Unsolicited MSP Response File Benefits Introduction
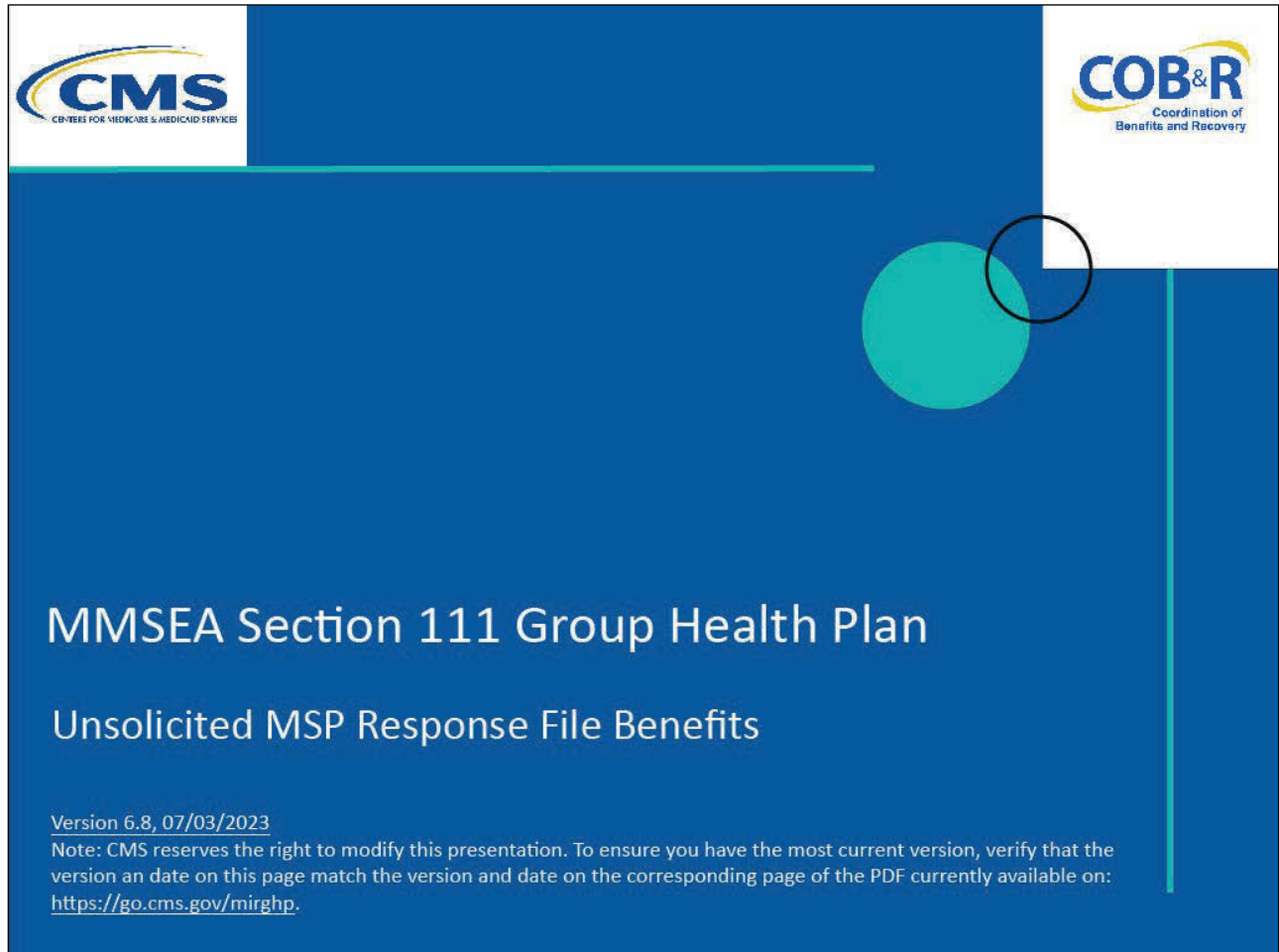
Slide 1 of 22 - Unsolicited MSP Response File Benefits Introduction

Slide notes

Welcome to the Unsolicited Medicare Secondary Payer (MSP) Response File Benefits course.

