

## Exhibit I – Implementation Dates of Blue Plan’s Obligations Under §7 of the Agreement

Pursuant to §7, the implementation dates of the Blue Plans’ obligations under §7 of the Agreement are as follows, except as otherwise provided on Exhibit H.

Section	Obligation	Start Date
§ 7.3	Availability of Fee Schedules and Scheduled Payment Dates – Complete Fee Information	Final Order Date + 12 months
§ 7.3	Availability of Fee Schedules and Scheduled Payment Dates – Up to 100 CPT Codes	Final Order Date
§ 7.5	Reduced Precertification Requirements – Posting on Provider Website	Final Order Date + 3 Months
§ 7.5	Reduced Precertification Requirements – Proposals to Self-Insured Plans	Contracts Issued or Renewed After Final Order Date
§ 7.6	Greater Notice of Policy and Procedure Changes	Final Order Date
§ 7.8	Disclosure of and Commitments Concerning Claims Payment Practices	–
§ 7.8(b)	Consistency of Claim Payment Practices	Final Order Date + 12 months
§ 7.8(d)	Disclosure of Significant Edits on Provider Website	Final Order Date + 6 months (or as soon thereafter as practicable)
§ 7.8(d)(i)	Publish Customized Edits on Provider Website	Final Order Date + 6 months (or as soon thereafter as practicable)
§ 7.8(d)(ii)	Commitments regarding Submission of Clinical Information	Final Order Date
§ 7.8(d)(iii)	Disclosures regarding Modifiers 25 and 59	Final Order Date + 6 months
§ 7.9	Physician Advisory Committee	–
§ 7.9(a)	Establishment of Physician Advisory Committee	The later of the Final Order Date + 3 months or the selection of the members of the Physician Advisory Committee in accordance with § 7.9(b)
§ 7.9(b)	Selection of Members by Blue Plan	Preliminary Approval Date + 60 days
§ 7.9(b)	Selection of Members by Physicians or State Medical Societies	Preliminary Approval Date + 60 days
§ 7.9(b)	Selection of Remaining Members	Preliminary Approval Date + 120 days
§ 7.10	New Dispute Resolution Process for Physician Billing Disputes	–
§ 7.10(a)	Establishment of Billing Dispute Reviewer (“BDR”)	Final Order Date + 4 months
§ 7.10(d)	Selection of BDR	Preliminary Approval Date + 120 days
§ 7.11	Determinations Related to Medical Necessity or the Experimental or Investigational Nature of Any Proposed Health Care Service or Supply	–
§ 7.11(a)	Procedures regarding Initial Determinations	Final Order Date
§ 7.11(b)(ii)	Establishment of Internal and External Review Process	Final Order Date + 12 months
§ 7.13	Participating in Blue Plans’ Network	–
§ 7.13(a)	Credentialing of Physicians	Final Order Date + 6 months
§ 7.13(b)	General Commitments regarding All Products Clauses	Final Order Date
§ 7.13(c)	Termination Without Cause	Final Order Date
§ 7.14	Fee Schedule Changes	–
§ 7.14(a)	Establishing Standard Fee Schedules	Final Order Date
§ 7.14(a)	Limitations regarding Reduction of Fee Schedules	January 1 of the Year following the Effective Date
§ 7.14(b)	Payment Rules for Injectibles, DME, Administration of Vaccines, and Review of New Technologies	Final Order Date
§ 7.14(c)	Usual, Reasonable, and Customary Appeals	Final Order Date + 3 months
§ 7.14(d)	Usual, Reasonable, and Customary Determinations	Final Order Date + 3 months
§ 7.16	Application of Clinical Judgment	–
§ 7.16(a)	Medical Necessity Definition – Current Agreements	Final Order Date
§ 7.16(a)	Medical Necessity Definition – Future Agreements	Agreements Issued After Final Order Date
§ 7.16(a)	Adverse Determination Denial Rate	For the calendar year beginning after the Final Order Date
§ 7.16(b)	Policy Issues Involving Clinical Judgment	Final Order Date

