



REVGUARD

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— WHITE PAPER · NO SURPRISES ACT

Maximizing Revenue Under the NSA.

A strategic framework for optimizing out-of-network reimbursement through arbitration leverage, contracting discipline, and operational excellence.

**110-
180%**

IDR AWARDS VS.
QPA

30d

OPEN NEGOTIATION
WINDOW

5

STRATEGIC REVENUE
LEVERS

IDR STRATEGY
CONTRACTING
ARBITRATION
RECOVERY

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ES EXECUTIVE SUMMARY

The NSA didn't eliminate OON revenue. It changed how you earn it.

The No Surprises Act, effective January 1, 2022, fundamentally reshaped out-of-network reimbursement dynamics in U.S. healthcare. While designed to protect patients from unexpected medical bills, the legislation creates both constraints and opportunities for providers, payers, and revenue cycle organizations.

This paper outlines a strategic framework for optimizing revenue within NSA regulatory boundaries — with a focus on **arbitration leverage**, **contracting strategy**, **documentation rigor**, and **operational discipline**. The competitive edge lies in execution, not regulation.

"Maximizing revenue under the NSA is not a legal question. It is an operational one."



01 THE FRAMEWORK

Three pillars define NSA economics.

The NSA prohibits balance billing for certain out-of-network services and replaces it with a structured payment framework built on three interconnected mechanisms.

QPA

QUALIFYING PAYMENT AMOUNT

Typically the median in-network rate. Acts as the de facto reimbursement anchor.

30d

OPEN NEGOTIATION

A 30-day window to reach agreement before formal dispute escalation.

IDR

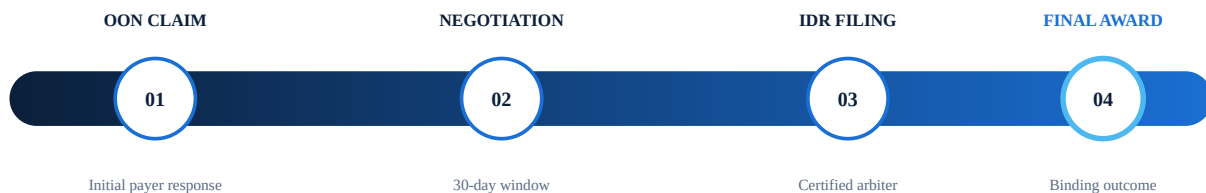
INDEPENDENT DISPUTE RESOLUTION

Formal arbitration — the primary lever for achieving reimbursement above QPA.

The NSA Revenue Workflow

FROM CLAIM TO FINAL PAYMENT · NSA PATHWAY

Four stages, two windows, one outcome



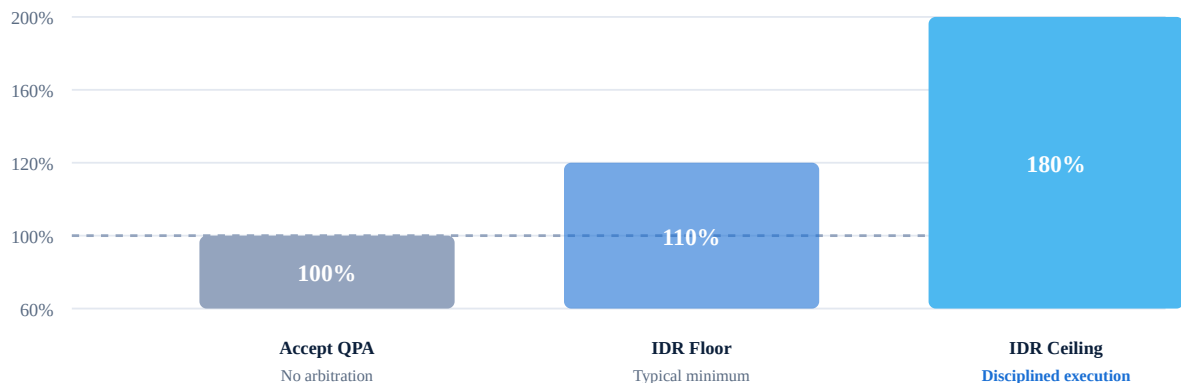
THE FINANCIAL IMPLICATION

The QPA acts as the reimbursement anchor, creating downward pressure on out-of-network revenue unless proactively managed. Every dollar above QPA has to be fought for — and won — through disciplined IDR execution.

