

Independent Dispute Resolution (IDR) Gateway



Notice of IDR Initiation User Guide

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Introduction

This user guide contains instructions for completing the “Notice of IDR Initiation” web form within the IDR Gateway. This document is intended for use by health care providers, health care facilities, providers of air ambulance services, group health plans, health insurance issuers, and Federal Employees Health Benefits (FEHB) Program carriers that use the Federal IDR process to help resolve payment disputes.

As referred to in this document, a health care provider, facility, or provider of air ambulance services, and a plan, issuer, or FEHB carrier are the “parties” to the Federal IDR process. Instructions for a party also apply to a representative acting for a party. Certified Independent Dispute Resolution (IDR) entities are also referred to as “certified IDR entities,” or “certified entity.” The Department of Health and Human Services, the Department of Labor, and the Department of Treasury are collectively referred to as “the Departments.”

- On November 13, 2026, the Federal IDR process will transition from single-use web forms into the IDR Gateway.
- For a limited period, parties can continue to submit the “Notice of IDR Initiation” web form without signing in to the IDR Gateway. Refer to the user guides on the [Overview of rules & fact sheets](#) for instructions.
- The “Notice of IDR Initiation” web form will not be available outside the IDR Gateway after January 15, 2027. Parties must create an IDR Gateway account to continue participating in the Federal IDR process.

Important Information

- The initiating party can start a dispute in the Independent Dispute Resolution (IDR) Gateway using the “Notice of IDR Initiation” web form.
- The initiating party can start the Federal IDR process within 4 business days after the end of the 30-business-day open negotiation period if an agreement is not reached between the disputing parties.
- The initiating party can use this web form if it participated in an open negotiation period that has expired without an agreement for an out-of-network total payment amount for the qualified IDR item or service. The initiating party will need to provide information for both parties involved in the dispute.
- The disputing parties can still reach an agreement on a payment amount during the Federal IDR process, but must reach an agreement before the certified independent dispute resolution entity determines the payment amount.
- The initiating party cannot submit duplicate dispute line items with the same Claim Number, Date of Service, Service Code, and if applicable, Service Code Modifier(s) as another previously entered dispute line item, except for the following situations:
 - If the previously submitted dispute was subject to the cooling off period and was closed as ineligible due to submission prior to the end of the cooling off period
 - If the newly submitted dispute received approval for an extension from the Federal IDR team
- If the initiating party needs to resubmit items or services that were determined improperly batched or bundled, it should use the “Notice of IDR Initiation – Resubmission” web form to do so. The duplicate dispute check does not apply to the “Notice of IDR Initiation – Resubmission” web form.

- For each dispute line item submitted, the date the item or service was furnished must be prior to the open negotiation start date.
- For batched disputes, all dispute line items must have dates of service that are within 30 business days of each other, unless a cooling off period applies.

Federal IDR Process Guidance from the Departments

Guidance issued by the Departments of the Treasury, Labor, Health and Human Services (collectively, the Departments), and Office of Personnel Management can be found in Frequently Asked Questions (FAQs) documents listed on the following pages:

- U.S. Department of Health and Human Services (CMS.gov No Surprises): [Overview of rules and fact sheets](#)
- U.S. Department of Labor: [Frequently Asked Questions](#)



Note: Send any questions regarding the IDR Notice of Initiation process and the web form to the Federal IDR Questions mailbox at:
FederalIDRQuestions@cms.hhs.gov

1 Complete the Notice of IDR Initiation Web Form

1.1 Before Starting the Notice of IDR Initiation Web Form



Important: If the initiating party has started a dispute through the IDR Gateway in the past, the initiating party should clear its computer cache or open the IDR Gateway in a private or incognito window to access the updated “Notice of IDR Initiation” web form.



Note: The initiation date of the Federal IDR process is the date that the Departments receive the Notice of IDR Initiation.

Make sure this dispute belongs in the Federal IDR process. Review the [IDR State](#) list to help determine which states have processes that may apply to payment determinations for the items, services, and parties involved.

Have the following information and items available to complete the web form:

- Open negotiation period start date and documents to confirm the open negotiation period start date (for example, the notice of open negotiation)
- If the dispute contains multiple items and services with different open negotiation dates, submit documentation for each open negotiation period start date. Additionally, if the initiating party enters an open negotiation start date more than 34 business days earlier than the date on which the web form was completed it must also upload at least one of the following to confirm that the claim is still eligible for the Federal IDR process:
 - Documents to confirm the extension approval received from the [Federal IDR Questions](#) mailbox
 - Documents to confirm the certified IDR entity request to re-submit the dispute
 - The dispute number that triggered the cooling off period and documents to confirm the cooling off period has expired
- Information to identify the qualified IDR items or services, including claim number (and whether they are designated as batched or bundled items or services)
- Dates and location of qualified IDR items or services
- Type of qualified IDR items or services such as emergency services or post-stabilization services
- Item and service codes for corresponding services, place of service code, and service code modifier(s)
- Qualifying Payment Amount (QPA), initial payment amount and cost-sharing amount
- Documents to confirm the claim and QPA information (i.e., the notices associated with the initial payment or notice of denial of payment)
- The preferred certified IDR entity

You must complete and submit the web form in a single session.

- For security reasons and protection of personal data, the session will time out after 60 minutes of inactivity and a warning message will display.

- If there is no response within 60 seconds, the system will end the session and return to the [No Surprises Act](#) web page. Select **Continue** to restart the 60-minute timer for inactivity.
- If the initiating party exits the web form prior to completing all information and submitting it, the information entered is not saved. When the party selects **Exit**, the following window will appear.

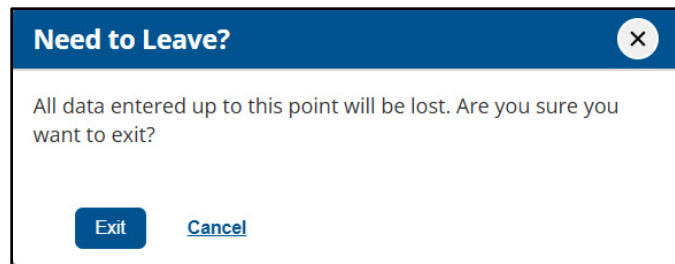


Figure 1. Need to Leave Notice

1.2 Access the Notice of IDR Initiation Web Form

This web form must include, among other information, the QPA supplied with the initial payment or notice of denial of payment, the initiating party's preferred certified IDR entity, and the qualified IDR items or services at issue. The initiation date of the Federal IDR process is the date that the Departments receive the Notice of IDR Initiation. The initiating party information will display first on the web form.



To learn more about the QPA, please navigate to the FAQs documents on the CMS.gov No Surprises [Overview of rules and fact sheets](#).

