

The “No Surprises Act” & Good Faith Estimates

The No Surprises Act was passed in December 2020, under Section 2799B-6 of the Public Health Service Act, with the aim of protecting consumers from receiving unexpected medical bills.

The Good Faith Estimate provision of the No Surprises Act federally mandates that healthcare providers must give clients an estimate of anticipated healthcare items and services, using what is called a “Good Faith Estimate.” This took effect on January 1, 2022.

The Solstice Clinic staff are diligently working to establish the process that will allow us to provide these in a timely manner. Please contact us for any questions or issues.

What is a Good Faith Estimate?

A Good Faith Estimate (GFE) is an estimate of the total expected costs of non-emergency healthcare items or services. A GFE:

- Intends to offer predictability and transparency in how much clients will be charged for healthcare services prior to their appointment.
- Includes all regularly scheduled appointments (i.e., psychotherapy sessions).
- Does NOT include no-shows, late cancellations, or other services related to crisis care, which by definition are unexpected and cannot be predicted for the purpose of compiling a GFE in advance.
- May also include consultations with client collateral contacts, fees related to paperwork requests, and other legal and administrative fees related to client care, when such items are scheduled in advance.

At The Solstice Clinic, we offer GFEs for the entire year (12 months) for regular/recurring services such as E/M and psychotherapy. Your estimate will give you a reasonable idea of what to expect in terms of service costs for one whole year, based on our current rates and the frequency of sessions that the doctor mutually agrees upon with the client in advance.

What are your rights as a client?

We support each and every client in knowing their rights as pertains to the No Surprises Act. You can find more details regarding your rights and protections against surprise medical bills [here](#).

In addition, the GFE offers specific protections:

- You have the right to receive a GFE even if you receive superbills from The Solstice Clinic, since we are not an in-network insurance provider.
- You have the right to receive a GFE for the total expected cost of any non-emergency healthcare service.

- You have the right to request a GFE before you schedule a healthcare service. When you request a GFE, The Solstice Clinic is required to provide you the GFE no later than 3 business days after the date of the request.
- You have the right to receive a GFE no later than 1 business day after the date of scheduling as long as the healthcare service is scheduled at least 3 business days before the scheduled date of service.
- You have the right to receive a GFE no later than 3 business days after the date of scheduling as long as the healthcare service is scheduled at least 10 business days before the scheduled date of service.
- You have the right to dispute a bill that exceeds your GFE. The federal government offers a dispute resolution process for this purpose.

Make sure to save a copy or picture of your GFE.

For questions about the dispute process or for more information about your right to a GFE, please visit www.cms.gov/nosurprises.

What considerations should clients keep in mind?

DISCLAIMERS:

The information provided in the Good Faith Estimate is only that: an estimate. Actual healthcare items, services, or charges may differ or change throughout the year, even for long-term established clients. For new clients, we may revise your estimate once we have met and discussed more details around your symptoms, likely diagnoses, severity, and treatment plan, which may not be reflected in the GFE you initially receive. However, we will never schedule healthcare services or items without client consent, and clients may request an updated GFE at any time.

The GFE is not a contract, and does not bind, obligate, or require any client to obtain healthcare services or items from Solstice Clinic at any time.

There are no federal provisions allowing clients to waive their right to a GFE at this time. The regulation allows clients to waive some of the protections related to balance billing but does not allow us to bypass the GFE through a client waiver. As such, we are required by law to send all ongoing clients new GFEs every 12 months; clients cannot opt-out and are required to acknowledge receipt and understanding of each new GFE in order to comply with federal law so that we may continue working together.

Still have questions about the Good Faith Estimate? Please visit www.cms.gov/nosurprises for more guidance.