**02 THE PRIMARY LEVER**

IDR is where revenue above QPA is won.

Independent Dispute Resolution is the only formal mechanism for achieving reimbursement above the QPA anchor. Organizations with disciplined IDR workflows consistently achieve awards in the range of 110–180% of QPA — depending on specialty, documentation, and arbiter strategy.

TYPICAL IDR AWARD RANGE · % OF QPA**Disciplined IDR execution vs. accepting the QPA anchor**

Winning Tactics

- **Build statistically defensible case packages** — benchmark against regional commercial rates, acuity profiles, and provider expertise
- **Leverage batching strategies** to reduce administrative cost per dispute and scale volume efficiently
- **Track arbiter tendencies and payer behaviors** to refine submission strategy claim-by-claim
- **Invest in specialized IDR analytics** — benchmarking data is the single strongest predictor of award outcomes

**03 UPSTREAM LEVERS**

Every contract writes tomorrow's QPA.

Two of the most powerful NSA revenue levers happen before a claim is ever submitted: the in-network contracts you sign, and the clinical documentation you capture at the point of service.

Contracting Strategy

Because the QPA is derived from contracted rates, contract management has become a direct revenue optimization function. Every in-network rate signed today influences the reimbursement floor tomorrow.

- Negotiate higher in-network rates to influence future QPA calculations
- Avoid unfavorable contracts that depress median rates across your specialty
- Use NSA arbitration outcomes as leverage in payer negotiations

STRATEGIC INSIGHT

Contracting is no longer a procurement function — it is a revenue engineering function. Organizations that treat contract rate decisions as QPA calibration consistently outperform peers on OON reimbursement over a multi-year horizon.

Clinical Documentation & Coding Precision

IDR success and negotiation leverage depend heavily on the ability to demonstrate service complexity. Weak documentation materially reduces arbitration win rates — often by 30 points or more.

- Ensure accurate CPT/HCPCS coding aligned with acuity and procedure complexity
- Document case complexity, patient condition, and resource utilization at the point of service
- Integrate clinical and financial data for dispute support — IDR packages are stronger when both sides talk to each other

Documentation is not a compliance exercise. It is the evidentiary backbone of every IDR award.

**04 EXECUTION LAYER**

Workflow & data — the silent revenue killers.

Revenue leakage under the NSA rarely comes from reimbursement policy. It comes from missed deadlines, incomplete submissions, and the absence of data infrastructure to know which claims to pursue.

Operational Workflow Excellence

- Automate NSA timelines — open negotiation windows, IDR filing deadlines, and arbiter response cycles
- Centralize NSA case management so no claim falls through the cracks between departments
- Implement denial tracking specific to NSA-eligible claims, separate from standard denial workflows

OPERATIONAL REALITY

Operational inefficiency — not reimbursement policy — is the leading cause of lost revenue under the NSA. A missed 30-day negotiation window forfeits leverage entirely.

Data & Analytics Infrastructure

Advanced analytics separate organizations that earn above QPA from those that simply accept it. Data maturity correlates directly with revenue capture rates.

**Payer-specific reimbursement models**

Historical award data, payer behavior patterns, and specialty-specific benchmarks — the foundation of every winning IDR case.

**Variance monitoring**

Continuous tracking across billed charges, QPA, and final payments surfaces the gap that arbitration was designed to close.

**High-yield claim identification**

Not every claim belongs in IDR. Data maturity tells you which ones justify the filing cost — and which ones do not.

**05 RISK MANAGEMENT**

Aggressive revenue capture, zero compliance risk.

Maximizing NSA revenue must remain fully compliant with federal regulations. The organizations that win long-term are the ones that pursue every dollar of legitimate reimbursement without ever crossing regulatory lines.

Key Risks

RISK	EXPOSURE
Improper batching of claims in IDR	Arbiter rejection; wasted filing fees
Non-compliant patient billing practices	Federal penalties; reputational damage
Inaccurate representation of market rates	Lost arbitration credibility; systemic award reductions

Mitigation Strategy

01**Regular compliance audits**

Quarterly review of NSA claim workflows, IDR submissions, and patient billing practices. Catch issues before they become patterns.

