



April 18, 2022

The Centers for Medicare & Medicaid Services (CMS) recently posted several No Surprises Act (NSA) updates to its [website](#). Updates include:

- The opening of the Federal Independent Dispute Resolution (IDR) [portal](#);
- Updated IDR guidance for [disputing parties](#) and [certified IDR entities](#);
- A new Frequently Asked Questions [document](#) on general NSA requirements;
- A new Frequently Asked Questions [document](#) specific to good faith estimates for uninsured or self-pay individuals; and
- An NSA [enforcement agreement](#) between CMS and Illinois.

Disputing parties for whom the open negotiation period has expired have 15 business days from April 15 to submit a notice of initiation of the IDR process through the IDR portal. In the future, disputing parties will have 30 business days from the conclusion of the open negotiation period to initiate the IDR process. Training on the IDR process and portal is available on the [CMS YouTube channel](#), and questions on the IDR process or portal may be sent to [federalIDRquestions@cms.hhs.gov](mailto:federalIDRquestions@cms.hhs.gov).

In the updated FAQ documents, CMS clarified that good faith estimates for uninsured and self-pay patients do not need to include a diagnosis code if the scheduled service does not logically coincide with a determined diagnosis, such as an initial screening visit. CMS also outlined provider responsibilities specific to ensuring provider directories remain up-to-date.

IHA updated its NSA FAQ [document](#) to reflect these and other clarifications. We will provide a breakdown of the CMS-Illinois NSA enforcement agreement in the near future.

[Contact us](#) with questions or comments.

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