

CMS Independent Dispute Resolution Public Use Files Q1 & Q2 2025



In January 2026, the Centers for Medicare & Medicaid Services (CMS) published the Federal Independent Dispute Resolution (IDR) Public Use Files (PUFs) and supplemental tables for the first and second quarters of 2025.

- **These datasets provide transparent**, detailed information on dispute activity under the No Surprises Act (NSA), the federal law designed to protect patients from unexpected out-of-network medical bills.
- The IDR process applies when clinicians and payers cannot agree on a payment amount for out-of-network (OON) services after open negotiation and instead request arbitration by a certified independent entity.

Key Takeaways:

The public files include data on:

- disputes initiated and outcomes,
- whether disputes were eligible or closed,
- payment determinations reached by certified IDR entities,
- offers submitted by each party, and
- stratifications by clinician type, insurer type, and state.

Early analysis indicates that clinicians continue to prevail in the vast majority of disputes, with about **88% of determinations favoring the clinician** and most award amounts exceeding the insurer’s qualifying payment amount (QPA).



Why This Data Is Important to Physician Clients:

Real-World Insight into Payment Outcomes - The IDR PUFs show how often clinicians win disputes and how award amounts compare to the payer's QPA, which is a key benchmark in arbitration. This helps physicians understand **expected arbitration results** under current policy trends.

Trends in Dispute Activity - Physicians can see how frequently disputes are initiated, which payer types are involved most often, and geographic patterns. This is useful for identifying systemic issues in reimbursement negotiations that may affect practice revenue.

Negotiation Strategy Support - Knowing how disputes tend to be resolved (e.g., high clinician success rates) can inform a practice's **negotiation posture and decision-making around whether to pursue IDR**.

Transparency and Advocacy - The PUFs provide primary data that physician groups and advocates can use in discussions with payers and policymakers about payment fairness and implementation of the NSA.

Benchmarking and Financial Planning - Practices can benchmark their expected dispute outcomes against national data, which can improve **financial planning, contracting decisions, and dispute readiness**.

