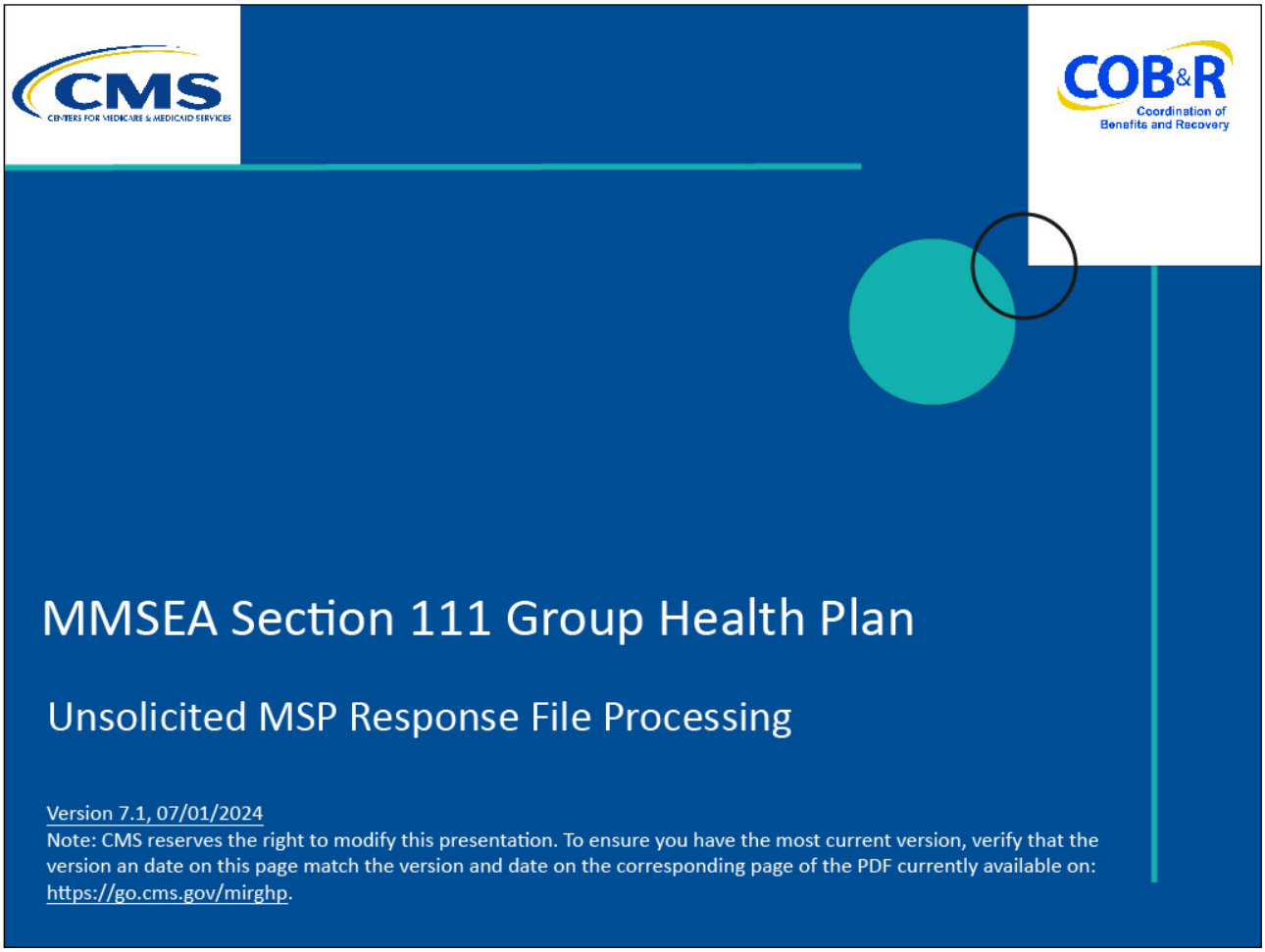
Unsolicited MSP Response File Processing

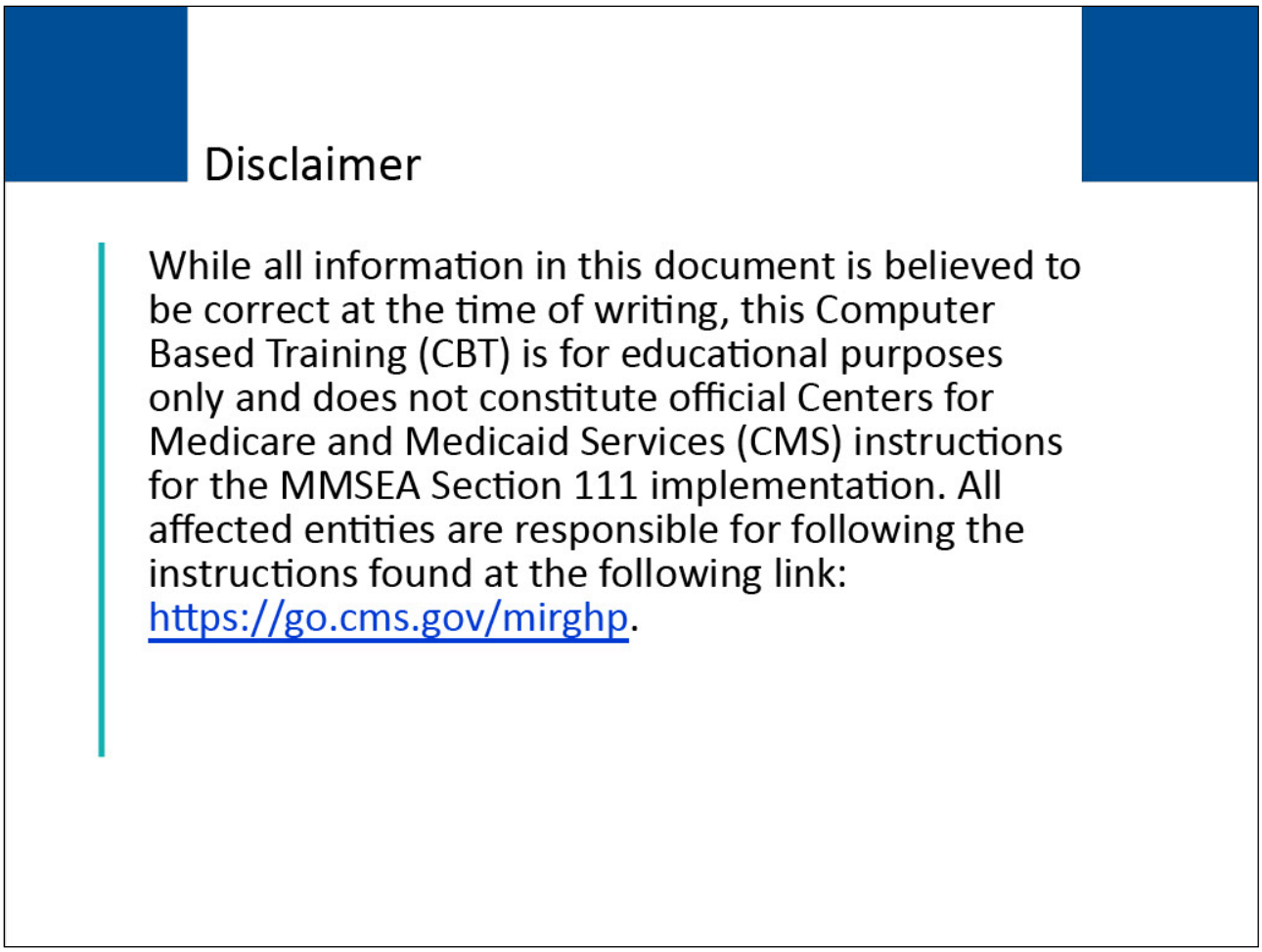
Slide 1 - of 32 - Unsolicited MSP Response File Processing Introduction