1. [Sign in](#) to the IDR Gateway.
2. From the Home menu bar, select the **Start a Dispute** option from the **Disputes** dropdown list. The "Introduction & Qualification Questions" page displays.

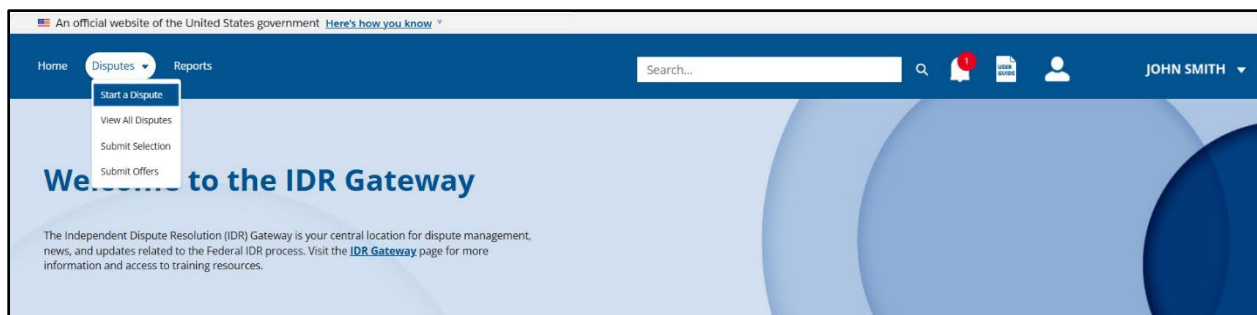


Figure 2. Start a Dispute Menu Bar Option

1.3 Introduction and Qualification Questions

The “Introduction & Qualification Questions” page is the first page of the “Notice of IDR Initiation” web form.

The following questions help to confirm eligibility for the payment dispute process. The initiating party is only allowed to proceed, and create a dispute, if the dispute meets basic eligibility criteria. Any fields marked with an asterisk (*) are required fields on the web form. If the initiating party is a third-party administrator (TPA) or third-party representative, it should indicate which party it is working on behalf of. Access a glossary of terms referenced in this document by selecting the link contained within the “Need help with terms?” section.

An official website of the United States government [Here's how you know](#)

Home Disputes Reports Search... JOHN SMITH

Start a Dispute: Notice of IDR Initiation

- Introduction & Qualification Questions**
- Dispute Type
- Initiating Party Information
- Non-Initiating Party Information
- Dispute Line Items
- Preferred Certified IDR Entity & COI
- Review & Submit
- Confirmation

1 Disputing parties will generally have **4 business days** from the conclusion of their open negotiation period to submit a Notice of IDR Initiation, unless the dispute qualifies for an exception, such as the dispute being subject to the cooling-off period, the dispute having received prior approval for an extension, or a certified IDR entity has requested the party to resubmit the dispute.

IMPORTANT: The administrative fee is \$15.00.

NOTE: Once you complete the Notice of IDR Initiation, download a copy and send the Notice of IDR Initiation PDF to the Non-Initiating Party.

REMINDER: You must complete and submit the web form in a single session. For security reasons and protection of personal data, your session will time out after 30 minutes of inactivity.

1 Important: IDR Operations Rule Changes

Batched disputes with an open negotiation date on or after November 1, 2026, cannot exceed 50 dispute line items.

Qualified IDR items and services with an open negotiation start date on or after November 1, 2026, may be batched in the following circumstances:

- Items and services are furnished to a single patient during a single patient encounter, which is defined as a patient encounter on one or more consecutive days during which the qualified IDR items or services are furnished to the same patient and billed on the same claim form.
- Items and services are furnished to one or more patients and are billed under the same service code or a comparable code under a different procedural code system (e.g., Current Procedural Terminology [CPT] codes with modifiers, if applicable, Healthcare Common Procedure Coding Systems [HCPCS] codes with modifiers, if applicable, or Diagnosis-Related Group [DRG] codes with modifiers, if applicable).
- Anesthesiology, radiology, pathology, and laboratory items and services that are furnished to one or more patients under service codes belonging to the same Category I CPT code section, as specified in guidance by the Departments.

Figure 3. Start a Dispute Page

1. Review the instructions and then complete the questions:

Introduction

▼ Introduction to the Notice of Initiation

Use this form if you participated in an open negotiation period that has expired without an agreement for an out-of-network total payment amount for the qualified IDR item or service.

You can start the Federal Independent Dispute Resolution (IDR) process within 4 business days after the end of the 30-business-day open negotiation period if a determination of the total payment for the qualified IDR item(s) or service(s), including cost-sharing, wasn't reached.

You will need to **provide information for both parties involved** in the dispute.

The parties can still reach an agreement on a payment amount during the IDR process, but you must reach an agreement before the certified independent dispute resolution entity determines the payment amount.

Review the [IDR State list](#) to determine which states will have processes that apply to payment determinations for the items, services, and parties involved. FEHB plans are subject to the Federal IDR process unless OPM contracts with FEHB carriers include terms that adopt state law as governing for this purpose.

Need Help? Contact FederalIDRQuestions@cms.hhs.gov if you have any questions about this form.

Before starting:

You may need to provide information by uploading separate documents. The total file size limit for all uploaded documents is 500MB. Be sure your files meet this limitation.

Along with the general information you'll need to start your Federal IDR dispute process, provide:

- Information to identify the qualified IDR items or services (and whether they are designated as batched or bundled items or services)
- Dates and location of qualified IDR items or services
- Type of qualified IDR items or services such as emergency services and post-stabilization services
- Codes for corresponding service and place-of-service
- Attestation that qualified IDR items or services are within the scope of the Federal IDR process
- Your preferred certified IDR entity

Initiation Process

Step 1: Complete the qualification questions.

Step 2: Complete and submit the initiation form. Provide any additional information.

Step 3: You will receive an acknowledgment email once the form is submitted.

Qualification Questions

▼ How to Complete Qualification Questions

Before continuing we'd like to ask you a series of quick questions to confirm your eligibility for the payment dispute process. This process allows health care providers, plans, and issuers to resolve disputes. If you are an uninsured patient, self-paying patient, or insured patient, visit <https://www.cms.gov/nosurprises>.

Answer the following:
If you're a third-party administrator, please indicate which party you are working on behalf of below.

Need help with terms? Refer to the [glossary of insurance terms and definitions](#) that are commonly used in this form.

Figure 4. Start a Dispute Page (Introduction to Notice of Initiation)

2. *Was the service in question provided prior to 1/1/2022?