Slide 2 of 22 - Disclaimer

Disclaimer

While all information in this document is believed to be correct at the time of writing, this Computer Based Training (CBT) is for educational purposes only and does not constitute official Centers for Medicare and Medicaid Services (CMS) instructions for the MMSEA Section 111 implementation. All affected entities are responsible for following the instructions found at the following link: https://go.cms.gov/mirghp.

Slide notes

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All affected entities are responsible for following the instructions found at the following link: CMS GHP Website.

Slide 3 of 22 - Course Overview

Slide notes

This course provides background information on the Unsolicited MSP Response File process, explains the benefits of participation, and clarifies the process for enrollment.

Note: Effective July 2023, for Section 111, GHP RREs that offer primary prescription drug coverage and opt-in to receive unsolicited alerts from the S111 portal will now receive information for drug coverage types U, V, W, X, Y, Z, 4, 5, or 6 in the Unsolicited MSP Response File Detail Record.

Slide 4 of 22 - Background

Background

The BCRC collects information to identify other health insurance that is primary to Medicare

Other insurance is posted as an MSP occurrence on CWF and MBD

MSP occurrences are used to
- Prevent mistaken payments of Medicare benefits
- Recover money owed to Medicare

Slide notes

The Benefits Coordination & Recovery Center (BCRC) collects information to identify other health insurance that Medicare beneficiaries have that is primary to their Medicare coverage.

This other insurance information is posted by the BCRC in the form of MSP occurrences on the Medicare Common Working File (CWF) and Medicare Beneficiary Database (MBD).

MSP occurrences are used in the Medicare claims payment process to prevent mistaken payment of Medicare benefits. The Commercial Repayment Center (CRC) also utilizes this information in recovering money owed to Medicare for claims paid by Medicare when another payer was properly primary to Medicare.

Slide 5 of 22 - Background

Background

The BCRC employs various methodologies to identify and maintain MSP occurrences, including
- Other Section 111 RREs
- Telephone calls from employers, insurers, Medicare beneficiaries and attorneys
- Medicare claim processing contractors
- CRC
- Responses to the IRS/SSA/CMS Data Match
- IEQs
- Employer VDSAs

