

Preparing for the No Surprises Act: Your 10-Step Action Plan

On January 1, 2022 the No Surprises Act went into effect, and it's critical that all ambulatory surgery centers put together an action plan in order to comply. Our experts have put together the following 10-step plan to help you get started. In addition to reviewing this plan, we also recommend consulting your ASC's attorney, and researching any additional legislation that is specific to your state.

PREPARE

1. **Educate your staff and stakeholders** by sharing the details of the law and patient's rights. CMS has very helpful resources, or you can reference HST's resources written by our price transparency experts.
2. **Post the CMS model disclosure** in your facility's waiting room (or some place that's highly visible to patients) and also update your website.
3. **Update your payor directories.**
4. **Review and update your chargemaster** and consider the QPAs for out-of-network cases. If you plan on balance billing prepare your Patient Waiver of Rights Consent.
5. **Connect with your co-providers** and make it clear how they should communicate their expected charges and patient financial responsibility for inclusion on the Good Faith Estimates (GFE).

EXECUTE

1. **Verify each patient's insurance plan** and, if necessary, request additional information regarding scheduled procedure, diagnoses, and patient contact info: mobile and email.
2. **For out-of-network patients** use their in-network benefits and the QPA for the allowed amount.
3. **Provide Good Faith Estimates** of all expected charges to uninsured and self-pay patients. Track patient communications and retain the GFES as part of the medical record for seven years.
4. **Provide the disclosure of patient rights** to all patients. It's required that this disclosure is given to every patient.
5. **Embrace price transparency** as much as you can, showcasing your ASC as the low-cost, high-quality leader in your community. You should proactively provide estimates or your facility fees to all patients, update your website to encourage transparency, and consider adding a consumer shopping calculator to your website as well.

