

Notice of Independent Dispute Resolution (IDR) Initiation Web Form



User Guide

May 2024

Notice of Independent Dispute Resolution (IDR) Initiation Web Form

Table of Contents

Introduction	4
1 Before Starting the Web Form	4
2 Notice of Initiation Web Form — Welcome Page and Qualification Questions	6
2.1 Welcome Page	6
2.2 Qualification Questions.....	7
2.2.1 Page 1	7
2.2.2 Page 2.....	8
2.2.3 Page 3.....	10
3 Notice of IDR Initiation — Contact Information Section	10
3.1 Initiating Party Contact Information	11
3.2 Non-Initiating Party Contact Information	11
3.3 Third-Party Administrators	12
3.4 Use of Special Characters	12
3.4.1 Name Fields	12
3.4.2 Address Fields	12
4 Notice of IDR Initiation — Dispute Item and Payment Section	13
4.1 Line Item Information.....	13
4.1.1 Single Line Item — Not Bundled	13
4.1.2 Single Line Item — Bundled.....	14
4.1.3 Batched Items and Services	14
4.2 Payment Information.....	15
4.3 Type of Qualified Item(s) or Service(s)	15
5 Notice of Initiation Form — Summary of Qualified Items and/or Services.....	17
5.1 Summary of Qualified Items and/or Services Table	17
5.1.1 Single Line Item — Not Bundled	18
5.1.2 Single Line Item — Bundled.....	18
5.1.3 Batched Items or Services	18
5.2 Additional Supporting Documentation.....	19
6 Notice of Initiation Form — Submit IDR Notice of Initiation Web Form	19
6.1 Preferred Certified IDR Entity	19
6.2 Complete COI Attestation	20
7 IDR Notice of Initiation Web Form Confirmation.....	20
8 Frequently Used Acronyms.....	22

Notice of Independent Dispute Resolution (IDR) Initiation Web Form

Table of Figures

Figure 1: Session Expiring	5
Figure 2: Exit Warning.....	6
Figure 3: Security Statement Check Box Warning.....	7
Figure 4: Need help with terms?	7
Figure 5: Date of Service Error Message	7
Figure 6: Open Negotiation Must Elapse Error Message.....	9
Figure 7: Extension Justification Reasons.....	9
Figure 8: Surprise Billing Protections	9
Figure 9: Special Character Error Message for Name Fields.....	12
Figure 10: Special Character Error Message for Address Fields	13
Figure 11: Notice of Initiation — “Line Item” Section	14
Figure 12: “Line Item” Section — First Bundled Item or Service	14
Figure 13: “Line Item” Section — Subsequent Item or Service	14
Figure 14: Notice of Initiation — “Payment Information” Section	15
Figure 15: Complex State Attestation Statement.....	16
Figure 16: Type of Qualified Items or Services — Single Not Bundled Dispute	16
Figure 17: Type of Qualified Items or Services — Single Bundled Dispute.....	17
Figure 18: Notice of Initiation — Finished Dialogue Box.....	17
Figure 19: Notice of Initiation — Summary of Qualified Items and/or Services Table Single Line Item — Not Bundled.....	18
Figure 20: Notice of Initiation — Summary of Qualified Items and/or Services Table Single Line Item — Bundled	18
Figure 21: Notice of Initiation — “Additional Supporting Documentation” Section.....	19
Figure 22: Notice of Initiation — “Preferred Certified IDR Entity” Section	20
Figure 23: Notice of Initiation — Conflict of Interest Attestation	20
Figure 24: Confirmation Page Next Steps	21

Table of Tables

Table 1: Acronyms Table	22
-------------------------------	----

Notice of Independent Dispute Resolution (IDR) Initiation Web Form

Introduction

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

Important information:

You 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.

Use this web 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 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.



Important: *Guidance issued by the Departments of the Treasury, Labor, Health and Human Services, and Office of Personnel Management on the calculation and use of qualifying payment amounts (QPAs), as well as their related exercise of enforcement discretion, can be found in FAQs about Consolidated Appropriations Act Implementation, 2021 Part 62 (October 6, 2023). Available at <http://www.cms.gov/files/document/faqs-part-62.pdf>.*

Guidance issued by the Departments of the Treasury, Labor, Health and Human Services, and Office of Personnel Management on the initiation of batched disputes and disputes involving air ambulance services can be found in No Surprises Act (NSA) Independent Dispute Resolution (IDR) Batching and Air Ambulance Policy FAQs (November 28, 2023), available at <https://www.cms.gov/files/document/faqs-batching-air-ambulance.pdf> and FAQs about Affordable Care Act and Consolidated Appropriations Act, 2021 Implementation Part 63 (November 28, 2023), available at <https://www.cms.gov/files/document/faqs-part-63.pdf>.



