

Cooling-Off Periods and Initiation Windows After Nov. 1, 2026

Batched disputes move to a 30-business-day cooling-off period – followed by just **4 business days** to initiate the Federal IDR process for held-over items. All other disputes keep the 90-calendar-day cooling-off period and 30-business-day window.

Which timeline applies? Look at the determination that started the cooling-off period.

Was it a batched determination and did its open negotiation period begin on or after Nov. 1, 2026?

YES

Batched timeline: 30 business days of cooling-off, then **4 business days** to initiate

NO

Standard timeline: 90 calendar days of cooling-off, then **30 business days** to initiate

The **earlier** determination controls – not how the next dispute is structured. Single and bundled determinations always follow the standard timeline.

	Batched Disputes Open negotiation period began on or after Nov. 1, 2026	All Other Disputes Single and bundled disputes (any date), and batched disputes with open negotiation periods that began before Nov. 1, 2026
Cooling-off period after a payment determination	30 business days (was 90 calendar days)	90 calendar days
Window to initiate IDR for heldover items	4 business days after the cooling-off period ends (was 30 business days)	30 business days after the cooling-off period ends (unchanged)
Held-over items that qualify	NEW Open negotiation period ended in the 30 business days before the cooling-off period, or during it	Open negotiation period ended during the cooling-off period
Line-item limit	NEW 50 line items per batched dispute	Single and bundled disputes: not applicable. Earlier batched disputes: follow current CMS guidance
Federal IDR portal checks	NEW Beginning Nov. 1, 2026: blocks initiation before the cooling-off period ends or more than 4 business days after	Blocks initiation before day 90. NEW Also blocks initiation more than 30 business days after (since Sept. 24, 2026).

Check determination letter

Letters will show the applicable cooling-off period.

Count business days

Weekends and federal holidays don't count.

Prepare during cooling-off

Have held-over items and documentation ready when the window opens.

Questions about the Federal IDR process?

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