

Independent Dispute Resolution (IDR) Gateway



Notice of Offer User Guide

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Introduction

This user guide contains an overview of the IDR “Notice of Offer” web form and tips for successfully completing and submitting the web form. 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, subject to the Federal IDR process,¹ 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” in 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.”

The “Notice of Offer” web form is used during the **submission of offers and payment of fees phase** of the Federal IDR process. This phase of the Federal IDR process comes immediately after the certified IDR entity assigned to the parties’ dispute has attested that the certified IDR entity does not have a conflict of interest and has indicated that the dispute is eligible for the Federal IDR process. During the submission of offers and payment of certified IDR entity fees phase, **certified IDR entities will ask parties to submit their final payment offers** for the item(s) or service(s) being disputed.

- **Effective November 2022, all parties have been required to submit their offers through the “Notice of Offer” web form.**
- 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 Offer” 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 Offer” 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.

¹ Requirements Related to Surprise Billing; Part II, 86 FR 55980-55994 (October 7, 2021), <https://www.federalregister.gov/d/2021-21441>.

Submission of Offers and Payment of Certified IDR Entity Fee Phase Overview

There are five main steps during the submission of offers and payment of certified IDR entity fee phase of the Federal IDR process, one of which is completing the “Notice of Offer” web form.

1. Each party to the dispute will:
2. **Receive an email from the certified IDR entity** requesting payment of the administrative fee and certified IDR entity fee.
3. **Receive an email from the Federal IDR Questions inbox** (FederalIDRQuestions@cms.hhs.gov) with a unique link to the “Notice of Offer” web form for the related dispute.
4. **Submit** both the **administrative fee** and **certified IDR entity fee** directly to the certified IDR entity. An offer will not be considered received by the certified IDR entity until both the certified IDR entity fee and the administrative fee have been paid directly to the certified IDR entity.
5. Complete and **submit** the “Notice of Offer” web form, **including** supporting documentation.
6. **Receive an acknowledgment email** once the web form is submitted and communications from the certified IDR entity if more information is needed related to the offer.

Important Information about the Notice of Offer Web Form

- The parties must submit the “Notice of Offer” web form and pay the administrative and certified IDR entity fees **no later than 10 business days** after the email with the “Notice of Offer” web form link is sent.



Important: The day the email with the “Notice of Offer” web form link is sent is Day Zero of the ten-business-day period that the parties must submit their offer and pay their administrative and certified IDR entity fees. The parties may open and review the web form link any number of times before submission.

- Some of the prepopulated fields on the “Notice of Offer” web form are not editable. If the party thinks that any of the non-editable prepopulated fields have incorrect information, it must **contact the certified IDR entity** to identify what information is incorrect and why. The party may need to provide evidence to support this assertion.
- **Submit the “Notice of Offer” web form only once.** If a correction is needed to the “Notice of Offer” web form after submitting the web form, contact the certified IDR entity.
- The party may exit the web form without submitting it by selecting the **Exit** button at the bottom of the page. Doing so will **clear all of the information entered on the web form**. The party can access the link again but must re-enter any information previously entered.

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](#)



Send any questions regarding the IDR Notice of Offer process and the web form to the [Federal IDR Questions](#) inbox.

1 Complete the Notice of Offer Web Form

1.1 Before Starting the Notice of Offer Web Form

Before starting the “Notice of Offer” web form, the party should have the following items available to submit along with the web form:

- A final offer of an out-of-network rate expressed as a dollar amount
- Any information requested by the certified IDR entity relating to the offer
- Information regarding the circumstances included in [Section 1.1.1](#) and [Section 1.1.2](#) below relating to the offer
- Any additional information relating to the offer that the party would like the certified IDR entity to consider, that does not include information on prohibited factors. For more information on the prohibited factors, refer to the relevant Federal IDR guidance for disputing parties available on the [CMS Overview of rules & fact sheets](#) page.



Important: Refer to the Texas Medical Association v. U.S. Department of Health and Human Services, No. 23-40605 (5th Cir. Aug. 11, 2026) for important information about the Qualifying Payment Amount.

