CMS Manual System	Department of Health & Human Services (DHHS)
Pub 100-20 One-Time Notification	Centers for Medicare & Medicaid Services (CMS)
Transmittal 1971	Date: November 9, 2017
	Change Request 10292

SUBJECT: Modifications to the National Coordination of Benefits Agreement (COBA) Crossover Process

**I. SUMMARY OF CHANGES:** Through this change request, the Centers for Medicare & Medicaid Services (CMS) creates requirements so that the Part B shared system will suppress the inclusion of a duplicate diagnosis code pointer on outbound 837 professional coordination of benefits claims. Additionally, CMS creates requirements so that two of the shared systems will create a workaround solution for Claim Adjustment Reason Code 237 for the benefit of CMS's COBA trading partners.

## **EFFECTIVE DATE: April 1, 2018**

\*Unless otherwise specified, the effective date is the date of service.

**IMPLEMENTATION DATE: April 2, 2018** 

Disclaimer for manual changes only: The revision date and transmittal number apply only to red italicized material. Any other material was previously published and remains unchanged. However, if this revision contains a table of contents, you will receive the new/revised information only, and not the entire table of contents.

**II. CHANGES IN MANUAL INSTRUCTIONS:** (N/A if manual is not updated) R=REVISED, N=NEW, D=DELETED-*Only One Per Row*.

R/N/D CHAPTER / SECTION / SUBSECTION / TITLE				
N/A	N/A			

## III. FUNDING:

# For Medicare Administrative Contractors (MACs):

The Medicare Administrative Contractor is hereby advised that this constitutes technical direction as defined in your contract. CMS does not construe this as a change to the MAC Statement of Work. The contractor is not obligated to incur costs in excess of the amounts allotted in your contract unless and until specifically authorized by the Contracting Officer. If the contractor considers anything provided, as described above, to be outside the current scope of work, the contractor shall withhold performance on the part(s) in question and immediately notify the Contracting Officer, in writing or by e-mail, and request formal directions regarding continued performance requirements.

## **IV. ATTACHMENTS:**

**One Time Notification** 

# **Attachment - One-Time Notification**

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SUBJECT: Modifications to the National Coordination of Benefits Agreement (COBA) Crossover Process

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## I. GENERAL INFORMATION

**A. Background:** This instruction addresses two (2) issues affecting the COBA Medicare crossover process: 1) Making certain that diagnosis code pointers are not duplicated on outbound 837 professional coordination of benefits (COB) claims; and 2) providing COBA trading partners with a workaround strategy for easily determining each negative payment adjustment amount (e.g., Electronic Health Records (EHR), Physician Quality Reporting System (PQRS), and Value-based Payment Modifier (VBM) represented at the claim's service line level.

Billing vendors representing physicians and non-physician practitioners submit Health Insurance Portability and Accountability Act (HIPAA) Accredited Standards Committee (ASC) X12N 837 professional claims to Medicare that include multiple diagnosis codes. Within the HIPAA ASC X12N 837 professional claims format, physicians and non-physician practitioners make a reference to which specific diagnosis code is relevant for the service detail line through diagnosis code pointers. Diagnosis code pointers are included within the SV107 composite of the 2400 loop of 837 professional claims. Many HIPAA edit validators interpret a repeated instance of a diagnosis code pointer as violating the "if not required, do not send" guidance provided in the Technical Report Type 3 (TR-3) Implementation Guide. CMS will address this problem within the Multi-carrier System (MCS)-created 837 professional coordination of benefits (COB) claims through this instruction.

Currently, COBA trading partners are realizing difficulty in calculating Medicare's allowed amount on HIPAA ASC X12N 837 COB/crossover claims. The biggest obstacle has been that Claim Adjustment Reason Code (CARC) 237 is included at the service detail line as a consolidated amount. This occurs because current HIPAA ASC X12 TR-3 Guide requirements specify that CARCs may not be broken out separately at the service line level on 837 claims transactions or on 835 Electronic Remittance Advices. Also, currently, the associated Remittance Advice Remark Codes (RARCs) that identify each negative adjustment amount are only available in the Medicare Outpatient Adjudication information segment within 837 COB/crossover claims. CMS identifies a workaround solution for this CARC 237 issue through this instruction.