Slide notes

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

Slide 2 of 32 - Disclaimer

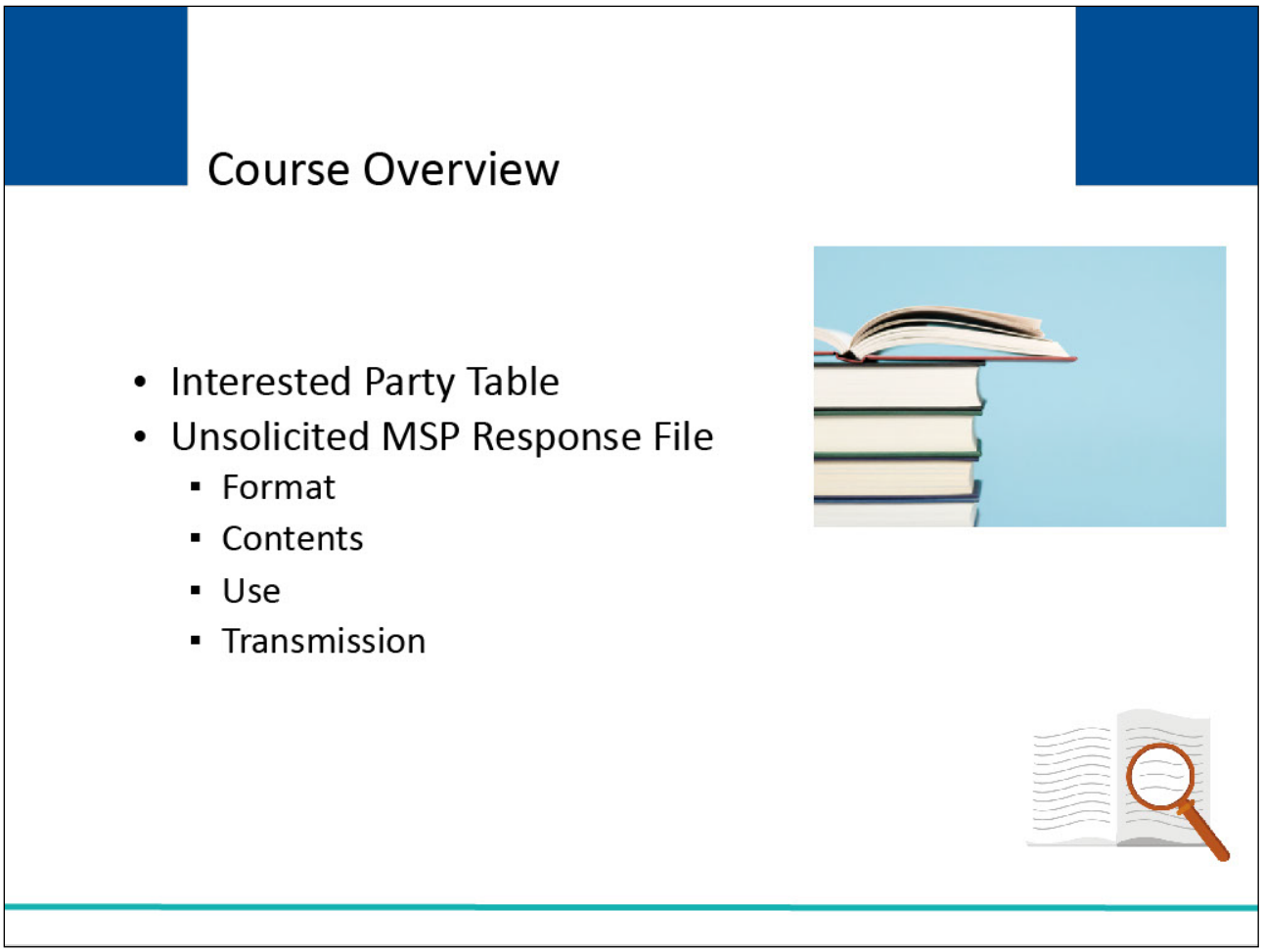


Slide notes

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 this link: http://go.cms.gov/mirghp.

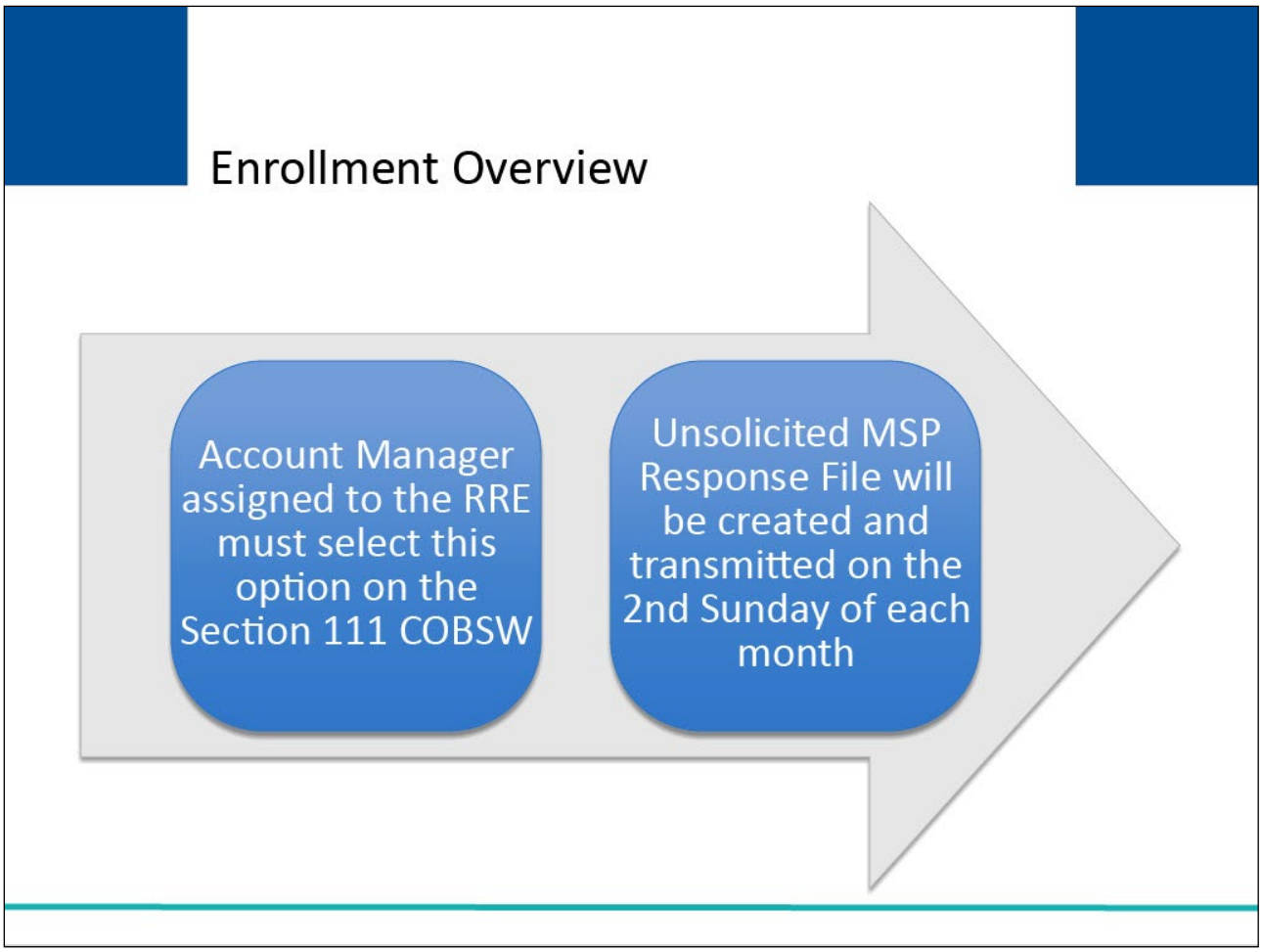
Slide 3 of 32 - Course Overview



Slide notes

This course explained the Interested Party table, reviews the Unsolicited MSP Response File format and contents, provides insight on how to use the Unsolicited MSP Response File, and explains when and how it will be transmitted.

