Surgery Center LLC (Seattle) (47-2066485)
128%	\$903	Spokane Urology PS (Spokane) (91-1043589)
125%	\$885	Pacific Northwest Urology Specialists PLLC (Bellingham) (47-3036836)
124%	\$876	Public Hospital District 1 Skagit County (Arlington)
124%	\$874	Peacehealth (Bellingham) (91-0565889)
118%	\$863	The Polyclinic (Seattle) (91-0369070)
121%	\$858	Sound Surgeons PLLC (Everett) (46-1190829)
121%	\$856	Sound Pain Alliance PLLC (Bellingham) (82-3663428)
121%	\$856	Sound Pain Alliance PLLC (Tukwila) (82-3663428)
115%	\$841	Seattle Hand Surgery Group PC (Seattle) (91-1652268)
119%	\$840	Privia Medical Group Washington PLLC (Walla Walla)
116%	\$818	Western Washington Medical Group (Everett) (91-1602128)
114%	\$809	Western Washington Medical Group (Everett) (91-1602128)
114%	\$807	Fourth Corner Neurosurgical Assoc (Bellingham) (91-1416044)
109%	\$801	Retina Surgery Center LLC (Bellevue) (85-3784941)
111%	\$781	Proliance Surgeons Inc PS (Burien) (91-1606533)

## Ambulatory Surgery & Endoscopy Center Rates (Facility)

- 2026 Regence WA reimbursement for colonoscopy w/lesion removal (45385) varies widely among ASCs. The 2026 Washington Medicare ASC reimbursement rate is about \$700.



% Mdcr	Rate	ASC Name (City) (TIN)
219%	\$1,550	Peacehealth ASC Bellingham (Bellingham) (92-3072163)
196%	\$1,437	Pacmed Clinics (Seattle) (56-2290878)
202%	\$1,430	Redmond Ambulatory Surgery Center LLC (Redmond) (81-3558711)
185%	\$1,351	Virginia Mason Medical Center (Bellevue) (91-0565539)
191%	\$1,351	Virginia Mason Medical Center (Issaquah) (91-0565539)
191%	\$1,351	Virginia Mason Medical Center (Lynnwood) (91-0565539)
169%	\$1,191	Peacehealth Medical Group (Bellingham) (91-0565889)
156%	\$1,102	VP Surgery Center of Auburn LLC (Auburn) (37-1668651)
154%	\$1,085	Olympia Orthopaedic Associates PLLC (Olympia) (91-1674528)
151%	\$1,064	Northwest Endoscopy Center LLC (Bellingham) (91-1919202)
140%	\$987	Fourth Corner Neurosurgical Associates Inc PS (Bellingham) (91-1416044)
139%	\$981	Whatcom ASC LLC (Bellingham) (99-4469411)
133%	\$972	Overlake Ambulatory Surgery Center (Bellevue) (91-1925618)
131%	\$958	The Retina Surgery Center LLC (Bellevue) (85-3784941)
132%	\$929	Pacific Northwest Urology Specialists, PLLC (Bellingham) (47-3036836)
131%	\$926	Privia Medical Group Washington PLLC (Walla Walla) (91-0862542)
125%	\$911	Seattle Hand Surgery Group (Seattle) (91-1652268)
128%	\$904	Puget Sound Gastroenterology PLLC (Edmonds) (91-1123468)
124%	\$904	Puget Sound Gastroenterology PLLC (Kirkland) (91-1123468)
124%	\$904	Puget Sound Gastroenterology PLLC (Seattle) (91-1123468)
121%	\$855	Proliance Surgeons Inc PS (Burien) (91-1606533)
121%	\$855	Proliance Surgeons Inc PS (Edmonds) (91-1606533)
121%	\$855	Proliance Surgeons Inc PS (Everett) (91-1606533)
121%	\$855	Proliance Surgeons Inc PS (Issaquah) (91-1606533)
117%	\$855	Proliance Surgeons Inc PS (Kirkland) (91-1606533)
121%	\$855	Proliance Surgeons Inc PS (Lakewood) (91-1606533)
121%	\$855	Proliance Surgeons Inc PS (Mount Vernon) (91-1606533)
121%	\$855	Proliance Surgeons Inc PS (Mountlake Terrace) (91-1606533)
121%	\$855	Proliance Surgeons Inc PS (Puyallup) (91-1606533)
121%	\$855	Proliance Surgeons Inc PS (Renton) (91-1606533)
117%	\$855	Proliance Surgeons Inc PS (Seattle) (91-1606533)
121%	\$855	Proliance Surgery Center At Valley LLC (Renton) (84-2108616)
120%	\$848	Surgery Center of Silverdale (Silverdale) (20-2974934)
115%	\$840	Eastside Endoscopy Center (Bellevue) (91-1665997)
119%	\$840	Eastside Endoscopy Center (Issaquah) (91-1665997)
118%	\$834	Gastroenterology Associates PLLC (Olympia) (91-2104493)
113%	\$795	Ear Nose and Throat Associates Southwest Inc PS (Olympia) (91-1829653)
109%	\$794	Howard S Barnebey (Bellevue) (91-1357221)
111%	\$787	Western Washington Endoscopy Centers LLC (Federal Way) (20-0289310)
111%	\$787	Western Washington Endoscopy Centers LLC (Gig Harbor) (20-0289310)
111%	\$787	Western Washington Endoscopy Centers LLC (Puyallup) (20-0289310)
111%	\$787	Western Washington Endoscopy Centers LLC (Tacoma) (20-0289310)

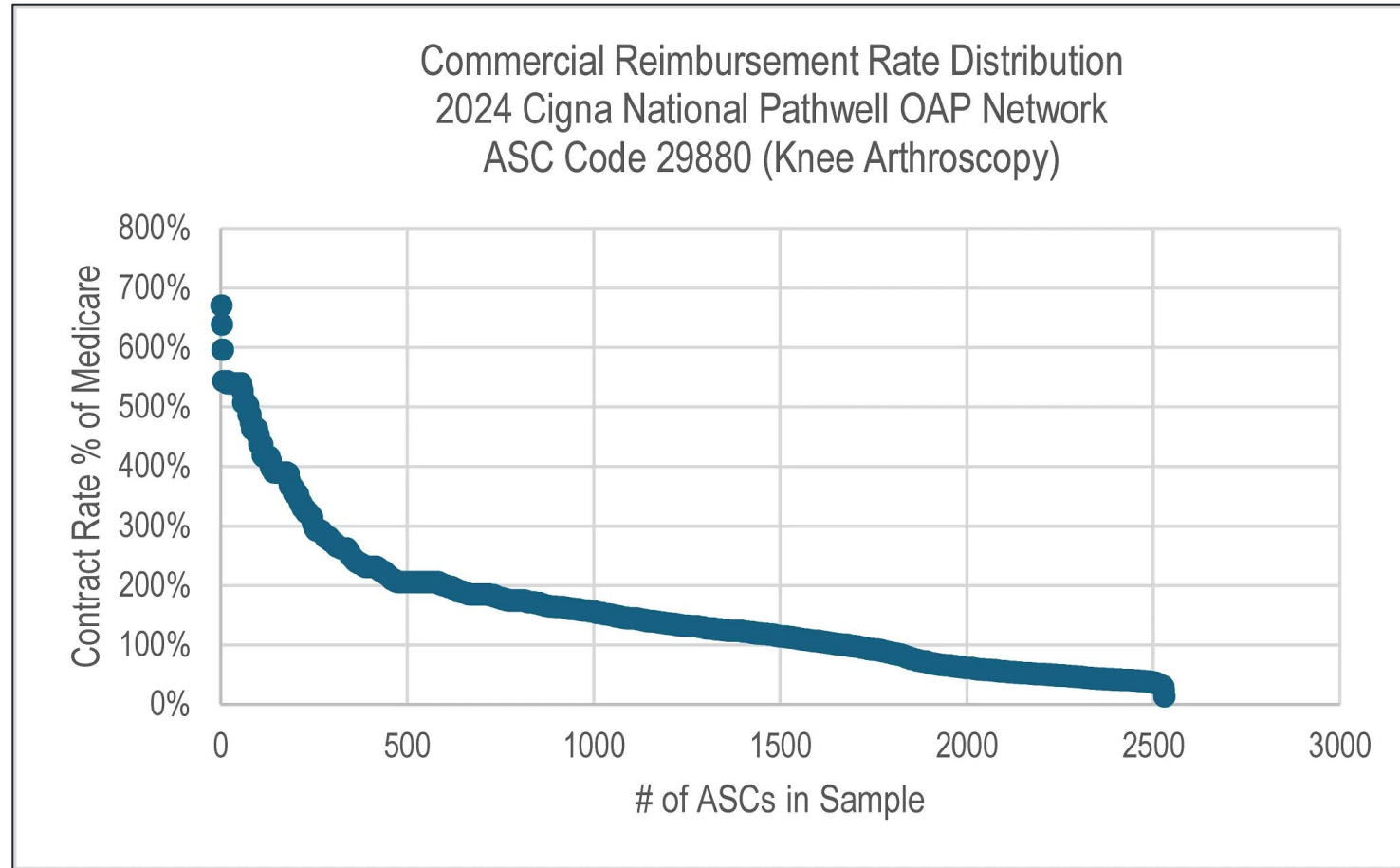
## Ambulatory Surgery & Endoscopy Center Rates (Facility)

- 2024 study of >2,500 ASCs in Cigna's national Pathwell OAP network found national chains dominate rates.



## Ambulatory Surgery & Endoscopy Center Rates (Facility)

- 2024 study of >2,500 ASCs in Cigna's national Pathwell OAP network found national chains dominate rates.

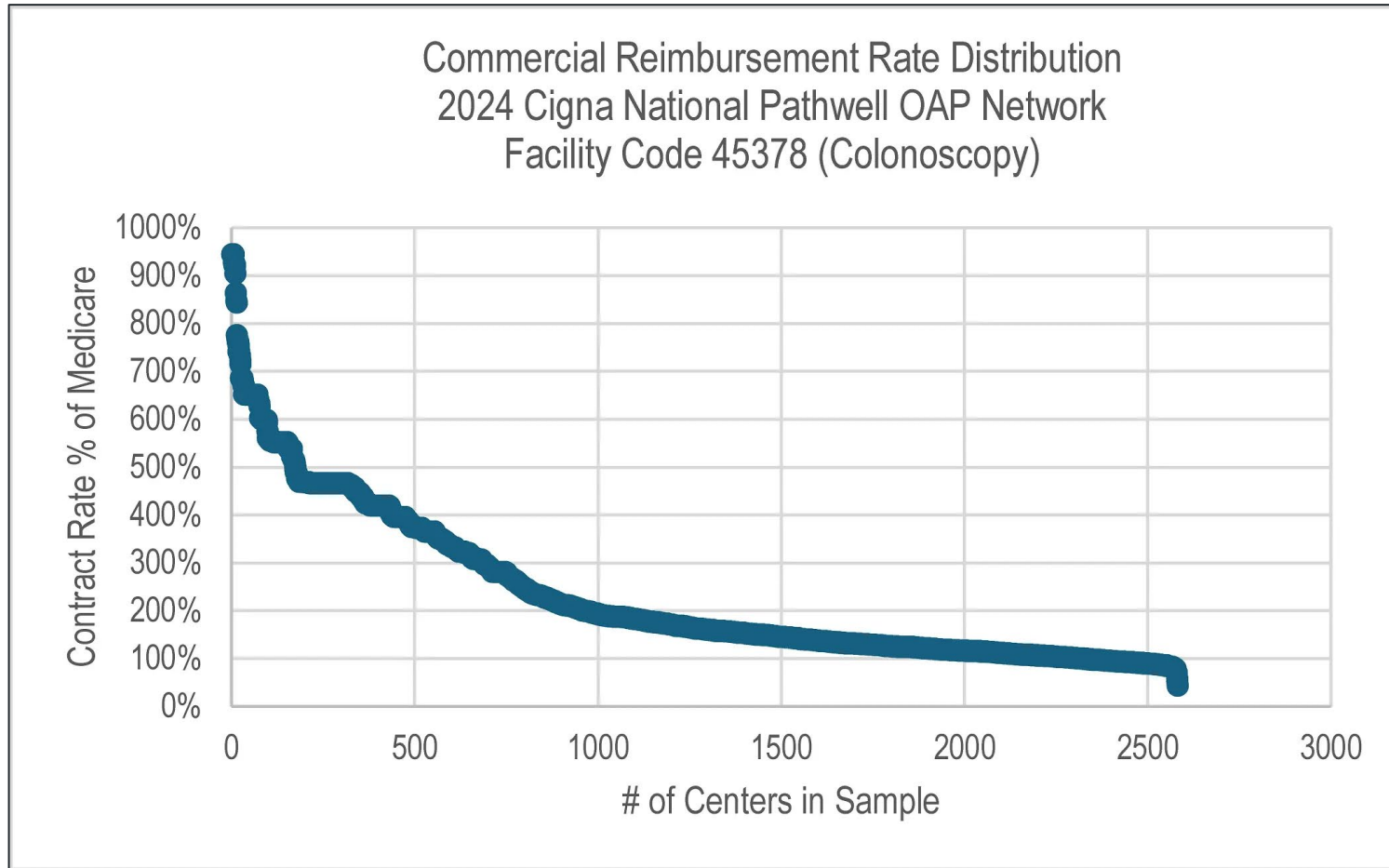


### 29880: Cigna Pathwell OAP 2024

Affiliate	Market	% Medicare	Centers
Baylor Scott & White	TX	124%	33
Hartford Health	CT	463%	5
HCA Healthcare	Tampa, FL	417%	16
	Miami, FL	507%	9
	Houston, TX	172%	13
	Austin, TX	543%	12
HCA MountainStar	UT	165%	11
Memorial Hermann	TX	263%	15
RWJBarnabas Health	NJ	232%	26
SCA	CT	463%	3
Sutter Health	CA	390%	35
Texas Health Resources/SCA	TX	540%	37
United Urology Group	MD	175%	20
USPI	AZ	206%	22
	Miami-Tampa, FL	185%	15
	Orlando-North, FL	206%	40
	KS	206%	1
	MD	185%	11
	MO	206%	11
	VA	185%	2


## Ambulatory Surgery & Endoscopy Center Rates (Facility)

- 2024 study of over 2,500 ASCs and endoscopy centers in Cigna's national Pathwell OAP network found national chains dominate rates.