- Select the radio button next to "Yes" or "No."
- The following alert displays if the "Yes" radio button is selected:

▼ Date of Service Stop

i This dispute is not eligible for the IDR process because the date of service you provided is before 01/01/2022.

* Was the service in question provided prior to 01/01/2022? ☒ Yes ☐ No

Figure 5. Date of Service Error Message



Important: If the plan renewal date for plan year 2022 is after the date of service, the dispute will not be eligible for the Federal IDR process.

- *I am (or I am acting on behalf of) a: This information does not automatically populate from the IDR Gateway organization information. Select the radio button identifying the organization type.
 - Group Health Plan
 - Individual health insurance issuer
 - Federal Employees Health Benefits (FEHB) carrier
 - Health care provider

- e. Health care facility
- f. Provider of air ambulance services



Important: If a member is only enrolled in coverage other than through a group health plan, an individual health insurance issuer, or an FEHB carrier (such as Medicare, Medicaid, Children's Health Insurance Plan [CHIP], TRICARE plan coverage, or healthcare sharing ministry), the dispute is not eligible for the Federal IDR process.

4. If the initiating party is (or is acting on behalf of) a "health care provider," "health care facility" or "provider of air ambulance services" the following additional fields will display. The initiating party must complete at least one of the two fields:
 - a. * **Tax ID.** The Taxpayer Identification Number (TIN) must be nine digits.
 - b. * **National Provider Identifier (NPI).** The NPI number must be ten digits.
5. Indicate the ***Health Plan Type** by selecting the appropriate dropdown option:
 - a. "Individual health insurance issuer"
 - b. "Fully-insured ERISA group health plan"
 - c. "Federal Employees Health Benefits (FEHB) carrier"
 - d. "Either partially or fully self-insured ERISA group health plan"
 - e. "Church plan"
 - f. "Non-federal governmental plan (e.g., state or local government plan)"
 - g. "No Plan/Issuer Response" (This option only displays if the initiating party is a provider. This option does not display if the initiating party is a plan or issuer).
6. If the initiating party selects "Federal Employees Health Benefits (FEHB) carrier" it must provide the three digit ***Enrollment Code**.
7. If the initiating party identifies as a plan or issuer and selects "Either partially or fully self-insured ERISA group health plan," it must also answer the following question: ***Has the self-insured plan opted into any specified state laws that would apply to the items and services in this dispute?** Select the radio button next to "Yes" or "No."
8. If the initiating party identifies as a plan or issuer and selects "Church Plan" or "Non-federal governmental plan (e.g., state or local government plan)" it must answer the following question:
 - a. ***Is the health plan fully or self-insured?** Select the radio button to indicate whether the plan is "Fully insured" or "Self-insured."
 - b. If the initiating party selects "Self-insured" it must also answer the following question: ***Has the self-insured plan opted into any specified state laws that would apply to the items and services in this dispute.** Select the radio button next to "Yes" or "No."



Important: Failure to answer the specified state law question, if prompted, will result in an error message: "Self-insured plans must attest to whether or not they have opted into a specified state law that applies to the items and services in a dispute."

Figure 6. My Role Qualification Questions

9. ***When did the open negotiation period start?** The initiating party must upload evidence of the open negotiation period start date. An example of evidence is a copy of the notice or notices of open negotiation for the claim or claims in this dispute that was sent to the non-initiating party.



Note: If the batched dispute contains multiple items and services with different open negotiation dates, enter the open negotiation period start date for the first claim in the batch. Submit documentation for each open negotiation period start date. The certified IDR entity will review the open negotiation periods for each item and service to confirm the dispute meets batching criteria.



Note: To upload evidence, select the **Upload** button or drag and drop documents into the appropriate space on the web form, which will appear after selecting the extension reason, or drag and drop documents into the “Or drop files” area of the web form. The file limitation for the entire dispute is 500MB. Be sure the file(s) meets this limitation. The initiating party must upload at least one file. The file name is displayed when the information is loaded.

Figure 7. Open Negotiation Period Section



Important: If the parties can't agree on an out-of-network rate, the 30-business-day open negotiation period must elapse before starting the Federal IDR process.

- a. If the initiating party enters a date that is **fewer** than 31 business days prior to the current date, the following error message displays.

The screenshot shows a web form titled "Open Negotiation (ON) Period" with a "Stop" button in the top right corner. Below the title bar, there is an information icon and a message: "The 30 business-day open negotiation period must elapse before starting the federal IDR process. (Use format Dec 31, 2024)". Below this, a red asterisk indicates a required field: "When did the Open Negotiation period start?". A date input field is shown with the text "May 15, 2024" and a calendar icon to its right.

Figure 8. Open Negotiation Period (Must Elapse Error Message)

- b. If the initiating party enters a date that is more than 34 business days prior to the current date, extension justification reasons will display as pictured below.
- c. If the extension justification reasons are displayed, select an appropriate reason why this dispute is eligible for an extension and upload evidence of the extension reason.
 - i. "I received an extension approval from the Federal IDR mailbox and will upload evidence of this extension in the Supporting Documentation section of this web form." If the initiating party selects this extension reason: An **Upload** button will display, and the initiating party will be required to upload a copy of the extension approval received from the Federal IDR Questions mailbox.
 - ii. "The item(s) or service(s) under dispute was subject to the cooling off period." If the initiating party selects this extension reason:
 1. A **Dispute Reference Number** field will display. Using the "DISP-XXXXXX" format, enter the dispute number that triggered the cooling off period.
 - a. If the cooling off period has not elapsed for the dispute, an error message will display stating that the cooling off period must elapse before starting the Federal IDR process.
 - b. If no dispute number is entered, the following error message will display: "Enter the dispute reference number."
 - c. If the dispute number is not entered in a valid format or the dispute is not found, an error message stating the dispute number is not valid will display.
 2. An **Upload** button will display, and the initiating party will be required to upload a copy of the payment determination(s) that initiated the cooling off period. If the dispute is subject to overlapping cooling off periods, upload a copy of all payment determinations that triggered a cooling off period.



Important: To upload evidence of the extension reason, select the **Upload** button, which will appear after selecting the extension reason, or drag and drop documents into the "Or drop files" area of the web form. The file limitation for the entire dispute is 500MB. Be sure the files meet this limitation. The file name is displayed when the information is loaded.

Open Negotiation (ON) Period Complete

* When did the Open Negotiation period start?

Upload Files

Upload Files Or drop files

Do not upload documents that include PHI/PII.

File limitations for entire dispute (500MB)

Uploaded files

Remove File OpenNegotiationStart.docx

⚠ The Federal IDR Process must be initiated within 4 business days of the open negotiation period ending.

* provide a reason why this dispute is eligible for an extension to this requirement.

☐ I received an extension approval from the federal IDR mailbox, and will upload evidence of this extension in the Supporting Documentation section of this webform.