Slide 4 of 32 - Enrollment Overview



Slide notes

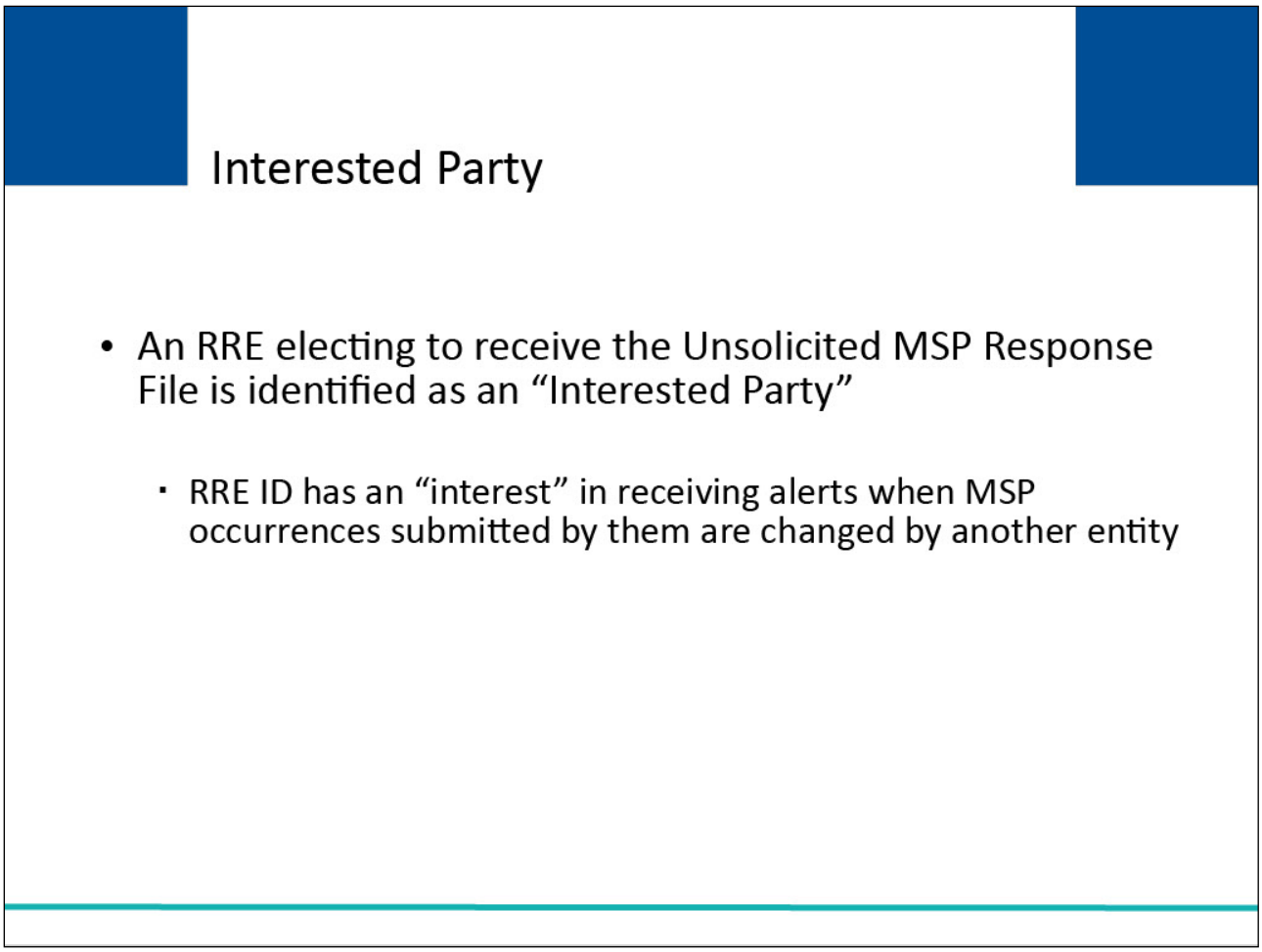
The Unsolicited MSP Response File was implemented to notify GHP RREs whenever another entity changes or deletes an MSP occurrence previously submitted by them.

In order to receive the Unsolicited MSP Response File, the Account Manager assigned to the Responsible Reporting Entity (RRE) must select this option on the Section 111 Coordination of Benefits Secure Website (COBSW) for the RRE ID.

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

Note: 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. Additionally, the response file will include several new fields for drug-only or drug/MSP records (Section 9.10).

Slide 5 of 32 - Interested Party



Slide notes

Once an RRE has elected to receive the Unsolicited MSP Response File, the participating RRE is identified as an “Interested Party” (i.e., the RRE ID now has an “interest” in receiving alerts when MSP occurrences submitted by them are changed by another entity).

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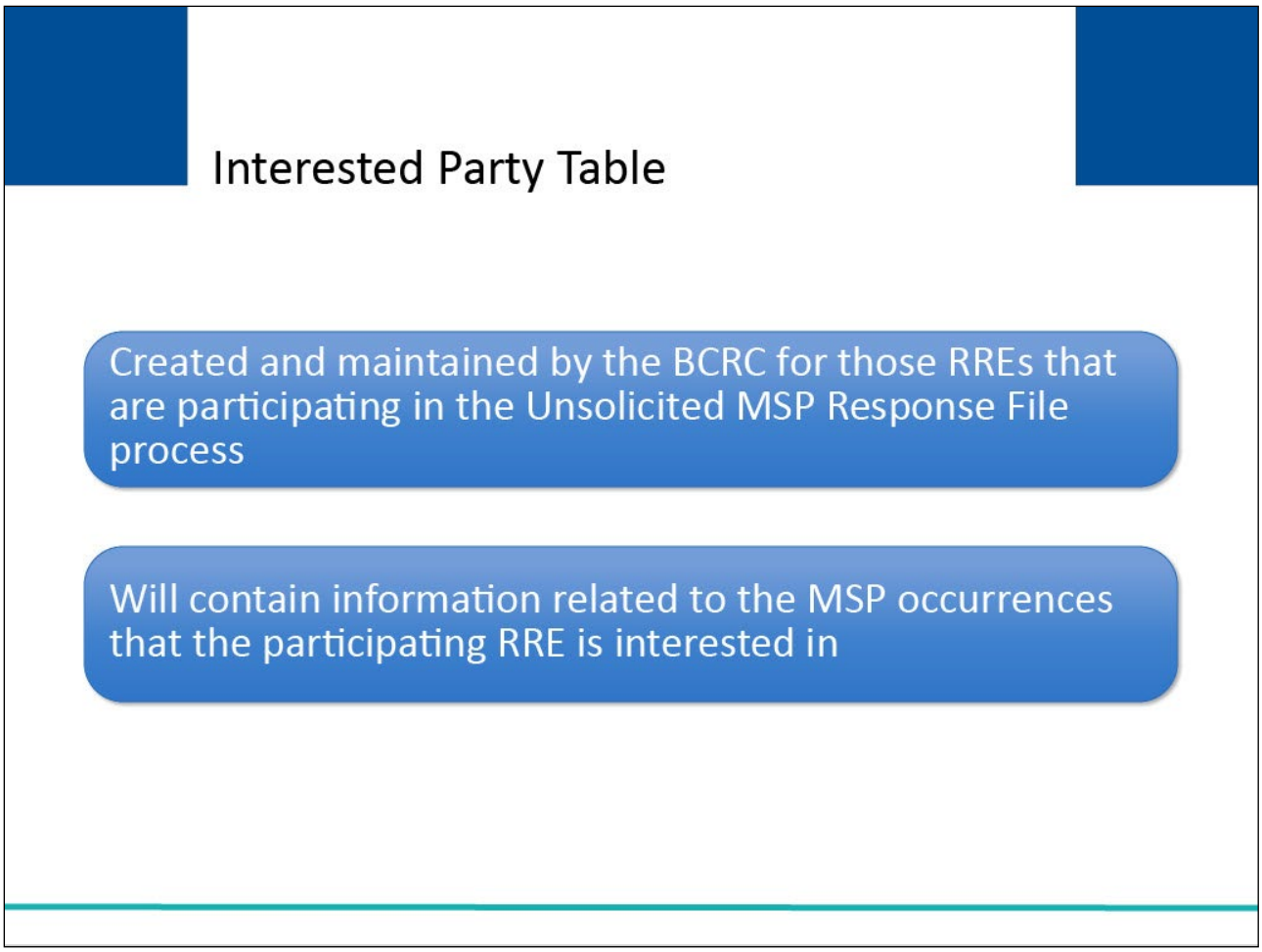
(i.e., the RRE ID now has an “interest” in receiving alerts when MSP occurrences submitted by them are changed by another entity).