## 45378: Cigna Pathwell OAP 2024

Affiliate	Market	% Medicare	Centers
Banner Health	AZ	188%	22
Baylor Scott & White	TX	282%	35
Hartford Health	CT	599%	5
HCA Healthcare	Miami, FL	351%	9
	Tampa, FL	324%	16
	Austin, TX	556%	12
	Houston, TX	308%	14
HCA Midwest Health	KS	539%	5
	MO	539%	4
HCA MountainStar	UT	321%	11
MedStar	DC	308%	1
	MD	308%	7
Memorial Hermann	TX	470%	15
RWJBarnabas Health	NJ	365%	27
SCA	CT	599%	3
Sutter Health	CA	552%	37
Texas Health Resources/SCA	TX	652%	37
United Digestive	GA	155%	16
University of California	CA	458%	8
USPI	AZ	467%	22
	Orlando-North, FL	467%	40
	Miami-Tampa, FL	420%	15
	KS	467%	1
	MD	420%	11
	MO	467%	11
VA	420%	2	

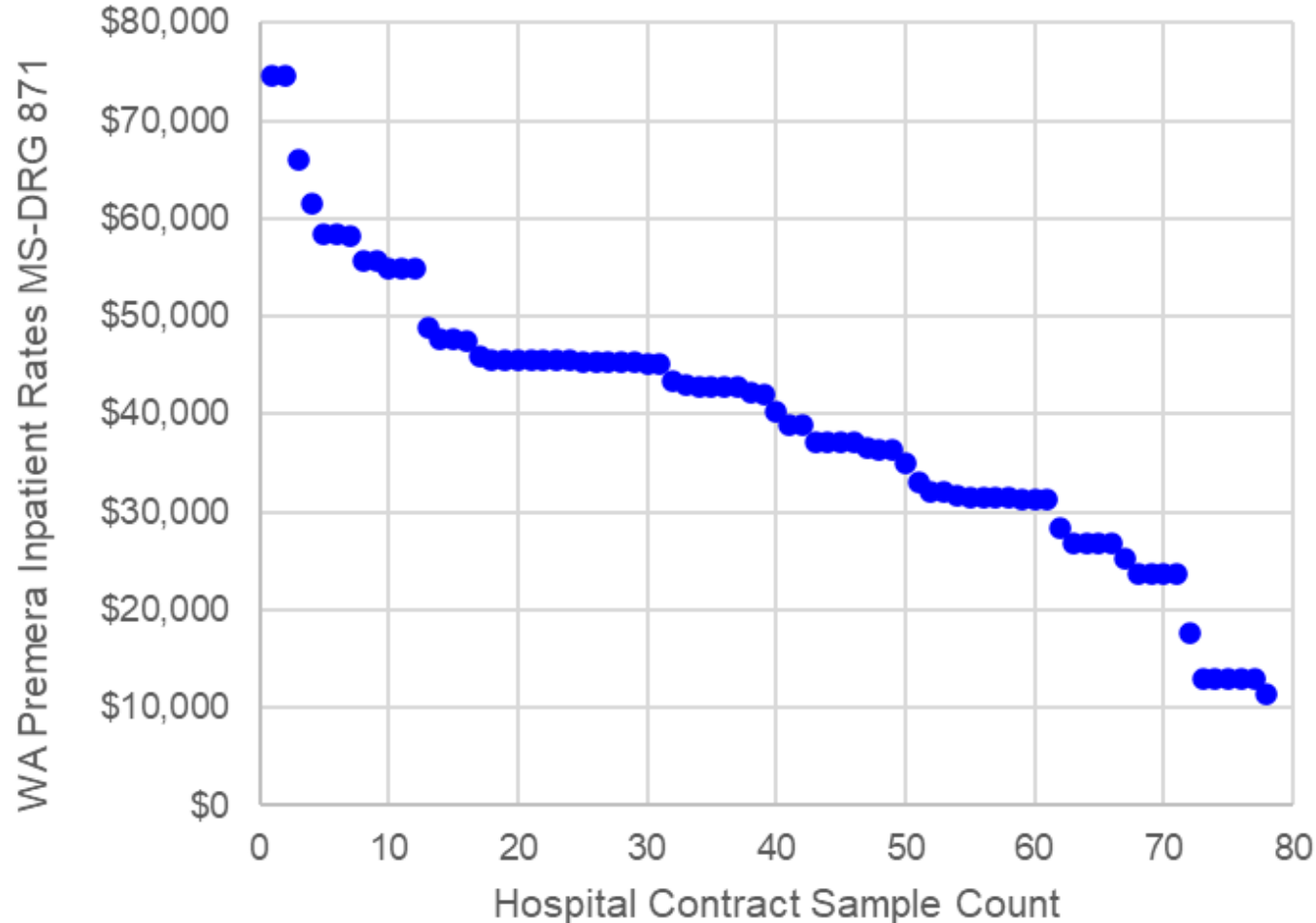


Washington Commercial  
Reimbursement:  
Inpatient Hospital

*Coker*

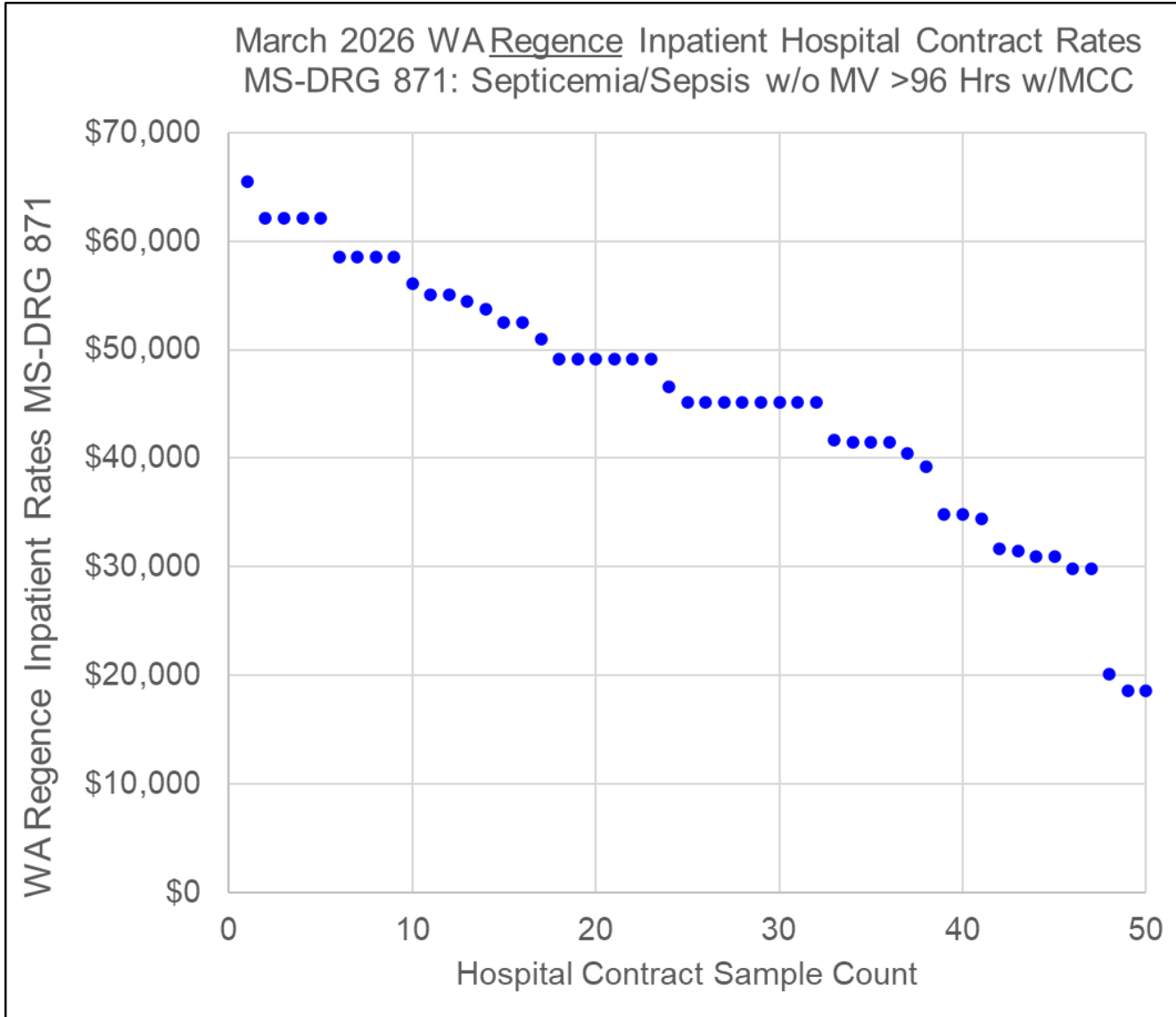
## Inpatient Hospital Reimbursement (Washington Premera)

March 2026 WA Premera Inpatient Hospital Contract Rates  
MS-DRG 871: Septicemia/Sepsis w/o MV >96 Hrs w/MCC



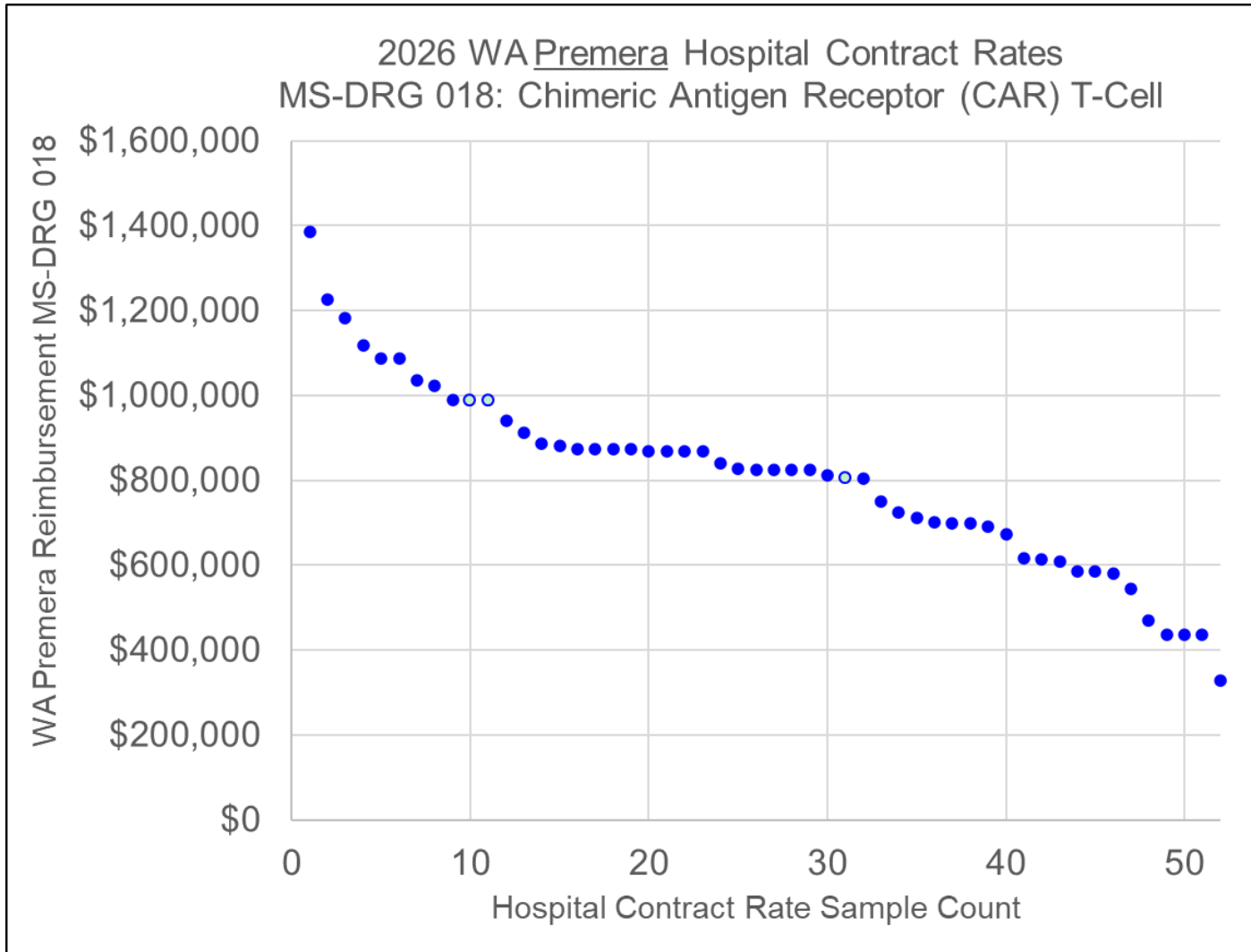
Name (City) (TIN)	Rate
Peacehealth (Bellingham) (91-0565889)	\$74,544
St John Medical Center (Longview) (91-0564987)	\$66,036
Harborview Medical Center (Seattle) (91-1631806)	\$61,483
Providence Hospital (Aberdeen) (91-0573108)	\$58,477
Providence Hospital (Centralia) (91-0573108)	\$58,477
Multicare Health System (Tacoma) (91-1352172)	\$58,178
Providence Health & Services Wa (Everett) (35-2346161)	\$55,741
Providence Health System In Washington (Olympia) (91-0567732)	\$54,997
Enumclaw Community Hospital (Enumclaw) (91-0715805)	\$48,926
Swedish Edmonds (Edmonds) (27-2305304)	\$47,715
Harrison Medical Center (Silverdale) (91-0565546)	\$47,425
Virginia Mason Medical Center (Seattle) (91-0565539)	\$45,892
Multicare Health System (Auburn) (91-1352172)	\$45,533
Multicare Health System (Covington) (91-1352172)	\$45,533
Multicare Health System (Puyallup) (91-1352172)	\$45,533
Multicare Health System (Tacoma) (91-1352172)	\$45,533
Franciscan Health System (Gig Harbor) (38-3769889)	\$45,264
Saint Clare Hospital (Lakewood) (91-1487485)	\$45,264
St Francis Hospital (Federal Way) (91-1267921)	\$45,264
St Joseph Medical Center (Tacoma) (91-0564491)	\$45,264
Peacehealth Southwest Medical Center (Vancouver) (91-6068143)	\$45,160
Providence Health & Services Wa (Spokane) (36-4640211)	\$43,346
Yakima Valley Memorial Hospital Association (Yakima) (91-0567263)	\$43,041
Public Hospital District 1 Skagit County (Arlington) (56-2392010)	\$42,876
Public Hospital District 1 Skagit County (Camano Island) (56-2392010)	\$42,876
Public Hospital District 1 Skagit County (Darrington) (56-2392010)	\$42,876
Public Hospital District 1 Skagit County (Mount Vernon) (56-2392010)	\$42,876
Multicare Health System (Spokane) (91-1352172)	\$42,242
University of Washington (Seattle) (91-6001537)	\$41,974
Swedish Health Services (Issaquah) (91-0433740)	\$40,350
Providence Health & Services Washington (Walla Walla) (30-0502262)	\$38,990
Providence Health & Services Washington (Spokane) (35-2345508)	\$37,134
Overlake Hospital Medical Center (Bellevue) (91-0652651)	\$37,068
Multicare Health System (Spokane Valley) (91-1352172)	\$36,556
Multicare Health System (Elma) (91-1352172)	\$36,344
Multicare Health System (Olympia) (91-1352172)	\$36,344
Public Hospital District 1 of King County (Renton) (91-6000986)	\$35,002