☒ The item(s) or service(s) under dispute was subject to the cooling off period.

* Dispute Reference Number

Upload Files

Upload Files Or drop files

Do not upload documents that include PHI/PII.

File limitations for entire dispute (500MB)

Uploaded files

Remove File DISP-XXXXXX_PaymentDetermination.docx

Figure 9. Open Negotiation Period (Extension Justification Reasons)

10. ***Did the health care provider or health care facility get consent from the participant, beneficiary, or enrollee to waive surprise billing protections for these items or services?** Select the radio button next to “Yes” or “No.” If the surprise billing protections were waived, the following message will display after selecting the radio button next to “Yes.”

Consent to Waive Stop

ⓘ This dispute is not eligible for the Federal IDR process. Based on your selection, the surprise billing protections were waived, and the items and services do not qualify for the dispute process.

* Did the health care provider or health care facility get consent from the participant, beneficiary, or enrollee to waive surprise billing protections for these items or services?

☒ Yes ☐ No

Figure 10. Consent to Waive Message

11. Select **Continue**.

1.4 Dispute Type



Important: Refer to Batching Sub-regulatory Guidance on the CMS.gov No Surprises [Overview of rules and fact sheets](#) page for more information on the criteria for batched or bundled disputes. For questions regarding eligibility, contact the [Federal IDR Questions](#) mailbox.

Figure 11. Select a Dispute Type

1. Select the appropriate radio button in response to the question: ***What are you disputing today?**
 - a. “A single dispute. I’m disputing either (a) one service code that represents one item or service, or (b) one service code that represents multiple items or services (a bundled payment arrangement).” If the initiating party selects the single dispute radio button, indicate “Yes” or “No” to the following question: **Are you disputing a bundled payment arrangement (multiple items or services billed or reimbursed under one service code)?**



Important: If the initiating party has indicated the provider of the item or service as “Provider of air ambulance services,” it will receive a pop-up window upon selecting “single dispute.” The pop-up window will inform that “As a result of the Federal IDR Operations rule, multiple codes under a single air transport may be submitted as a batched dispute. Are you sure you want to proceed with submitting a single dispute?”

- b. “A batched dispute. I’m disputing multiple items or services related to the treatment of a similar condition.” If the initiating party selects this option, a window will appear under the heading: **Do your disputes qualify for the batching process?** Review the list of questions in the pop-up and select the **No** or **Yes** button. Selecting **No** returns the initiating party to the select a single dispute option. Selecting **Yes** takes the initiating party to the next screen.
2. Select **Continue**.

1.5 Contact Information

In this section of the web form, the initiating party provides contact information for themselves and the non-initiating party. The contact information of the initiating party displays first.

- If the party is a health care provider, health care facility, or provider of air ambulance services, the ***Health care provider name** and ***Hospital, Health Care Facility or Group Name** fields display.
- If the party is a group health plan, health insurance issuer, or FEHB carrier, the ***Health Insurance Plan or Company** field displays.

If the initiating party enters a name in the Primary or Secondary point-of-contact fields, it is then required to enter the full contact information, including the mailing address.

1.5.1 Initiating Party Contact Information

Enter the email address for the organization handling the payment dispute in the required email field for the initiating party. The organization handling the payment dispute may be the entity named in the dispute or another organization, such as a third-party administrator (TPA) or revenue cycle manager. If there are other contacts that should be included in communications related to the dispute, add them in the primary and secondary points-of-contact sections.

Enter the information in the following text fields. Required fields are marked by a red asterisk (*) on the web form.

1. Name and Address Information (This is where the initiating party enters its contact information.):
 - a. ***Health care provider name**
 - b. ***Hospital, Health Care Facility or Group Name**
 - c. ***Email**
 - d. ***Phone**
 - e. **Fax**
 - f. ***Mailing Address**
 - g. ***City**
 - h. ***State**
 - i. ***ZIP Code**
2. Primary point of contact if different from above:
 - a. **Primary Contact Name**
 - b. **Email**
 - c. **Phone**
 - d. **Email**
 - e. **Mailing Address**
 - f. **City**
 - g. **State**
 - h. **ZIP Code**

3. Secondary point of contact: **(optional)**
 - a. **Secondary Contact Name**
 - b. **Phone**
 - c. **Email**
 - d. **Mailing Address**
 - e. **City**
 - f. **State**
 - g. **ZIP Code**
4. Select **Continue**.

1.5.2 Non-Initiating Party Contact Information

Enter the email address for the organization handling the payment dispute in the required email field for the non-initiating party. The organization handling the payment dispute may be the entity named in the dispute or another organization, such as a third-party administrator (TPA) or revenue cycle manager. If there are other contacts that should be included in communications related to the dispute, add them in the primary and secondary points-of-contact sections.

Enter the information in the following fields. Required fields are marked by a red asterisk (*) on the web form.

1. ***Select one of the insurance provider types below:**
 - a. Group health plan
 - b. Individual health insurance issuer
 - c. Federal Employee Health Benefits (FEHB) carrier
2. Name and Address Information:
 - a. ***Health Insurance Plan or Company**
 - b. ***Email**
 - c. ***Phone**
 - d. **Fax**
 - e. ***Mailing Address**
 - f. ***City**
 - g. ***State**
 - h. ***ZIP Code**
3. Primary point of contact if different from above:
 - a. **Primary Contact Name**
 - b. **Phone**
 - c. **Email**
 - d. **Mailing Address**
 - e. **City**
 - f. **State**
 - g. **ZIP Code**

4. Secondary point of contact: **(optional)**
 - a. **Secondary Contact Name**
 - b. **Phone**
 - c. **Email**
 - d. **Mailing Address**
 - e. **City**
 - f. **State**
 - g. **ZIP Code**

1.5.3 Use of Special Characters

This subsection outlines which special characters may be used in name and address fields.

1.5.3.1 Name Fields

The system will display the error message below if a special character is used in a name field that is **not** in the list of valid special characters: comma (,), hyphens/dash (-), apostrophe (') period (.), accent mark (à), ampersand (&), and tilde (~). The error message will be displayed in the following fields when selecting anywhere outside of the field, hovering out of the field, selecting the tab button on the keyboard, or selecting the **Continue** button.

