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March 3, 2011

CMS Issues Direct Data Entry Reporting Option and Beneficiary Lookup Online Query Alerts

On February 11 and 14, 2011, the Centers for Medicare and Medicaid Services (CMS) issued four alerts (three updates to previous alerts and one new alert) providing information pertaining to Non-Group Health Plans (NGHP), classified as Responsible Reporting Entities (RREs) under Section 111 of the Medicare, Medicaid and SCHIP Extension Act. The alerts address new online Beneficiary Lookup query capability and the Direct Data Entry (DDE) option for reporting.

Beneficiary Lookup Alert Summary

CMS announced that on **March 1, 2011** a new, online, real-time query capability became available on the Section 111 Coordination of Benefits Secure Website (COBSW). Using the same matching criteria and methodology as the electronic query, the new Beneficiary Lookup action will indicate if information supplied for an injured party can be matched to a Medicare beneficiary. The Beneficiary Lookup can be used in addition to the RREs monthly electronic query submission.

RREs that have not selected the DDE reporting option and are in a production status will be able to use the Beneficiary Lookup once they are logged in to the COBSW (www.section111.cms.hhs.gov).

RREs are limited to 100 query requests per-calendar month, using the Beneficiary Lookup, for each RRE ID. The system will display a count of the RRE's remaining queries, which will reset to 100 on the first day of each succeeding calendar month. Each query submitted using the Beneficiary Lookup will count toward an RRE's 100 per-month limit regardless of located match. The Beneficiary Lookup function will be displayed in the action list on RRE's listing pages prior to March 1, 2011, but will not be operational until March 1, 2011.

Use of the Beneficiary Lookup is described in Section 111-Data Use Agreement of the User Guide. All users associated with the RRE ID on COBSW will be able to use the Beneficiary Lookup function, if desired, with no special application or sign-up required. Use of Beneficiary Lookup action is optional.

The RRE will be required to enter the same information that is used for the electronic query process. The system will then attempt to match submitted information to a Medicare beneficiary. First, an exact match on the Health Insurance Claim Number (HICN), or Social Security Number (SSN) must be found. If the HICN and SSN are supplied, only HICN will be used for matching. Then, three of the four remaining criteria must be matched exactly.

If information entered is matched to a Medicare beneficiary, a message will display indicating a match was found along with following data elements:

- Current HICN Medicare has on file for beneficiary

- SSN supplied by user, if applicable
- Current first name Medicare has on file for beneficiary
- Current last name Medicare has on file for beneficiary
- Current date of birth Medicare has on file for beneficiary
- Current gender Medicare has on file for beneficiary

If information entered cannot be matched to a Medicare beneficiary, a message will indicate no match has been found.

To view a copy of this Alert (along with detailed instructions on how to use the Beneficiary Lookup) go to http://www.cms.gov/MandatoryInsRep/Downloads/NGHPBeneficiaryLookup.pdf

DDE Alerts Summary

CMS announced the implementation date for responsible reporting entities (RREs) that use DDE has changed to **July 11, 2011,** due to input received from pilot testers of the DDE system. The additional time will be used to resolve technical issues, implement enhancements and allow for more extensive pilot testing of the DDE system.

CMS has confirmed that claims not initially reported until March 1, 2011 **will not** be considered late due to this change. However, moving the DDE implementation date **does not** change retroactive reporting requirements (January 1, 2010) associated with claim reports of Ongoing Responsibility for Medicals (ORM) for all NGHP RREs (liability, self insurance, no-fault and worker's compensation), and (October 1, 2010) as associated with no-fault and workers' compensation Total Payment Obligation to Claimant (TPOC) amounts. The MMSEA Section 111 dedicated website, at http://www.cms.gov/MandatoryInsRep/, includes complete information about required claim reporting dates. **RREs using the DDE reporting option are required to complete retroactive reporting by September 30, 2011.**

Despite the change of implementation date, RREs that use the DDE option retain the same responsibility and accountability as any other RRE and must continue to report all data elements required under current file submission methods.

After the DDE application has been implemented, and RREs using DDE have completed their required retroactive reporting, ongoing DDE claim-record submissions are required within 45 calendar days of the TPOC date, assumption of ORM, and/or termination of ORM. The revised implementation date for DDE does not apply to RREs submitting claim reports via Claim Input Files.

To view a copy of the revised Alert regarding revised DDE implementation, click here or go to http://www.cms.gov/MandatoryInsRep/Downloads/RevImplemnetationDDDNGHP.pdf

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To view a copy of the revised alert pertaining to DDE registration information, click here or go to http://www.cms.gov/MandatoryInsRep/Downloads/RevDDRRegistration021411.pdf
To view a copy of the revised alert pertaining to DDE general guidelines, click here or go to http://www.cms.gov/MandatoryInsRep/Downloads/RevDDEOption02142011.pdf

PMSI Client Support – PMSI is committed to providing our clients the most current information on MMSEA reporting requirements and will continue to deliver updates as new information is issued by CMS. RRE's should attend CMS teleconferences and consult the MMSEA Section 111 dedicated web site at http://www.cms.gov/MandatoryInsRep/ to obtain additional information about reporting requirements.

For more information on Medicare Secondary Payer related Government Affairs Alerts, please contact your PMSI Representative at 888.MSA.PMSI, or visit the Knowledge Center section of our website at www.pmsionline.

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