# Inpatient Hospital Reimbursement (Washington Regence)



Rate	Name (City) (TIN)
\$65,513	Providence Centralia Hospital (Centralia) (91-0573108)
\$62,101	Swedish Health Services (Seattle) (91-0373400)
\$62,101	Swedish Health Services (Seattle) (91-0433740)
\$58,524	Providence St Peter Hospital (Lacey) (91-0567732)
\$58,524	Providence St Peter Hospital (Olympia) (91-0567732)
\$56,038	Harborview Medical Center (Seattle) (91-1631806)
\$55,049	Providence Health & Services Wa (Walla Walla) (30-0502262)
\$54,448	St Anthony Hosp Psych Prof Srv (Gig Harbor) (38-3769889)
\$53,738	Multicare Health System (Tacoma) (91-1352172)
\$52,537	Providence Regional Medical Center Everett (Everett) (35-2346161)
\$51,010	Harrison Medical Center (Silverdale) (91-0565546)
\$49,107	Highline Medical Center (Burien) (91-0712166)
\$49,107	St Clare Hospital (Lakewood) (91-1487485)
\$49,107	St Elizabeth Hospital (Enumclaw) (91-0715805)
\$49,107	St Francis Community Hospital (Federal Way) (91-1267921)
\$49,107	St Joseph Medical Center (Tacoma) (91-0564491)
\$46,546	Virginia Mason Medical Center (Seattle) (91-0565539)
\$45,168	Multicare Health System (Auburn) (91-1352172)
\$45,168	Multicare Health System (Covington) (91-1352172)
\$45,168	Multicare Health System (Puyallup) (91-1352172)
\$45,168	Multicare Health System (Tacoma) (91-1352172)
\$41,697	University Of Washington Med (Seattle) (91-6001537)
\$41,428	Overlake Medical Center & Clinics (Bellevue) (91-0652651)
\$40,457	Swedish Health Services (Issaquah) (91-0433740)
\$39,196	Multicare Health System (Olympia) (91-1352172)
\$34,841	King County Public Hospital District 2 (Kirkland) (91-0844563)
\$34,366	Public Hospital District 1 of Snohomish County (Monroe) (91-6018764)
\$31,615	Yakima Valley Memorial Hospital Association (Yakima) (91-0567263)
\$31,410	Public Hospital District No 1 Skagit County (Arlington) (56-2392010)
\$30,956	Public Hospital District No 1 Skagit County (Mount Vernon) (56-2392010)
\$29,864	Swedish Edmonds (Edmonds) (27-2305304)
\$20,072	Grays Harbor Community Hosp (Aberdeen) (91-0568304)
\$18,564	Public Hosp Dist No 4 King County WA (Snoqualmie) (91-0908129)

# Inpatient Hospital Reimbursement (Washington Premera)



Per disclaimer at beginning, most hospitals do not offer CAR T-cell therapy, but still have contract rates.

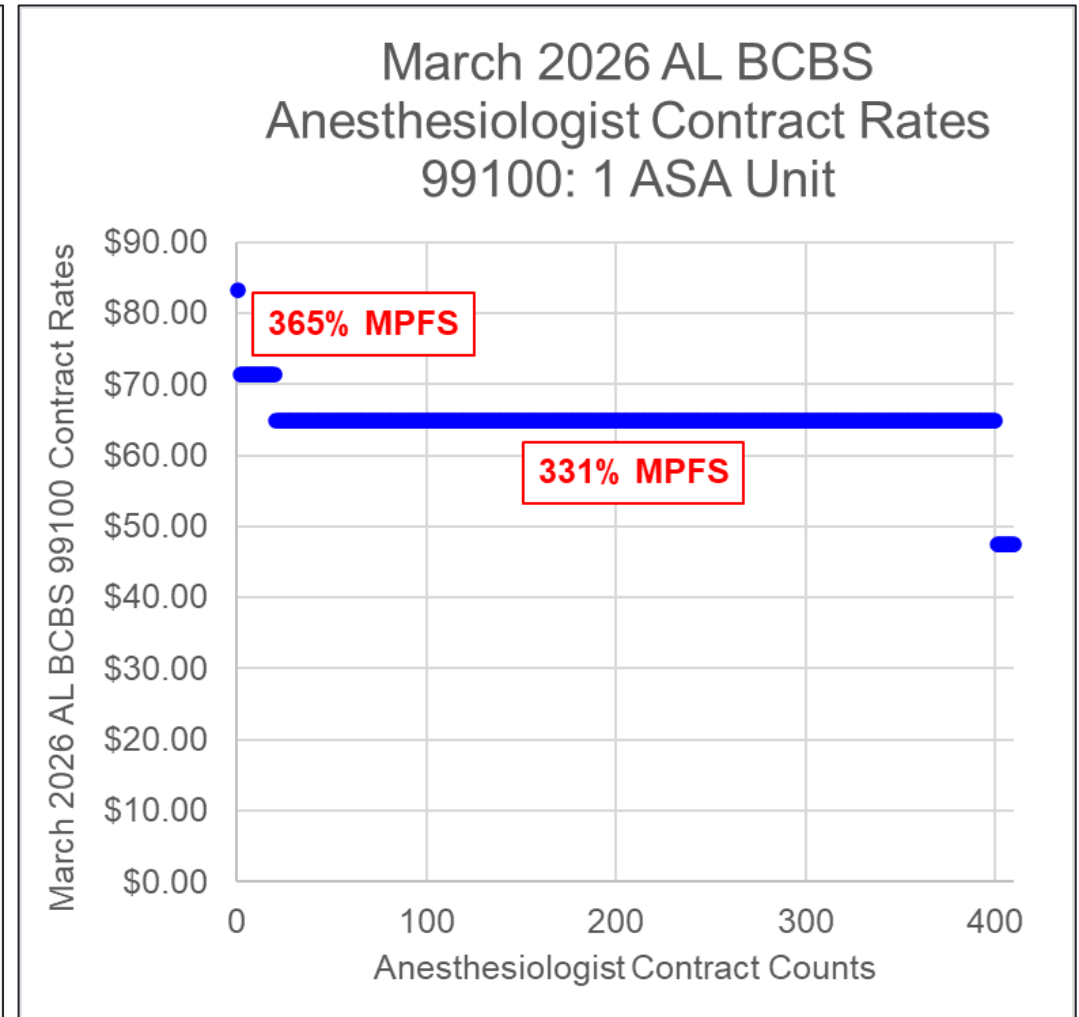
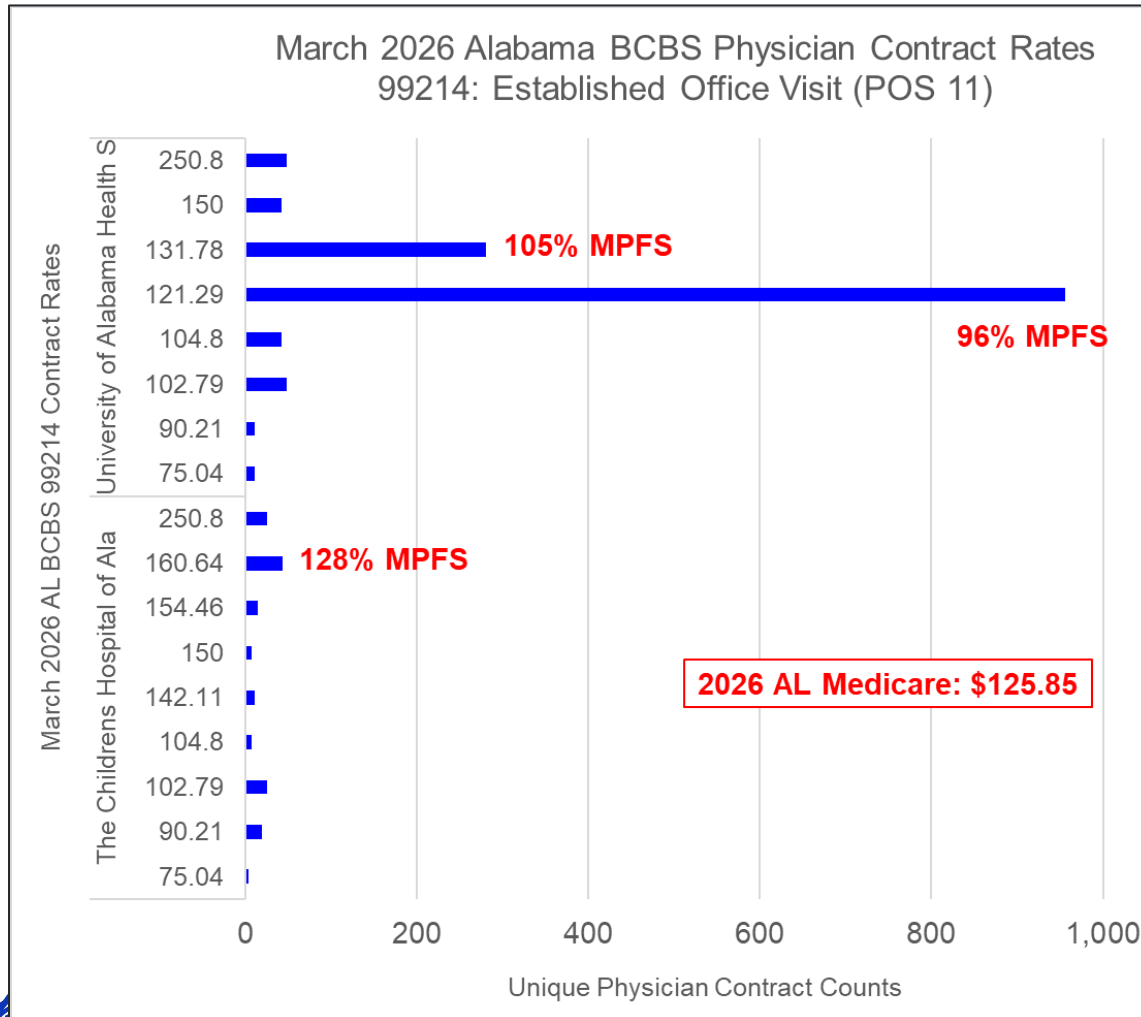
Rate	Name (City) (TIN)
\$1,385,249	Peacehealth (Bellingham) (91-0565889)
\$1,227,157	St John Medical Center (Longview) (91-0564987)
\$1,181,536	Harborview Medical Center (Seattle) (91-1631806)
\$1,118,032	Multicare Health System (Tacoma) (91-1352172)
\$1,086,675	Providence Hospital (Aberdeen) (91-0573108)
\$1,086,675	Providence Hospital (Centralia) (91-0573108)
\$1,035,833	Providence Health & Services Wa (Everett) (35-2346161)
\$1,022,017	Providence Health System In Washington (Olympia) (91-0567732)
\$988,342	Swedish Health Services (Everett) (91-0433740)
\$988,342	Swedish Health Services (Seattle) (91-0373400)
\$988,342	Swedish Health Services (Seattle) (91-0433740)
\$940,228	Enumclaw Community Hospital (Enumclaw) (91-0715805)
\$911,380	Harrison Medical Center (Silverdale) (91-0565546)
\$886,693	Swedish Edmonds (Edmonds) (27-2305304)
\$881,928	Virginia Mason Medical Center (Seattle) (91-0565539)
\$875,027	Multicare Health System (Auburn) (91-1352172)
\$875,027	Multicare Health System (Covington) (91-1352172)
\$875,027	Multicare Health System (Puyallup) (91-1352172)
\$875,027	Multicare Health System (Tacoma) (91-1352172)
\$869,861	Franciscan Health System (Gig Harbor) (38-3769889)
\$869,861	Saint Clare Hospital (Lakewood) (91-1487485)
\$869,861	St Francis Hospital (Federal Way) (91-1267921)
\$869,861	St Joseph Medical Center (Tacoma) (91-0564491)
\$839,203	Peacehealth Southwest Medical Center (Vancouver) (91-6068143)
\$827,136	Yakima Valley Memorial Hospital Association (Yakima) (91-0567263)
\$823,968	Public Hospital District 1 Skagit County (Arlington) (56-2392010)
\$823,968	Public Hospital District 1 Skagit County (Camano Island) (56-2392010)
\$823,968	Public Hospital District 1 Skagit County (Darrington) (56-2392010)
\$823,968	Public Hospital District 1 Skagit County (Mount Vernon) (56-2392010)
\$811,787	Multicare Health System (Spokane) (91-1352172)
\$806,621	University Of Washington (Seattle) (91-6001537)
\$805,492	Providence Health & Services Wa (Spokane) (36-4640211)
\$749,823	Swedish Health Services (Issaquah) (91-0433740)
\$724,549	Providence Health & Services Washington (Walla Walla) (30-0502262)
\$712,346	Overlake Hospital Medical Center (Bellevue) (91-0652651)
\$702,503	Multicare Health System (Spokane Valley) (91-1352172)
\$698,431	Multicare Health System (Elma) (91-1352172)
\$698,431	Multicare Health System (Olympia) (91-1352172)
\$690,064	Providence Health & Services Washington (Spokane) (35-2345508)
\$672,637	Public Hospital District 1 Of King County (Renton) (91-6000986)

