

TIMELINE OF NO SURPRISES ACT IMPLEMENTATION

DECEMBER 27

The NSA is signed into law

2020

SEPTEMBER 10

The Departments release interim final rules for the NSA

2021

OCTOBER 28

TMA files first lawsuit against the HHS over implementation of the NSA

JANUARY 1

NSA goes into effect

AUGUST 19

The Departments release updated final rules regarding the NSA

2022

FEBRUARY 23

Court rules in favor of the TMA in its first lawsuit; vacates HHS rules

SEPTEMBER 22

TMA files second lawsuit against HHS; arguing the Independent Dispute Resolution process puts too much emphasis on the QPA

NOVEMBER 30

TMA files third lawsuit against HHS; arguing that the rules artificially deflate the QPA

DECEMBER 18

HHS abruptly raises administrative fee

JANUARY 31

TMA files fourth lawsuit against HHS; arguing against abrupt fee hike

JULY 12

HHS appeals the verdict of the second lawsuit; still pending final ruling

2023

FEBRUARY 6

Court rules in favor of TMA in its second lawsuit; vacating HHS rules giving preferential weight to the QPA

AUGUST 3

Court rules in favor of TMA in its fourth lawsuit, vacating abrupt administrative fee hike

AUGUST 24

Court rules in favor of TMA in its third lawsuit; vacating rules that deflate the value of the QPA

SEPTEMBER 19

Congressional hearing on NSA implementation issues

JANUARY 12

HHS appeals ruling in third lawsuit; still pending final ruling

2024

MARCH 18

39 members of Congress sign a letter urging the Administration to properly implement the NSA

KEY TERMS

The Departments: U.S. Departments of Health and Human Services, Labor, and the Treasury

NSA: No Surprises Act

TMA: Texas Medical Association

HHS: Department of Health & Human Services

QPA: Qualified Payment Amount