IDR Gateway Technical Guidance

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This document contains technical guidance regarding implementation of the Independent Dispute Resolution (IDR) Gateway.

Q1. If I am not a U.S. citizen, can I sign-up for the IDR Gateway?

A1: In order to access the IDR Gateway, a user must be both lawfully present and physically located in the United States or its territories. Non-U.S. citizens can verify their identity and access the IDR Gateway as long as they have a valid U.S. state-issued ID, social security number, and U.S. address.

Q2. Will parties still receive email notifications related to IDR web form submissions?

A2: Yes, for this initial IDR Gateway implementation, parties will receive emails as well as in-system notifications related to IDR web form submissions and other IDR activity conducted through the IDR Gateway.

Q3. Will parties be able to submit IDR web forms without signing into the IDR Gateway?

A3: For a limited period after the dispute web forms become available in the IDR Gateway, parties may continue to submit dispute web forms through the legacy, non-Gateway web forms. However, these non-Gateway web forms will be discontinued in January 2027, and parties are strongly encouraged to transition their dispute processing activities as soon as possible.

Q4. Will open negotiation be in the Gateway?

A4: The initial rollout of the IDR Gateway does not include functions to support open negotiation. As required in the Federal IDR Operations Final Rule, open negotiation functions will be required within the Gateway once those features are available. The Departments will provide notice and technical assistance in advance of the open negotiation features becoming available.

Q5. Do health plans, health insurance issuers, and Federal Employee Health Benefits (FEHB) carriers subject to the IDR Registry requirement need to set up their organization in the IDR Gateway if they use a third-party administrator (TPA) or other third party to process IDR disputes?

A5: No, only organizations and individuals that process disputes, represent parties, or submit IDR web forms in the current Federal IDR process should sign up for the IDR Gateway at this time. The IDR Registry is not yet available, and therefore, plans, issuers, and carriers are not yet required to register. The Departments will provide notice and technical assistance in advance of the IDR Registry becoming available, and parties will have 90 business days to register after the Departments issue guidance announcing that the functionality supporting the registry has become available.

Q6. When creating an organization in the IDR Gateway, which tax ID should organizations with multiple tax IDs use?

A6: Organization tax IDs collected during IDR Gateway organization setup are only used to prevent the creation of duplicate organization accounts and to help users find organization accounts. The tax ID associated with an organization's account in the IDR Gateway is not matched to or populated as the tax ID on the IDR dispute. The tax IDs collected on the Notice of Initiation or on the Selection Response form should reflect the tax ID of the disputing party named in the dispute. These do not have to be the same as the tax ID associated with the organization in the IDR Gateway that processes the dispute.

For an organization with multiple tax IDs, the appropriate tax ID for the IDR Gateway depends on the organization's structure and situation.

In some cases, an entity may be a subsidiary of another entity. If the parent organization has joined the IDR Gateway or plans to join the IDR Gateway, then subsidiaries should not create a new organization in the IDR Gateway. Instead, they should join the parent entity's organization in the IDR Gateway, which should utilize the parent entity's primary tax ID. Users associated with affiliated entities will be able to join this parent organization even if those affiliated entities use different tax IDs.

In other instances, organizations (acting as representatives) may process disputes for multiple clients (disputing parties) in the Federal IDR Process. In this case, processing organizations should use their own tax ID, rather than a client's tax ID, when creating an organization account in the IDR Gateway. Even though a processing organization lists its own tax ID on its IDR Gateway organization's account, IDR Gateway users associated with that IDR Gateway organization account will be able to submit dispute web forms for clients using the client's tax ID.

If an organization needs to account for different offices or locations that process disputes for different clients, it should make sure that all email addresses used for dispute processing are added to the organization's IDR Gateway account and that the organization's administrator completes the necessary steps to verify those email addresses. If needed, organization administrators can also limit certain staff members' access so that they can only view and process disputes that belong to their sub-division by separating sub-divisions using the workspace feature available in the IDR Gateway.

Q7. Is there Application Programming Interface (API) access for the IDR Gateway?

A7: API access for dispute processing is not in scope for the initial IDR Gateway release. While a timeline for implementing an API for the IDR Gateway has not yet been determined, the Departments will provide notice to parties in advance of any such functionality becoming available, as it has done for other major IDR enhancements.