

Buyer Beware: Will the No Surprises Act Eliminate Surprise Billing?

Xavier Baker

Susan Feigin Harris

Leah Stewart

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Agenda

- **Overview**
- **Price Transparency / No Surprises Act**
 - Timeline
 - Implementation Bumps
 - Enforcement and Risks of Non-Compliance
- **No Surprises Act Litigation**
- **Implementation and Operational Challenges**
- **Closing Thoughts**

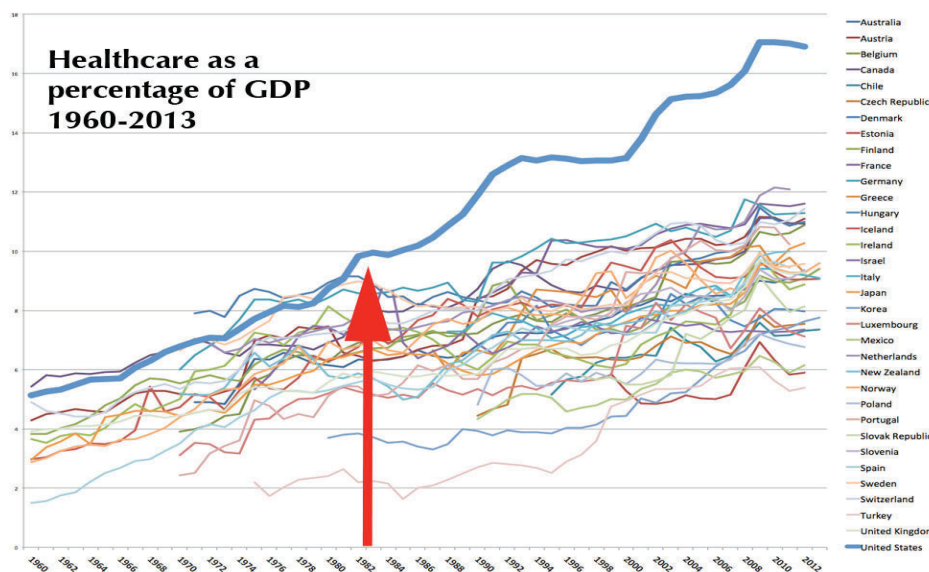


Overview - Where Are We?

- Increased focus on price transparency
 - Surprise billing horror stories
 - 80% of health care consumers attempt to look up the price of a service before accessing it
 - February 2020: 2 out of 3 Americans said unexpected medical bills were a top budget concern
- Benefit plan designs and care options increasingly complex
- Technology has allowed for detailed pricing comparisons in other industries
- Bipartisan support for the No Surprises Act in December 2020



Overview - How Did We Get Here?



Overview - Price Transparency

Rules That Make Up Today's Environment

- ✓ Health Plan Transparency Final Rules
 - Organization-specific payment rate data
 - 500 shoppable services
- ✓ Hospital Price Transparency Final Rule
 - Publish standard charges in machine-readable format
 - Publish standard charges in consumer-friendly format
- ✓ Transparency in Coverage Rule
 - Ban on gag clauses
 - Pharmacy benefit and drug cost data
 - Insurer/Broker compensation disclosure

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Overview – No Surprises Act

Rules That Make Up Today's Environment, cont.

- ✓ No Surprises Act Rules
 - New out-of-network payment rate set by the Independent Dispute Resolution (IDR) process
 - Advanced cost estimates for scheduled services
 - Personalized out-of-pocket estimation tool
 - Patient disclosure and provider directory updates



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