1.1.1 Circumstances/Factors Considered for Qualified Non-Air Ambulance Items and Services

Circumstances/Factors for Qualified Non-Air Ambulance Items and Services	
1.	The level of training, experience, and quality and outcomes measurements of the provider or facility that furnished the qualified IDR item or service (such as those endorsed by the consensus-based entity authorized in Section 1890 of the Social Security Act).
2.	The market share held by the provider or facility or that of the plan in the geographic region in which the qualified IDR item or service was provided.
3.	The acuity of the participant, beneficiary, or enrollee receiving the qualified IDR item or service, or the complexity of furnishing the qualified IDR item or service to the participant, beneficiary, or enrollee.
4.	The teaching status, case mix, and scope of services of the facility that furnished the qualified IDR item or service, if applicable.
5.	Demonstrations of good faith efforts (or lack thereof) made by the provider or facility or the plan to enter into network agreements with each other, and, if applicable, contracted rates between the provider or facility, as applicable, and the plan during the previous four plan years.
6.	Additional information submitted by a party related to the offer for the payment amount for the qualified IDR item or service that is the subject of the payment determination and that does not include information on prohibited factors.

Circumstances/Factors for Qualified Non-Air Ambulance Items and Services

7. **The QPA submitted.** Certified IDR entities may request, and parties may provide, additional information relevant to the submitted QPA. Certified IDR entities can consider such information when determining the appropriate payment amount for an item or service, to the extent such information does not include the prohibited factors identified in 26 CFR 54.9816-8T(c)(5)(v), 29 CFR 2590.716-8(c)(5)(v), and 45 CFR 149.510(c)(5)(v).

1.1.2 Circumstances/Factors Considered for Qualified Air Ambulance Items and Services

Circumstances/Factors for Qualified Air Ambulance Items and Services

1. **The quality and outcomes measurements** of the provider of air ambulance services that furnished the services.
2. **The acuity of the condition of the participant, beneficiary, or enrollee receiving the services, or the complexity of providing services** to the participant, beneficiary, or enrollee.
3. **The level of training, experience, and quality of medical personnel** that furnished the air ambulance services.
4. **The air ambulance vehicle type, including the clinical capability level of such vehicle.**
5. **The population density of the point of pick-up** for the air ambulance (such as urban, suburban, rural, or frontier).
6. **Demonstrations of good faith efforts (or lack thereof) made by the provider of air ambulance services or the plan to enter into network agreements, as well as contracted rates** between the provider and the plan during the previous four plan years.
7. **Additional information submitted by a party** related to the offer for the payment amount for the qualified IDR item or service that is the subject of the payment determination and that does not include information on prohibited factors.
8. **The QPA submitted.** Certified IDR entities may request, and parties may provide additional information relevant to the submitted QPA. Certified IDR entities can consider such information when determining the appropriate payment amount for an item or service, to the extent such information does not include the prohibited factors identified in 26 CFR 54.9816-8T(c)(5)(v), 29 CFR 2590.716-8(c)(5)(v), and 45 CFR 149.510(c)(5)(v).

1.1.3 Required information for providers and facilities:

- Number of employees employed by the provider practice or facility
- Practice specialty or type

1.1.4 Required information for providers of air ambulance services:

- Air ambulance vehicle type, including the clinical capacity level of such vehicle
- Air ambulance point of pick-up (i.e., ZIP Code)

1.1.5 Required information for plans and issuers and FEHB carriers:

- Coverage area of the plan, issuer, or FEHB carrier (i.e., the ZIP Code where the item or service was furnished)
- Geographic area used to calculate the QPA
- Health plan type (e.g., fully insured, self-insured, partially self-insured, FEHB carrier)

1.2 Access the Notice of Offer Web Form in the IDR Gateway

The initiating and non-initiating party will receive an email from the [Federal IDR Questions](#) inbox with information and instructions on how to complete the “Notice of Offer” web form.

Parties with IDR Gateway accounts can access the “Notice of Offer” web form within the IDR Gateway in one of two ways:

- Parties can access the “Notice of Offer” web form using the unique link in the email. Refer to [Section 1.2.1](#) for steps.
- Parties who have joined an organization can navigate to the “Notice of Offer” web form within the IDR Gateway. Refer to [Section 1.2.2](#) for steps.

1.2.1 Access the Web Form Using a Link

1. Select the IDR Gateway web form link from the email with the following subject line: “Action Required for DISP-XXXXXX: Your IDR Notice of Offer Submission Is Due.”
2. Sign in to the IDR Gateway.
 - a. If the party has joined an IDR Gateway organization, the first page of the “Notice of Offer” web form displays. Refer to [Section 1.3](#) for next steps.
 - b. If the party has NOT joined an organization, the “Enter your Dispute Reference Number” page displays. Refer to [Section 1.2.3](#) for next steps.