# Observations in Other States

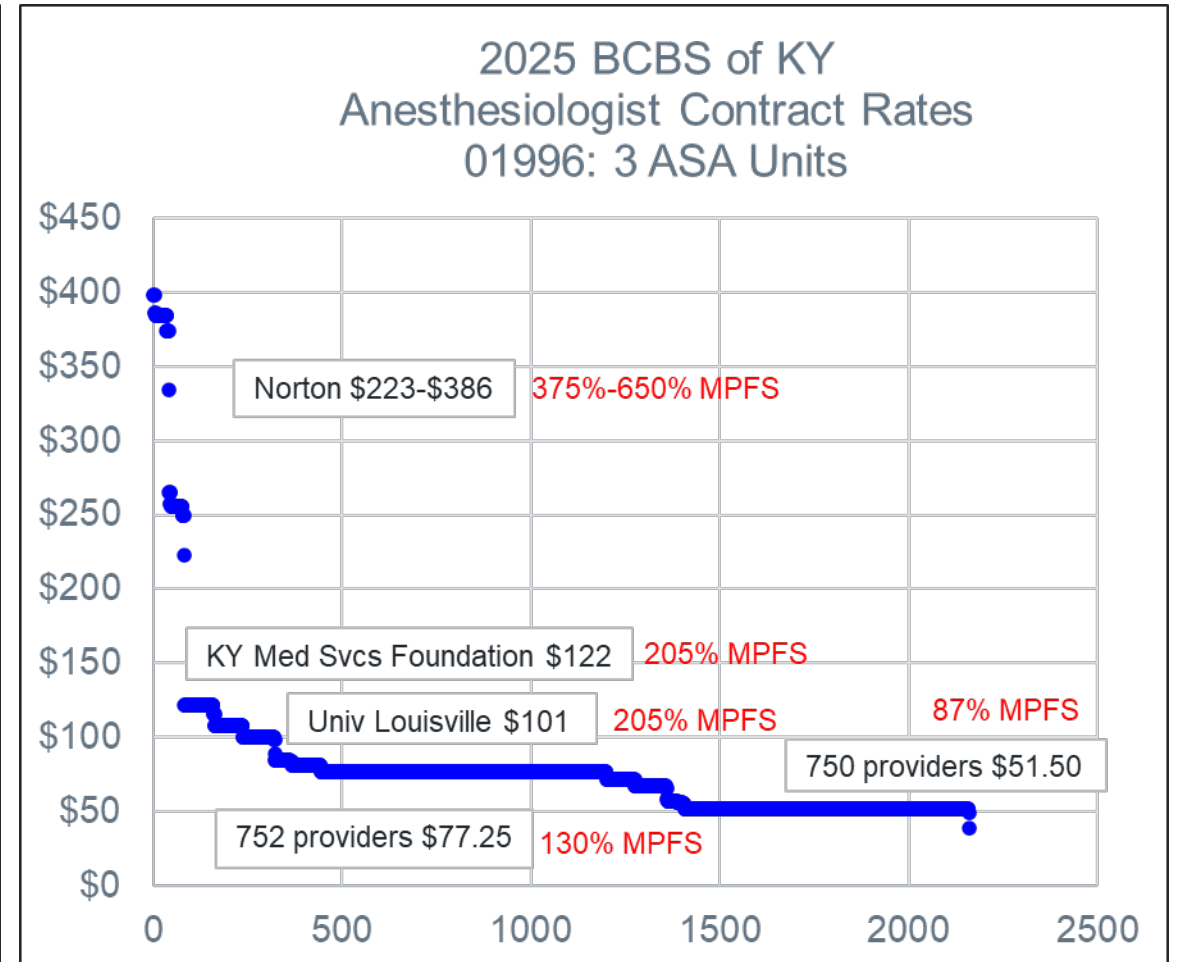
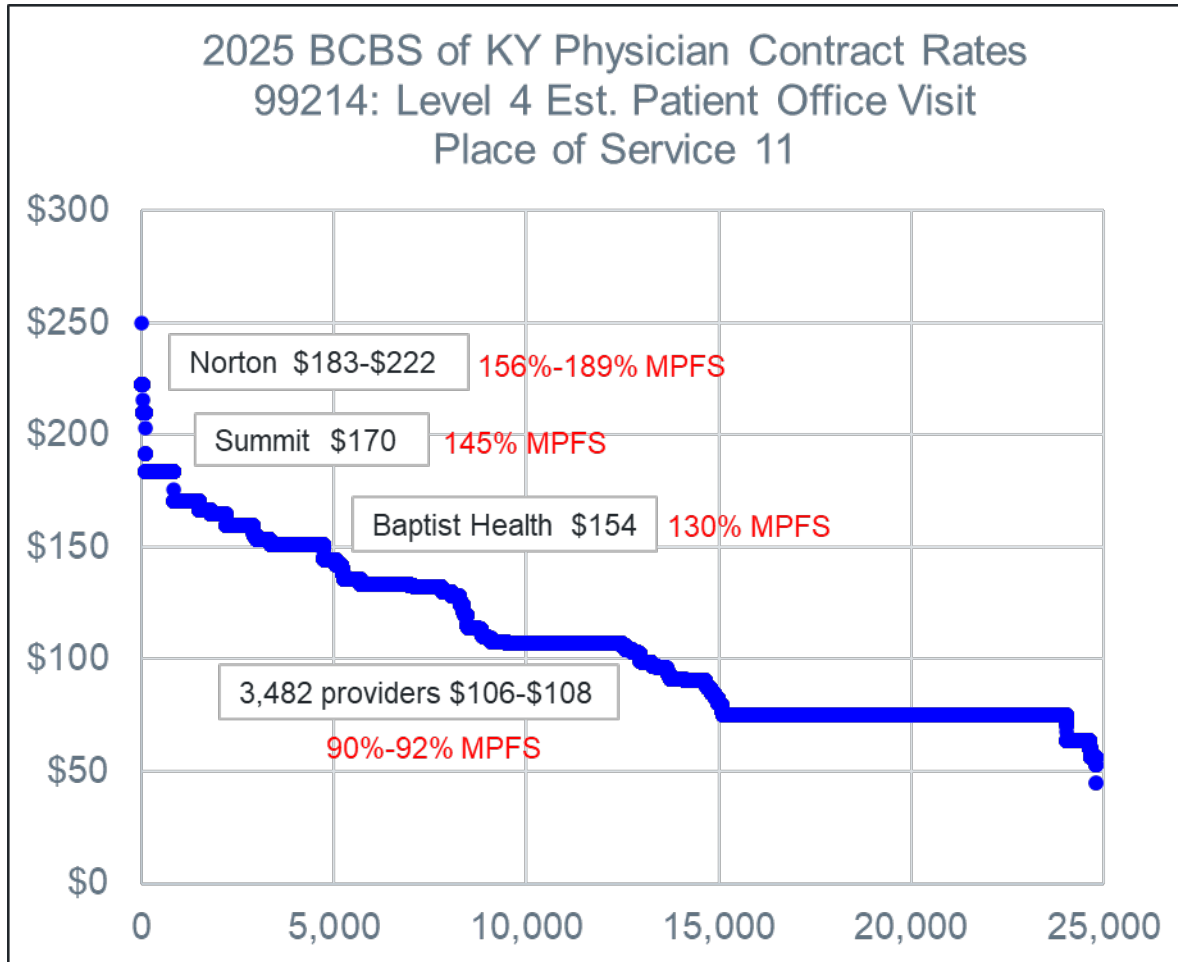
*Coker*

## Alabama: BCBS of AL Has 80%-90% Market Share

- One commercial health insurance carrier (BCBS of AL) has 80% to 90% market share in most Alabama markets.
- The 2026 Medicare rate for 99214 is \$125.85. The 2025 Alabama Medicare ASA rate is \$19.63.



## Kentucky: BCBS of KY Has About 67% Market Share



## Fragmented Payor Markets: Minnesota, Oregon & Wisconsin

### 99214 Family Medicine Commercial Reimbursement Largest Commercial Payor by State (2025)

# of Contracts	Payor	Locality	25 <sup>th</sup> Perc	50 <sup>th</sup> Perc	75 <sup>th</sup> Perc	90 <sup>th</sup> Perc	25 <sup>th</sup> % Mdcr	50 <sup>th</sup> % Mdcr	75 <sup>th</sup> % Mdcr	90 <sup>th</sup> % Mdcr
773	Cambia BCBS	Portland, OR	\$222	\$316	\$359	\$359	170%	242%	275%	275%
1,082	Cambia BCBS	Rest of Oregon	\$222	\$281	\$318	\$327	181%	229%	259%	287%
27	BCBS MN	Minnesota	\$267	\$296	\$308	\$326	216%	240%	250%	284%
2,176	UHC WI	Wisconsin	\$166	\$257	\$278	\$326	139%	215%	233%	280%

## Wisconsin Insurance Concentration

- Wisconsin Commercial Physician Reimbursement (and Compensation) Higher than National Average because the insurance market is fragmented. There is not single carrier that “owns” half the state’s market.

Market concentration (HHI) and largest insurers’ market shares, as of Jan. 1, 2023  
Combined PPO+HMO+POS+EXCH (total) product markets

State and MSAs	Herfindahl-Hirschman Indices	Largest Insurer	Share (%)	2nd Largest Insurer	Share (%)
<b>Wisconsin</b>	<b>1430</b>	<b>UnitedHealth Group</b>	<b>27%</b>	<b>Elevance Health</b>	<b>20%</b>
Appleton, WI	2013	UnitedHealth Group	33%	Elevance Health	25%
Eau Claire, WI	1800	Elevance Health	31%	Marshfield (Security HP)	18%
Fond du Lac, WI	1898	UnitedHealth Group	31%	Quartz	19%
Green Bay, WI	1674	UnitedHealth Group	28%	Elevance Health	23%
Janesville-Beloit, WI	1899	Medica	25%	Elevance Health	24%
La Crosse-Onalaska, WI-MN	2275	Quartz	39%	Cigna	22%
Madison, WI	2032	Medica	31%	Quartz	21%
Milwaukee-Waukesha, WI	2924	UnitedHealth Group	48%	Elevance Health	22%
Oshkosh-Neenah, WI	2198	UnitedHealth Group	39%	Elevance Health	20%
Racine, WI	3210	UnitedHealth Group	51%	Elevance Health	23%
Sheboygan, WI	2882	UnitedHealth Group	48%	Elevance Health	21%
Wausau-Weston, WI	1829	Elevance Health	27%	UnitedHealth Group	26%

Source: Competition in Health Insurance. A comprehensive study of U.S. markets. American Medical Association. 2024.

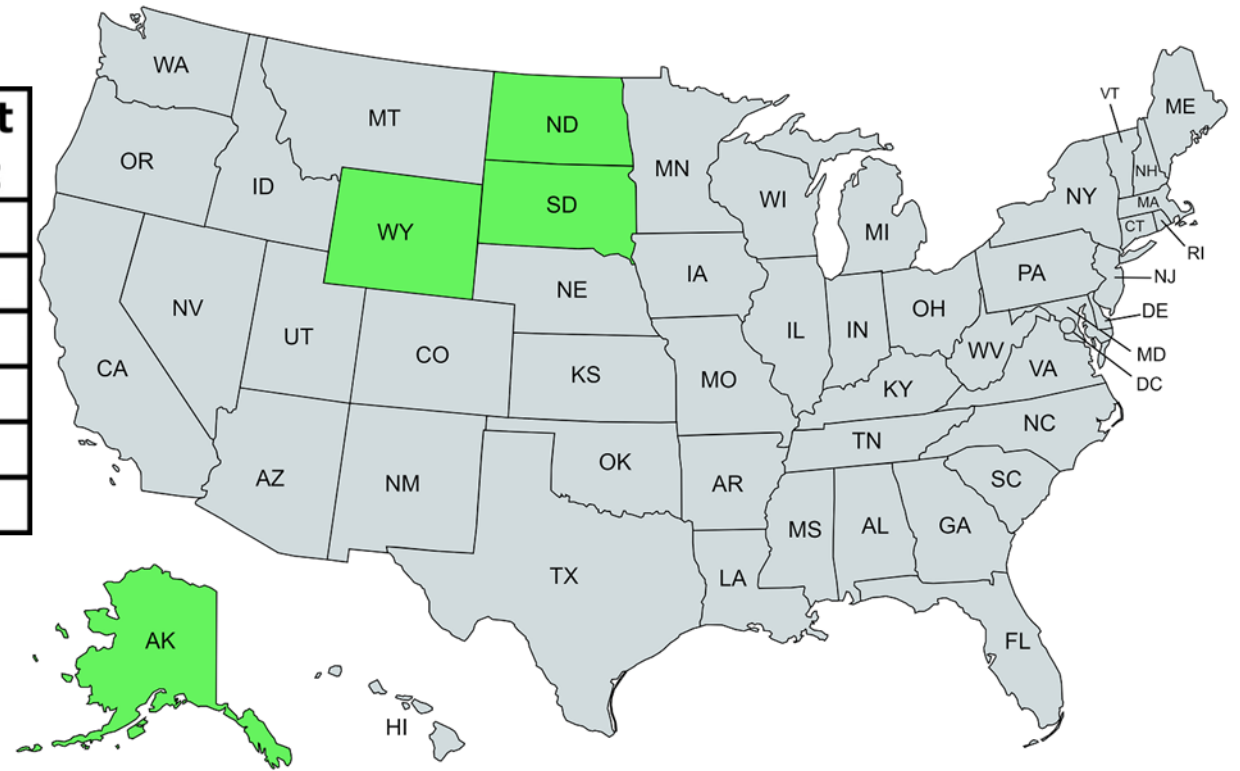
## Commercial Reimbursement: Wisconsin Local Market

CBSA	Specialties	Commercial Reimbursement % of Medicare (Overall)
Appleton, WI	Primary Care	216%
Eau Claire, WI		274%
Green Bay, WI		231%
Madison, WI		232%
Milwaukee-Waukesha-West Allis, WI		215%
State-WI		223%
Appleton, WI	Non-Primary Care	184%
Eau Claire, WI		231%
Fond du Lac, WI		205%
Green Bay, WI		213%
Madison, WI		189%
Milwaukee-Waukesha-West Allis, WI		186%
Oshkosh-Neenah, WI		198%
Racine, WI		172%
Sheboygan, WI		197%
State-WI	192%	

Source: Comparing Commercial and Medicare Professional Service Prices. Health Care Cost Institute. August 2020.

## Supply-and-Demand Shortage Impacts

State	FTE MD/DO Residents	2022 Population	Population/ Resident	Cost Rpt Wrksht
WY	18.0	581,629	32,313	S-2
AK	32.4	733,276	22,611	E-4
MT	80.3	1,122,878	13,991	E-4
ID	98.6	1,938,996	19,659	E-4
SD	138.7	909,869	6,559	E-4
ND	143.2	778,912	5,439	E-4



## Supply-and-Demand Shortage Impacts

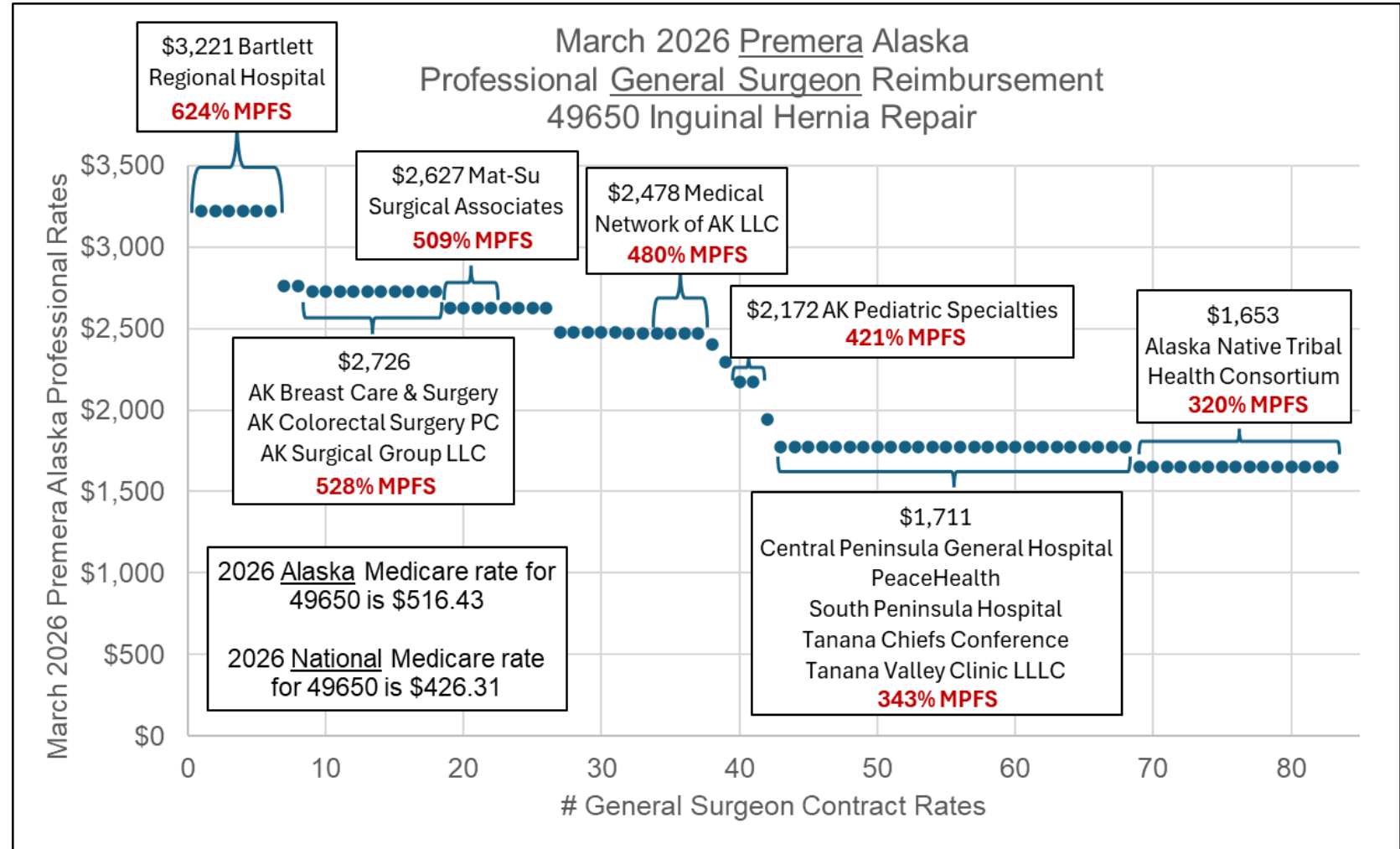
### 99214 Family Medicine Commercial Reimbursement Largest Commercial Payor by State (2025)

