

[Employee Benefits Management Newsletter, No. 805, Benefits News, \(Sept. 1, 2026\)](#)

Employee Benefits Management Newsletter

Employee Benefits Management Directions

EMPLOYEE BENEFITS MANAGEMENT DIRECTIONS HEADLINES, Report No. 805, September 1, 2026

Compliance timeline clarified for IDR operations final rules

The Departments of Labor, HHS, and Treasury (Departments) have issued guidance clarifying when group health plans and health insurance issuers must comply with various provisions of the federal independent dispute resolution operations final rules, which were issued in June 2026. The guidance explains that some requirements have fixed applicability dates, while others become effective only after the Departments announce that supporting functionality is available in the new IDR Gateway.

CARC/RARC disclosures. Plans and issuers must use specified remittance advice remark codes (RARCs), and any required claim adjustment reason codes (CARCs), when communicating whether items or services are subject to the No Surprises Act and federal IDR process. These requirements apply to items and services furnished on or after January 1, 2027.

IDR Gateway registration. Plans and issuers must register in the IDR Gateway by the later of 90 business days after the Departments announce the registry functionality is available or the date the plan begins offering coverage subject to the federal IDR process.

Open negotiation and IDR process changes. Revised requirements governing open negotiation notices and responses, IDR initiation and responses, certified IDR entity selection, eligibility review, withdrawals, extensions, and certain dispute submission procedures will apply beginning 90 calendar days after the Departments announce that the applicable IDR Gateway functionality is available.

QPA disclosure requirements. Requirements concerning information that must be shared regarding the qualifying payment amount (QPA) became effective August 3, 2026.

Batching rules. The revised definition and treatment of batched qualified IDR items and services, including batching limitations and cooling-off periods, apply to disputes with open negotiation periods beginning on or after November 1, 2026.

The Departments stated that notices announcing new IDR Gateway functionality and related applicability dates will be posted on the CMS No Surprises website and distributed through the federal IDR mailing list.

SOURCE: [Federal Independent Dispute Resolution \(IDR\) Operations Final Rules Implementation Timeline Guide for Certified IDR Entities and Disputing Parties](#), August 7, 2026.