02**Legal review of arbitration templates**

Pre-approved IDR case package templates reviewed by healthcare regulatory counsel — speeds filings, reduces exposure.

03**Staff training on NSA requirements**

Ongoing education for billing, coding, and clinical staff on NSA workflows, timelines, and documentation standards.

**06 ORGANIZATIONAL DESIGN**

NSA is a cross-functional discipline.

High-performing organizations don't treat the NSA as a billing problem. They treat it as a coordinated revenue strategy that spans legal, RCM, analytics, and payer relations — with executive visibility into the outcomes.

Recommended Structure



Dedicated NSA Revenue Team

A cross-functional pod combining legal, revenue cycle, and analytics expertise. Owns the end-to-end NSA claim lifecycle — from eligibility detection through final award.



Executive-level KPI tracking

IDR win rate, average award as a percentage of QPA, and cycle time — reported monthly to finance leadership, not buried in RCM dashboards.



Integration with contracting & payer relations

Arbitration outcomes feed directly into contract renewal strategy. The feedback loop between IDR data and contract negotiations is where long-term advantage compounds.

**IDR Win
Rate**

PRIMARY OUTCOME METRIC

**Award vs.
QPA**

REVENUE LIFT TRACKER

Cycle Time

OPERATIONAL EFFICIENCY

The three KPIs above tell you everything about your NSA program. If you can't report them monthly, you don't have a program.

**07 TECHNOLOGY**

Purpose-built platforms, not spreadsheets.

The difference between organizations that consistently earn 110–180% of QPA and those that don't is almost always technology. Manual NSA workflows cannot scale — and cannot win.

Capabilities to Prioritize

01**Automated eligibility detection**

Not every claim qualifies for NSA protection. Systems should flag NSA-eligible claims at intake — before they enter the wrong workflow.

02**IDR workflow orchestration**

Deadline tracking, case package assembly, submission management, and arbiter communication — all in one system with a single audit trail.

03**Benchmarking databases**

Regional rate data, specialty-specific award history, and arbiter decision patterns — the evidence library behind every winning case package.

04**Executive reporting dashboards**

Real-time visibility into IDR pipeline, award rates, and revenue realized — with drill-down to claim-level detail for audit and attribution.

THE REVGUARD APPROACH

RevGuard's IDR platform combines all four capabilities into a single revenue engine — purpose-built for specialty providers operating under the NSA. Eligibility detection, workflow orchestration, benchmarking, and reporting in one integrated system.

**08 FUTURE OUTLOOK**

The regulatory ground is still shifting.

NSA implementation continues to evolve through regulatory refinement, federal court rulings, and payer behavioral shifts. Providers who stay adaptive will keep winning. Those who lock in today's playbook will watch their margins compress.

Trends to Monitor



Changes to QPA calculation methodology

Federal agencies continue to refine how QPAs are derived. Every methodology change moves the reimbursement anchor — up or down.



Increased scrutiny of arbitration decisions

Court challenges and administrative reviews are reshaping IDR practice. Case law is actively being written.



Payer strategies to suppress reimbursement

Expect continued innovation on the payer side — narrower QPA calculations, aggressive batching objections, and slower cycle times.

09 CONCLUSION

Execution, not regulation, is the edge.

The No Surprises Act introduces structural constraints on out-of-network revenue — but it does not eliminate strategic advantage. Organizations that invest in **arbitration excellence**, **data infrastructure**, and **disciplined operations** can not only preserve but enhance revenue performance.

The NSA narrows the range of possible outcomes. Inside that range, the gap between winners and losers widens every year.



REVGUARD

RG ABOUT REVGUARD

The revenue intelligence platform for modern healthcare.

RevGuard is a revenue intelligence platform providing Medical Billing, RCM Services, and Arbitration Recovery. We enable healthcare organizations to maximize revenue capture, accelerate cash flow, and enforce payer accountability through data, automation, and dispute resolution — with deep specialization in Independent Dispute Resolution under the No Surprises Act.

NEXT STEP

See what your NSA program is leaving on the table.

Request an IDR benchmarking review. We'll analyze your current win rates, average awards as a percentage of QPA, and cycle times — and model the revenue upside of a disciplined IDR operation.

GET IN TOUCH → revguard.co · Austin, TX