Contracts	Payor	Locality	25 <sup>th</sup> Perc	50 <sup>th</sup> Perc	75 <sup>th</sup> Perc	90 <sup>th</sup> Perc	25 <sup>th</sup> % Mdcr	50 <sup>th</sup> % Mdcr	75 <sup>th</sup> % Mdcr	90 <sup>th</sup> % Mdcr
7	Premera AK	Alaska	\$383	\$453	\$453	\$453	241%	285%	285%	285%
473	Premera AK	Alaska	\$316	\$316	\$338	\$484	199%	199%	212%	304%
3418	BCBS ID	Idaho	\$240	\$240	\$248	\$248	205%	205%	211%	211%
619	BCBS MT	Montana	\$202	\$202	\$202	\$202	162%	162%	162%	162%
18	BCBS ND	North Dakota	\$273	\$273	\$273	\$273	222%	222%	222%	222%
481	Avera SD	South Dakota	\$203	\$211	\$211	\$211	166%	172%	172%	172%
44	Avera SD	South Dakota	\$202	\$202	\$202	\$202	165%	165%	165%	165%
14	Avera SD	South Dakota	\$181	\$181	\$181	\$181	148%	148%	148%	148%
121	Avera SD	South Dakota	\$125	\$125	\$125	\$125	103%	103%	103%	103%
182	CIGNA WY	Wyoming	\$142	\$163	\$187	\$196	114%	132%	151%	158%

# Supply-and-Demand Shortage Impacts



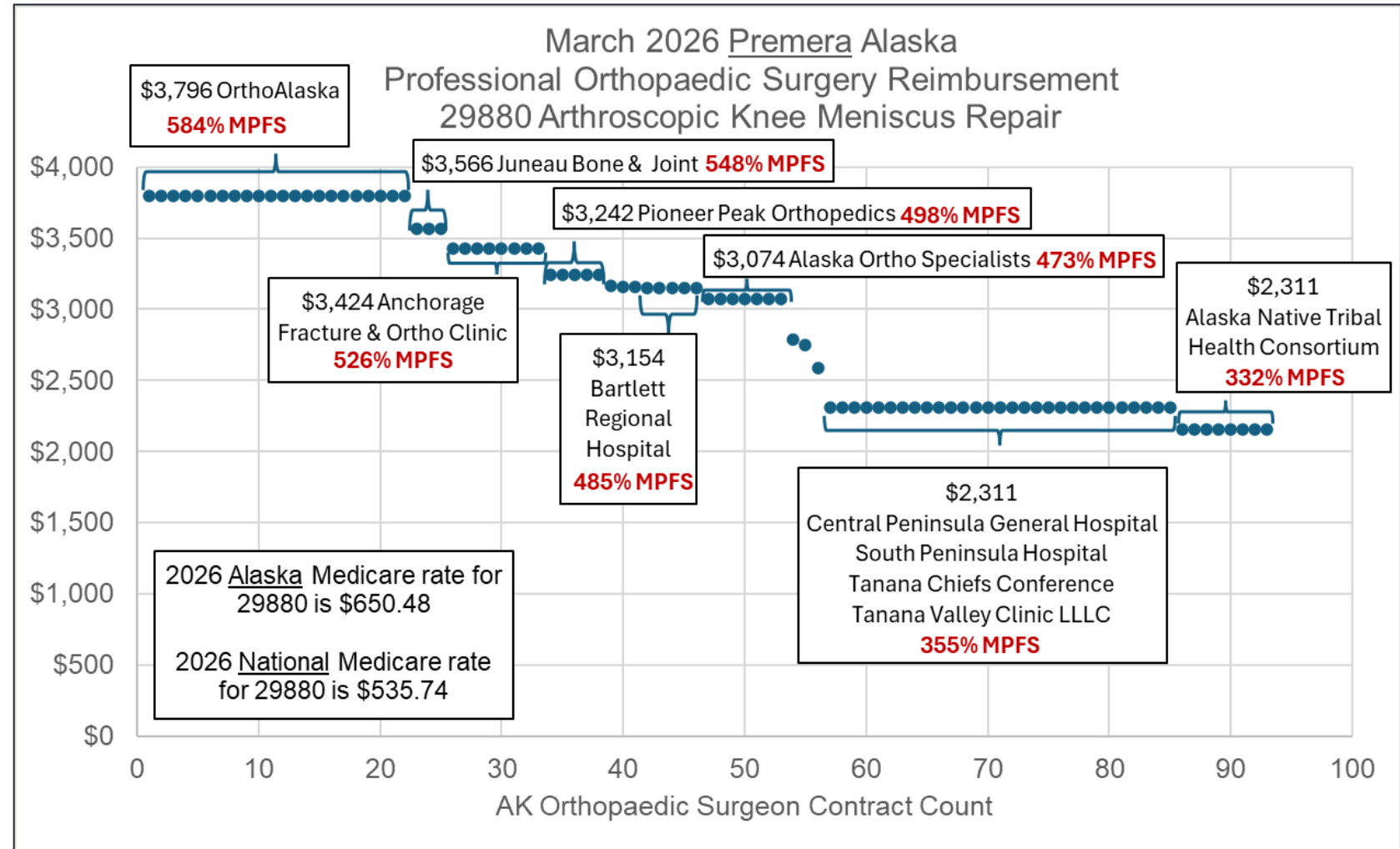
State	FTE MD/DO Residents	2022 Population	Population/Resident	Cost Rpt Wrksh
WY	18.0	581,629	32,313	S-2
AK	32.4	733,276	22,611	E-4
MT	80.3	1,122,878	13,991	E-4
ID	98.6	1,938,996	19,659	E-4
SD	138.7	909,869	6,559	E-4



# Supply-and-Demand Shortage Impacts

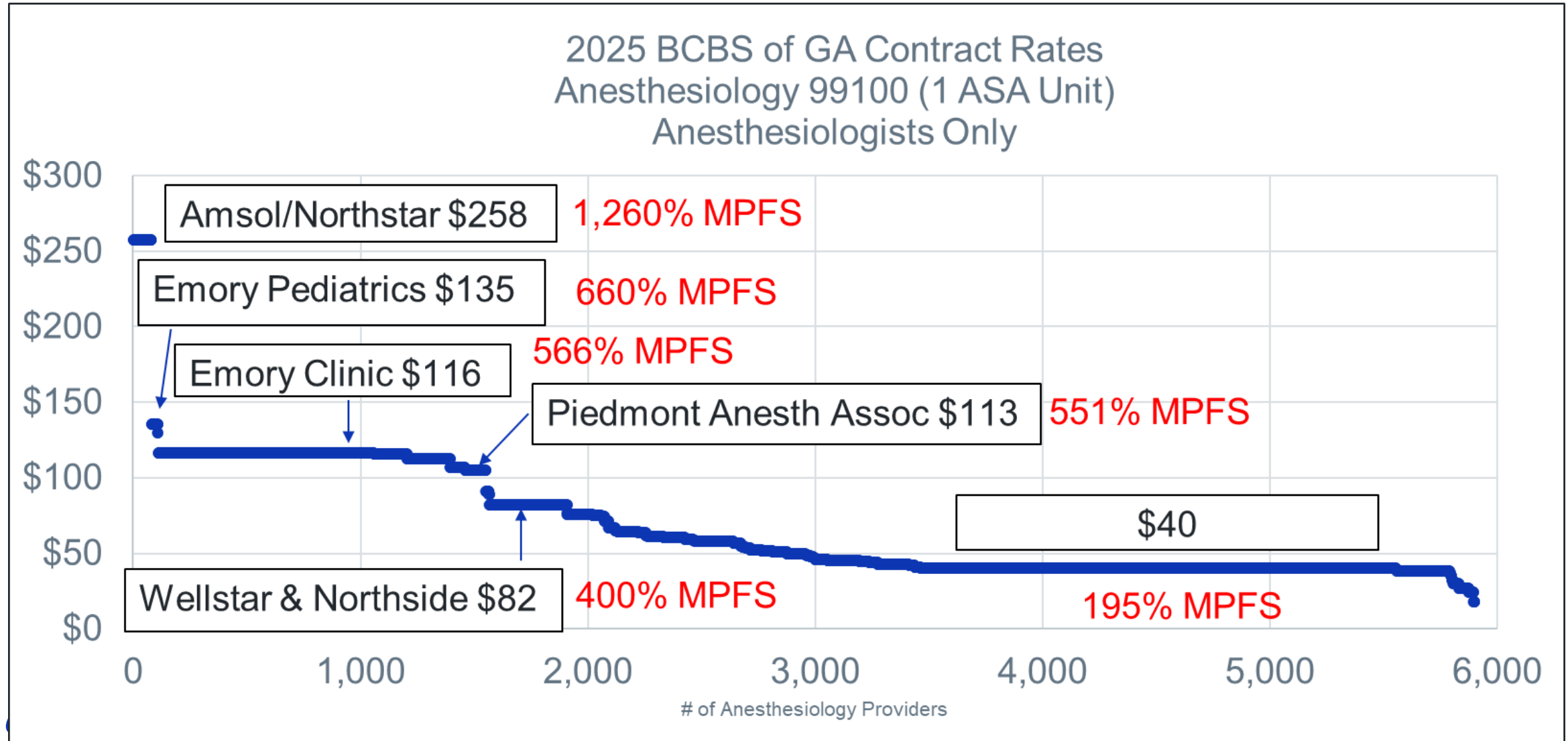


State	FTE MD/DO Residents	2022 Population	Population/Resident	Cost Rpt Wrksh
WY	18.0	581,629	32,313	S-2
AK	32.4	733,276	22,611	E-4
MT	80.3	1,122,878	13,991	E-4
ID	98.6	1,938,996	19,659	E-4
SD	138.7	909,869	6,559	E-4



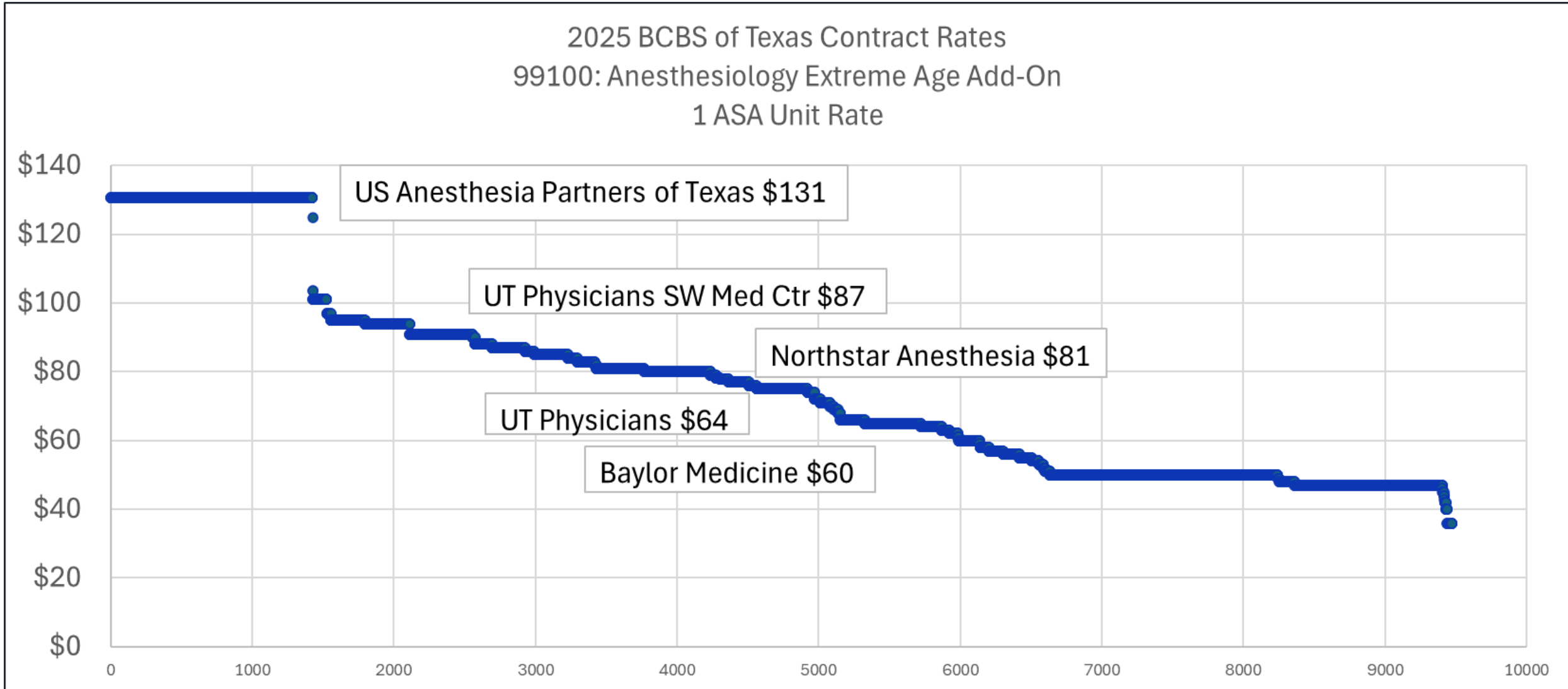
## Anesthesiology (Professional)

- 2025 professional Medicare reimbursements for 99100 (1 ASA unit) is \$20.48 in Atlanta and \$20.09 in the Rest of Georgia.