While each method is effective, CMS has found that historically
- Some sources are more reliable than others
- Information collected from different sources can result in conflicting information
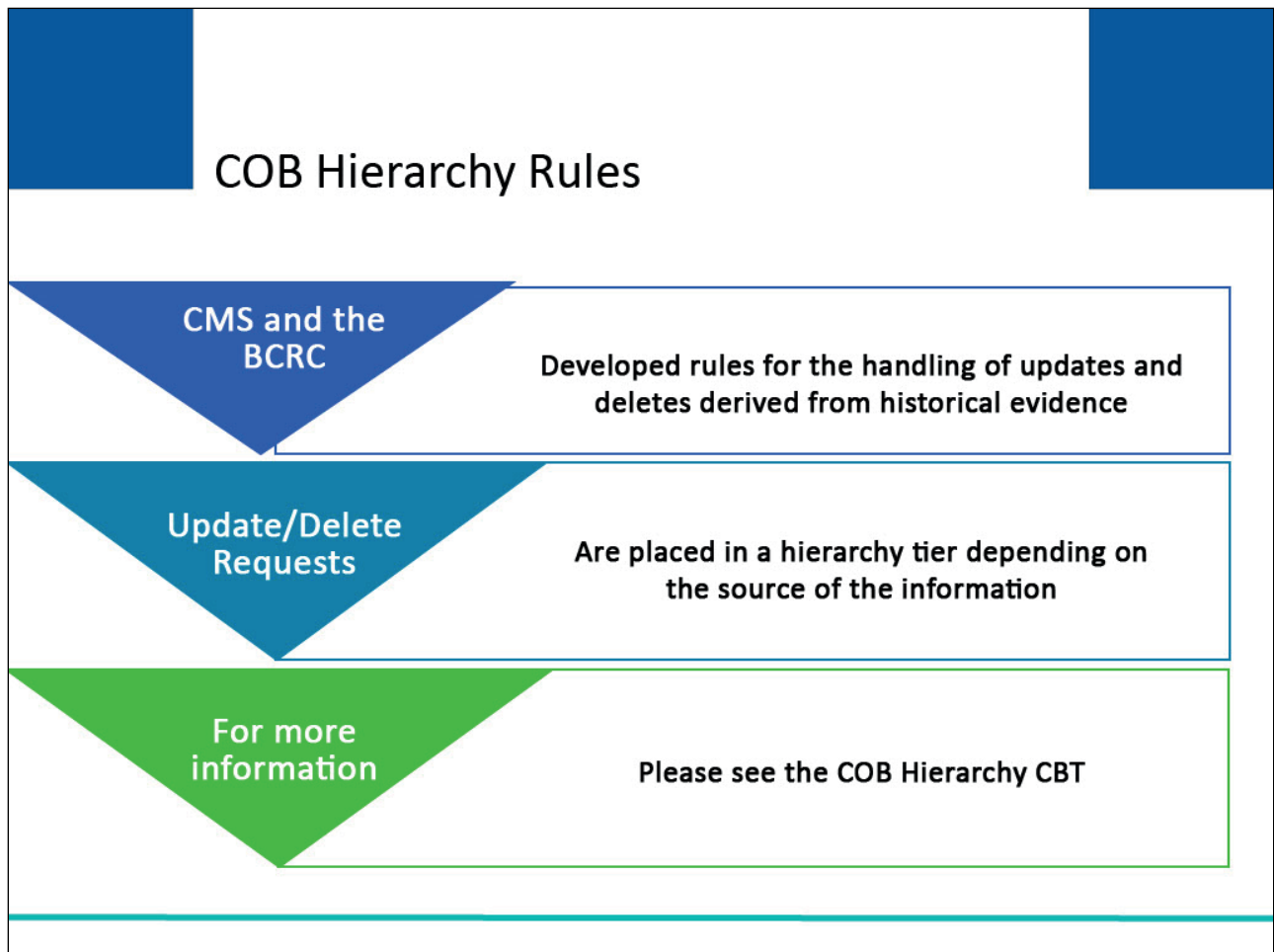
Slide notes

The BCRC employs various methodologies to identify and maintain MSP occurrences for Medicare beneficiaries. These methodologies have differing sources, including the following:

- other Section 111 Responsible Reporting Entities (RREs),
- telephone calls to the BCRC Call Center from employers,
- insurers,
- Medicare beneficiaries and attorneys,
- Medicare claim processing contractors,
- the CRC,
- responses to the IRS/SSA/CMS Data Match process,
- Initial Enrollment Questionnaires (IEQs), and
- employer Voluntary Data Sharing Agreements (VDSAs).

While each of these methods have proven effective, CMS has found that historically, some sources are more reliable than others and collection from different entities can result in conflicting information or "flip-flopping" of certain fields that make up an MSP occurrence. This in turn can result in reduced data integrity, inaccurate Medicare claim payment and recovery issues.

Most often, the conflicting information is related to the MSP Termination Date.

Slide 6 of 22 - COB Hierarchy Rules

Slide notes

In order to preserve the integrity of MSP data, CMS and the BCRC developed rules for the handling of updates and deletes derived from historical evidence regarding the reliability of the source of that information.

These rules involve placing an update or delete request in a hierarchy tier based on the source of the information. This tier level will be compared to the tier level of the entity that last added, updated, or deleted the MSP occurrence to determine if the update/delete will be allowed. For more information on the Coordination of Benefits (COB) Hierarchy process, please see the COB Hierarchy CBT.