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

1 Before Starting the Web Form



Important: *If you have initiated an IDR case through this portal in the past, clear your computer's cache or open this web form in a private or incognito window to access the updated “Notice of IDR Initiation” web form.*

Before starting the “**Notice of IDR Initiation**” web form:

Notice of Independent Dispute Resolution (IDR) Initiation Web Form

Make sure that this dispute belongs in the Federal IDR process. You can 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 items available to provide along with the web form:

- Documents to confirm the open negotiation period start date (for example, the notice of open negotiation). Additionally, any party that enters an open negotiation start date more than 34 business days earlier than the date on which the form was completed must also upload at least one of the following to confirm that the claim is still eligible for the IDR process:
 - Documents to confirm the extension approval received from the Federal IDR mailbox.
 - Documents to confirm the certified IDR entity's request to re-submit the dispute.
 - Documents to confirm the 90-day 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 and post-stabilization services.
- Item and Service codes for corresponding service and place-of-service.
- QPA and cost-sharing amount.¹
- Documents to confirm the claim and QPA information (i.e., the notices associated with the initial payment or notice of denial of payment).
- Open negotiation period start date.
- Your preferred certified IDR entity.

Complete and submit the web form in a single session. For security reasons and protection of personal data, your session will time out after 60 minutes of inactivity. After 60 minutes of inactivity, the following message will display.

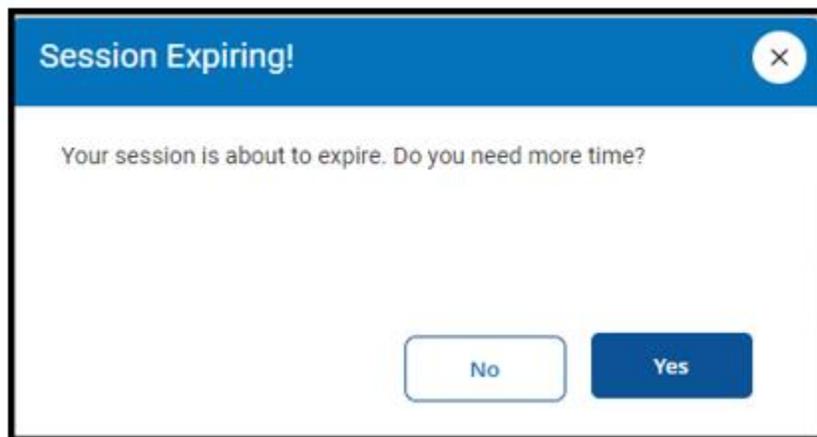


Figure 1: Session Expiring

¹ Refer to Frequently Asked Questions (FAQs) About Affordable Care Act and Consolidated Appropriations Act, 2021 Implementation Part 62 (October 6, 2023), available at <https://www.cms.gov/files/document/faqs-part-62.pdf>.

Notice of Independent Dispute Resolution (IDR) Initiation Web Form

If you do not respond within 60 seconds, the system will end the session and return you to the No Surprise's Act (NSA) page. Selecting **Continue** will restart the 60-minute timer for inactivity.

If you exit the web form prior to completing all the information, the information you have entered will not be saved. When you select **Exit**, the following dialogue box will appear.

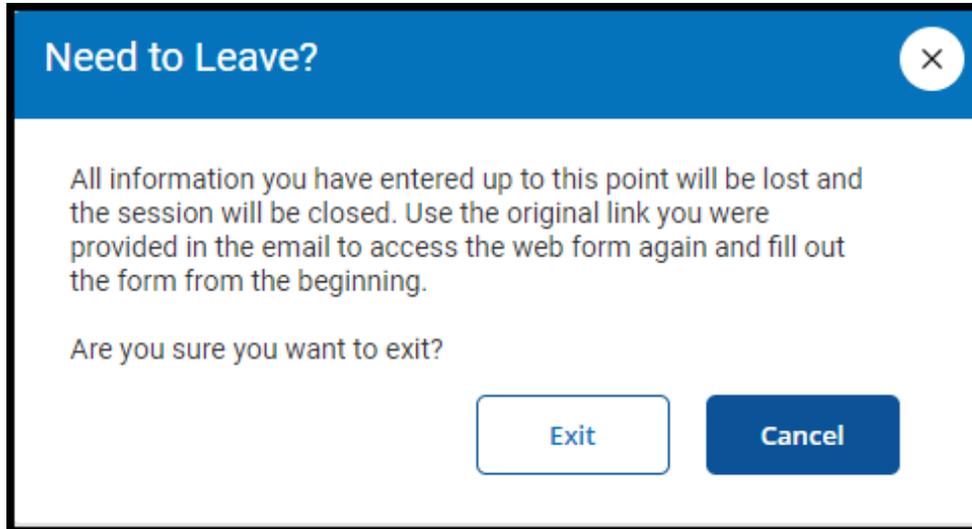


Figure 2: Exit Warning

2 Notice of Initiation Web Form — Welcome Page and Qualification Questions

This 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's information will display first on the web form.



Note: To learn more about the QPA, please see: <https://www.cms.gov/files/document/faqs-part-62.pdf>.