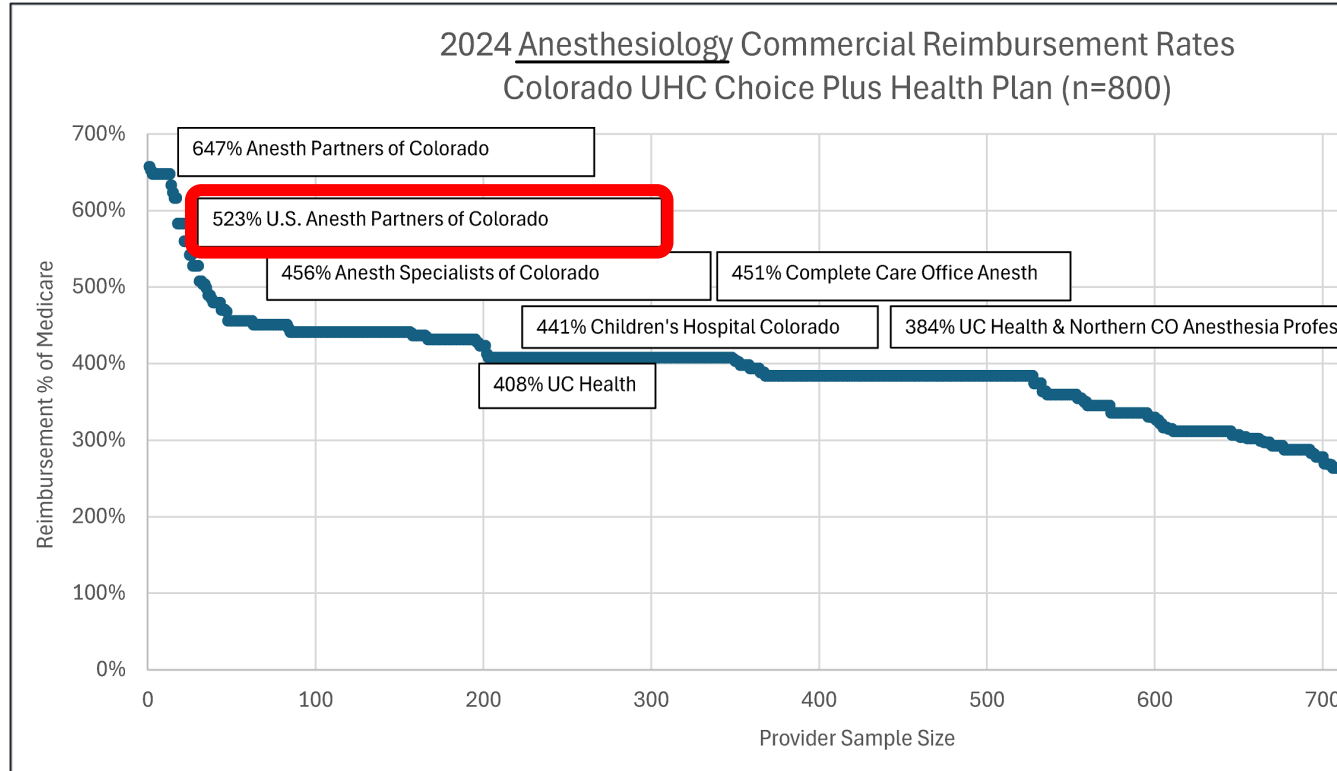
## Anesthesiology (Professional)

- In many markets, national chains like U.S. Anesthesia Partners dominate commercial reimbursement.



# State of Colorado v. U.S. Anesthesia Partners of Colorado

- Antitrust Settlement: February 23, 2024 (CASE NUMBER: 2024CV30595)



## INJUNCTIVE RELIEF

### A. RELINQUISHMENT OF EXCLUSIVE HOSPITAL CONTRACTS WITH COMMONSPIRIT HEALTH

3. Relinquishment of Five Facility Agreements. USAP Colorado agrees to relinquish its facility agreements at five (5) hospitals in the Denver-Boulder area and in Durango:

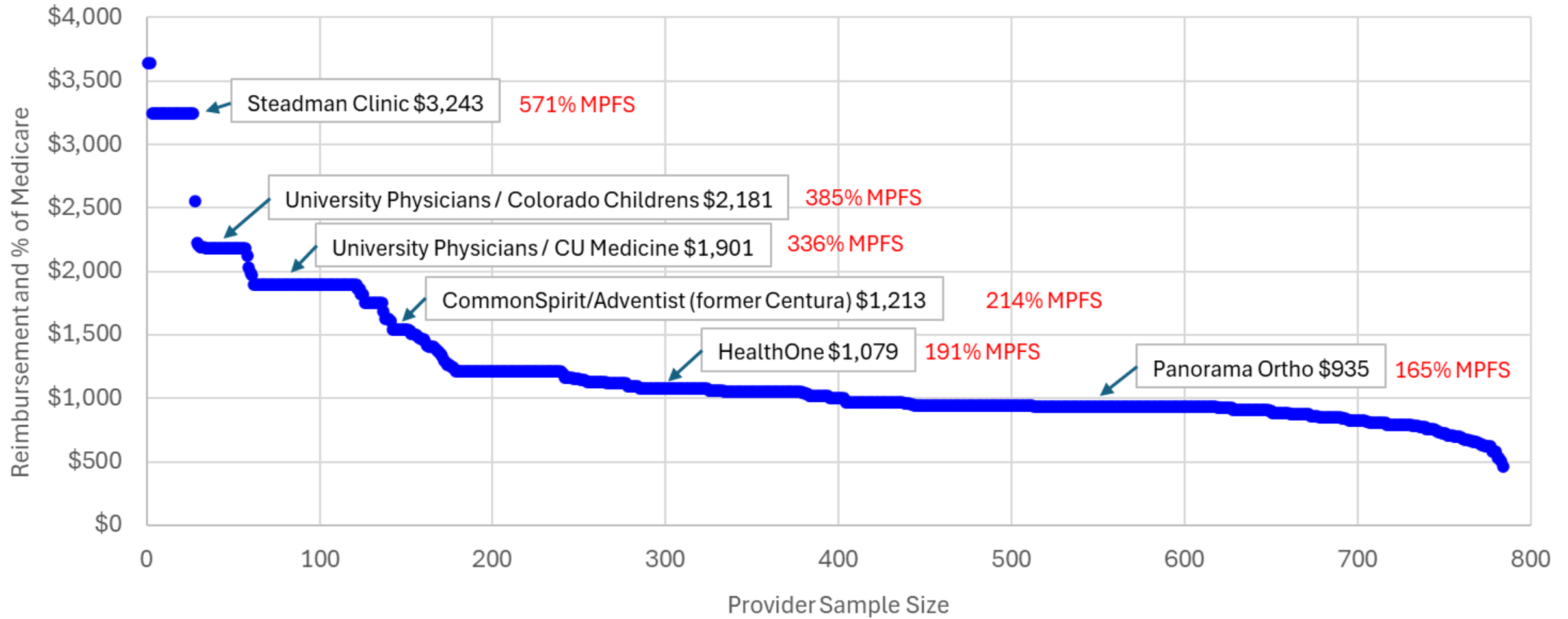
- a. CommonSpirit - St. Anthony Hospital, 11600 W 2nd Place, Lakewood, CO 80228;
- b. CommonSpirit - St. Anthony North Hospital, 14300 Orchard Pkwy., Westminster, CO 80023;
- c. OrthoColorado Hospital, 11650 W 2nd Place, Lakewood, CO 80228;
- d. CommonSpirit - Longmont United Hospital, 1950 Mountain View Ave., Longmont, CO 80501; and
- e. CommonSpirit - Mercy Hospital, 1010 Three Springs Blvd., Durango, CO 81301.

4. Clinical Roster. On or before thirty (30) business days after the date of this Judgment, USAP Colorado will provide a current roster of all USAP clinicians primarily serving any of the five (5) hospitals listed in Paragraph 3.

5. Waiver of Non-compete Provisions for Clinicians at the Five Facilities. Until one year following the date of this Judgment, USAP Colorado will waive or release the non-compete provision in the employment agreement for any clinicians primarily serving the five (5) hospitals listed in Paragraph 3, and as reflected in the Clinical Roster provided to the Attorney General pursuant to Paragraph 4, to allow CommonSpirit to staff and support anesthesia services at the five (5) hospitals.

# Colorado Orthopaedic Professional Reimbursement

2025 Orthopaedic Surgery Professional Commercial Reimbursement Rates  
Colorado UHC PPO Health Plan (n=784)  
CPT 29880



# Use Applications

*Coker*

---

# Commercial Reimbursement Data Uses

## Uses

- Benchmarking
- Pro forma financial projections
- Services not covered by Medicare
  - Professional consults (99242-5,99252-5)
  - Dental & vision services
  - Behavioral & mental health services
  - Well-child care visits
  - 16 new telemedicine codes (98000-98015)
  - Fertility treatments (employer-sponsored benefit)
- New services
  - Inpatient cell therapy: CAR T-cell therapy
    - Kymriah, Yescarta
  - Inpatient gene therapy: Sickle cell therapy
    - Casgevy, Lyfgenia

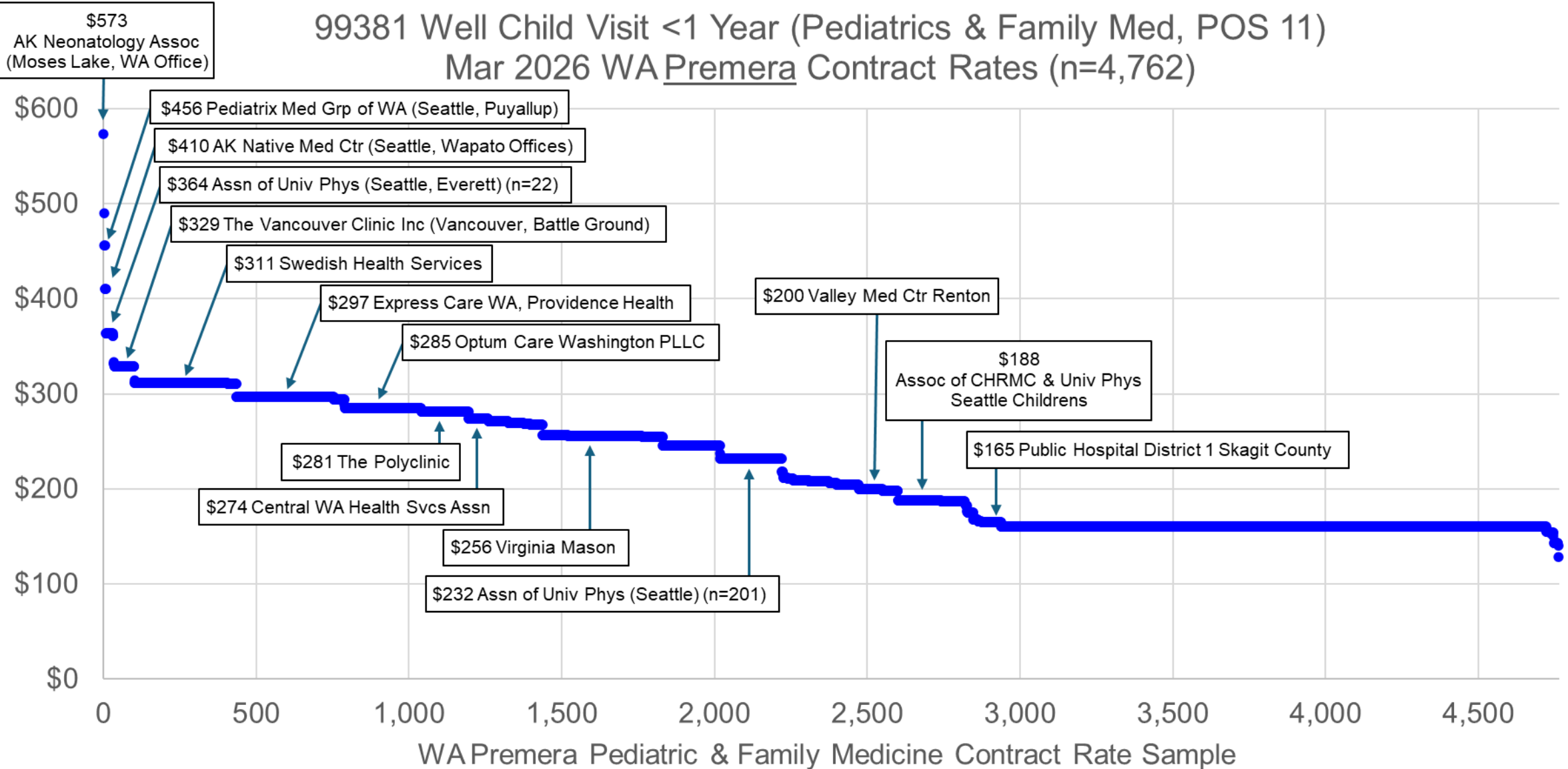
## Uses

- Managed care contracting
- Hospital-based service planning
  - Anesthesiology, hospitalist, radiology
- Strategy
  - New service line development
  - FQHCs, RHCs, CAHs, and other alternative payment models