Slide 7 of 22 - Unsolicited MSP Response File Process

Unsolicited MSP Response File Process

MSP occurrences established by Section 111 RREs can be updated or deleted by other entities

Enhancements have been implemented by the BCRC to inform GHP RREs when this situation happens

- GHP RREs can voluntarily elect to participate in the Unsolicited MSP Response File process
  - RREs will be notified whenever another entity changes or deletes an MSP occurrence previously submitted by them

Slide notes

Even with MSP hierarchy rules in place, MSP occurrences established by Section 111 RREs can be updated or deleted by other Section 111 RREs, the BCRC Call Center, a BCRC Analyst, the CRC, the Beneficiary Call Center (i.e., 1-800-Medicare), or a Medicare Advantage (MA) Plan. Enhancements have been implemented by the BCRC to inform Group Health Plan (GHP) RREs when this situation happens.

GHP RREs can now voluntarily elect to participate in the Unsolicited MSP Response File process which will notify them whenever another entity changes or deletes an MSP occurrence previously submitted by them.

Slide 8 of 22 - Unsolicited MSP Response File Process

Slide notes

Once enrolled, the participating RRE will receive a monthly Unsolicited MSP Response File. This file will include Detail Records for any MSP occurrences submitted by the RRE that were subsequently changed by another entity.

Each record will include the key matching fields for the MSP occurrence, the last Document Control Number (DCN) submitted by the RRE, the most current MSP information (i.e., if one MSP occurrence was updated multiple times during the monthly timeframe, only information from the last MSP update will be sent), and the most recent Medicare beneficiary entitlement and enrollment information. Detail Records will also provide information related to the entity that requested the change to the MSP occurrence and the reason for the change, if known. For more information on this process, please see the Unsolicited MSP Response File Processing CBT.

Slide 9 of 22 - Unsolicited MSP Response File Benefits

Slide notes

RREs may elect to receive the Unsolicited MSP Response File because of the many benefits they can attain. This file will provide RREs with prompt notification regarding changes made to MSP information on Medicare beneficiaries covered by the RRE's GHP.

It will also identify the source and reason for the change (if known).

Slide 10 of 22 - Unsolicited MSP Response File Benefits

Slide notes

This prompt notification of changes and identification of the source of changes will assist participating RREs in the following ways:

- allow for more precise confirmation or investigation of GHP coverage and its relevance to MSP determinations;
- provide information that may be useful in the RRE's business relationships with their employer/other plan sponsor customers;
- improve both the accuracy of data reporting and its compliance with the Section 111 reporting requirements; and,
- improve the overall accuracy of MSP information used and stored by Medicare, RREs, and employers.

Slide 11 of 22 - Unsolicited MSP Response File Benefits

Unsolicited MSP Response File Benefits

Knowing the source of the change and reason for the update/delete request will assist the RRE

- Confirm the validity of a reported modification, and of the data in its own system

RRE can verify the accuracy of the update/delete request with the source of the submitted change

- RRE can use the information to update their internal systems if their data is incorrect, or
- Submit an override record if their data is correct

Slide notes

Knowing the source of the change and reason for the update/delete request will assist the RRE in confirming the validity of a reported modification, and of the data in its own system.

The RRE can use this information to verify the accuracy of the update/delete request with the source that submitted the change to ensure compliance with Section 111 reporting.

Once verified, the RRE can use this information to update their internal systems if their data is incorrect or submit an override record if their data is correct.

Slide 12 of 22 - Unsolicited MSP Response File Benefits

Slide notes

The Unsolicited MSP Response File will streamline the hierarchy override process to override the SPH0 error in one quarterly MSP Input File submission.

By opting to use and verify the information in the Unsolicited MSP Response File, a participating RRE can submit an update transaction on their MSP Input File using the hierarchy Override Code (HB) before receiving the SPH0 error.