2.1 Welcome Page

The first page of the "**Notice of IDR Initiation**" web form is the Welcome page.



Important: If you have initiated an IDR case through this portal in the past, clear your computer's cache or open this web form in a private or incognito window to access the updated "**Notice of IDR Initiation**" web form.

1. Review the instructions before proceeding.
2. Select the check box next to the statement: ***I hereby agree to the terms and conditions expressed in the security and privacy agreement*** at the bottom of the welcome page. Failure to do so will prevent you from moving forward in the web form and will display the following warning message.

Notice of Independent Dispute Resolution (IDR) Initiation Web Form

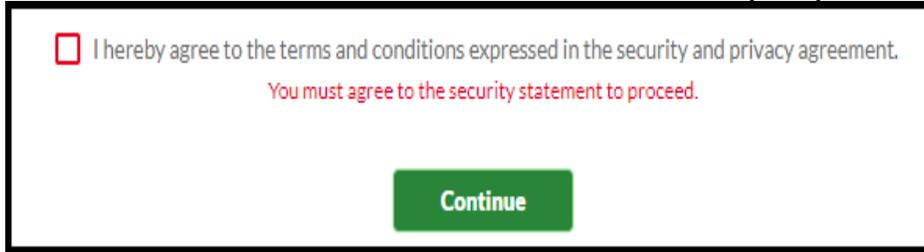


Figure 3: Security Statement Check Box Warning

3. Select the **Continue** button to proceed to the “Qualification Questions” page.

2.2 Qualification Questions

The following screens contain a series of questions to confirm eligibility for the payment dispute process. The initiator is only allowed to proceed, and a dispute created, if the dispute meets basic eligibility criteria. Any fields marked with a red asterisk (*) are required fields on the web form. If you are a third-party administrator (TPA) or third-party representative, please indicate which party you are working on behalf of. You can also access a glossary of terms referenced in this document by selecting the link contained within the “Need help with terms?” section.

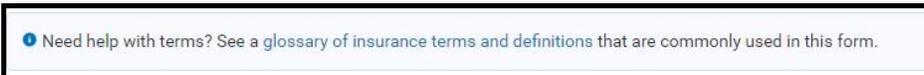


Figure 4: Need help with terms?

2.2.1 Page 1

Complete the following questions:

1. **Was the service in question provided prior to 1/1/2022?**
 - a. Select the radio button next to “Yes” or “No.”
 - b. You will see the following message if you select the “Yes” radio button for this question:

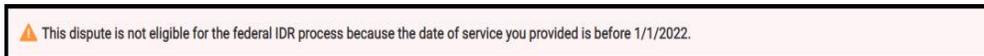


Figure 5: Date of Service Error Message



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

2. **I am (or I am acting on behalf of) a: (select one)**

Select the radio button identifying your organization type.

- a. “Group Health Plan”
- b. “Individual health insurance issuer”
- c. “Federal Employees Health Benefits (FEHB) carrier”
- d. “Health care provider”
- e. “Health care facility”
- f. “Provider of air ambulance services”



Important: If a member is only enrolled in coverage that is not a group health plan, an individual health insurance issuer, or a FEHB carrier such as Medicare, Medicaid, Children’s Health Insurance Plan (CHIP), or TRICARE plan coverage, the dispute is not eligible for the IDR process.

Notice of Independent Dispute Resolution (IDR) Initiation Web Form

3. If you are (or are acting on behalf of) a “health care provider,” health care facility” or “provider of air ambulance services” the following additional fields will display. You must complete at least one of the two fields:
4. **Tax ID.** Your Taxpayer Identification Number (TIN) must be 9-digits.
5. **National Provider Identifier (NPI).** Your NPI number must be 10-digits.
6. **Health Plan Type** (required for all disputing parties): (select one)

Select the dropdown and identify the health plan type.

- a. “Individual health insurance issuer”
 - b. “Fully insured private group health plan”
 - c. “Either partially or fully self-insured private (employment-based) group health plan”
 - d. “Federal Employees Health Benefits (FEHB) carrier”
 - e. “Church plan”
 - f. “Non-federal government plan (or state or local government plan)”
 - g. “No Plan/Issuer Response”
7. If you select “either partially or fully self-insured private (employment-based) group health plan,” you must also answer the following question: ***Is the ERISA plan self-insured?***

Select the radio button identifying whether the ERISA (Employee Retirement Income Security Act of 1974) plan is self-insured.

- a. “Yes”
 - b. “No”
8. If you select “Federal Employees Health Benefits (FEHB) carrier” you must provide the three (3) digit **Enrollment Code**.
9. Select **Continue**.

2.2.2 Page 2

Complete the following questions:

1. ***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.