Slide 6 of 32 - Interested Party Table

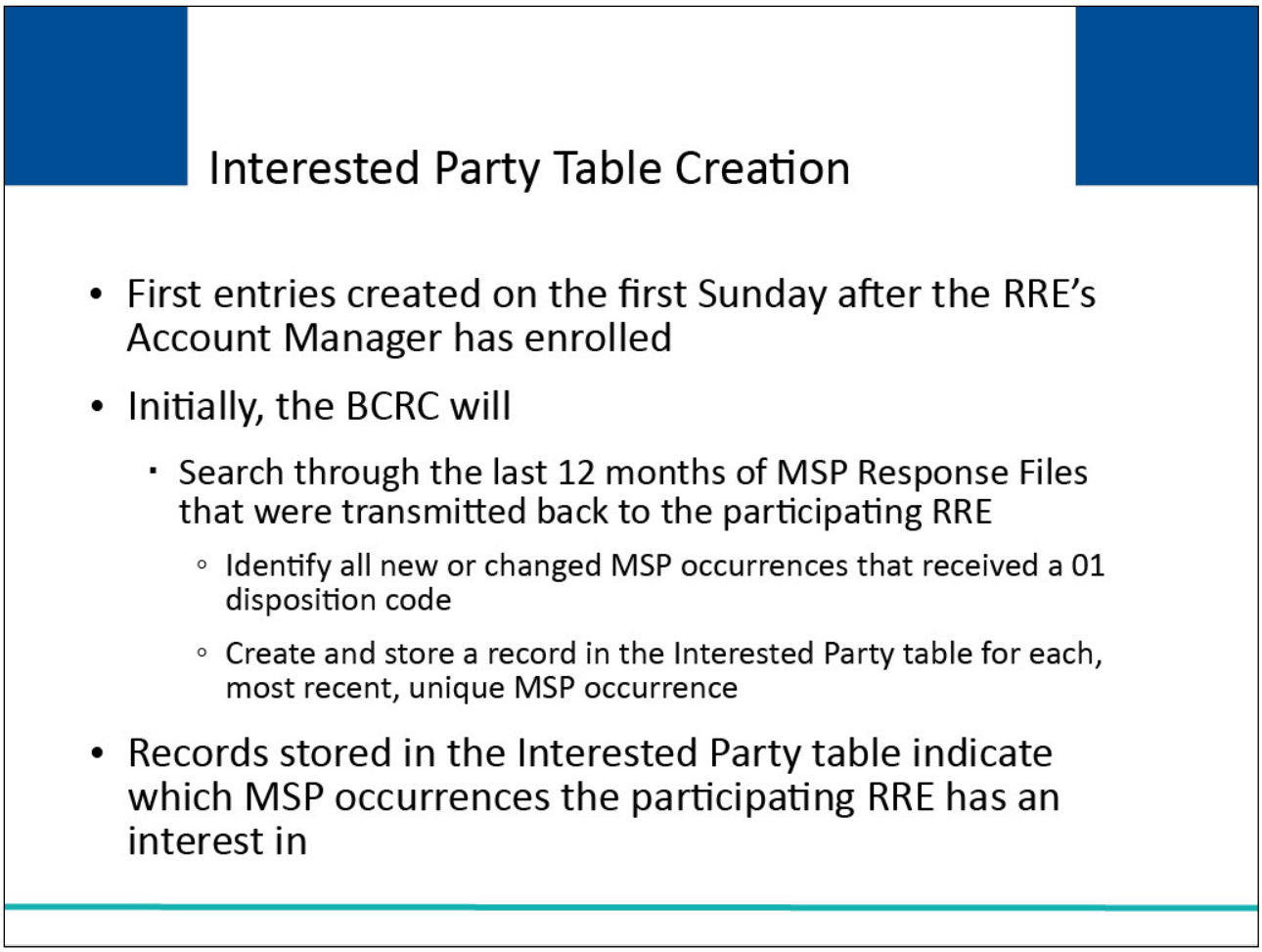


Slide notes

For those RREs who participate in the Unsolicited MSP Response File process, the BCRC will create and maintain entries in what is referred to as the “Interested Party table”.

The Interested Party table will contain information related to the MSP occurrences for which a participating RRE might be interested in receiving notifications.