Note: An SPH0 error will be received if an RRE submits an update/delete transaction for an MSP occurrence last updated by a higher-ranking source.

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Unsolicited MSP Response File Benefits

Participating RREs can submit an update transaction on their MSP Input File using the hierarchy Override Code before receiving the SPH0 error

- Normally this would require at least two quarterly file submissions
  - First submission would produce the SPH0 error
  - Second submission would submit the Override Code

- Note: Could take longer than two submissions, depending on the length of time needed to verify the change

Slide notes

RREs that participate in the Unsolicited MSP Response File process do not need to wait to receive an SPH0 error on an MSP Input File Detail Record before being able to submit the HB Override Code.

Normally this would require at least two quarterly file submissions to rectify. The first submission would produce the SPH0 error, and the second would submit the Override Code.

Note: This process could actually take longer than two submissions, or more than six months to rectify, depending on the length of time needed to verify the change.

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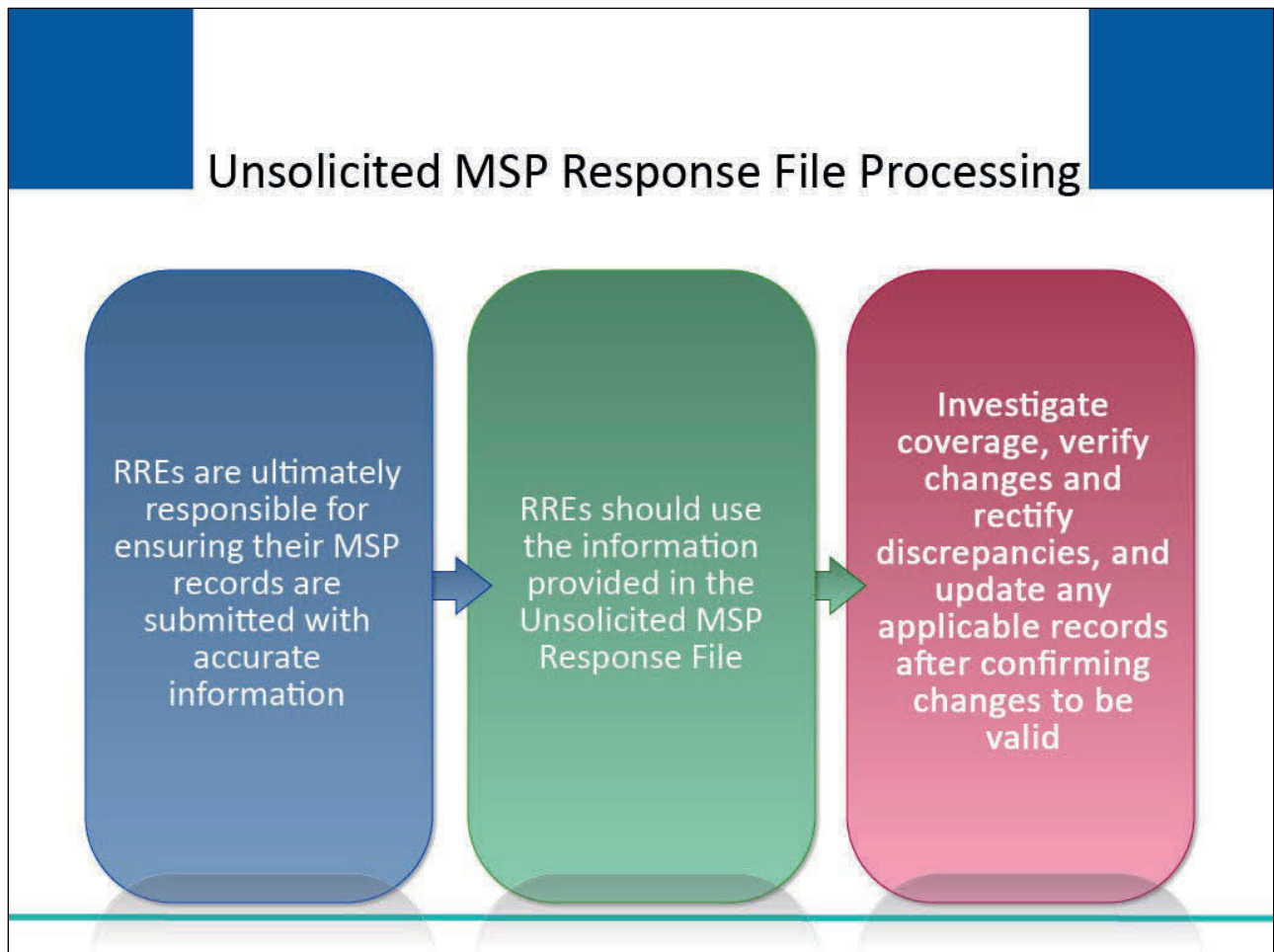
Slide notes