1. ***Health Care Provider Name**
2. ***Hospital, Heath care facility or group name**
3. **Primary point of contact if different from above: (Initiating Party)**
4. **Secondary point of contact (optional) (Initiating Party)**
5. **Health Insurance Plan or Company**
6. **Primary point of contact if different from above: (Non-Initiating Party)**
7. **Secondary point of contact (optional) (Non-Initiating Party)**
8. **Initiating Party Signature**

1.5.3.2 Address Fields

The system will display the error message below if a special character is entered in an address field that is **not** in the list of valid special characters: number sign (#), comma (,), hyphen/dash (-), apostrophe ('), period (.), accent mark (à), ampersand (&), tilde (~), forward-slash (/), backward-slash (\), and colon (:). The error message will be displayed in the following fields when selecting anywhere outside of the field, hovering out of the field, selecting the tab button on the keyboard, or selecting the **Continue** button.

1. ***Mailing Address (initiating party)**
2. ***City (initiating party)**
3. ***Mailing Address (non-initiating party)**
4. ***City (non-initiating party)**

1.6 Dispute Line Items

This section of the web form must include, among other information, the QPA for each item or service that was provided with the initial payment or denial of payment, the initiating party preferred certified IDR entity, and the qualified IDR items or services at issue.



Important: If this dispute involves a Federal Employees Health Benefits (FEHB) carrier that has a contract with the Office of Personnel Management (OPM) that includes terms to adopt a state process for making out-of-network payment determinations, the initiating party will need to inquire with the state on how to handle the dispute. Similarly, if this dispute involves an Employee Retirement Income Security Act (ERISA) plan that has opted into the state process for determining an out-of-network payment rate, the initiating party will need to inquire with the state on how to handle this dispute.

1.6.1 Enter a New Line Item

The fields populated in this section reflect the information provided under the “Qualification Question” section of the web form, specifically in response to the question: **What are you disputing today?** Possible choices include “Single Line Item – Not Bundled,” “Single Line Item – Bundled,” or “Batched Items or Services.”

1.6.1.1 Single Line Item – Not Bundled

If the dispute involves a single line item with no bundling, the “New Line Item” section will display the following fields:

1. Enter the description of the item or service.
2. Add the **Claim Number** for the dispute line item entered. The **Claim Number** field accepts up to 40 characters and is alphanumeric.
3. Use the **calendar** icon to select the date of the item or service.



Important: The web form will verify that the Date of the qualified IDR item or service entered for each dispute line item is prior to the open negotiation start date provided by the initiating party on a previous page of the web form. This validation applies to the date of any item or service entered on a single, bundled, or batched dispute.

4. Enter the qualifying payment amount in the ***QPA** field.
5. Enter the cost sharing amount in the ***Cost sharing amount allowed** field.
6. Enter the initial payment in the **Initial payment amount for the item(s) and/or service(s) (if applicable)** field.
7. Select the item(s) or service(s) under dispute by selecting the checkbox next to the service. The initiating party may choose more than one service category.
 - a. Emergency item(s)/service(s)
 - b. Post-stabilization service(s)
 - c. Professional service(s)
 - d. Hospital-based service(s)
 - e. Item(s)/service(s) furnished by a nonparticipating provider at a participating health care facility

- f. Out-of-network air ambulance service(s)
 - g. Other: Provide description” (Put description in text box provided)
8. Provide the service codes in identified fields below.
- a. ***Service Code** (five-character code)
 - b. **Service Code Modifier(s)** (Service code modifiers must be two alpha-numeric characters. Up to 4 separate service code modifiers can be entered. When more than one service code modifier is entered, the modifiers will be automatically separated by a semicolon.)
 - c. ***Place of Service Code** (two digits)
 - d. ***Location of Service** (state)

The screenshot shows the 'New Line Item' form with the 'Line Item Details' section expanded. The form includes the following fields and options:

- * Enter the description of the item or service:** Text input field.
- * Claim Number:** Text input field.
- * Date of the qualified IDR item or service:** Date picker (format: Enter date MMM D, YYYY).
- * Qualifying Payment Amount (QPA):** Text input field (format: \$#####).
- * Cost sharing amount allowed:** Text input field (format: \$#####).
- Initial payment amount for the item(s) and/or service(s) (if applicable):** Text input field (format: \$#####).
- * Select the item(s) or service(s) under dispute and provide the service code:**
 - ☐ Emergency item(s)/service(s)
 - ☐ Post-stabilization service(s)
 - ☐ Professional service(s)
 - ☐ Hospital-based service(s)
 - ☐ Item(s)/service(s) furnished by a nonparticipating provider at a participating health care facility
 - ☐ Out-of-network air ambulance service(s)
 - ☐ Other: Provide description
- * Service Code:** Text input field (format: 01;AA;02;03).
- Service Code Modifier(s):** Text input field (format: Enter up to 4 modifiers (i.e. 01;AA;02;03)).
- * Place of Service Code:** Text input field (format: Enter text...).
- * Location of Service:** Dropdown menu (format: Select an Option).

Figure 12. New Line Item (Line Item Details)

9. Upload any relevant documentation of the claim and QPA. Examples of acceptable documentation include the initial payment or notice of denial of payment, remittance form and explanation of benefits, and explanation of payments.



Important: To upload relevant documentation, select the **Upload** button or drag and drop documents into the appropriate space on the web form or drag and drop documents into the “Or drop files” area of the web form. The file limitation for the entire dispute is 500MB. Be sure the file(s) meets this limitation. The initiating party must upload at least one file. The file name is displayed when the information is loaded.

10. If the initiating party enters a state from the Complex State list, further screening for dispute eligibility is required. The initiating party is required to attest to the following statement: ***I have reviewed the state-specific eligibility criteria regarding the IDR processes for this item or service, and attest that this item or service is eligible for the Federal IDR process.**

Documentation

* Upload documentation of the claim and QPA. Examples of acceptable documentation include the initial payment or notice of denial of payment, remittance form and explanation of benefits, explanation of payments.

Parties may submit additional information related to the supplied QPA, including additional information about the QPA that a disputing party believes the certified IDR entity should consider when selecting between the offers made by each disputing party.

Upload Files

[Upload Files](#) Or drop files

Do not upload documents that include PHI/PII.

File limitations for entire dispute (500MB)

No File Selected.

☐ I have reviewed the state-specific eligibility criteria regarding the IDR processes for this item or service, and attest that this item or service is eligible for the Federal IDR process.

Figure 13. New Line Item (Documentation Upload and State-Specific Eligibility Attestation)

1.6.1.2 Single Line Item – Bundled

If the dispute involves a single line item bundled, the “New Line Item” section will display the ***Item or Service Type** field, as well as the fields listed in [Section 1.6.1.1](#).

1. **First Item Entry.** The **Item or Service Type** field is grayed out and indicates “Bundled Item or Service.” The bundled item or service code is the service code under dispute.

Line Item Details

Item or Service Type:
Bundled Item or Service

Bundled item or service: Your first entry will automatically default to one item or service code that represents multiple items or services (component items or services).