**B. Policy:** The MCS shared system shall suppress any instances of duplicated diagnosis code pointers when creating the 2400 SV107 composite within outbound HIPAA ASC X12N 837 professional crossover claims. (Note: This applies to 837 professional COB claims created both from incoming hard copy CMS-1500 and electronically-submitted Part B claims.)

In creating its outbound 837 professional COB claims for COBA crossover purposes, MCS shall create a 2400 NTE ("Third Party Organization Notes") segment for each associated service detail line when a CARC 237 is included in the Claim Adjustment Segment (CAS) for the service line. In creating the 2400 NTE02, MCS shall include the following information in association with each service detail line:

- The service line number (e.g., SX1);
- The word "ALLOWED AMOUNT= ";
- The dollar amount representative of the allowed amount that is sent to the provider for the detail line; and
- All CARC 237-related RARCs followed by associated monetary amounts.

So, for example, 2400 NTE02 shall be formatted as follows: SX1; ALLOWED AMOUNT= 350.00; RARC N700= 5.25; RARC N699= 6.75; RARC N701= 11.50 (Please note: spaces shall be included as shown.)

The Fiscal Intermediary Shared System (FISS) shall create a 2400 NTE (Third Party Organization Notes) segment for each associated service detail line when a CARC 237 is included in the CAS for each service line on 85x Type of Bill (TOB) 837 institutional COB claims. In creating the 2400 NTE02 on outbound TOB 85x (Critical Access Hospital) COB claims, FISS shall include the following information in association with each service detail line to the extent applicable:

- The service line number (e.g., SX1);
- RARC N700 followed by the monetary amount representing an EHR negative adjustment; and
- RARC N699 followed by the monetary amount representing a PQRS negative adjustment.

So, for example, 2400 NTE02 shall be formatted as follows: SX1; RARC N700= 5.25; RARC N699= 6.75 (Please note: spaces shall be included as shown.)

(Note: FISS does not produce a VBM-related CARC 237 adjustment on 85x TOB claims.)

When certain CARC 237 RARCs (e.g., E.H.R., PQRS, or VBM) do not apply to the service detail line, MCS shall populate the CARC 237-related RARC in 2400 NTE02 with an associated zero monetary amount (for example: RARC N700= 00.00). FISS shall not create a zero monetary amount in 2400 NTE02 for either RARC N700 or N699 when it does not apply to the service detail line.

## II. BUSINESS REQUIREMENTS TABLE

"Shall" denotes a mandatory requirement, and "should" denotes an optional requirement.

Number	Requirement	Responsibility								
'		A/B		D		Shared-			Other	
		MAC		M	System					
					E	M	aint	aine	ers	
		A	В	Н		F	M	V	C	
				Н	M	I	C	M	W	
				Н	A	S	S	S	F	
					C	S				
10292.1	The MCS shared system shall suppress any instances						X			
	of duplicated diagnosis code pointers when creating									
	the 2400 SV107 composite within outbound HIPAA									

Number	Requirement	R	sno	nci	bilit	v				
Timinet		A/I MA			D M E		Sys	red- tem		Other
		A	В	H H H	M A C	F I	M	V M S	С	
	ASC X12N 837 professional crossover claims.  (Note: This applies to 837 professional COB claims created both from incoming hard copy CMS-1500 and electronically-submitted Part B claims.)									
10292.2	In creating its outbound 837 professional COB claims for COBA crossover purposes, MCS shall create a 2400 NTE (Third Party Organization NOTEs) for each associated service detail line when a CARC 237 is included in the Claim Adjustment Segment (CAS) for the service line.						X			
10292.2.1	In creating its outbound 837 professional COB claims for COBA crossover purposes, MCS shall create a 2400 NTE ("Third Party Organization Notes") segment for each associated service detail line when a CARC 237 is included in the Claim Adjustment Segment (CAS) for the service line. In creating the 2400 NTE02, MCS shall include the following information in association with each service detail line:						X			
	• The service line number (e.g., SX1);									
	• The word "ALLOWED AMOUNT= ";									
	The dollar amount representative of the allowed amount that is sent to the provider for the detail line; and									
	All CARC 237-related RARCs followed by associated monetary amounts.									
	So, for example, 2400 NTE02 shall be formatted as follows: SX1; ALLOWED AMOUNT= 350; RARC N700= 5.25; RARC N699= 6.75; RARC N701= 11.50 (Please note: spaces shall be included as shown.)									
10292.3	In creating its outbound 837 institutional COB claims for COBA crossover purposes, FISS shall create a 2400 NTE (Third Party Organization Notes) for each associated service detail line when a CARC 237 is					X				