Slide 7 of 32 - Interested Party Table Creation



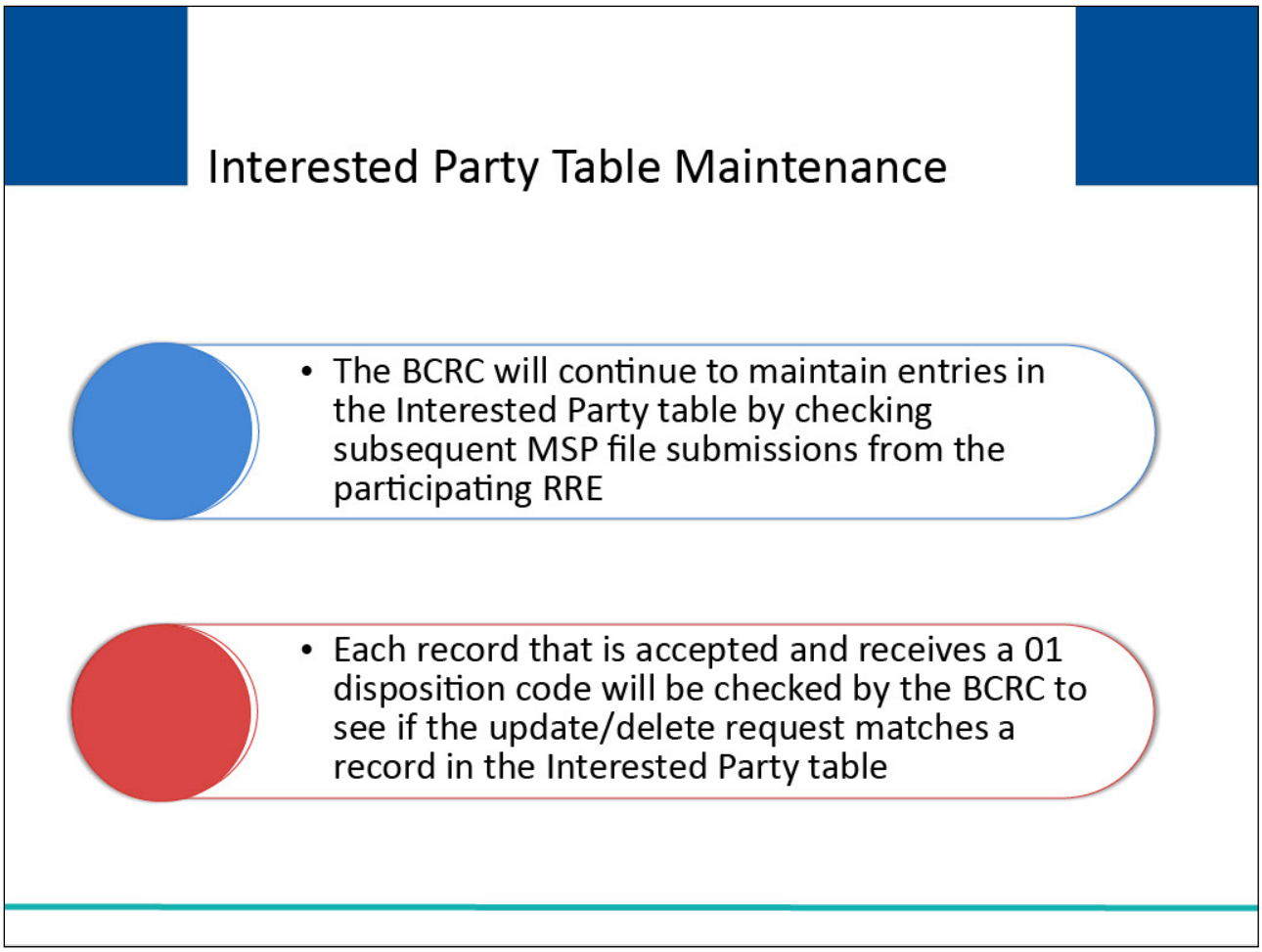
Slide notes

The first Interested Party table entries will be created by the BCRC on the first Sunday after the RRE's Account Manager has enrolled in this process.

Initially, the BCRC will search through the last 12 months of MSP Response Files that were transmitted back to the participating RRE. It will identify all new or changed MSP occurrences that received a 01 disposition code.

For each most recent, unique, MSP occurrence identified, the BCRC will create and store a record in the Interested Party table. These records indicate which MSP occurrences the participating RRE has an interest in.

Slide 8 of 32 - Interested Party Table Maintenance

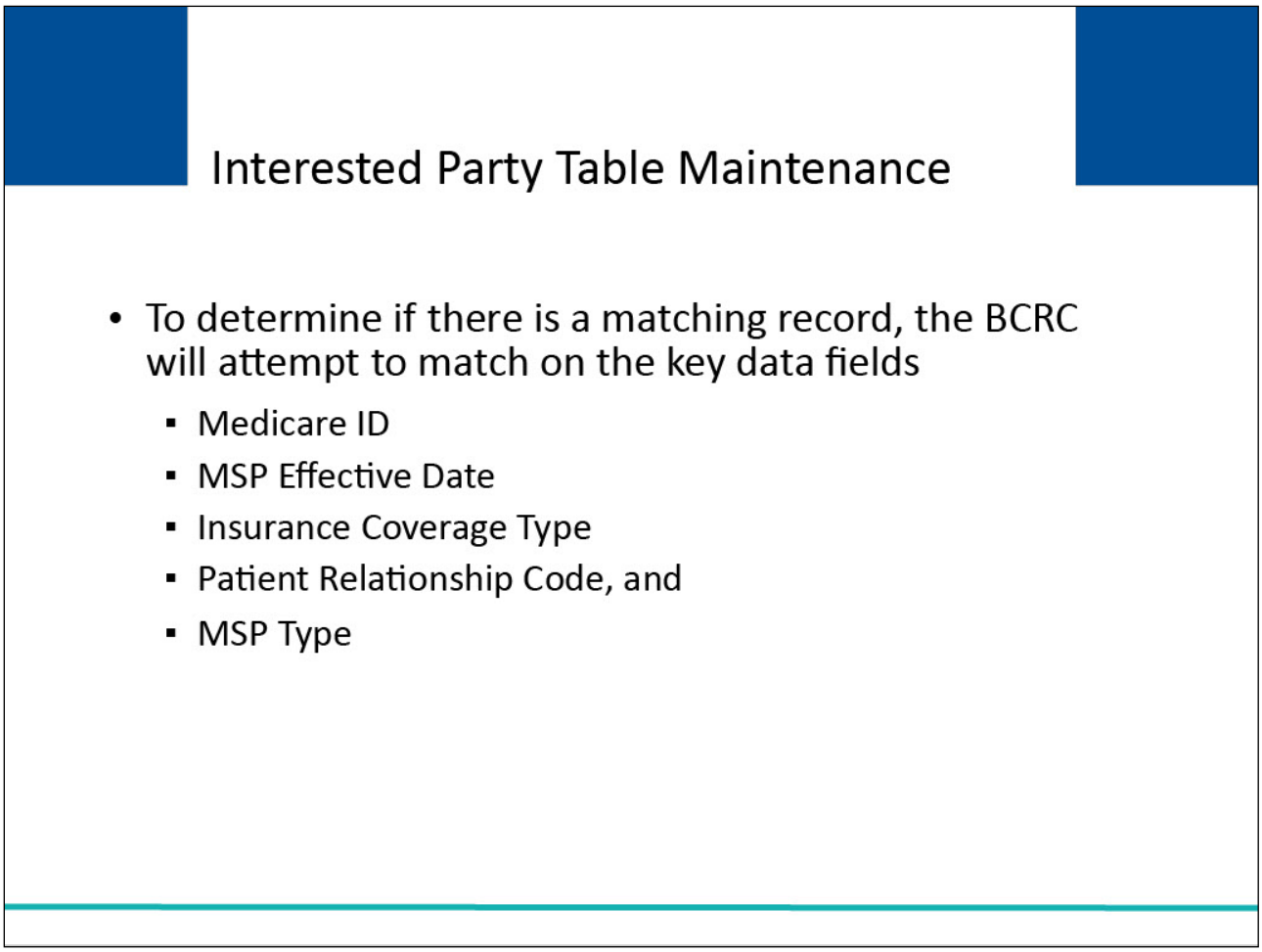


Slide notes

The BCRC will continue to maintain entries in the Interested Party table by checking subsequent MSP file submissions from the participating RRE.

Each record that is accepted and receives a 01 disposition code will be checked by the BCRC to see if the update/delete request matches an existing record on the Interested Party table.

Slide 9 of 32 - Interested Party Table Maintenance



Slide notes

To determine if there is a matching record, the BCRC will attempt to match on the key data fields:

Medicare ID,

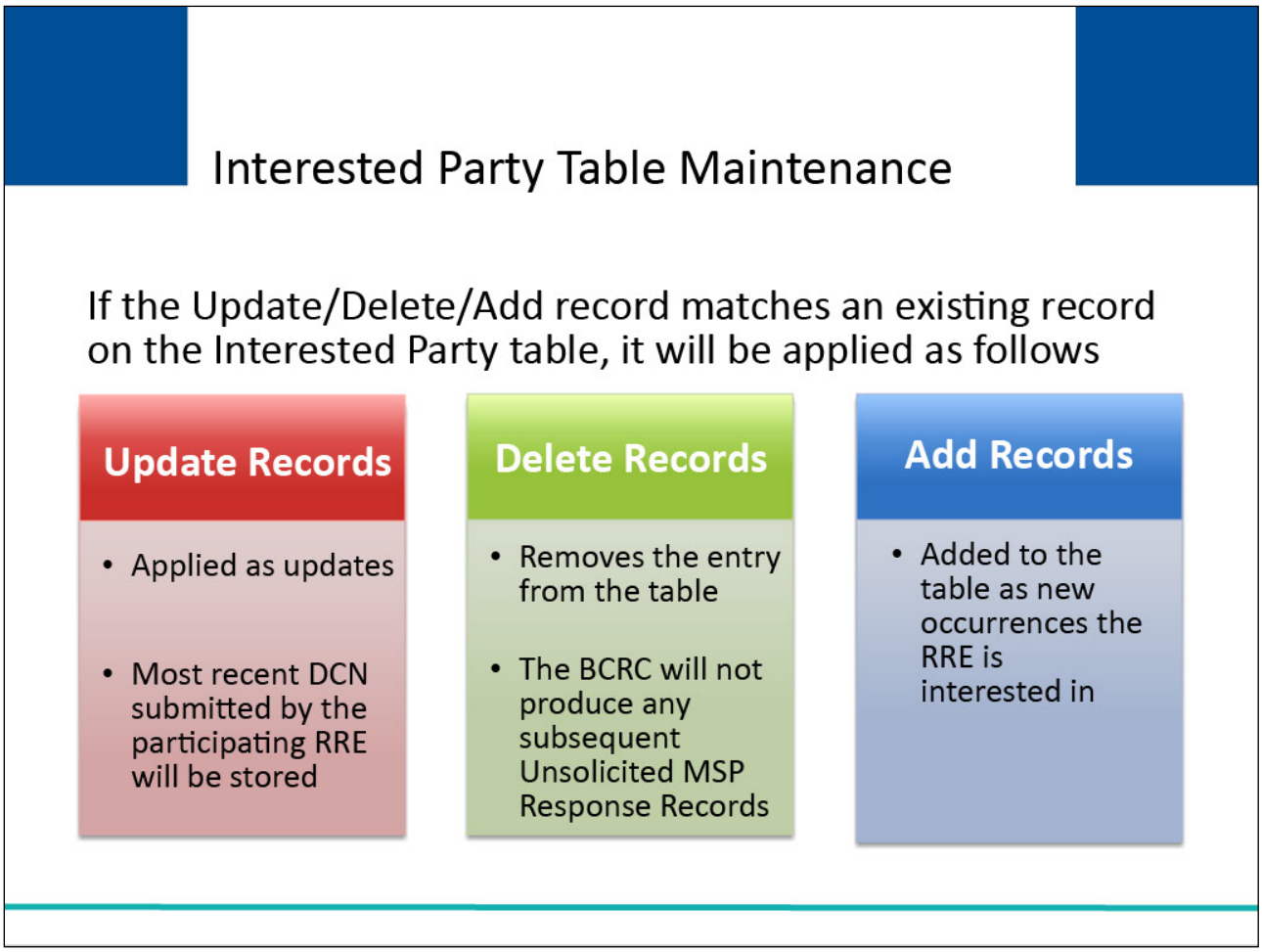
MSP Effective Date,

Insurance Coverage Type,

Patient Relationship Code, and

MSP Type.

Slide 10 of 32 - Interested Party Table Maintenance



Slide notes

If the Update/Delete/Add Record matches an existing record on the Interested Party table, the transaction will be applied to the Interested Party table as follows:

Update Records will be applied as updates to the Interested Party table.

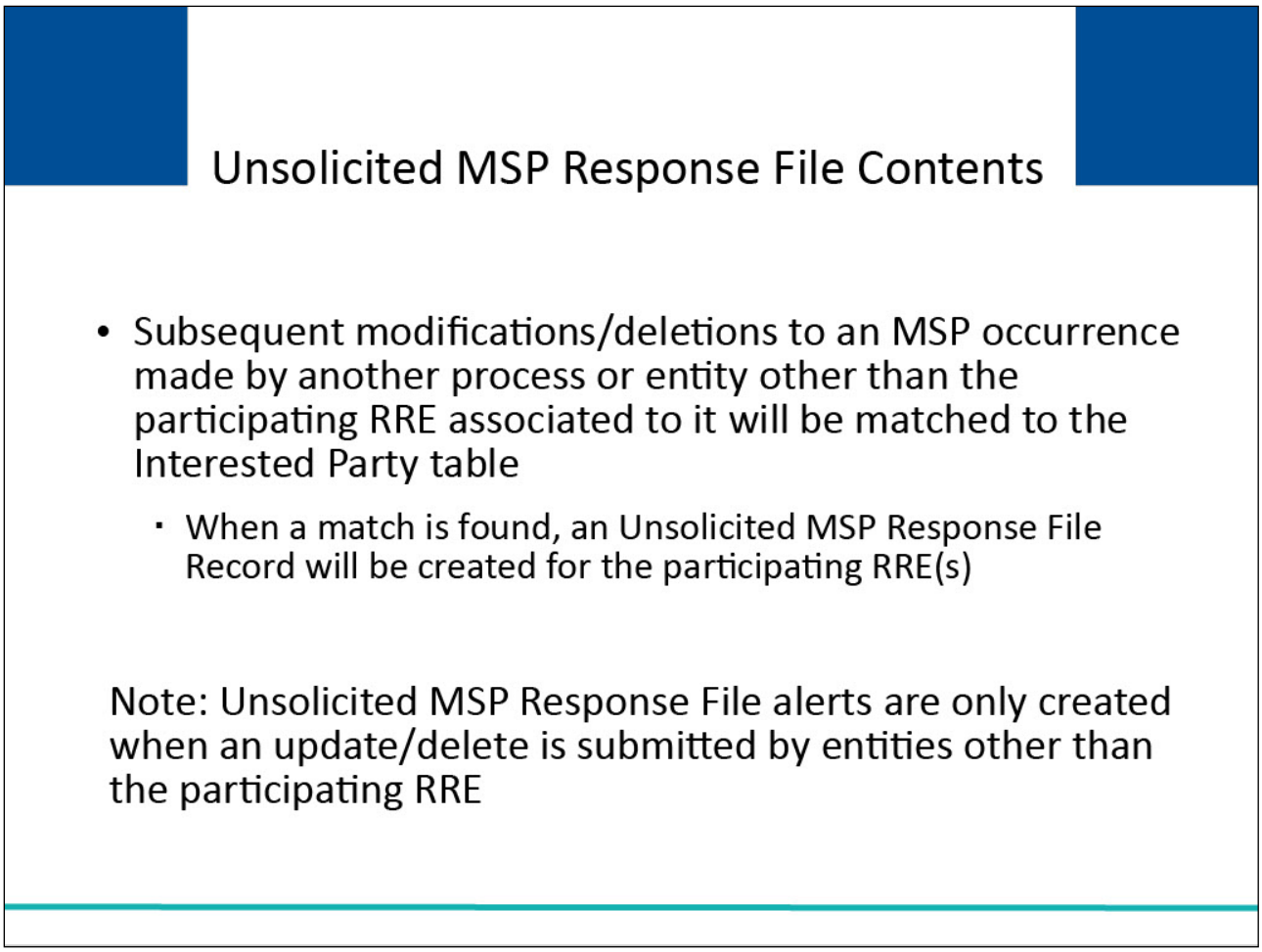
The most recent Document Control Number (DCN) submitted by the participating RRE will be stored on the Interested Party table.

Delete Records will remove the entry from the Interested Party table.

It is assumed that once the record is deleted by the associated RRE, they no longer have an interest in the record and the BCRC will not produce any subsequent Unsolicited MSP Response Records for it.

Add Records will be added to the Interested Party table as new occurrences the RRE is interested in.