Figure 14. New Line Item (First Bundled Item or Service)

2. **Subsequent Item Entries.** The **Item or Service Type** field is grayed out and indicates “Component Item or Service.” A component item or service (secondary line item) is an additional service billed under the primary service code. If there are no component items or services, proceed through the web form. Component entries are optional.

Line Item Details

Item or Service Type:
Component Item or Service

Component item or service (secondary line item): Items or services billed or reimbursed as components of the bundled payment arrangement.

Figure 15. New Line Item (Subsequent Item or Service)

1.6.1.3 Batched Items and Services

A batched dispute must contain items and services that meet the batching criteria outlined in the Batching Sub-regulatory Guidance on the CMS.gov No Surprises [Overview of rules and fact sheets](#) page. The fields in this section are the same as listed in [Section 1.6.1.1](#). To enter an additional claim for the dispute, select **Save & Add Another** at the bottom of the page.

As a result of the Federal IDR Operations Rule, air ambulance services for a single air ambulance transport, including air ambulance mileage code and base rate code, may be submitted as a batched dispute, so long as all other provisions of the batching regulations are satisfied, in accordance with guidance.

As a result of the Federal IDR Operations Rules changes, batched items and services with an open negotiation start date on or after November 1, 2026, cannot exceed **50 dispute line items**.



Important: The web form will also verify the Date of the qualified IDR item or service entered for each item or service is within 30 business days of all items and services in a batched dispute, unless a cooling off period applies.

1.6.2 Save the Dispute Line Item or Service

The initiating party will follow the steps below to save the dispute line item or service:

1.6.2.1 Single Line Item – Not Bundled

- Select **Save Item & Continue** to save the dispute line item.
- Select **Cancel** to exit the web form without saving and submitting the dispute line item.
- The **Cancel Line Item** button does not appear for single line item disputes that are not bundled.

1.6.2.2 Single Line Item – Bundled

- Select **Save & Add Another** to add component line items or services to the dispute. Component services are optional. The criterion for a bundled dispute is listed under the service code information.
- When all desired line items or services have been entered, select **Save Item & Continue** to save the dispute line item.
- Select **Cancel Line Item** to delete a dispute line item, if necessary. A confirmation window will pop up confirming the deletion. Select **Yes** to delete the line item. Select **No** to continue without deleting the line item. The initiating party will also have an opportunity to delete dispute line items on the “Summary of Qualified Items and/or Services” section.

1.6.2.3 Batched Disputes

- After completing the service code information for the first dispute line item or service, the initiating party must select **Save & Add Another**.
- The initiating party may not submit the dispute without adding more than one item. If the initiating party tries to save after entering only one item, it will receive the warning: “Batched items or services require two or more line items.”
- If the initiating party adds 50 line items to a batched dispute with an open negotiation start date on or after November 1, 2026, the **Add Line Item(s)** button is deactivated and the following warning displays: “Batched items or services cannot exceed 50 dispute line items. If you have additional items or services to report, you must create an additional dispute.”
 - The “Notice of IDR Initiation” web form will verify that the **Date of the qualified IDR item or service** entered for each item or service is prior to the open negotiation start date entered by the initiating party earlier in the web form.
 - The web form will also verify that the **Date of the qualified IDR item or service** entered for each item or service is within 30 business days of all items and services in a batched dispute, unless a cooling off period applies.
 - If a cooling off period applies, the items and services in the batched dispute are not subject to the 30-business-day date of service requirement.
- After entering multiple line items or services, select **Save Item & Continue** to save the dispute line item.
- Select **Cancel Line Item** to delete a dispute line item, if necessary. A confirmation window will pop up confirming the deletion. Select **Yes** to delete the line item. Select **No** to continue without deleting the line item. The initiating party will also have an opportunity to delete dispute line items on the “Summary of Qualified Items and/or Services” section.

1.6.3 Summary of Qualified Items and/or Services Table

This section of the web form contains a summary table of the items and services added to the web form. On this section of the web form the initiating party may upload additional information to support the dispute and delete any line items it does not wish to submit.

1. After selecting **Save Item & Continue**, review the **Summary of Qualified Items and/or Services** table.
 - a. Select the **pencil** icon displayed in the table if changes to an item or service are needed.
 - b. Select the **trash** icon to delete a line item or service.
 - c. Select the **Add Line Item(s)** button to add an item or service.
2. Select **Continue** to progress to the next page of the web form.



If the initiating party is submitting a single dispute the **Add Line Item(s)** button will not display.

The column headings in the table reflect the type of dispute the initiating party is initiating: Single Line Item – Not Bundled, Single Line Item – Bundled, or Batched Items or Services.

1.6.3.1 Single Line Item – Not Bundled

The single line item – not bundled table displays the following columns:

- Description of Item or Service
- Claim Number
- Date of Item or Service
- Qualifying Payment Amount (QPA)
- Location of Service (include state)
- Service Code
- Service Code Modifier(s)
- Place of Service Code(s)
- Actions

Summary of Qualified Items and/or Services

Review summary of qualified items and/or services. Select the link displayed in the table if you need to make changes to an item or service.

- If you still need to add items or services, select **Back**.
- To add another item or service, select **Add Line Item(s)**.
- If you are ready to submit your form, select **Continue**.

This is a summary of the dispute items or services entered. Do NOT include personal identifying information (PII) or protected health information (PHI) in the description of items or services.

Showing 1 - 1 of 1

	Description of Item(s) or service(s)	Claim Number	Date of Item or service	QPA	Location of Service (include state)	Service Code	Service Code Modifier(s)	Place of Service Code(s)	Actions
1	Total Knee Replacement	123456789A	Aug 1, 2026	\$6000	AK	01638	—	87	✎

Figure 16. Summary of Qualified Items and/or Services Table (Single Line Item – Not Bundled)

1.6.3.2 Single Line Item – Bundled

The single line item – bundled table displays the following columns:

- Description of Item(s) or Service(s)
- Claim Number
- Line Item Type
- Date of Item or Service
- Qualifying Payment Amount (QPA)
- Location of Service (include state)
- Service Code
- Service Code Modifier(s)
- Place of Service Code(s)
- Actions

This is a summary of the dispute items or services entered. Do NOT to include personal identifying information (PII) or protected health information (PHI) in the description of items or services.

