

## No Surprises Act Update Full-Year 2024 IDR Metrics

Emergency Medicine  
(May/June 2025)

### EDPMA

The Emergency Department Practice Management Association (EDPMA) is the trade association for emergency medicine focused on the sustainable delivery of high-quality, cost-effective patient care in emergency departments. Our members see or support approximately 60% of essentially all annual emergency department visits.



#### The Study

Eight EDPMA members with a collective national scope representing hundreds of emergency medicine practices (“the clinicians”) answered seven questions in a highly focused survey. The questions covered the calendar 2024 period and concerned two variables: (1) health plan payments owed the clinicians from disputes won in the NSA’s IDR process; and (2) the costs expended by the practices to access the IDR process in 2024 to achieve fair payment.



#### The Findings

##### 1. Health Plan Payments Owed to Clinicians

The five questions posed in this area resulted in the following answers (rounded to the nearest hundred):

- A total of 313,800 IDR disputes were won by the practices in 2024.
- 186,900 disputes (59.6% of the total disputes won by clinicians) were NOT paid within the statutory 30-day time frame.
- \$29,099,100 (or \$3,637,300 per respondent) was unpaid to clinicians/practices as of 12/31/2024.
- 33,300 disputes (26.3% of the paid disputes) were paid to clinicians – but paid the WRONG amount.
- On average, a claim spends 184 days in the IDR Process, from IDR initiation in the portal to certified IDR entity determination (6 months and 4 days).

##### 2. Fees Paid by the Emergency Groups to Receive Fair Payment

- The reported Administrative Fees paid to enter the IDR portal were **\$20,829,500**, which averaged \$2,603,700 per respondent.
- The reported amounts paid into the IDRE escrow amounts were an astonishing **\$133,870,300**, or \$16,733,800 per respondent.



#### The Conclusions

##### 1. Health Plan Payment Non-Compliance Continues with Impunity

The lack of enforcement by regulatory agencies has perpetuated massive payment non-compliance by health plans into the 3rd year of the NSA program.

##### 2. Systemic IDR Inefficiencies Cause Excessive Delays for Closures

In 2024 the average time exceeded six months for an IDR claim to reach adjudication by the IDRE—not counting any further time for collecting the health plan amounts owed. This excessive lag represents a “worst practice” case study.

##### 3. Fees Paid by the Emergency Groups to Receive Fair Payment

Emergency Medicine clinicians paid a staggering average of \$16.7 million per organization to achieve fair payment. Such costs prohibit countless smaller clinical groups from pursuing fair payments to which they are entitled. Corrective action to this inequity needs to be developed.