

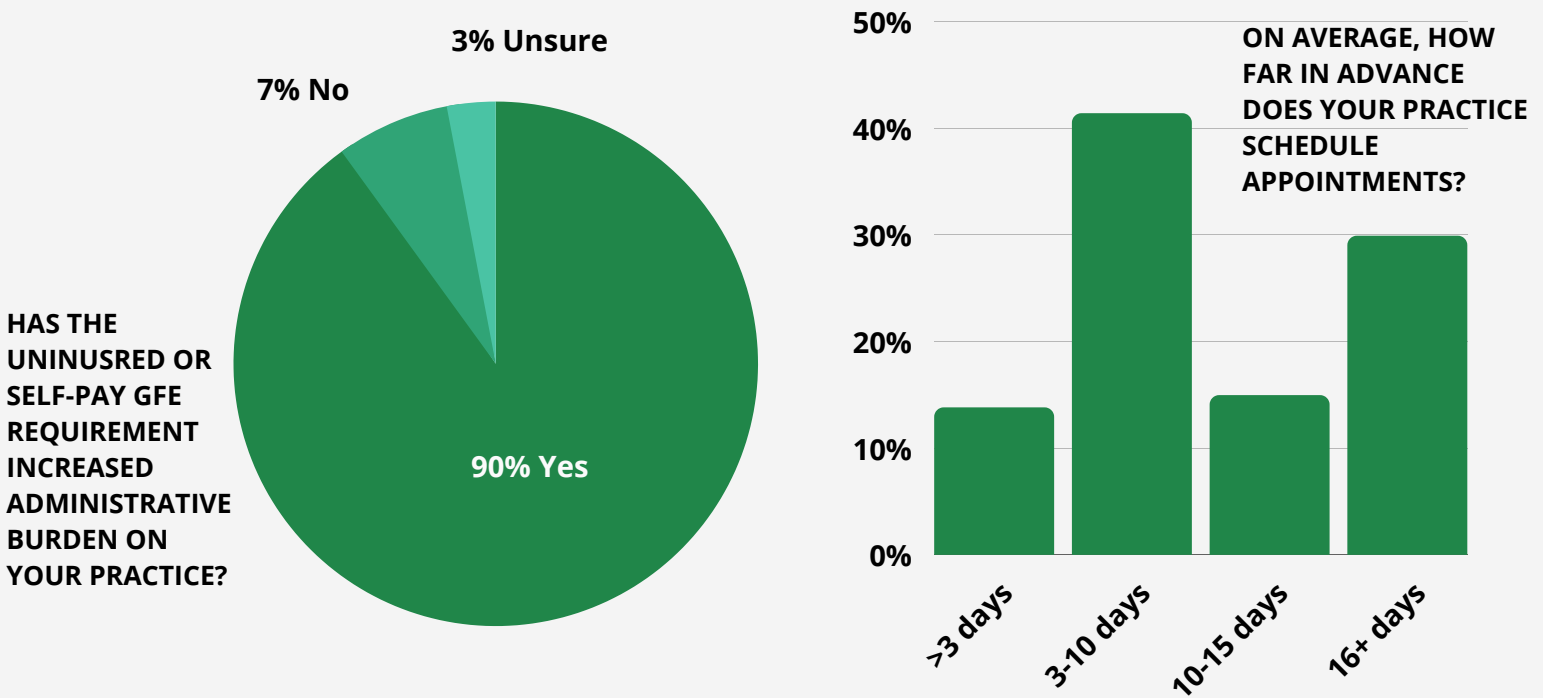
On Jan. 1, 2022, the uninsured or self-pay good faith estimate (GFE) requirements, as part of the No Surprises Act, took effect. These new policies require that practices issue a GFE to an eligible patient either upon request or upon scheduling services. The U.S. Department of Health and Human Services (HHS) and the Centers for Medicare and Medicaid Services (CMS) released a final rule implementing these requirements less than three months prior to the policies taking effect.

MGMA and our members support initiatives to increase appropriate price transparency and empower patients to be active members of their care teams. However, group practices did not have sufficient time to implement new workflows, making it difficult to appropriately implement the new price transparency provisions.

MGMA urges Congress to delay the implementation of the uninsured or self-pay GFE and the advanced explanation of benefits (AEOB) requirements until the end of CY 2023 to:

1. Provide the **Department** time to draft and implement effective policies,
2. Provide **practices** with the time necessary for proper implementation, and
3. Ensure **patients** are aware of their rights to price transparency information.

MGMA CONDUCTED A SURVEY OF MEMBER GROUP PRACTICES EVALUATING THE IMPACT THE UNINSURED OR SELF-PAY GFE MANDATE HAD ON PRACTICES DURING THE FIRST MONTH OF IMPLEMENTATION



WHAT MGMA MEMBERS ARE SAYING ABOUT GFE IMPLEMENTATION:

- "We have provided GFEs in the past but the stricter timelines, need for provider specific NPI, need to reissue if appointment is rescheduled."
- "A patient will schedule for one reason and then add to that when the patient is in with the provider. The provider may then perform additional test that would not be included in the GFE."
- "EMR/EHR that most private practices have do not have the capability to automate this process. This takes 1 FTE for our office which takes away from other vital billing processes."

MGMA Survey: "Implementation of Surprise Billing Requirements." Conducted January 25, 2022. N = 89.