Q Search this table [Add Line Item\(s\)](#)

Showing 1 - 2 of 2

	Description of Item(s) or service(s)	Claim Number	Line item type	Date of Item or service	QPA	Location of Service (include state)	Service Code	Service Code Modifier(s)	Place of Service
1	Total Knee Replacement	123456789	Bundled Item or Service	Aug 4, 2026	\$6000	AK	27447	59;LT	21
2	Arthroscopy	123456789A	Component Item or Service	Aug 4, 2026	\$2000	AK	01638	—	21

« »

[Back](#) [Continue](#) [Cancel](#)

Figure 17. Summary of Qualified Items and/or Services Table (Single Line Item – Bundled)

1.6.3.3 Batched Items or Services

The batched items or services table displays the following columns:

- Description of Item(s) or Service(s)
- Claim Number
- Date of Item or Service
- Qualified Payment Amount (QPA)
- Location of Service (including state)
- Service Code
- Service Code Modifier(s)
- Place of Service Code(s)
- Actions

Summary of Qualified Items and/or Services

Review summary of qualified items and/or services. Select the link displayed in the table if you need to make changes to an item or service.

- If you still need to add items or services, select **Back**.
- To add another item or service, select **Add Line Item(s)**.
- If you are ready to submit your form, select **Continue**.

This is a summary of the dispute items or services entered. Do NOT to include personal identifying information (PII) or protected health information (PHI) in the description of items or services.

Q Search this table [Add Line Item\(s\)](#)

Showing 1 - 3 of 3

	Description of Item(s) or service(s)	Claim Number	Date of Item or service	QPA	Location of Service (include state)	Service Code	Service Code Modifier(s)	Place of Service Code(s)	Actions
1	Arthroscopy	123456789A	Aug 1, 2026	\$2000	AK	01638	—	87	Edit Delete
2	Meniscectomy	123456789B	Aug 1, 2026	\$2500	AK	07314	—	21	Edit Delete
3	Total Knee Replacement	ECKT78409JLS2	Aug 1, 2026	\$6000	AK	27447	59;LT	21	Edit Delete

[Back](#) [Continue](#) [Cancel](#)

Figure 18. Summary of Qualified Items and/or Services Table (Batched)

1.7 Preferred Certified IDR Entity & Conflict of Interest

The final steps in completing the “Notice of IDR Initiation” web form include selecting a preferred certified IDR entity, attesting that no conflict of interest (COI) exists between the initiating party and the selected certified IDR entity, and uploading additional supporting documentation to the dispute.

1.7.1 Preferred Certified IDR Entity Selection

Select the dropdown arrow in the ***IDRE legal business name** field and select the certified IDR entity preferred to handle the dispute.

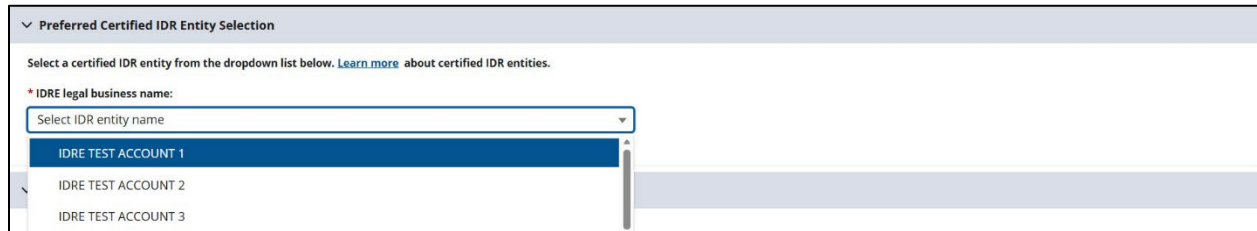


Figure 19. Notice of Initiation (Preferred Certified IDR Entity Selection)

1.7.2 Conflict of Interest Attestation

1. Select the “Yes” or “No” radio button next to the following statement: **Is the undersigned individual below a third-party administrator or other service provider initiating on behalf of the plan, issuer, carrier, or Health Care Provider/Health Care Facility/Provider of Air Ambulance Services?**
2. Select the checkbox next to the following statement: ***I (We), the undersigned initiating party (or representative of the initiating party), attest that to the best of my knowledge the preferred certified IDR entity does not have a disqualifying conflict of interest and that the item(s) and/or service(s) at issue are qualified IDR item(s) and/or service(s) within the scope of the Federal IDR process.**
3. Information automatically populates in the ***Initiating party** and ***Date** fields and cannot be changed.



Important: Applicability for the Federal IDR process includes meeting the cooling off period for like items and services billed to the same plan/issuer.

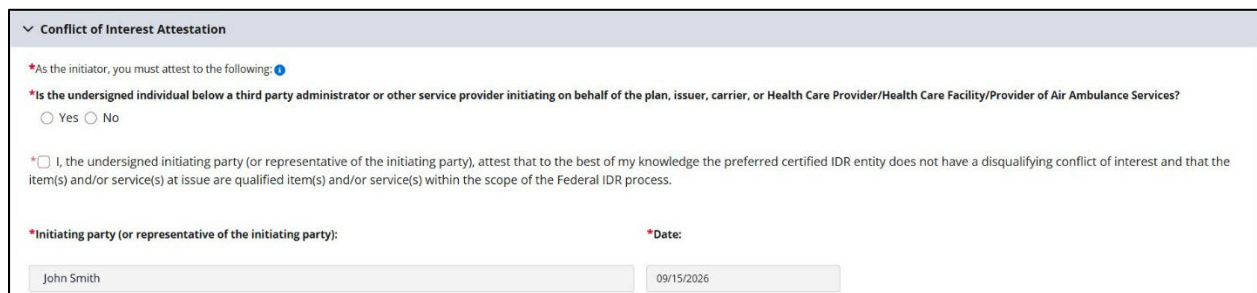


Figure 20. Notice of Initiation (Conflict of Interest Attestation)

1.7.3 Additional Supporting Documentation

1. Upload any additional supporting documentation that is relevant to the dispute. Additional supporting documentation may prevent delays in processing the dispute and expedite the process.



Important: To upload additional supporting documentation, select the **Upload** button or drag and drop documents into the appropriate space on the web form or drag and drop documents into the “Or drop files” area of the web form. The file limitation for the entire dispute is 500MB. Be sure the file(s) meets this limitation. The file name is displayed when the information is loaded.

2. After reviewing the inputs on the table, if the initiating party does not have any other documents to add, select the **Continue** button on the bottom left of the page.



Important: If the initiating party tries to upload a file greater than 500MB, this message will appear: “The file you are attempting to upload exceeds the 500MB file size limit for the entire dispute and cannot be uploaded. Reduce the file size and try attaching the document again.”

Figure 21. Notice of Initiation (Additional Supporting Documentation)

1.8 Submit the Notice of IDR Initiation

Before you submit the “Notice of IDR Initiation” web form, review the information entered in each section.