Slide 11 of 32 - Unsolicited MSP Response File Contents



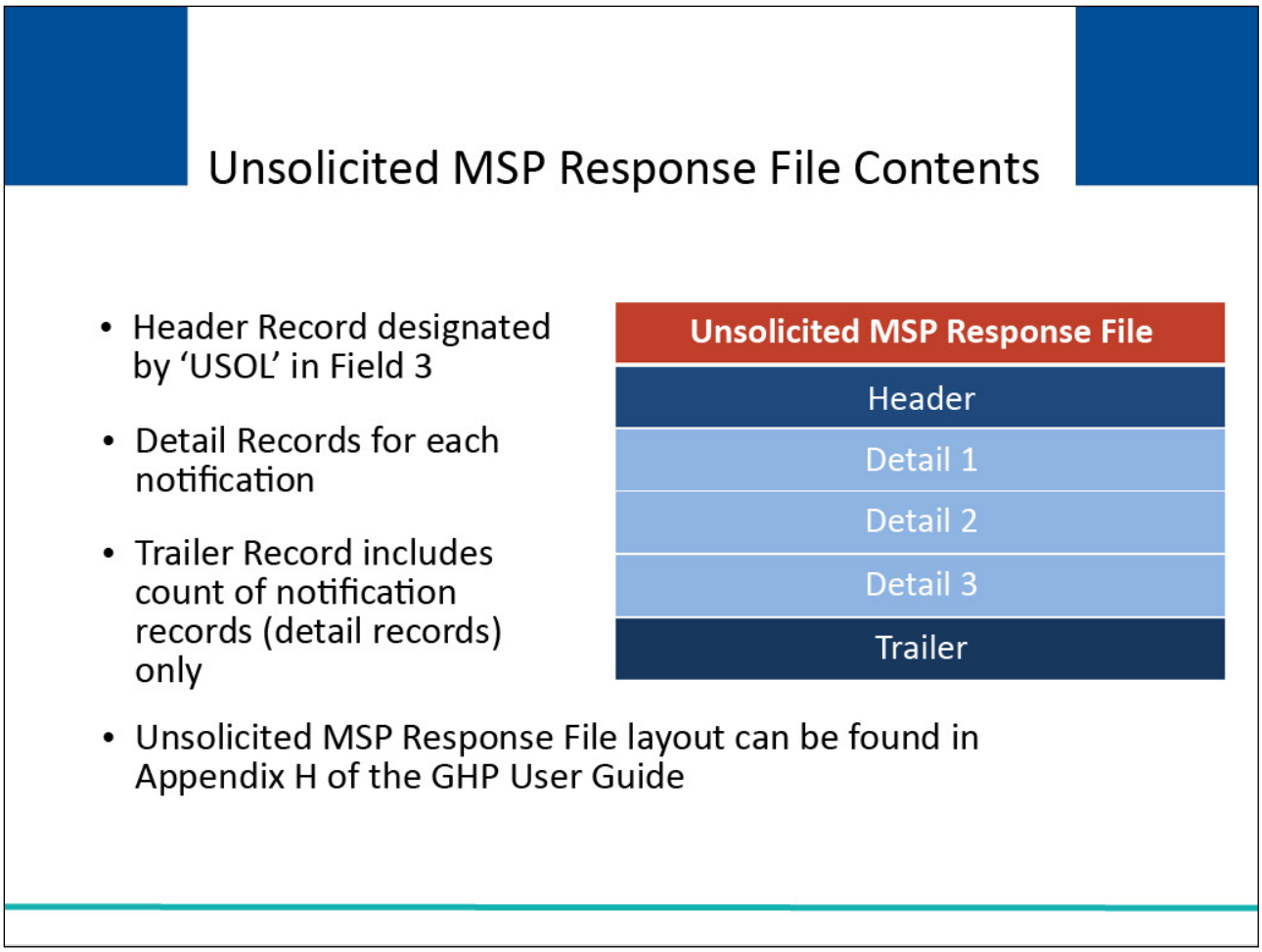
Slide notes

Subsequent modifications or deletions to an MSP occurrence made by another process or entity other than the participating RRE associated to it will be matched to the Interested Party table.

If there is a match, an Unsolicited MSP Response File Record will be created for the participating RRE(s).

Note: Participating RREs will only receive Unsolicited MSP Response File alerts for updates and deletes submitted by entities other than themselves.

Slide 12 of 32 - Unsolicited MSP Response File Contents

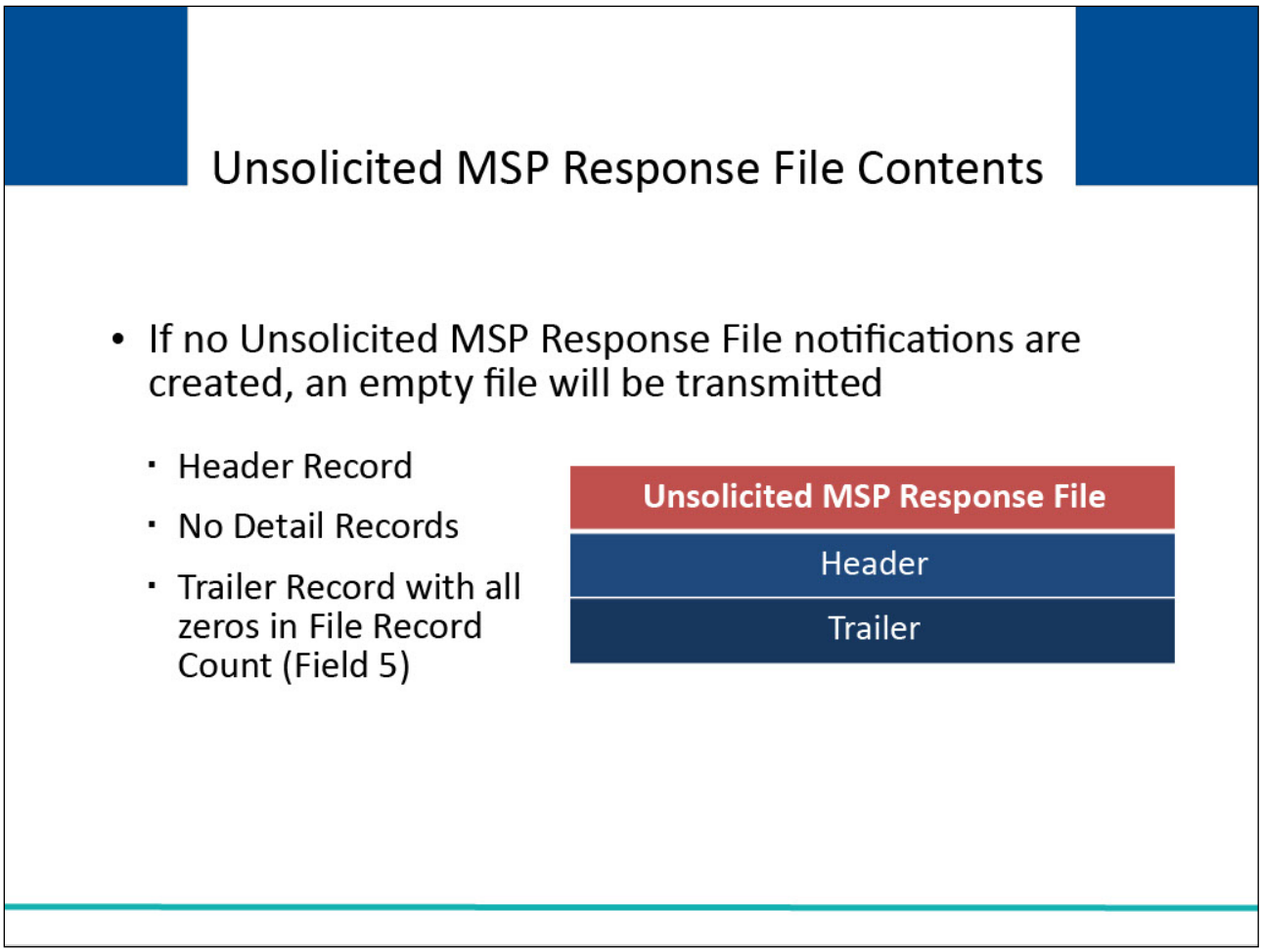


Slide notes

The Unsolicited MSP Response File includes a Header Record designated by a value of "USOL" in Field 3, followed by Detail Records for each notification, followed by a Trailer Record. The Trailer Record contains a count of the total number of notification records included in the submission. This count does not include the Header and Trailer Records.

Please refer to Appendix H of the Section 111 GHP User Guide for the Unsolicited MSP Response File layout.

