



July 30, 2025

The Honorable Greg Murphy, M.D.
407 Cannon House Office Building
Washington, D.C. 20515

The Honorable Jimmy Panetta
200 Cannon House Office Building
Washington, D.C. 20515

The Honorable John Joyce, M.D.
2101 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Raul Ruiz, M.D.
2342 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Bob Onder, M.D.
1113 Longworth House Office Building
Washington, D.C. 20515

The Honorable Kim Schrier, M.D.
1110 Longworth House Office Building
Washington, D.C. 20515

Re: MGMA Letter of Support for the No Surprises Enforcement Act

Dear Representatives Murphy, Panetta, Joyce, Ruiz, Onder, and Schrier:

The Medical Group Management Association (MGMA) thanks you for your longstanding leadership in supporting medical groups' ability to offer high-quality, cost-effective care. With a membership of more than 60,000 medical practice administrators, executives, and leaders, MGMA represents more than 15,000 medical group practices ranging from small private medical practices to large national health systems, representing more than 350,000 physicians. We write to you today to express our support for the bipartisan, bicameral No Surprises Enforcement Act.

The No Surprises Act Independent Dispute Resolution (IDR) process has been plagued with difficulties since its inception. Providers have faced significant backlogs, administratively complex and resource-consuming procedures that often shift due to regulatory changes, and much more. Exacerbating these issues are concerns that MGMA members have raised regarding health plans delaying payment or failing to pay following a determination from an IDR entity in their favor.¹ This is simply unacceptable and undercuts the value and purpose of an IDR process that is meant to resolve these disputes in a timely manner. Delaying or failing to pay providers in IDR disputes further strains practices and undercuts their financial viability.

The No Surprises Enforcement Act would institute commonsense accountability measures for health plans that do not follow the law by requiring them to pay monetary penalties plus interest for late or non-payments to a provider. Given that providers prevailed in IDR disputes at approximately an 85% rate for the second half of 2024, according to the Centers for Medicare & Medicaid Services (CMS), it is

¹ MGMA Testimony, "Reduced Care for Patients: Fallout From Flawed Implementation of Surprise Medical Billing Protections Hearing," October 3, 2023, <https://www.mgma.com/advocacy-letters/october-3-2023-mgma-shares-feedback-on-implementation-of-the-no-surprises-act>.

imperative that proper steps are taken to ensure health plans are following the law and medical groups receive appropriate reimbursement.²

MGMA thanks you for the introducing No Surprises Enforcement Act and your efforts to ensure medical groups can access an IDR process that allows them to get reimbursed for their services without facing unwarranted delays. If you have any questions, please contact James Haynes, Associate Director of Government Affairs, at jhaynes@mgma.org or 202-293-3450.

Sincerely,

/s/

Anders M. Gilberg
Senior Vice President, Government Affairs

² CMS, Supplemental Background on Federal Independent Dispute Resolution Public Use Files, July 1, 2024 – December 31, 2024, <https://www.cms.gov/files/document/federal-idr-supplemental-background-2024-q3-2024-q4.pdf>.