## Well Child Visit <1 Year (NOT on Medicare Physician Fee Schedule)

99381 Well Child Visit <1 Year (Pediatrics & Family Med, POS 11)  
Mar 2026 WA Premera Contract Rates (n=4,762)

WA Premera Contract Reimbursement 99381

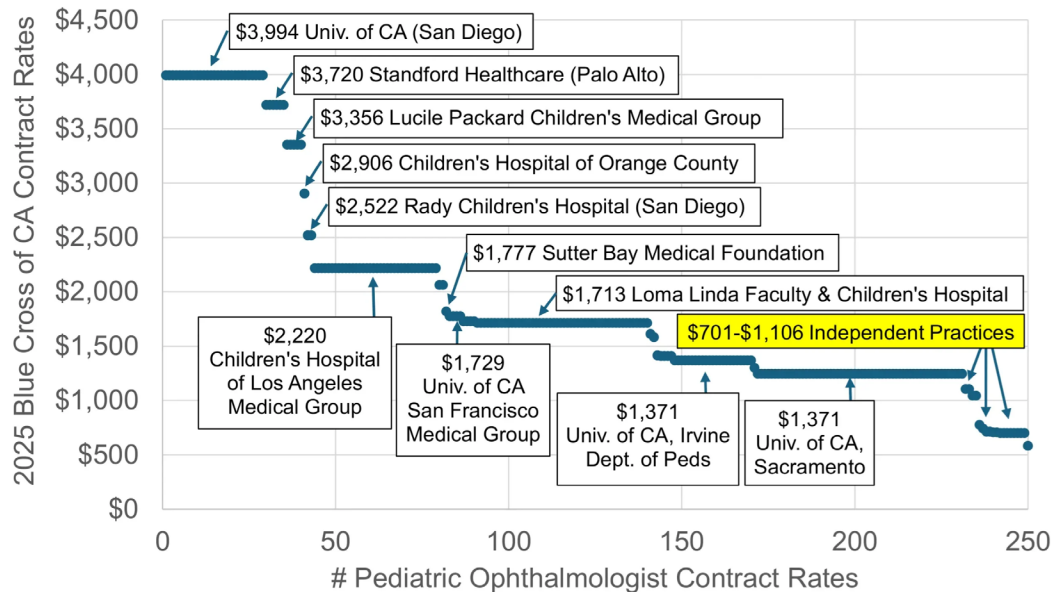


# Retinopathy of Prematurity

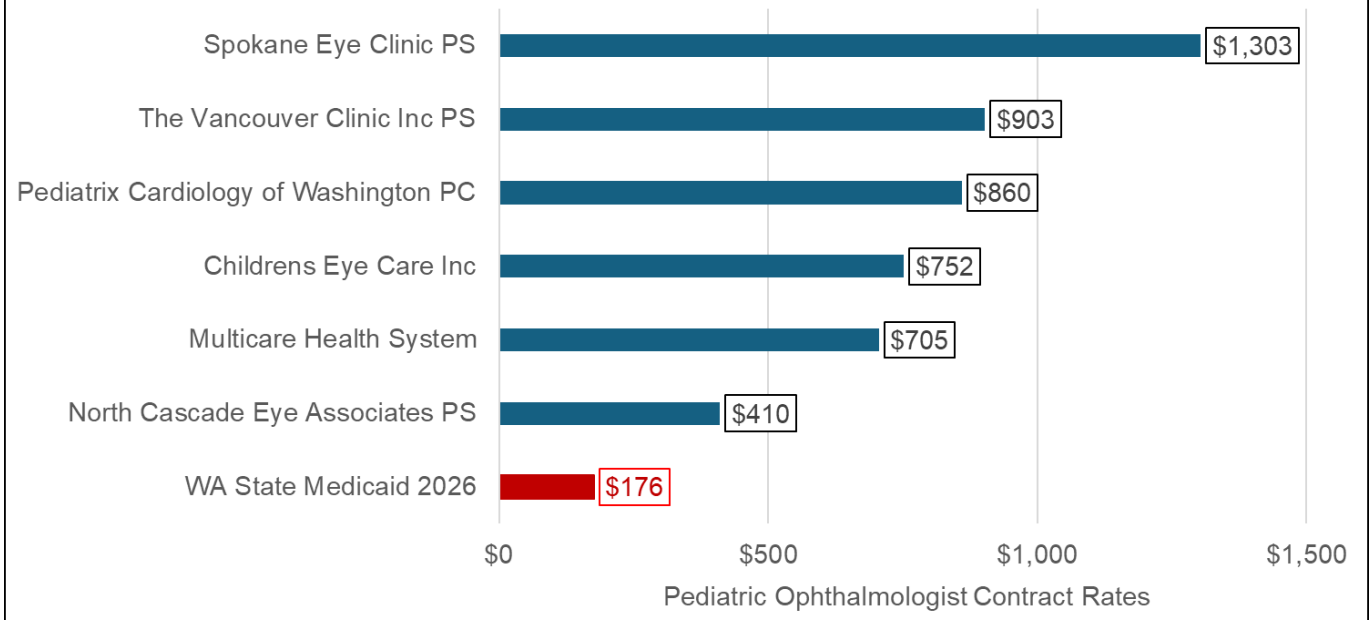


# FMV of Pediatric Ophthalmology Services

67228, Treatment of Retinopathy (Prof Fees)  
2025 Elevance Blue Cross of California  
Pediatric Ophthalmologists Only



67228, Treatment of Retinopathy (Prof Fees)  
Mar 2026 WA Premera  
Pediatric Ophthalmologists Only (Facility Setting)



- Hospital-subsidized professional service in NICUs
- American Academy of Pediatrics' Standards for Levels of Neonatal Care: II, III, and IV. designate screening of ROP in hospital NICUs as a standard of care
- California Children's Services codified in state NICU licensing standards
- ROP treatment: WA Medicaid \$176 and CA Medicaid \$300

---

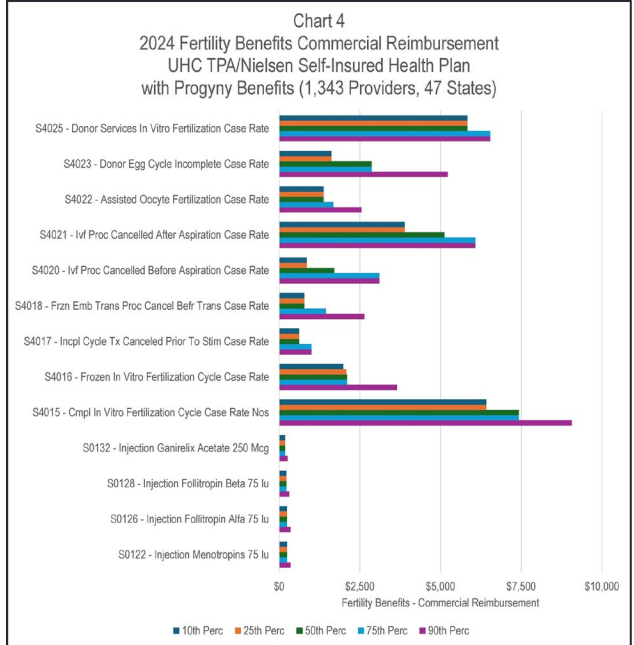
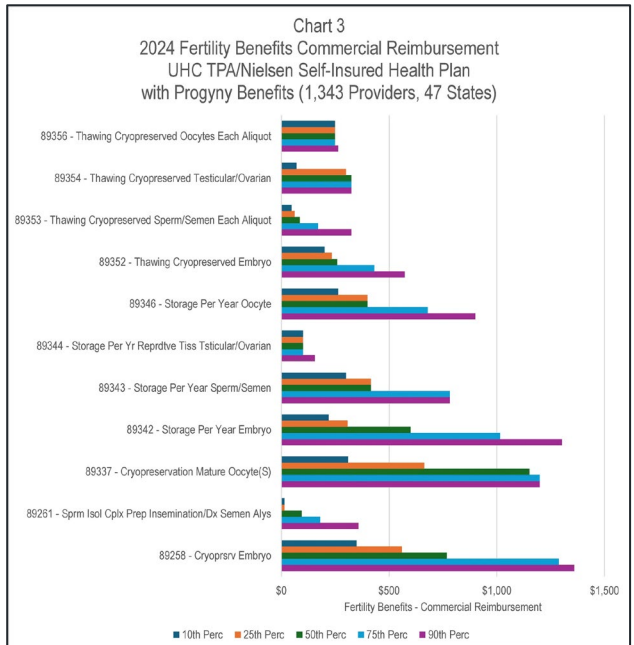
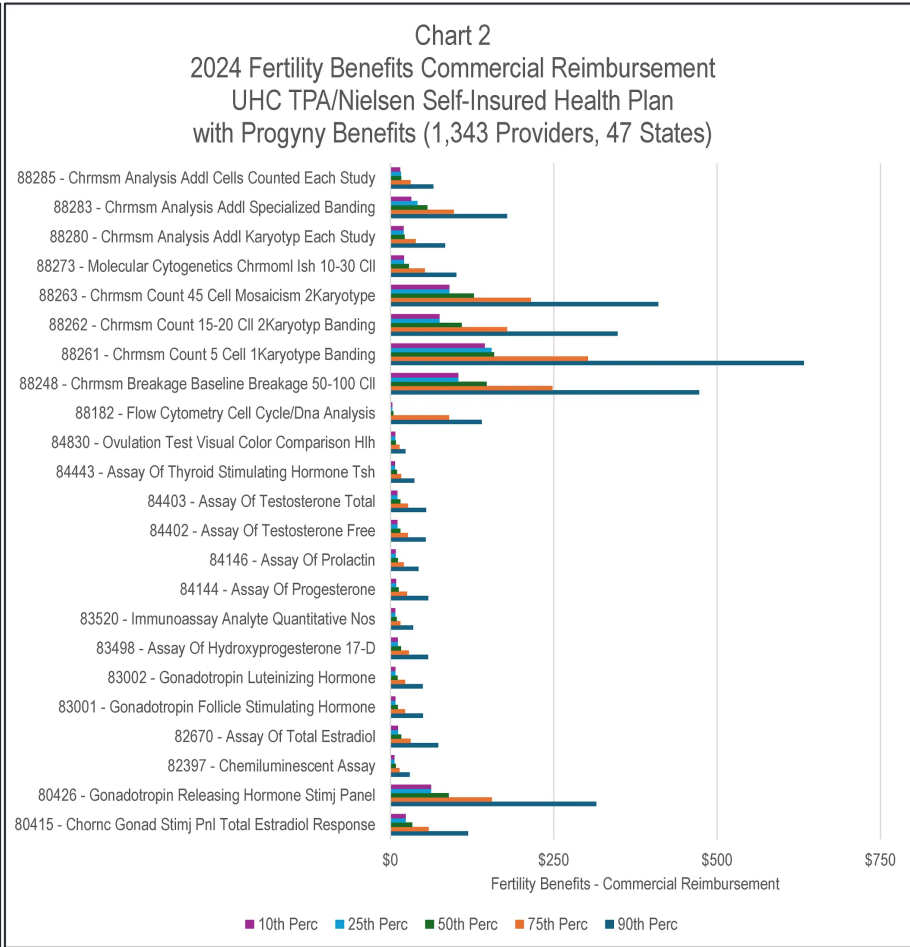
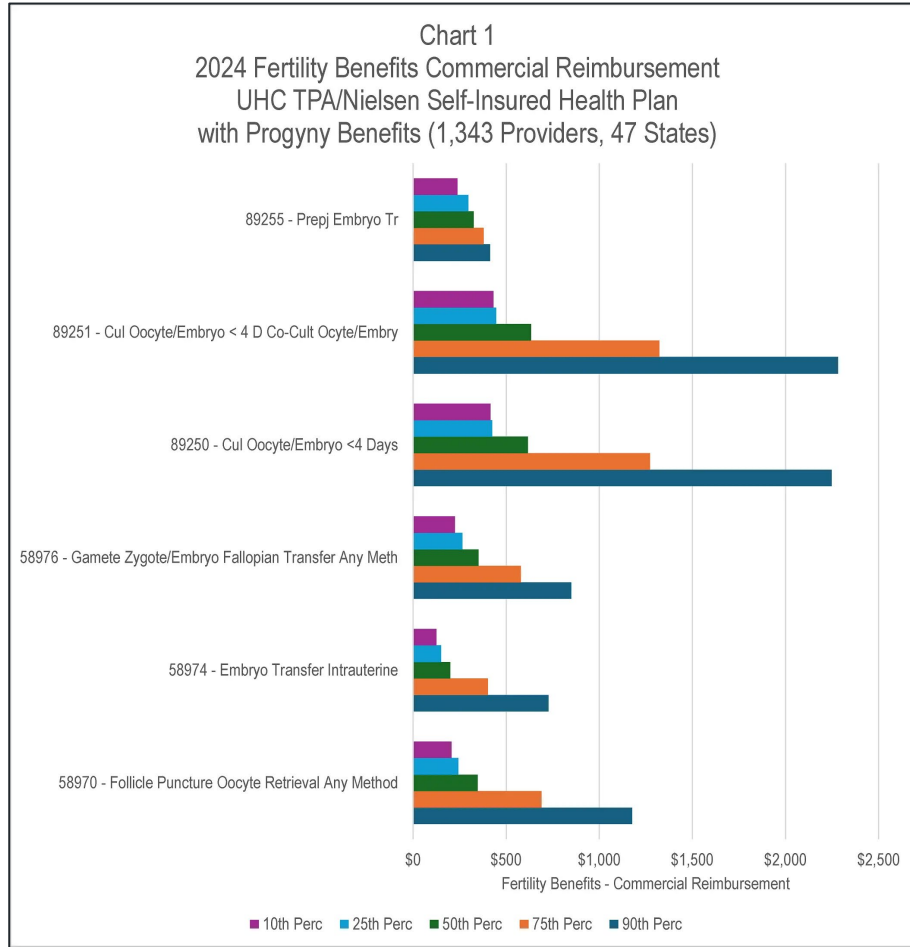
## Fertility Treatment Pricing

- Employer-sponsored fertility benefits are part of health plans—now reportable under technical definitions in regulations

# 2024 FERTILITY BENEFITS COMMERCIAL REIMBURSEMENT



# Fertility Treatment Pricing (2024 Nielsen Health Plan, UHC TPA)



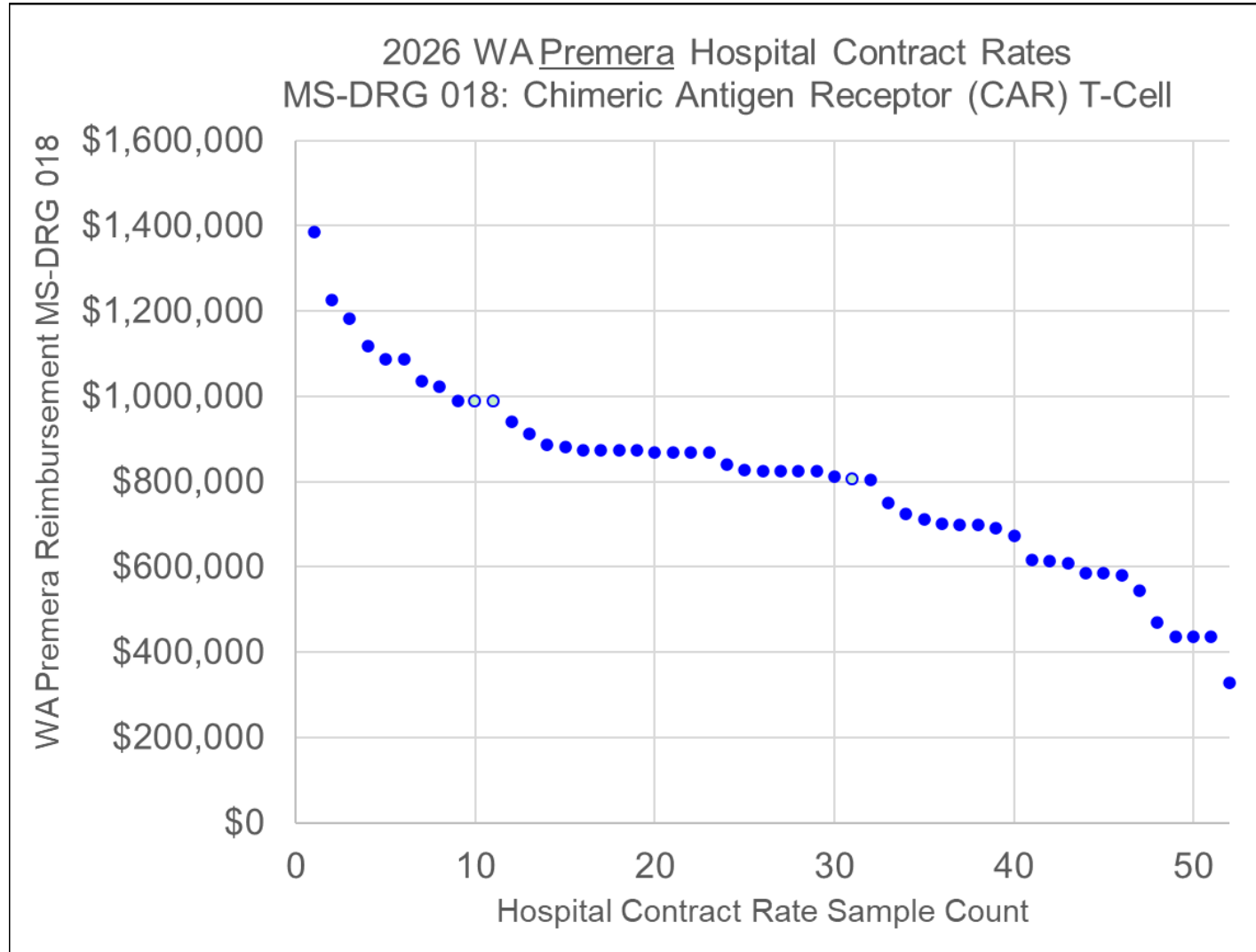
## New Treatment Pricing

- Inpatient cell therapy: CAR T-cell therapy (Kymriah, Yescarta) was #1 highest reimbursed commercial service in 2024
- Sickle cell gene therapy (Casgevy, Lyfgenia) will blow CAR T-cell therapy away by factor of 2-3 times higher rates