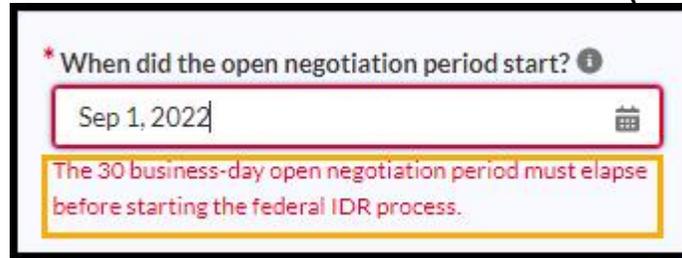
Note: To upload evidence, select the Upload Files button or drag and drop documents into the appropriate space on the web form, which will appear after you select the extension reason, or drag and drop documents into the “Or drop files” area of the web form. The file limitation for the entire dispute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



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 you enter a date that is **less** than 31 business days prior to the current date, you will receive the error message displayed below.

Notice of Independent Dispute Resolution (IDR) Initiation Web Form



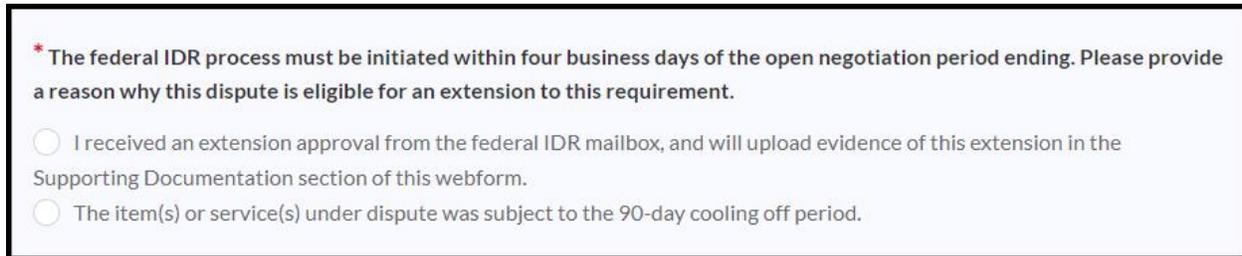
* When did the open negotiation period start? ⓘ

Sep 1, 2022

The 30 business-day open negotiation period must elapse before starting the federal IDR process.

Figure 6: Open Negotiation Must Elapse Error Message

- b. If you enter a date that is more than 34 business days prior to the current date, extension justification reasons will display as pictured below.



* The federal IDR process must be initiated within four business days of the open negotiation period ending. Please 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 90-day cooling off period.

Figure 7: Extension Justification Reasons

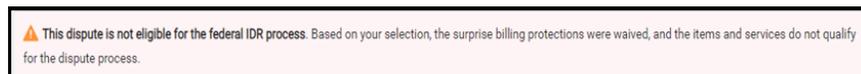
- c. If a pop-up is displayed, select an appropriate reason why this dispute is eligible for an extension and upload evidence of the extension reason.
- “I received an extension approval from the federal IDR mailbox and will upload evidence of this extension in the “Supporting Documentation” section of this web form.” If you select this extension reason an additional **Upload Files** button will display and you will be required to upload a copy of the extension approval you received from the federal IDR mailbox.
 - “The item(s) or service(s) under dispute was subject to the 90-day cooling off period.” If you select this extension reason, an additional **Upload Files** button will display and you will be required to upload a copy of the payment determination(s) that initiated the 90-day cooling off period.



Important: To upload evidence of the extension reason, select the Upload Files button, which will appear after you select 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 your file(s) meets this limitation. The file name is displayed when the information is loaded.

2. **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?**

- a. Select the radio button next to “Yes” or “No.”



⚠ 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.

Figure 8: Surprise Billing Protections

- ii. If the surprise billing protections were waived, you will see the message above after selecting the “Yes” radio button.

Notice of Independent Dispute Resolution (IDR) Initiation Web Form

3. Select **Continue**.

2.2.3 Page 3

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).”



Important: If you have indicated the provider of the item or service as “Provider of air ambulance services,” you will receive a pop-up window upon selecting “single dispute.” The pop-up window will inform you that “As a result of TMA III², 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?” Selecting “Yes” will navigate you to the next page of the form. Selecting “No” will return you to the previous page where you can change your response to the “What are you disputing today?” question.

- i. When the single dispute radio button is selected, indicate “Yes” or “No” to the second question:
 - ii. **Are you disputing a bundled payment arrangement (multiple items or services billed or reimbursed under one service code)?**
- b. “A batched dispute. I’m disputing multiple items or services related to the treatment of a similar condition.”
 - i. If the radio button for a batched dispute is selected, a pop-up 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** will return you to the select a single dispute option. After doing so, select **Continue**. Selecting **Yes** takes you to the next screen.

2. Select **Continue**.

3 Notice of IDR Initiation — Contact Information Section

In this section of the form, the initiating party provides contact information for themselves and the non-initiating party. The contact information of the initiating party will display first. For example, if the initiating party is a health care provider, health care facility, or provider of air ambulance services, fields for their information will display first and the group health plan, health insurance issuer, FEHB carrier or Third-party administrators (TPAs) will be displayed second. If the health insurance issuer is the initiating party, then the fields associated with the health care issuer will display first. If you enter a name in the Primary or Secondary point-of-contact fields, you are then required to enter the full contact information, including the mailing address.

