

Final Rules Implementing the No Surprises Act Adopted

A photograph of a man and a woman in a medical setting. The man, on the left, is wearing a light blue button-down shirt and is looking down at a document held by the woman. The woman, on the right, is wearing a white lab coat over a blue top and has a stethoscope around her neck. She is also looking at the document. The background is slightly blurred, showing what appears to be a hospital or clinic environment.

Healthcare Law Update

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Isabelle Bibet-Kalinyak
Member, Healthcare

Caroline J. Patterson
Counsel, Healthcare

Vanessa Coleman
Associate, Healthcare

BRACH | EICHLER^{LLC}
Counsellors at Law

On August 26, 2022, the Departments of Health and Human Services, Treasury and Labor, issued [final rules](#), with an effective date of October 25, 2022, to implement the No Surprises Act, which bans surprise medical bills. The final rules provide new details for the independent dispute resolution process to determine an out-of-network rate for items and services. The final rules reduce the emphasis on the qualifying payment amount (QPA), meaning the median contracted rate for a given service in a given market. The final rules require that arbiters offer a rate that best quantifies the value of the item or service under dispute considering the QPA and all permissible factors.

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For more information, contact:

Isabelle Bibet-Kalinyak | 973.403.3131 | ibibetkalinyak@bracheichler.com

Caroline J. Patterson | 973.403.3141 | cpatterson@bracheichler.com

Vanessa Coleman | 973.364.5208 | vcoleman@bracheichler.com