<b>N</b> T <b>N</b>	<b>D</b> • •	<b>-</b>		•1	•10					
Number	Requirement	Responsil								
		A/B			D			red-		Other
		MAC		M		Sys	tem			
					Ε	M	aint	aine	ers	
		Α	В	Н		F	M	V	С	
		7 1		Н	M		C	M	_	
				Н	A	S	S	S	F	
				П	C	S	3	3	Г	
	' 1 1 1' / CACC 1 ' 1' 0" TOD					3				
	included in the CAS for each service line on 85x TOB									
	claims.									
10292.3.1	10292.3.1					X				
	In creating the 2400 NTE02 on outbound TOB 85x									
	(Critical Access Hospital) COB claims, FISS shall									
	include the following information in association with									
	each service detail line to the extent applicable:									
	each service detail line to the extent applicable.									
	• The service line number (e.g., SX1);									
	• RARC N700 followed by the monetary amount									
	representing an EHR adjustment; and									
	representing an Erric adjustment, and									
	DADCINCOO CII III II									
	• RARC N699 followed by the monetary amount									
	representing a PQRS adjustment.									
	So, for example, 2400 NTE02 shall be formatted as									
	follows:									
	SX1; RARC N700=5.25; RARC N699= 6.75 (Please									
	note: spaces shall be included as shown.)									
	note. spaces shall be included as shown.)									
	(Note: FISS does not produce a VBM-related CARC									
	237 adjustment on 85x TOB claims.)									
10292.4	When certain CARC 237 RARCs (e.g., E.H.R., PQRS,						X			
	or VBM) do <b>not</b> apply to the service detail line, MCS						**			
	shall populate the CARC 237-related RARC in 2400									
	NTE02 with an associated zero monetary amount (for									
	example: RARC N700= 00.00).									
10292.4.1	FISS shall not create a <b>zero monetary</b> amount in the					X				
	2400 NTE02 for either RARC N700 or N699 when it									
	does not apply to the service detail line.									
	11 4									
10292.5	The shared systems shall implement the requirements					X	X			
10474.3						Λ	Λ			
	in this instruction based upon outbound COB files									
	created with a date of April 1, 2018, and after.									

#### III. PROVIDER EDUCATION TABLE

Number	Requirement	Responsibi		lity		
			A/B		D	C
		ľ	MA(	$\mathbf{C}$	M	Е
					Е	D
		Α	В	Н		Ι
				Н	M	
				Н	Α	
					С	
	None					

## IV. SUPPORTING INFORMATION

Section A: Recommendations and supporting information associated with listed requirements: N/A

<sup>&</sup>quot;Should" denotes a recommendation.

X-Ref	Recommendations or other supporting information:
Requirement	
Number	

Section B: All other recommendations and supporting information: N/A

#### V. CONTACTS

**Pre-Implementation Contact(s):** Brian Pabst, brian.pabst@cms.hhs.gov

**Post-Implementation Contact(s):** Contact your Contracting Officer's Representative (COR).

## VI. FUNDING

## **Section A: For Medicare Administrative Contractors (MACs):**

The Medicare Administrative Contractor is hereby advised that this constitutes technical direction as defined in your contract. CMS does not construe this as a change to the MAC Statement of Work. The contractor is not obligated to incur costs in excess of the amounts allotted in your contract unless and until specifically authorized by the Contracting Officer. If the contractor considers anything provided, as described above, to be outside the current scope of work, the contractor shall withhold performance on the part(s) in question and immediately notify the Contracting Officer, in writing or by e-mail, and request formal directions regarding continued performance requirements.

**ATTACHMENTS: 0**