² *Texas Medical Association et al. v. U.S. Department of Health and Human Services et al. Case No. 6:22-cv-450-JDK (TMA III) order.*

Notice of Independent Dispute Resolution (IDR) Initiation Web Form

3.1 Initiating Party Contact Information

Enter the information in the following text fields:

1. **Name and Address Information** (This is where the initiating party enters their contact information):
 - a. **Health care provider name**
 - b. **Hospital, health care facility or group name**
 - c. **Mailing Address**
 - d. **City**
 - e. **State**
 - f. **Zip Code**
 - g. **Email**
 - h. **Phone**
2. **Primary point-of-contact if different from above** (if there is a TPA, this is where the TPA enters their contact information):
 - a. **Name**
 - b. **Mailing Address**
 - c. **City**
 - d. **State**
 - e. **Zip Code**
 - f. **Email**
 - g. **Phone**
3. **Secondary point-of-contact:** (optional)
 - a. **Name**
 - b. **Mailing Address**
 - c. **City**
 - d. **State**
 - e. **Zip Code**
 - f. **Email**
 - g. **Phone**

3.2 Non-Initiating Party Contact Information

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:**
 - a. **Health Insurance Plan or Company**
 - b. **Mailing Address**
 - c. **City**
 - d. **State**
 - e. **Zip Code**
 - f. **Email**
 - g. **Phone**
2. **Primary point-of-contact if different from above:**
 - a. **Name**
 - b. **Mailing Address**

Notice of Independent Dispute Resolution (IDR) Initiation Web Form

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

3.3 Third-Party Administrators

TPAs for health plans should provide their contact information in the “Primary point-of-contact” section. Third-party representatives for providers should provide their contact information in the “Primary point-of-contact” section. Any fields marked with a red asterisk (*) are required fields on the web form.

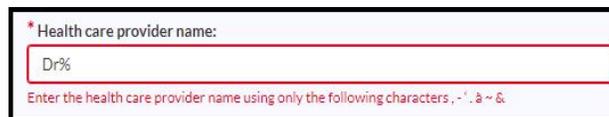
3.4 Use of Special Characters

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

3.4.1 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 clicking 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, Health Care Facility; 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**



The screenshot shows a text input field with a red border. Above the field, the text reads: "* Health care provider name:". Inside the field, the text "Dr%" is visible. Below the field, a red error message states: "Enter the health care provider name using only the following characters, -, ' à ~ &." The entire error message is enclosed in a black rectangular box.

Figure 9: Special Character Error Message for Name Fields

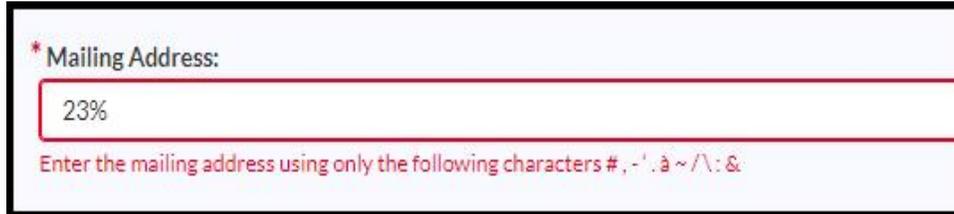
3.4.2 Address Fields

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 (/),

Notice of Independent Dispute Resolution (IDR) Initiation Web Form

backward-slash (\) and colon (:). The error message will be displayed in the following fields when clicking 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)**



* Mailing Address:
23%
Enter the mailing address using only the following characters #, -, ' . à ~ / \ : &

Figure 10: Special Character Error Message for Address Fields

4 Notice of IDR Initiation — Dispute Item and Payment Section

This section of the 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’s preferred certified IDR entity, and the qualified IDR items or services at issue. The initiating party must also furnish the Notice of IDR Initiation to the other party and to the Departments by submitting notice using the Federal IDR portal, available at <https://www.nsa-idr.cms.gov>. The initiation date of the Federal IDR process is the date that the Departments receive the Notice of IDR Initiation.



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, you will need to inquire with your state on how to handle your dispute. Similarly, if this dispute involves an ERISA plan that has opted into the state process for determining an out-of-network payment rate, you will need to inquire with the state on how to handle your dispute.

4.1 Line Item Information

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.”

4.1.1 Single Line Item — Not Bundled

If the dispute involves a single line item with no bundling, the “Line Item Information” section will display the **Claim Number** field and the **Date of the qualified item or service** calendar field.

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

Notice of Independent Dispute Resolution (IDR) Initiation Web Form

Line Item

* Claim Number:
123456

* Date of the qualified IDR item or service:
Jan 5, 2022

Figure 11: Notice of Initiation — “Line Item” Section

4.1.2 Single Line Item — Bundled

If the dispute involves a single line item bundled, the “Line Item Information” section will display the Item or **Service Type** field, the **Claim Number** field and the **Date of the qualified item or service** field.

