**February 29, 2024**

**Medicare Secondary Payer (MSP) Mandatory Reporting Provisions Section 111 of the Medicare, Medicaid, and SCHIP Extension Act (MMSEA) of 2007 (See 42 U.S.C. 1395y(b)(7)&(b)(8))**

## Alert: Upcoming Change to Prevent Duplicate and Multiple Open-Ended Drug Records from Being Created

It has come to the attention of CMS that some Section 111 Group Health Plan (GHP) Responsible Reporting Entities (RREs) are repeatedly reporting the same drug coverage for a beneficiary. This has resulted in the creation of duplicate Drug Records. Normally, on the MSP Input File, the RRE submits the Effective Date (Field 10) to reflect the start date of the covered individual's GHP Coverage and submits a Termination Date (Field 11) to reflect the end date of the covered individual's GHP Coverage. If drug coverage is continuous, an RRE should not periodically submit records with updated coverage dates if those dates already fall within the same period for the beneficiary.

Effective April 2024, the S111 reporting logic will be updated so that if an RRE submits an MSP Input File Detail record (add or update transaction) for any drug coverage type (U, V, W, X, Y, Z, 4, 5, or 6) with an effective date or termination date that falls within or overlaps an existing drug record's effective date or termination date, the record will be rejected with disposition code "SP" and a new Rx error "RX19 – Overlapping Rx Coverage" will be returned on the response file.

For example, let us assume that RRE ABC provides drug coverage for Mr. Brown from 01/01/24 to 12/31/24 and this information was previously reported.  Then, the RRE submits an add or update transaction with coverage that begins 02/01/24 and ends 12/31/24 or the termination date is left open-ended, and all other matching criteria is met.  If this happens, the record will be rejected.
Note:  As a reminder, if a Section 111 RRE submitted incorrect drug coverage dates previously, that entity should send a "delete" transaction and then submit an "add" transaction to reflect the correct coverage dates.

Additional information will be available in the April 2024 version of the GHP User Guide which will be available on the [GHP User Guide](#) page of [CMS.gov](#).