1.2.2 Access the Web Form from Within the IDR Gateway

1. From the Home menu bar, select the **Submit Offer** option from the Disputes dropdown list. The “Disputes” page displays.
2. Select the **Offer Due** tab.
3. From the Actions column of the Offer Due table, select the **Submit Offer** button next to the desired dispute. The first page of the web form displays.

1.2.3 Enter the Dispute Reference Number

Parties who have an IDR Gateway account but have not joined an organization must provide a dispute reference number to access the “Notice of Offer” web form within the IDR Gateway.

1. Enter the * **Dispute Reference Number** (referred to as “IDR Reference Number” on the email containing the unique link to the “Notice of Offer” web form).
2. Select **Continue**.

1.3 Review and Update Offer Information

Review the information and instructions on the “Notice of Offer” web form for the selected dispute before proceeding.

1.3.1 Update Point-of-Contact Email Addresses

1. Update the email address(es) provided for the organization, if necessary, by navigating to the appropriate email field and typing in the correct email address.
2. If the party updates its party email address, a message displays that updating the email address impacts dispute mapping in the IDR Gateway. Select **Confirm Update** to update the email address. Select **Cancel** to undo updates.

1.3.2 Complete Additional Information

The information displayed in the “Additional Information” section will vary based on whether the party completing the “Notice of Offer” web form is the initiating party or the non-initiating party and whether it is a health care provider, health care facility, provider of air ambulance services, plan, issuer, or FEHB carrier.

1.3.2.1 * I Am A

- If the initiating party is completing the web form, the * I am a field will display in the “Additional Information” section and is not editable. This field is prepopulated with information the initiating party submitted in the “Notice of IDR Initiation” web form.
- If the non-initiating party is completing the web form, the * I am a field will display in the “Additional Information” section and is prepopulated with information the initiating party submitted in the “Notice of IDR Initiation” web form. Confirm the information provided in the * I am a field is correct and update it if necessary.

1.3.2.2 * Health Plan Type

The **Health Plan Type** field will only display on the “Notice of Offer” web form in the “Additional Information” section if the party completing the web form is a health plan, issuer, or FEHB carrier.



If the party is a health care facility, health care provider, or provider of air ambulance services, the **Health Plan Type** field will not display.

- When the **initiating party** is a health plan, individual health insurance issuer, or FEHB carrier: The **Health Plan Type** field is prepopulated with the value the initiating party selected on the “Notice of IDR Initiation” web form and is not editable.
- When the **non-initiating party** is a health plan, individual health insurance issuer, or FEHB carrier:
 - If the non-initiating party **completed the “IDR Entity Selection Response” web form**, the field is prepopulated with the value the non-initiating party either attested to or selected on the “IDR Entity Selection Response” web form and is not editable.
 - If the non-initiating party **did NOT complete the “IDR Entity Selection Response” web form**, it must review and either attest to or update the ***Health Plan Type** provided by the initiating party.



Important: For detailed steps on how to attest to or update the Health Plan Type, refer to the IDR Entity Selection Response Web Form User Guide found on the [IDR Gateway](#) page.

1.3.2.3 * Practice or Facility Size

If the party completing the web form is a health care facility or a health care provider, the * **Practice or facility size** field will display in the “Additional Information” section. Select the dropdown next to the * **Practice or facility size** field to select the size of the practice or facility. This field is required for health care facilities and health care providers.

1.3.3 Complete Payment Offer

In the first part of the “Payment Offer” section the party may review previously submitted attestations about whether the disputed items or services are batched qualified item(s) or services and whether the items or services are bundled qualified item(s) or service(s).

The next part of the “Payment Offer” section is a payment information summary table.



Important: The information displayed in the payment information summary table will vary by party based on if it is a provider, facility, provider of air ambulance services, plan, issuer, or FEHB carrier, and whether the dispute is a single, bundled, or batched dispute.

The following **prepopulated fields** will **display for all parties**. These fields are prepopulated with information the initiating party submitted in the “Notice of IDR Initiation” web form and **are not editable**.

If the party thinks any of the **non-editable prepopulated fields** have **incorrect information**, it must contact the certified IDR entity to identify what information is incorrect and why.

