COSMOS
Navigate the Compliance Universe

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This is a slightly edited version of a chart that appeared in CMS's Oct. 7 interim final regulation.[1]

Independent Dispute Resolution Process

Step in the Process	Must Be Completed By
1. Payer sends provider initial payment or notice of denial of payment (also sends qualifying payment amount)	30 business days Starting on day payer receives all relevant data
2. Provider initiates 30-business-day open negotiation period	30 business days Starting on day of initial payment or notice of denial of payment
3. Either party initiates IDR process following failed negotiations	4 business days Starting business day after the open negotiation period ends
4. Mutual agreement on certified IDR entity selection; each party pays $50 administrative fee	3 business days After IDR initiation date
5. Feds select IDR entity if no agreement by parties	6 business days After IDR initiation date
6. Parties submit payment offers to IDR entity	10 business days After date of certified IDR entity selection

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7. Payment determination made; loser pays IDR entity fee	30 business days After date of certified IDR entity selection
8. Payment completed	30 business days After payment determination

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