Since RREs are ultimately responsible for ensuring that their MSP records are submitted with accurate information, RREs participating in the Unsolicited MSP Response File process should take advantage of this useful tool.

Although RREs are not required to develop processing to react to this file, RREs should use the information it provides to investigate the coverage information further, work with beneficiaries and employers to verify changes and rectify discrepancies, and also update any applicable records in their internal systems after confirming the changes to be valid.

Slide 15 of 22 - RRE Enrollment

Slide notes

To receive the Unsolicited MSP Response File, the RRE's Account Manager must sign up on the Section 111 Coordination of Benefits Secure Website (COBSW) at COBSW Section 111 Website.

Slide 16 of 22 - RRE Enrollment

Slide notes

Newly registering RREs that would like to receive the Unsolicited MSP Response File will select this option while providing RRE information during the registration process on the Section 111 COBSW.

During Account Setup, the Account Manager will select Yes for the "Would you like to receive Unsolicited Alerts?" question on the Company Information page.

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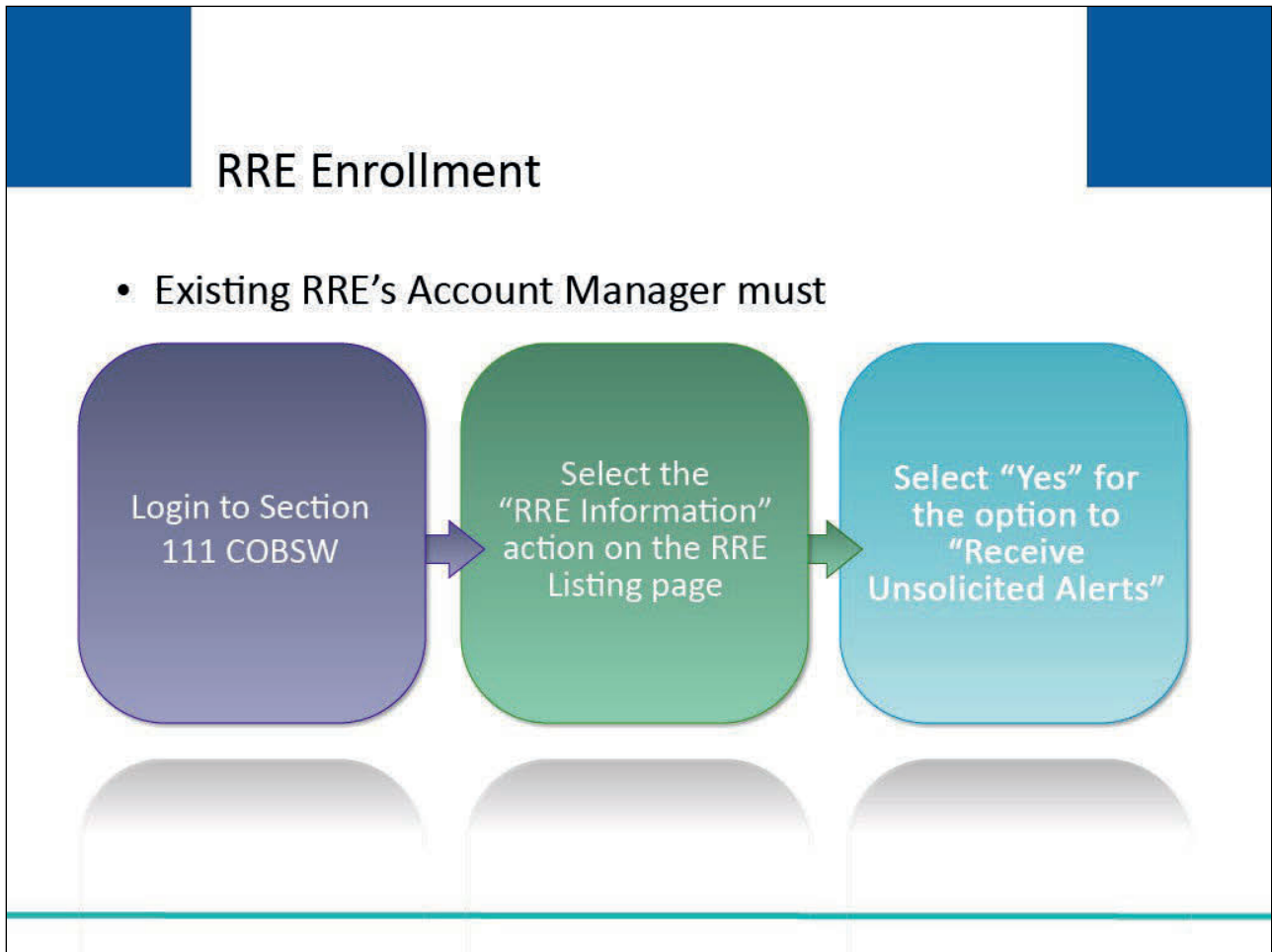
Slide notes