- Description of Item or Service
- Claim Number
- Location of Service
- Date of Service
- Service Code
- Percentage of QPA
- QPA for Applicable Year

The * **Final Payment Offer** field will display for all parties and **all parties are required to complete the field**. The * **Final Payment Offer** field is a numeric field that supports decimals. **Use this field to provide a final payment offer for the dispute line item.**

The Percentage of QPA (qualifying payment amount) column will display for all parties and **is automatically populated** based on the final payment offer the party enters, and the value in the QPA for Applicable Year column that the initiating party provided when it completed the “Notice of IDR Initiation” web form. The Percentage of QPA column is not editable.

1.3.3.1 Provider of Air Ambulance Services Fields

The following additional fields will display **only if the party is a provider of air ambulance services**. These fields are required:

- * **Air ambulance vehicle type**
- * **Clinical Capacity Level of such Vehicle**
- * **Air ambulance point of pick up ZIP Code** (i.e., the location of the patient at the time he/she was placed on the air ambulance).

1.3.3.2 Health Care Provider or Facility Fields

The following additional field **will display only if the party is a health care provider or health care facility**. This field is required:

- * **Provider or facility practice specialty**

1.3.3.3 Health Plan, Issuer, or FEHB Carrier Fields

The following additional fields will display **only if the party is a group health plan, individual health insurance issuer, or FEHB carrier**. These fields are required:

- * **Coverage Area ZIP Code** (i.e., the ZIP Code where the item or service was furnished)
- * **Geographic Region**

The * **Coverage Area ZIP Code** field is used to provide the ZIP Code where the item or service was furnished.

The * **Geographic Region** field is used to add the relevant geographic area (i.e., the nearest metropolitan area) where the items or services were rendered for the purposes of calculating the QPA. This is a dynamic field. When the party enters the first three letters of the * **Geographic Region**, options will begin to populate. Select the applicable * **Geographic Region** when it appears.

1.3.3.4 Upload Additional Offer Documentation

Parties may upload files relevant to the offer by selecting the **Upload Files** button or dragging and dropping files in the Or Drop Files area at the bottom of the “Payment Information” section. Before uploading documentation, clearly label the document so the certified IDR entity will know which line item or service the document is supporting.



When completing a “Notice of Offer” web form for a bundled dispute, an additional Line Item Type column will display on the offer summary table. This column will indicate whether the dispute line item was submitted as the bundled item or service or a component item or service. It is not required to submit component items or services.

If component items or services were submitted, the party may notice that some of the field values that were provided for the bundled item or service were not provided for the component items or services.

1.3.4 Sign & Submit

1. Select the check box next to the following statement: * **I agree to:**
 - a. Pay the administrative fee.
 - b. Pay the IDR entity fee if my dispute is found eligible for the IDR process.
 - c. Pay the outstanding amount (if any) of the out-of-network rate that is my responsibility as determined by the certified IDR entity.
 - d. I also understand that the final payment determination made by the certified IDR entity is binding upon the parties and not subject to judicial review except under certain limited circumstances.
2. Enter a name in the * **Signature** text box. The date field is not editable.
3. Select **Submit**. A “Ready to Submit” window displays to let the party know that once the “Notice of Offer” web form is submitted, it can no longer make any changes to its information.
4. From the “Ready to Submit” pop-up window, select **Submit**. The “Confirmation” page displays.

1.4 Confirmation

Once the party submits the web form, an email is sent to confirm the web form has been received along with a set of next steps.

Review the next steps:

1. **Make sure to pay the certified IDR entity fee and administrative fee** directly to the certified IDR entity.
2. The certified IDR entity will contact the party if it needs additional information.
3. The certified IDR entity will select one of the offers submitted by the disputing parties.
4. The party will receive an email from the certified IDR entity with a determination within 30 business days after the date the certified IDR entity was selected.
5. Select **Save as PDF** to save a PDF of the “Notice of Offer” web form. The party can also download this PDF from the **Documents** tab of the “Dispute Record” page.
6. Exit the web form. The following options are only available to parties that have an IDR Gateway account and have joined an organization:
 - a. To return to the default **Offer** tab view on the “Dispute Record” page, select **To Offer Home**.
 - b. To return to the “Disputes” page, select **Return to all disputes**.
7. If the party has not joined an organization, select **Return to Home** to return to the “Home” page.

Appendix A. Frequently Used Acronyms

Acronym	Definition
CMS	Centers for Medicare & Medicaid Services
FEHB	Federal Employees Health Benefits
IDR	Independent Dispute Resolution
QPA	Qualifying Payment Amount
TMA III	Texas Medical Association, et al. v. U.S. Department of Health and Human Services, et al., Case No. 6:22-cv-450-JDK

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