To edit information in the web form:

1. Select the **dropdown arrow** icon next to a section to expand or collapse it.
2. Select the **Edit** button next to the desired section. The page where that information was entered displays.
 - a. Update the information on the page, as needed.
 - b. If the initiating party updates the dispute type, it must re-enter the items or services on the dispute from the “Dispute Line Items” page.
3. Add, remove, or update items or services from the “Dispute Line Items” page. Refer to [Section 1.6.3](#) for instructions.
4. Select **Continue** to advance to the next page. The initiating party must select **Continue** on each page of the web form to return to the “Review & Submit” page.

5. Select **Submit** once all information is confirmed correct.

Review & Submit

[How to Review & Submit the Notice of IDR Initiation](#)

Qualification Questions
Edit

Date of Service

Service provided before 01/01/2022?
No

My Role

I am a (or acting on behalf of) Tax ID NPI
Health care facility 55-5555555 N/A
Health Plan Type
Fully insured ERISA group health plan

Open Negotiation Period

When did the Open Negotiation period start?
08/10/2026
Supporting Evidence
Test File 3.docx

Consent to Waive

Did the health care provider or health care facility get consent from the participant, beneficiary, or enrollee to waive surprise billing protections for these items or services?
No

Dispute Type
Edit

Initiating Party Information
Edit

Health Care Provider, Health Care Facility, or Provider of Air Ambulance Services Information or TPA

I'm a(n)
Health care facility
Mailing Address
123 Test Ct Falls Church, VA 22044
Phone
(555) 555-5555
Provider Name
TestOrgA
Fax
N/A
Email
idr.verified.user@gmail.com

Primary Contact Information

Primary Contact Name
N/A
Phone
N/A
Mailing Address
N/A
Email
N/A

Secondary Contact Information

Secondary Contact Name
N/A
Phone
N/A
Mailing Address
N/A
Email
N/A

Non-Initiating Party Information
Edit

Group Health Plan / Health Insurance Issuer / FEHB Carrier Information or TPR

Insurance Provider Type
Group Health Plan
Mailing Address
789 Main St Falls Church, VA 22044
Phone
(555) 555-5555
Health Insurance Plan or Company
TestOrgC
Fax
N/A
Email
idr.eto.test@gmail.com

Primary Contact Information

Primary Contact Name
N/A
Phone
N/A
Mailing Address
N/A
Email
N/A

Secondary Contact Information

Secondary Contact Name
N/A
Phone
N/A
Mailing Address
N/A
Email
N/A

Dispute Line Item(s)
Edit

Summary of Qualified Items and/or Services

This is a summary of the dispute items or services entered. Be sure NOT to include personal identifying information (PII) or protected health information (PHI) in the description of items or services.
Number of Items added
1

Line Item Description	Claim Number	Date of Service	Service Code	Service Code Modifiers	Place of Service Code	Location of Service	QPA	Cost Sharing Amount
1 Total Knee Replacement	123456789	Aug 1, 2026	27447	59;LT	21	AK	\$6000	\$3000

Preferred Certified IDR Entity & Conflict of Interest
Edit

Back Submit Cancel

Figure 22. Notice of IDR Initiation (Review & Submit)

1.9 Confirmation

Once the initiating party submits the web form, it will receive a confirmation email that the web form has been received and a set of next steps.

An official website of the United States government [Here's how you know](#)

Home Disputes Reports Search... JOHN SMITH

Start a Dispute: Notice of IDR Initiation

Introduction & Qualification Questions Dispute Type Initiating Party Information Non-Initiating Party Information Dispute Line Items Preferred Certified IDR Entity & COI Review & Submit Confirmation

Dispute Submitted
You have submitted the IDR initiation notice to the Departments. This notice must also be furnished to the non-initiating party the same day the notice is furnished to the Departments. We advise you print, save, and send a copy of this notice to the non-initiating party to fulfill the requirements for initiating the Federal IDR process.

Confirmation

Immediate Actions Required

- As the initiating party, it is your responsibility to provide the non-initiating party with a copy of the [Notice of IDR Initiation](#) on the same day you submitted this form.
- Select **Save as PDF** to save this document for your records.

What Happens Next

- You'll receive an email from FederalIDRQuestions@cms.hhs.gov confirming the initiation of the dispute.
- The non-initiating party will be notified that an IDR notice has been submitted and the party will be asked to review the preferred certified IDR entity.
- You'll receive a selection notice via email confirming the selection of the certified IDR entity or notifying you that the non-initiating party has selected an alternative certified IDR entity. If an alternative IDR entity has been selected, you will be given the opportunity to accept or deny the alternate selection.
- After a final certified IDR entity has been selected you will be notified of the selection and will be provided with information regarding the next steps, including how to submit your offers to the certified IDR entity and how to submit the administrative and IDR entity fees.
- To exit the web form, select **Back to All Disputes**.

Save as PDF **Back to All Disputes**

Figure 23. Notice of IDR Initiation (Confirmation)



Important: As the initiating party, you are required to provide the non-initiating party with a copy of the Notice of IDR initiation on the same day the initiating party submitted this web form. Selecting the **Notice of IDR Initiation** link, located in the banner on the “Confirmation” page, provides additional information regarding the requirement to provide the non-initiating party with a copy of this notice.

- Select **Save as PDF** to save this document for record keeping. The initiating party can also access any files associated with the dispute, including the Notice of IDR Initiation PDF, from the **Documents** tab of the Dispute Record page.
 - The initiating party will receive an email from the [Federal IDR Questions](#) mailbox confirming the initiation date of the dispute.
 - The non-initiating party will be notified by the Federal IDR portal that an IDR initiation notice has been submitted and will be asked to review the preferred certified IDR entity.
 - The initiating party will receive a selection notice via email confirming the selection of the certified IDR entity or a notification that the non-initiating party has selected an alternative certified IDR entity. If an alternative certified IDR entity has been selected, the initiating party will be given the opportunity to accept or deny the alternate selection.
- After selection of a certified IDR entity has been finalized, the initiating party will be notified of the selection and will be provided with information regarding next steps, including how to submit offers to the certified IDR entity and how to submit the administrative and IDR entity fees.

3. To return to the organization disputes, select **Back to All Disputes**. IDR Gateway users who have joined an organization can check the status of their disputes at any time. Sign in to the IDR Gateway, expand the Disputes option on the menu bar, and select **View All Disputes**.

Appendix A. Frequently Used Acronyms

Acronym	Definition
CHIP	Children's Health Insurance Plan
CMS	Centers for Medicare & Medicaid Services
COI	Conflict of Interest
ERISA	Employee Retirement Income Security Act of 1974
FEHB	Federal Employees Health Benefits
IDR	Independent Dispute Resolution
NPI	National Provider Identifier
NSA	No Surprises Act
OPM	Office of Personnel Management
QPA	Qualifying Payment Amount
TIN	Taxpayer Identification Number
TPA	Third-Party Administrator

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