If the RRE has completed registration for Section 111, the Account Manager must login to the Section 111 COBSW and select the "RRE Information" action on the RRE Listing page.

The Account Manager may then edit the RRE's information to select to receive the Unsolicited MSP Response File which is also referred to as "Receive Unsolicited Alerts - Yes/No."

Slide 18 of 22 - Unsolicited MSP Response File Transmission
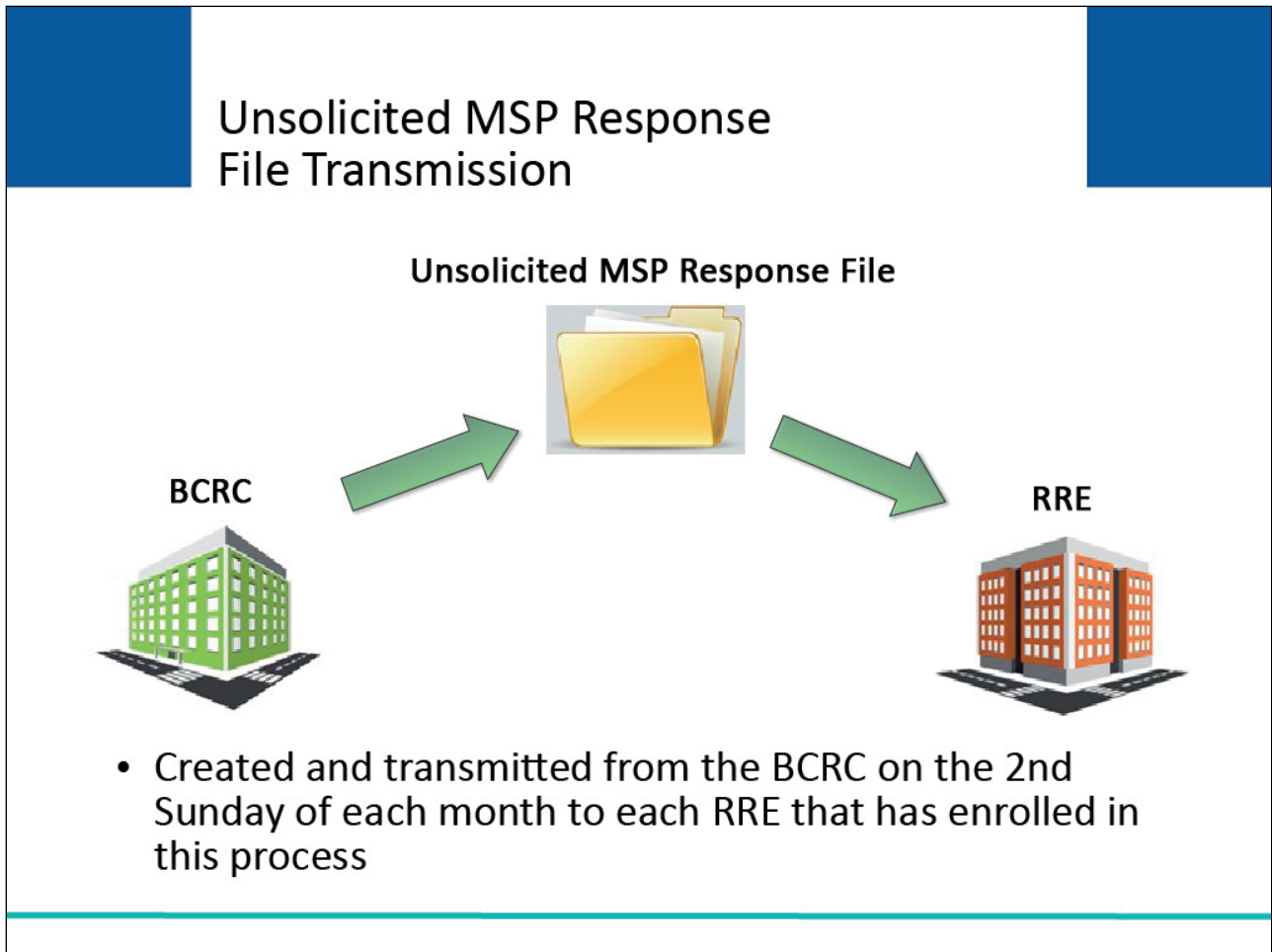
Slide notes

The Unsolicited MSP Response File will be created and transmitted from the BCRC on the 2nd Sunday of each month to each RRE that has enrolled in this process.

For more information on the transmission process, please see the Unsolicited MSP Response File Processing CBT.

Slide 19 of 22 - RRE Enrollment

Slide notes

When an RRE decides that they no longer wish to receive the Unsolicited MSP Response File, the Account Manager must again login to the Section 111 COBSW and change the "Receive Unsolicited Alerts" option to "No" using the "RRE Information" action.

Once an RRE opts out of this process, they will no longer receive the Unsolicited MSP Response File. Partial files will not be created (i.e., if an RRE discontinues this process prior to the monthly Unsolicited MSP Response File generation, they will not receive any file that month).

Slide 20 of 22 - Course Summary

Slide notes

This course provided background information on the Unsolicited MSP Response File process, explains the benefits of participation, and clarifies the process for enrollment.

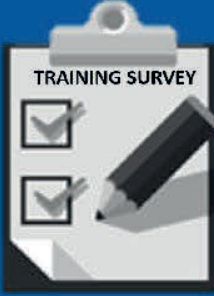**Slide 21 of 22 - Conclusion**

Slide notes

You have completed the Unsolicited MSP Response File Benefits course. Information in this course can be referenced by using the GHP User Guide's table of contents and any subsequent alerts.

These documents are available for download at the following link: CMS GHP Website.

Slide 22 of 22 - GHP Training Survey

Slide notes

If you have any questions or feedback on this material, please go to the following URL: GHP Training Survey.