1. First Item Entry: The **Item or Service Type** field is grayed out and indicates “Bundled Item or Service.”



Important: Your first entry will automatically default to the bundled item or service code, which is the service code under dispute.

Line Item

* Item or Service Type:
Bundled Item or Service

* Claim Number:
[Empty field]

* Date of the qualified IDR item or service:
[Empty field]

Enter the date of item or service.

1 Bundled item or service (primary line item): Your first entry will automatically default to the bundled item or service code, which is the claim under dispute.

Figure 12: “Line Item” Section — 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 form. Component entries are optional.

Line Item

* Item or Service Type:
Component Item or Service

Claim Number:
[Empty field]

Date of the qualified IDR item or service:
[Empty field]

1 Component item or service (secondary line item): Additional services billed under the primary claim.

Figure 13: “Line Item” Section — Subsequent Item or Service

4.1.3 Batched Items and Services

A batched dispute must contain items and services related to the treatment of a similar condition. The fields in this section are **Claim Number** and **Date of the qualified IDR item or service**. To enter an additional claim for the dispute, select **Save & Add Another** at the bottom of the page.

As a result of the TMA III order, air ambulance services for a single air ambulance transport, including air ambulance mileage code and base rate code, may be submitted as a batched

Notice of Independent Dispute Resolution (IDR) Initiation Web Form

dispute, so long as all provisions of the batching regulations are satisfied, in accordance with guidance.³

4.2 Payment Information

1. Enter the description of the item or service.
2. Enter the qualifying payment amount in the **QPA** field.
3. 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, explanation of payments.



Important: To upload relevant documentation, select the Upload Files 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 your file(s) meets this limitation. You must upload at least one file. The file name is displayed when the information is loaded.

4. Enter the cost sharing amount in the **Cost sharing amount allowed** field.
5. Enter the initial payment in the **Initial payment amount for the item(s) and/or service(s) (if applicable)** field.

Figure 14: Notice of Initiation — “Payment Information” Section

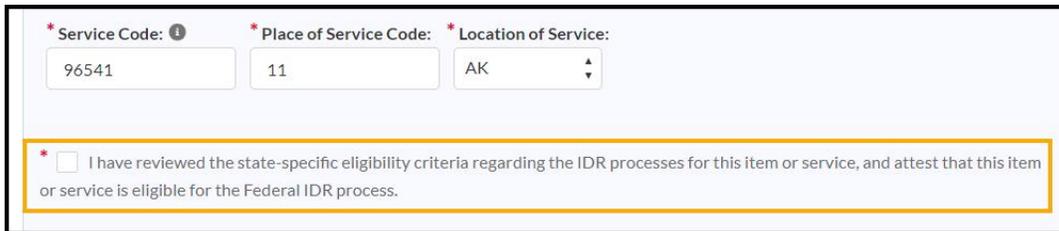
4.3 Type of Qualified Item(s) or Service(s)

1. Select the item(s) or service(s) under dispute by selecting the checkbox next to the service. You 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)”

³ Refer to FAQs about Affordable Care Act and Consolidated Appropriations Act, 2021 Implementation Part 63 (November 28, 2023), available at https://www.cms.gov/marketplace/resources/fact-sheets-faqs#Affordable_Care_Act.

Notice of Independent Dispute Resolution (IDR) Initiation Web Form

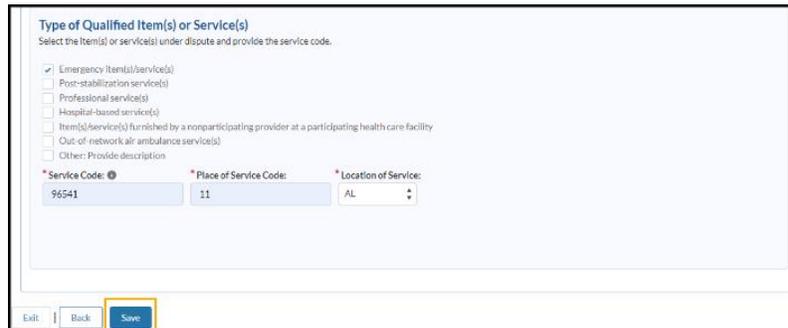
- g. "Other: Provide description" (Put description in text box provided)
2. Provide the service codes in identified fields below.
 - a. **Service Code** (five-digit code)
 - b. **Place of Service Code** (two-digits)
 - c. **Location of Service** (state)
 - d. If you enter a state from the Complex State list, further screening for dispute eligibility is required. You are 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.***



The screenshot shows a web form section titled "Complex State Attestation Statement". It contains three input fields: "Service Code" with the value "96541", "Place of Service Code" with the value "11", and "Location of Service" with a dropdown menu showing "AK". Below these fields is a checkbox with the text: "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." The checkbox is currently unchecked.

