



NO SURPRISES ACT COMPLIANCE CHECKLIST

For Dermatology Practices · 2026 Edition · DermEstimator

A practical compliance checklist for dermatology practice managers, billing leads, and front-desk staff.

WHO MUST PROVIDE A GOOD FAITH ESTIMATE (GFE)?

- Self-pay patients (no insurance being billed)
- Patients with insurance who explicitly request a GFE
- All scheduled procedures with a date 3+ business days in the future
- Any patient asking "how much will this cost?" — best practice is to provide one

WHEN DOES THE GFE NEED TO BE PROVIDED?

- Within 1 business day if appointment is 3–9 business days away
- Within 3 business days if appointment is 10+ business days away
- Immediately on request from any patient

REQUIRED ELEMENTS — EVERY GFE MUST INCLUDE

- Patient name and date of birth
- Date GFE was issued
- Description of primary item or service expected
- List of services or items reasonably expected with itemized expected charges
- Diagnosis codes (where applicable) and service codes (CPT/HCPCS)
- Provider/facility name, NPI, and TIN
- State where services will be performed
- Disclaimer: GFE shows expected charges only — actual charges may vary
- Notice of patient right to dispute charges \$400+ above estimate
- Information on the Patient-Provider Dispute Resolution (PPDR) process

PATIENT RIGHTS LANGUAGE — REQUIRED WORDING

Your GFE must include these patient rights statements (verbatim or substantially similar):

- "You have the right to receive a Good Faith Estimate of what your medical care will cost"
- "If you receive a bill that is at least \$400 more than your Good Faith Estimate, you can dispute the bill"
- "Make sure your healthcare provider gives you a Good Faith Estimate in writing at least 1 business day before your medical service or item"
- "If you receive a bill that is \$400+ more than the GFE, you may initiate the patient-provider dispute resolution process within 120 calendar days"
- Reference to <https://www.cms.gov/nosurprises> for additional information

DOCUMENTATION & AUDIT TRAIL

- Save a copy of every GFE issued (the practice must retain for at least 6 years)
- Time-stamp each GFE with date and time of issuance
- Document the delivery method (email, in-person handoff, patient portal)
- Have patient acknowledge receipt (signature or written confirmation)
- Maintain a log of all GFEs issued with patient identifier, date, procedure, estimated total

COMMON GFE COMPLIANCE GAPS IN DERMATOLOGY PRACTICES

Most NSA enforcement actions in dermatology stem from these errors:

- Not providing a GFE for Mohs surgery patients scheduling 1+ weeks ahead
- Quoting only the primary CPT and omitting add-on codes (17312, 17314)
- Missing diagnosis codes on the GFE
- No dispute resolution language included
- Calculating estimates from outdated fee schedules (must use current MPFS)
- Not retaining a copy of the issued GFE
- Forgetting cosmetic procedures (yes, NSA applies to cosmetic procedures when patient asks)
- No standardized template — every front-desk staff member writing their own

PENALTIES FOR NON-COMPLIANCE

Civil monetary penalties up to \$10,000 per violation. Each GFE failure can be treated as a separate violation. Practices with repeated documentation gaps have faced cumulative penalties in the six-figure range.

QUICK-START IMPLEMENTATION CHECKLIST FOR PRACTICE MANAGERS

- Designate one team member as NSA compliance lead
- Create a standardized GFE template (or use software that generates them)
- Train front-desk and scheduling staff on when a GFE is required
- Add a "Did patient receive GFE?" checkbox to your check-in workflow
- Audit issued GFEs quarterly — pull 10 random records and verify all required elements are present
- Update your fee schedule annually when Medicare Physician Fee Schedule changes
- Document any patient declining a GFE in writing

ABOUT DERMESTIMATOR

DermEstimator was built by a dermatology office manager to automate the patient quoting and GFE generation workflow. All 525 dermatology CPT codes, locality-correct Medicare rates, custom payer plans, and NSA-compliant GFEs in about 60 seconds.

Founding pricing: \$20/user/month locked forever for the first 20 practices.

[Learn more at dermestimator.com/founder](https://dermestimator.com/founder)

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