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WHA and Hospital Leaders Urge Senate Regulatory Reform Committee to Reject New Duplicative State Regulations on Hospital Price Reporting

Proponents of the legislation rely on outdated, wrong data to argue for more regulations on hospitals

On Jan. 7, the Senate Committee responsible for regulatory reform heard strong opposition from WHA and Wisconsin hospital leaders to legislation that would impose duplicative state-level regulations on hospitals that are already investing resources to comply with existing, federally enforced price transparency regulations.

WHA Vice President of Medicaid & Payer Reimbursement Policy Christian Moran was joined by Brian Stephens, CEO of Door County Medical Center and 2026 WHA board chair, and John Russell, president and CEO of Prairie Ridge Health and past WHA board chair of the association, to testify against Senate Bill 383. This bill imposes state-level enforcement, added state-level regulations and unlimited fines on Wisconsin hospitals in addition to the robust federal regulation and enforcement that already exists.



L to R: John Russell, Christian Moran, Brian Stephens

"While the task of complying with federal price transparency regulations is not easy, Wisconsin lawmakers should be proud of our state's hospitals and their track record," said Moran in his testimony before the Senate Committee on Licensing, Regulatory Reform, State and Federal Affairs. "Since these federal regulations first went into effect in 2019, not a single Wisconsin hospital has been fined for noncompliance."

To support their argument for more regulation on Wisconsin hospitals, proponents of the bill rehashed a false allegation that federal regulators have not been enforcing the existing federal hospital pricing requirements. WHA refuted this untrue claim over two years ago during a public hearing on a very similar bill that ultimately failed to pass in the last legislative session.

Moran debunked the claim again in his testimony against Senate Bill 383, noting that between Jan. 7, 2021 and June 30, 2025, federal regulators conducted over 6,000 audits and enforcement actions related to hospital price transparency compliance nationally. Nearly all these cases resulted in a hospital compliance, noted Moran, with only 27 hospitals receiving a fine—all outside Wisconsin.

"The fact that 6,000 enforcement or audit actions by CMS have resulted in only 27 hospitals across the country receiving a fine is indicative of an industry that is taking its regulatory compliance obligation seriously," said Moran.

Proponents of the bill also repeated a false claim that only 30% of Wisconsin hospitals are fully compliant with federal hospital price transparency rules, citing a November 2024 report from patientrightsadvocate.org that includes outdated, inaccurate information and, in some cases, relies on hospital price files that are now almost two years old.

Moran stressed in his testimony that no Wisconsin hospital has received a fine for noncompliance from the federal Centers for Medicare and Medicaid Services (CMS), which is the only arbiter of compliance of the federal hospital price transparency regulations.

In their testimony, Moran, Russell and Stephens encouraged lawmakers who are interested in health care price transparency to redirect their attention to insurers and third-party administrators. While payers and administrators are subject to federal price transparency regulations like those that exist for hospitals, no government source of enforcement data is available to evaluate compliance by these health care middlemen, noted Moran.

“There is a disconnect in this country between the concerted efforts of health care providers to provide reasonable and transparent prices and the costs that people are paying for insurance, and unfortunately hospital price transparency efforts have not put a dent in that dichotomy,” said Stephens. “Perhaps we need to be asking for more transparency from health insurance companies and other middlemen to understand the real drivers of health care costs in our country.”

[Learn more about price
transparency in Wisconsin.](#)

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EDUCATION EVENTS

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Jan. 28, 2026

2026 WHA Health Care Leadership Academy

Feb. 10, 2026

Age-Friendly Webinar Series Featuring Advocate Health