Figure 15: Complex State Attestation Statement

3. Save the form based on the type of dispute you are submitting.
 - a. **Single Line Item – Not Bundled:** After completing the service code information for your dispute, select the **Save** button.



The screenshot shows a web form section titled "Type of Qualified Item(s) or Service(s)". It contains a list of checkboxes for selecting the type of service: "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)", and "Other: Provide description". Below the list are three input fields: "Service Code" with the value "96541", "Place of Service Code" with the value "11", and "Location of Service" with a dropdown menu showing "AL". At the bottom of the form are three buttons: "Exit", "Back", and "Save". The "Save" button is highlighted with a yellow border.

Figure 16: Type of Qualified Items or Services — Single Not Bundled Dispute

3. Save the form based on the type of dispute you are submitting.
 - b. **Single Line Item – Bundled:** After completing the service code and/or subsequent item or service component information for your dispute, select the **Save** or **Save & Add Another** button. You may save without adding any component services, as component services are optional. The criterion for a bundled dispute is listed under the service code information.

Notice of Independent Dispute Resolution (IDR) Initiation Web Form

Type of Qualified Item(s) or Service(s)
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: 96541 * Place of Service Code: 11 * Location of Service: AL

Bundled dispute criteria:
A bundled payment arrangement represents multiple items or services that are billed or reimbursed under one service code. To be a bundled payment arrangement, the billed or reimbursed item or service could be broken into more than one component item or service. For more information see [\[link to August TA\]](#).

Exit | Back | Save | Save & Add another

Figure 17: Type of Qualified Items or Services — Single Bundled Dispute

- c. **Batched Disputes:** After completing the service code information for your dispute, you must enter another item or service before selecting the “Save” button. You may not save without adding additional services. If you try to save after entering only one item, you will receive the warning: **Batched items or services require two or more line items. Enter another item or service. If you do not have another item or service to report, you will need to select Back.** After selecting **Save**, When the “Finished?” dialogue box appears, if you are ready to submit your form, select **Continue**. If you still need to add items or services, select **Back**.

Finished?

If you are ready to submit your form, select **Continue**. If you still need to add items or services, select **Back**.

Back | Continue

Figure 18: Notice of Initiation — Finished Dialogue Box

5 Notice of Initiation Form — Summary of Qualified Items and/or Services

This section of the form contains a summary table of the items and services added to the form and allows the upload of additional information to support the dispute.

5.1 Summary of Qualified Items and/or Services Table

- After selecting **Continue**, review the **Summary of Qualified Items and/or Services** table displayed on the next page.
- Select the link displayed in the table if you need to make changes to an item or service.
- Select the **Add Another Item** button to add an item or service.



Note: If you are submitting a single dispute the Add Another Item button will not display.

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

Notice of Independent Dispute Resolution (IDR) Initiation Web Form

5.1.1 Single Line Item — Not Bundled

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

1. **Description of Items or Services**
2. **Claim Number**
3. **Date of Item or Service**
4. **Qualifying Payment Amount (QPA)**
5. **Location of Service (include state)**
6. **Service Code**
7. **Place of Service Code(s)**

Summary of Qualified Items and/or Services						
	Description of item(s) or service(s)	Claim Number	Date of item or service	Qualifying Payment Amount(QPA)	Location of service (include state)	Place of service code(s)
1	x-ray of the right femur	12345	04/14/2022	600	AK	96541 11

Figure 19: Notice of Initiation — Summary of Qualified Items and/or Services Table Single Line Item — Not Bundled

5.1.2 Single Line Item — Bundled

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

1. **Description of Items or Services**
2. **Claim Number**
3. **Line Item Type**
4. **Date of Item or Service**
5. **Qualifying Payment Amount (QPA)**
6. **Location of Service (include state)**
7. **Service Code**
8. **Place of Service Code(s)**

Summary of Qualified Items and/or Services					
	Description of item(s) or service(s)	Claim Number	Line item type	Date of item or service	Qualifying Payment Amount(QPA)
1	x-ray of the right femur	12345	Bundled Item or Service	04/22/2022	600
2	professional services	12345	Component Item or Service	04/14/2022	600

Figure 20: Notice of Initiation — Summary of Qualified Items and/or Services Table Single Line Item — Bundled

5.1.3 Batched Items or Services

The batched items or services table displays the following columns:

1. **Description of Item(s) or Service(s)**
2. **Claim Number**
3. **Date of Item or Service**
4. **Qualified Payment Amount (QPA)**

Notice of Independent Dispute Resolution (IDR) Initiation Web Form

5. **Location of Service (including state)**
6. **Service Code**
7. **Place of Service Code(s)**

5.2 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 Files** 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 your file(s) meets this limitation. You must upload at least one file. The file name is displayed when the information is loaded.

2. After reviewing your inputs on the table, if you do not have any other items to add, select the **Sign & Submit** button on the bottom left of the page.



Important: If you try 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.

Additional Supporting Documentation

If you need to add additional documents select Upload.

File limitations for entire dispute (500MB)

No File Selected.