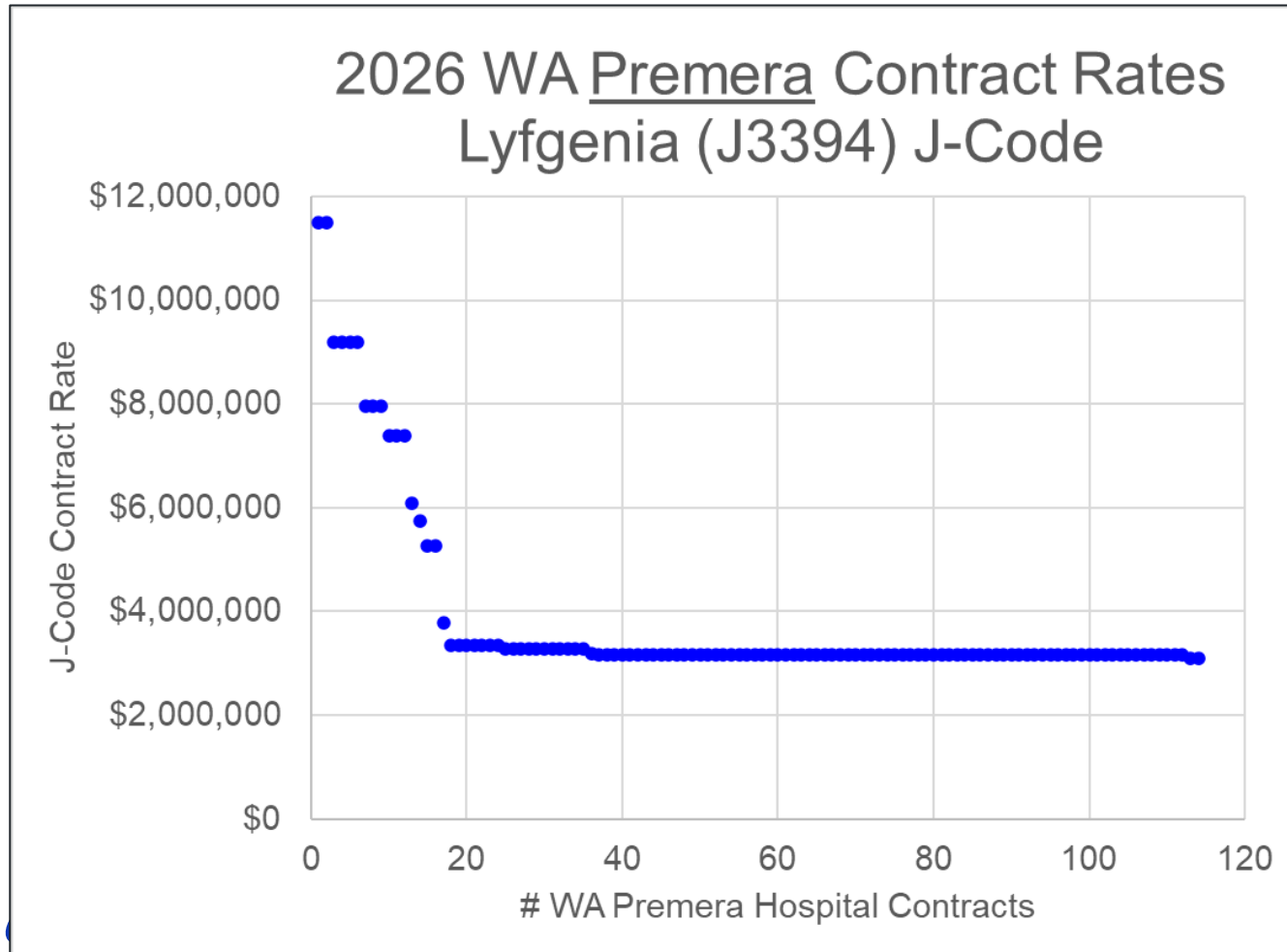
## New Treatment Pricing: CAR T-Cell Therapy

- Inpatient cell therapy: CAR T-cell therapy (Kymriah, Yescarta) was #1 highest reimbursed commercial service in 2024
- Sickle cell gene therapy (Casgevy, Lyfgenia) blows CAR T-cell therapy away by factor of 2-3 times higher rates during 2025 and 2026



## New Treatment Pricing: Lyfgenia for sickle cell treatment

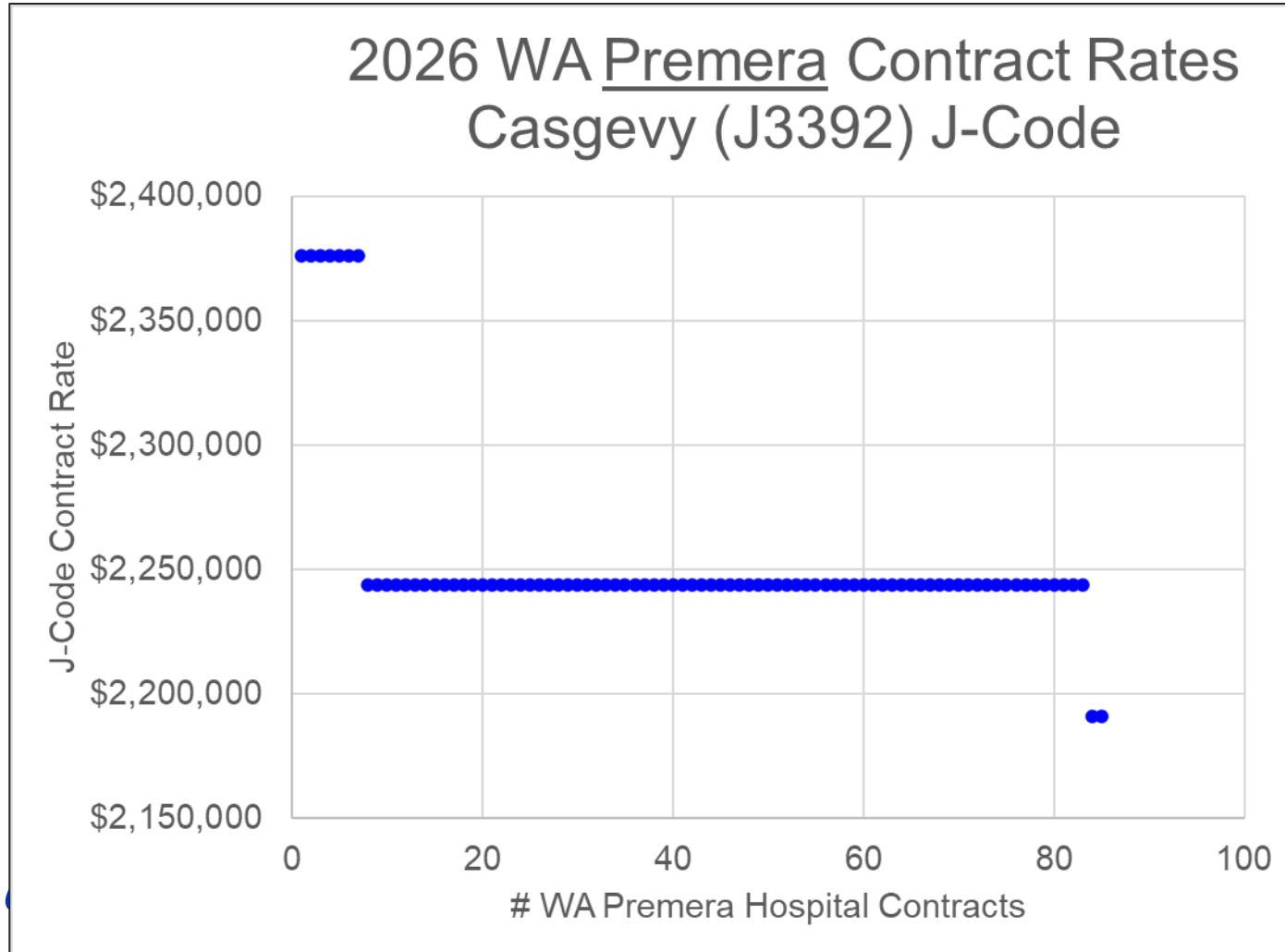
- Though it is a hospital-based treatment with no designated DRG code (yet), sickle cell gene therapy drug Lyfgenia (J3394) showed up in Washington contract rates as a J-code



Rate	Name (City) (TIN)
\$11,501,000	Harrison Medical Center (Silverdale) (91-0565546)
\$11,501,000	Multicare Health System (Tacoma) (91-1352172)
\$9,200,800	Multicare Health System (Auburn) (91-1352172)
\$9,200,800	Multicare Health System (Covington) (91-1352172)
\$9,200,800	Multicare Health System (Puyallup) (91-1352172)
\$9,200,800	Multicare Health System (Tacoma) (91-1352172)
\$7,952,120	Peacehealth (Bellingham) (91-0565889)
\$7,952,120	Peacehealth Southwest Medical Center (Vancouver) (91-6068143)
\$7,952,120	St John Medical Center (Longview) (91-0564987)
\$7,393,500	Multicare Health System (Olympia) (91-1352172)
\$7,393,500	Multicare Health System (Spokane) (91-1352172)
\$7,393,500	Multicare Health System (Spokane Valley) (91-1352172)
\$6,079,100	Yakima Valley Memorial Hospital Association (Yakima) (91-0567263)
\$5,750,500	Public Hospital District 2 Of King County (Kirkland) (91-0844563)
\$5,257,600	Public Hospital District 1 Of King County (Renton) (91-6000986)
\$5,257,600	University Of Washington (Seattle) (91-6001537)
\$3,778,900	Samaritan Hospital (Moses Lake) (91-6001698)
\$3,348,000	Providence Health & Services Wa (Chewelah) (61-1570502)
\$3,348,000	Providence Health & Services Wa (Spokane) (36-4640211)
\$3,348,000	Providence Health & Services Washington (Colville) (30-0502262)
\$3,348,000	Providence Health & Services Washington (Colville) (32-0260353)
\$3,348,000	Providence Health & Services Washington (Spokane) (35-2345508)
\$3,348,000	Providence Health System In Washington (Olympia) (91-0567732)
\$3,348,000	Providence Hospital (Centralia) (91-0573108)
\$3,286,000	Enumclaw Community Hospital (Enumclaw) (91-0715805)
\$3,286,000	Franciscan Health System (Gig Harbor) (38-3769889)
\$3,286,000	Grays Harbor Community Hospital (Aberdeen) (91-0568304)
\$3,286,000	Highline Community Hospital (Burien) (91-0712166)
\$3,286,000	Public Hospital District 1 Skagit County (Arlington) (56-2392010)
\$3,286,000	Public Hospital District 1 Skagit County (Mount Vernon) (56-2392010)
\$3,286,000	Rcch Trios Health Llc (Kennewick) (82-3962056)
\$3,286,000	Saint Clare Hospital (Lakewood) (91-1487485)
\$3,286,000	St Francis Hospital (Federal Way) (91-1267921)
\$3,286,000	St Joseph Medical Center (Tacoma) (91-0564491)
\$3,286,000	Virginia Mason Medical Center (Seattle) (91-0565539)
\$3,193,000	Overlake Hospital Medical Center (Bellevue) (91-0652651)
\$3,162,000	All Other Hospitals

## New Treatment Pricing: Casgevy for sickle cell treatment

- Though it is a hospital-based treatment with no designated DRG code (yet), sickle cell gene therapy drug Casgevy (J3392) showed up in Washington contract rates as a J-code



Rate	Name (City) (TIN)
\$2,376,000	Providence Health & Services WA (Chewelah) (61-1570502)
\$2,376,000	Providence Health & Services WA (Spokane) (36-4640211)
\$2,376,000	Providence Health & Services WA (Colville) (30-0502262)
\$2,376,000	Providence Health & Services WA (Colville) (32-0260353)
\$2,376,000	Providence Health & Services WA (Spokane) (35-2345508)
\$2,376,000	Providence Health System In WA (Olympia) (91-0567732)
\$2,376,000	Providence Hospital (Centralia) (91-0573108)
\$2,244,000	Adams County Public Hospital District (Ritzville) (91-6001963)

## Transparency in Coverage Rule – Changes & Updates

### Version 2.0 Schema Effective February 6, 2026

- Reduced File Sizes
- Improved In-Network Rates: Custom place-of-service codes
- Enhanced Out-of-Network (OON) Data
- Contextual Files: Introduction of change-log, utilization, taxonomy, and text files for better interpretation.

### HHS Proposed Rule 12-23-25 (Doc # 2025-23693)

- 2027 plan years, required disclosure by Jan. 1, 2028
- In-Network (Quarterly)
  - Restructure files for 70% size reduction
  - Add payment model labels (capitation, % charge)
  - Add \*enrollment total by plan\*
- Out-of-Network (Quarterly)
  - Aggregate by market (not plan)
  - Lower reporting threshold to  $\geq 11$  claims per service
  - Extended 6 month reporting period
- \*Prescription Drug Files (Monthly)\*
  - Negotiated rates, historical net prices, NDC
- Text Files
  - Change- logs, **\*\*\*utilization reported annually\*\*\***, taxonomy (NUCC), contact info

# CLOSING

Powerful crystal ball for:

- 1) NEW service lines, NEW businesses, and NEW emerging treatments
- 2) Financial forecasting & budgeting
- 3) Strategic planning

*Coker*



Learn More at: <https://datarise.cokergroup.com>



---

# Want Digital Copy of All 60+ Slides?



# Questions?

Nicholas A. Newsad, MHSA

VP of Innovation

[nnewsad@cokergroup.com](mailto:nnewsad@cokergroup.com)

(678) 710-8953

*Coker*