

<u>Date</u>	<u>Action</u>
<u>12/31/2020</u>	No Surprise Act is signed into law. (Public Law No: 116-260)
<u>7/13/2021</u>	Interim Final Rule I (Surprise billing and Qualifying Payment Amount)
<u>10/17/2022</u>	Interim Final Rule II (IDR process and good faith estimates)
<u>10/28/2021</u>	Texas Medical Association sues challenging the rule (claiming unfair process to resolve billing disputes between health insurers and providers)
<u>1/1/2022</u>	No Surprises Act becomes effective.
<u>2/23/2022</u>	Texas Medical Ass’n (TMA) I Decision (vacating QPA rebuttable presumption in IDR process) (HHS will revise its guidance)
<u>4/15/2022</u>	IDR process opens
<u>8/16/2022</u>	Departments publish final rule replacing QPA rebuttable presumption in response to TMA 1 decision,
<u>9/22/2022</u>	Texas Medical Association files a second lawsuit challenging the NSA, arguing the final rule will “unfairly advantage health insurers by requiring arbitrators to give outsized wight or consideration to QPA.
<u>11/30/2022</u>	TMA files its third lawsuit against the NSA arguing portions of the rule “artificially deflate the QPA.”
<u>1/31/2023</u>	TMA files 4 th lawsuit, challenging 600% hike in administrative fees when seeking dispute resolutions.
<u>2/6/2023</u>	Court rules in favor of TMA in its second lawsuit, ruling that the revised arbitration process continues to place a thumb on the scale in favor of insurers” and “that the challenged portions of the final rule are unlawful and must be set aside.”

<u>8/4/2023</u>	Texas Medical Association IV Decision (vacating increase in IDR admin fee + batching standard). Found federal agencies did not follow notice and comment requirements when increasing administrative fees and invalidated rules narrowing batching claims for arbitration. HHS temporarily suspends IDR process.
<u>8/24/2023</u>	Texas Medical Association III Decision (vacating calculation of QPA in July 2021) Interim Final Rule- QPA can't take into account rates never negotiated, providers outside specialty, must acct for risk sharing, bonus payments.
<u>9/26/2023</u>	Departments published Proposed Rule (IDR administrative fee changes)
<u>10/27/2023</u>	New Proposed Rule on IDR process (batching, improving communication, administrative fees)
<u>12/15/2023</u>	Departments reopen IDR portal for all dispute types (batching and single)
<u>12/21/2023</u>	Departments issued Final rule on IDR administrative fees. Setting fee at \$115.
<u>8/2/2024</u>	U.S Court of Appeals for 5 th circuit upheld decision in TMA IV that regulations gave QPA too much weight in deciding out of network payment amt.
<u>1/14/2025</u>	The Departments of Labor, HHS, and Treasury along with OPM jointly issued Part 69 of frequently asked questions designed to help stakeholders understand and adhere to the federal No Surprises Act. These FAQs discuss how health plans and issuers should calculate the QPA and provides updates to disclosure and patient cost- sharing requirements. <i>Plans and issuers can continue to rely on any QPAs that have already been calculated using a good faith, reasonable interpretation of the 2023 methodology.</i>