Supporting documentation:

- Providing additional supporting documentation at initiation can help expedite review and avoid delays. Examples of potential documentation may include copies of initial payment or notice of denial of payment and associated documents (e.g., a remittance advice or an explanation of benefits), the Notice of Open Negotiation, emails requesting a previously-submitted dispute be resubmitted with corrections to batching errors, or evidence of extensions being granted.
- Only include information directly relevant to this dispute. Submitting information not relevant to this dispute may delay processing of your dispute.

Figure 21: Notice of Initiation — “Additional Supporting Documentation” Section

6 Notice of Initiation Form — Submit IDR Notice of Initiation Web Form

The final steps in completing the “**Notice of IDR Initiation**” web form includes selecting a preferred certified IDR entity and attesting that no conflict of interest (COI) exists between the initiating party and the selected certified IDR entity.

6.1 Preferred Certified IDR Entity

Select the dropdown arrow in the **IDRE legal business name** field and select the entity you prefer to handle the dispute.

Notice of Independent Dispute Resolution (IDR) Initiation Web Form

Figure 22: Notice of Initiation — “Preferred Certified IDR Entity” Section

6.2 Complete COI 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. Enter your name in the ***Initiating party*** field.
4. The ***Date*** field will automatically populate with today’s date and cannot be changed.
5. Select ***Submit***.



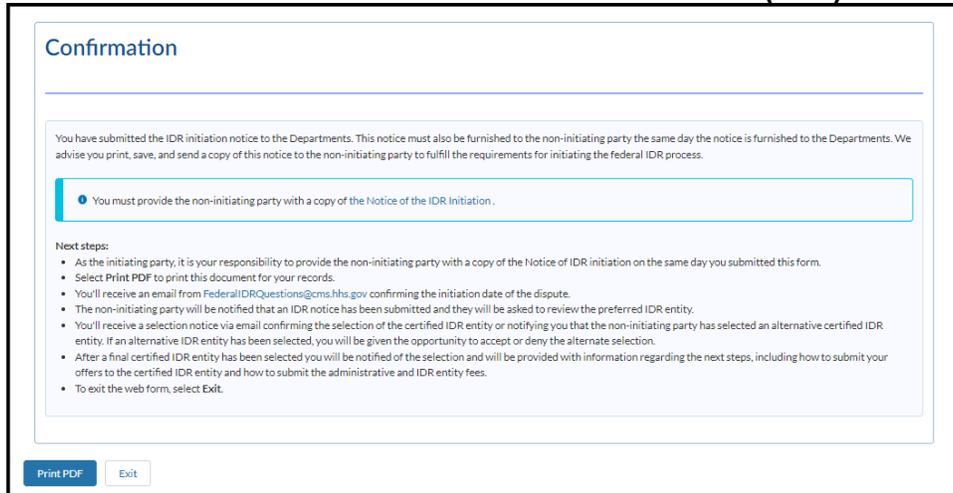
Important: Applicability for the Federal IDR process includes meeting the 90-day cooling off period for like items and services to the same plan/ issuer.

Figure 23: Notice of Initiation — Conflict of Interest Attestation

7 IDR Notice of Initiation Web Form Confirmation

Once you submit the web form, you will receive a confirmation email that the form has been received and a set of next steps.

Notice of Independent Dispute Resolution (IDR) Initiation Web Form



The screenshot shows a web form titled "Confirmation". At the top, it states: "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." Below this is a blue-bordered box containing a blue circle with an exclamation mark and the text: "You must provide the non-initiating party with a copy of the Notice of the IDR Initiation." Underneath, a section titled "Next steps:" lists several bullet points: "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 Print PDF to print this document for your records.", "You'll receive an email from FederalIDRQuestions@cms.hhs.gov confirming the initiation date of the dispute.", "The non-initiating party will be notified that an IDR notice has been submitted and they will be asked to review the preferred 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.", and "To exit the web form, select Exit." At the bottom of the form are two buttons: "Print PDF" and "Exit".

Figure 24: Confirmation Page Next Steps



Important: 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 web form. If you select the Notice of IDR Initiation link located in the banner on the Confirmation page, there is additional information regarding the requirement to provide the non-initiating party with a copy of this notice.

Select **Print PDF** to print this document for your records.

You'll receive an email from FederalIDRQuestions@cms.hhs.gov confirming the initiation date of the dispute.

The non-initiating party will be notified that an IDR notice has been submitted and 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 certified 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 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 **Exit**.

8 Frequently Used Acronyms

Acronym	Definition
CHIP	Children’s Health Insurance Plan
COI	Conflict of Interest
ERISA	Employee Retirement Income Security Act of 1974
FEHB	Federal Employees Health Benefits
IDR	Independent Dispute Resolution
NPI	National Provider Number
NSA	No Surprises Act
OPM	Office of Personnel Management
QPA	Qualifying Payment Amount
TIN	Taxpayer Identification Number
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 (TMA III) order.
TPA	Third Party Administrator

Table 1: Acronyms Table