## Exhibit I – Start Dates of Defendants’ Obligations Under Section 7 of the Agreement

Section	Obligation	Start Date
§ 7.16(c)	Consideration of an Administrative Exemption Program	Final Order Date + 6 months
§ 7.17	Billing and Payment	–
§ 7.17(a)	Time Period for Submission of Claims	Final Order Date
§ 7.17(b)	Claims Submission (re: acceptance of certain forms and submissions of Clinical Information)	Final Order Date
§ 7.18	Timeliness for Processing and Payment of Complete Claims	–
§ 7.18(a)	30 Day Period for Processing and Payment of Complete Claims	Final Order Date + 9 months
§ 7.18(a)	15 Business Day Period for Processing and Payment of Electronically Submitted Complete Claims	Effective Date + 1 year
§ 7.18(b)-(c)	Timing of Payment for Complete Claims and Payment of Interest (30 Day Period for Processing and Payment of Completed Claims)	Final Order Date + 9 months
§ 7.18(b)-(c)	Timing of Payment for Complete Claims and Payment of Interest (15 Business Day Period for Processing and Payment of Electronically Submitted Claims)	Effective Date + 1 year
§ 7.18(d)	Commitments regarding Claim Handling	Final Order Date + 9 months
§ 7.18(e)	Exceptions	Final Order Date
§ 7.19	No Automatic Downcoding of Evaluation and Management Claims	Final Order Date
§ 7.20	Bundling and Other Computerized Claim Editing	–
§ 7.20(a)	Modifier 51-exempt codes	Final Order Date + 9 months
§ 7.20(b)	Add-on codes	Final Order Date + 9 months
§ 7.20(c)	Modifiers 25 and 57	Final Order Date + 9 months
§ 7.20(d)	Supervision or interpretation or radiologic guidance codes	Final Order Date + 9 months
§ 7.20(e)	Indented codes	Final Order Date + 9 months
§ 7.20(f)	Modifier 59	Final Order Date + 9 months
§ 7.20(g)	Global periods	Final Order Date + 9 months
§ 7.20(h)	Intensity codes	Final Order Date + 9 months
§ 7.20(i)	Updating Claims Editing Software	Final Order Date + 6 months (or as soon thereafter as practicable)
§ 7.21	EOB and Remittance Advice Content	–
§ 7.21(a)	Content of EOB Forms	Final Order Date + 6 months (or as soon thereafter as practicable)
§ 7.21(a)	Content of Remittance or Similar Forms	Final Order Date + 6 months (or as soon thereafter as practicable)
§ 7.22	Overpayment Recovery Procedures	Final Order Date
§ 7.23	Improve Accuracy of Eligibility Information	Final Order Date
§ 7.25	Confirmation of Medical Necessity	Final Order Date
§ 7.27	Information about Physicians Provided by Blue Plan	Final Order Date
§ 7.29	Miscellaneous	–
§ 7.29(a)	No “Gag Clauses”	Final Order Date
§ 7.29(c)	Arbitration	Final Order Date
§ 7.29(d)	Impact on Standard Form Agreements and Individually Negotiated Contracts	–
§ 7.29(d)(i)	Standard Form Agreements	Final Order Date
§ 7.29(d)(ii)	Current Individually Negotiated Contracts	Preliminary Approval Date
§ 7.29(d)(iii)	Future Individually Negotiated Contracts	Preliminary Approval Date
§ 7.29(e)	Impact on Covered Services	Final Order Date
§ 7.29(e)	Recommendation to Self-Insured Plans	Contracts Issued or Renewed After Final Order Date

## Exhibit I – Start Dates of Defendants’ Obligations Under Section 7 of the Agreement

Section	Obligation	Start Date
§ 7.29(i)	Pharmacy Provisions	Final Order Date
§ 7.29(j)	Restrictive Endorsements	Preliminary Approval Date
§ 7.29(k)	Scope of Blue Parties’ Responsibilities	–
§ 7.29(k)(i)	Future Contracts with Delegated Entities	Contracts Entered Into After Final Order Date
§ 7.29(k)(ii)	Application to BlueCard Program or Similar Programs	Final Order Date
§ 7.29(k)(iii)	BlueCard Program Initiatives and Investments	Final Order Date
§ 7.29(k)(iv)	BCBSA Rules and Regulations	Preliminary Approval Date
§ 7.29(l)	Copies of Contracts	Final Order Date
§ 7.29(m)	State and Federal Laws and Regulations	Preliminary Approval Date
§ 7.29(o)	Limitations on Obligations of Non-Participating Physicians	Preliminary Approval Date
§ 7.29(q)	Effect of Assignment of Benefits	Preliminary Approval Date
§ 7.29(r)	“Most Favored Nations” Clauses	Contracts Issued or Renewed After Final Order Date
§ 7.30	Compliance with Applicable Law and Requirements of Government Contracts	Preliminary Approval Date
§ 7.31	Estimated Value of Section 7 Initiatives	–
§ 7.32	Force Majeure	Preliminary Approval Date
§ 7.33	Mental Health and Substance Abuse Provisions	–
§ 7.33(a)	Medical Necessity Definitions – Current Agreements	Final Order Date
§ 7.33(a)	Medical Necessity Definitions – Future Agreements	Agreements Issued After Final Order Date
§ 7.33(b)	Listing of Participating Psychiatrists; Referrals	Final Order Date
§ 7.33(c)	Payment for Medically Necessary Covered Services	Final Order Date
§ 7.33(d)	“Prudent Lay Person” Standard	Final Order Date
§ 7.33(e)	Posting of Authorization Form	Final Order Date
§ 7.35	Use of Third Party Intellectual Property	Preliminary Approval Date
§ 7.36	Competitive Flexibility	–
§ 7.36(a)	Negotiated Purchaser	Preliminary Approval Date
§ 7.36(b)	Ability of Blue Parties to Substitute Business Practices	Preliminary Approval Date
§ 7.36(c)	Modification for Specific Circumstances	Preliminary Approval Date