Federal IDR: What's Changing for Batched Disputes

For initiating parties and non-initiating parties

On October 29, 2026, CMS released guidance explaining how the batching and bundling provisions of the Federal IDR Operations Final Rule will work. It sets out new requirements for grouping items and services into a single dispute, the code ranges that can be batched, and updated cooling off periods. The key changes are summarized below.

Key date: November 1, 2026

New batching rules apply to disputes with open negotiation periods starting on or after this date.

The main changes

Topic	What's new
Batching criteria	A batch must meet all four: • Same provider or facility (same NPI or TIN) • Same payer: the same issuer, or the same self-insured plan (not just the same TPA) • Treatment of a similar condition (see below) • Items furnished within 30 business days of the first item
Similar condition	Met by any one of three paths: • One patient, one encounter: consecutive days, same claim form • Same or comparable service code, such as CPT 93000 and HCPCS G0403 (modifiers are ignored) • Anesthesia, radiology, pathology, or lab services in the same CPT code range listed in the guidance
50-line limit	Batches cannot exceed 50 line items. Modifiers and anesthesia qualifying circumstances add-on codes do not count. Traditional add-on codes do.
Cooling off period	After a determination, no new dispute for the same service code against the same party. • Batched dispute: 30 business days (shortened from 90 calendar days) • Single dispute: 90 calendar days (unchanged)
Filing after cooling off	Items whose open negotiation ended during the cooling off period can be filed once it ends: • After a batched dispute: within 4 business days • After a single dispute: within 30 business days Overlapping periods: the last one to end sets the window.
Bundled payments	Items billed or paid under one code that represents multiple services for one patient (e.g., a DRG) can be decided in a single determination. In effect since August 3, 2026.

Summary of CMS guidance released October 29, 2026. For general information only; not legal advice.