Slide 13 of 32 - Unsolicited MSP Response File Contents

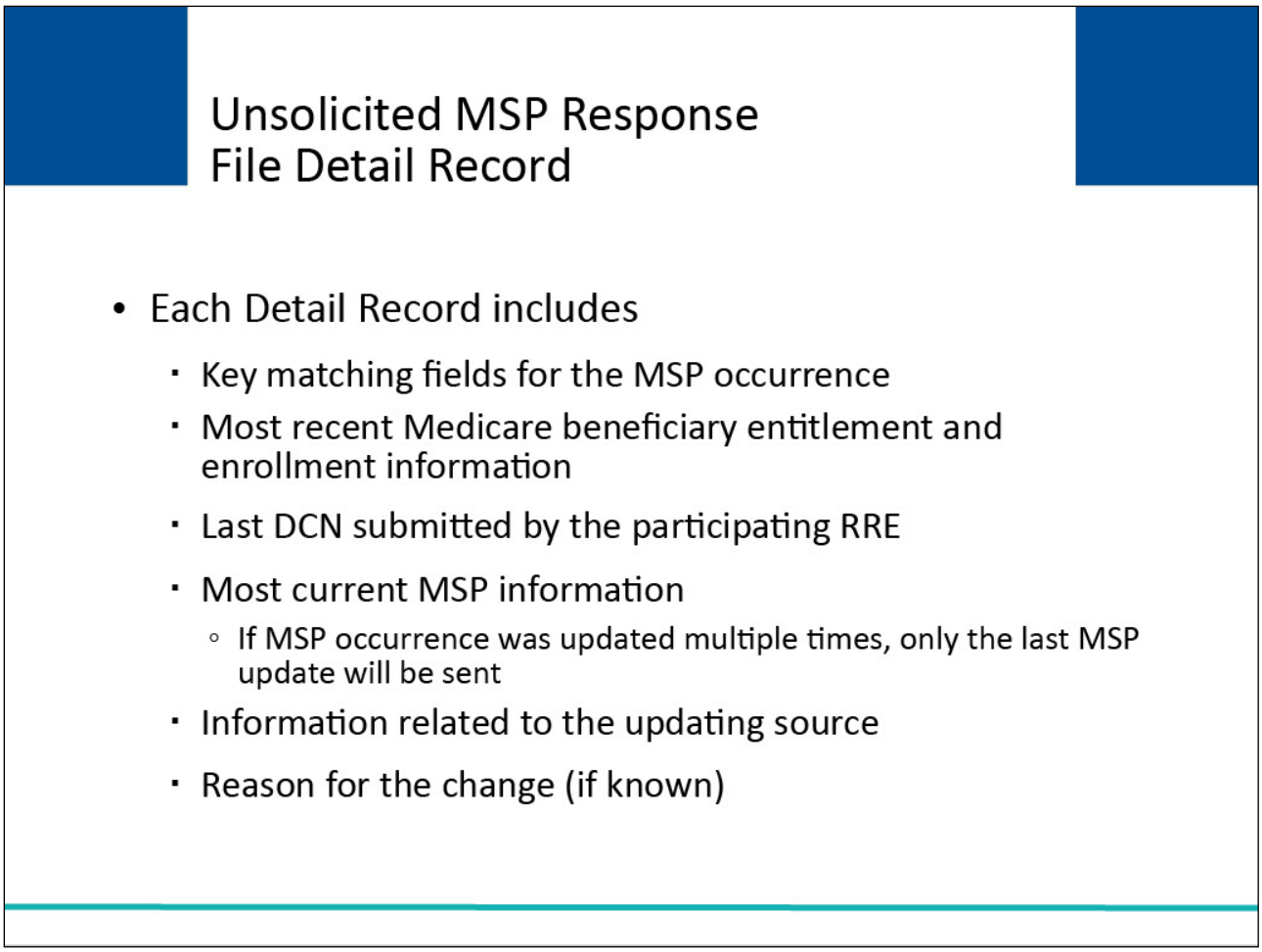


Slide notes

If no Unsolicited MSP Response File notifications are created for an RRE during the course of a month, an “empty” Unsolicited MSP Response File will be transmitted to the RRE.

This file will include a Header Record, no Detail Records, and a Trailer Record with a value of all zeros in the File Record Count (Field 5).

Slide 14 of 32 - Unsolicited MSP Response File Detail Record

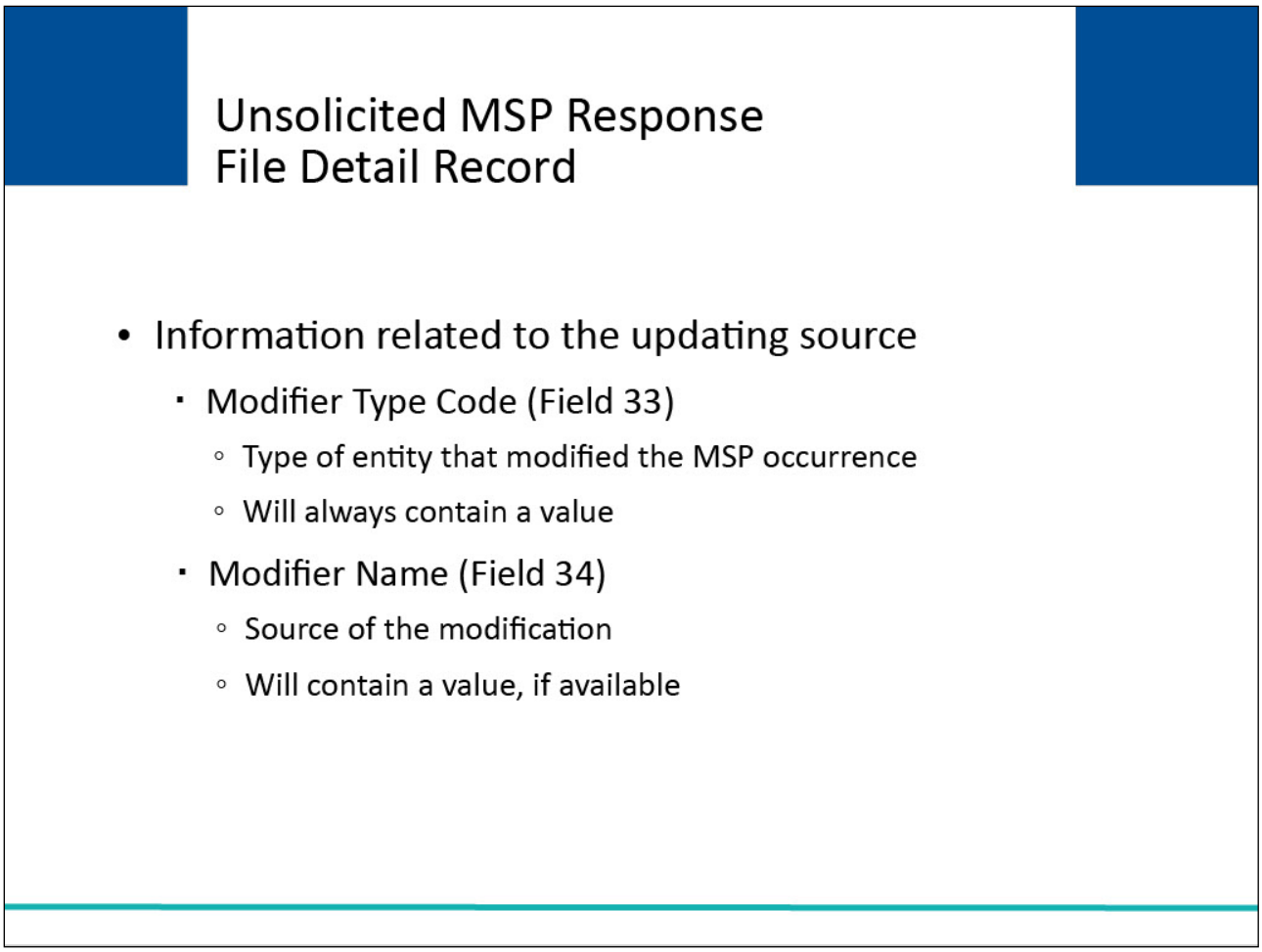


Slide notes

Each Detail Record includes the key matching fields for the MSP occurrence, the most recent Medicare beneficiary entitlement and enrollment information, the last DCN submitted by the participating RRE, and the most current MSP information. If an MSP occurrence was updated multiple times during the monthly timeframe by other entity(s) only information from the last MSP update will be sent.

The Detail Record will also include information related to the updating source and reason for the change (if known).

Slide 15 of 32 - Unsolicited MSP Response File Detail Record



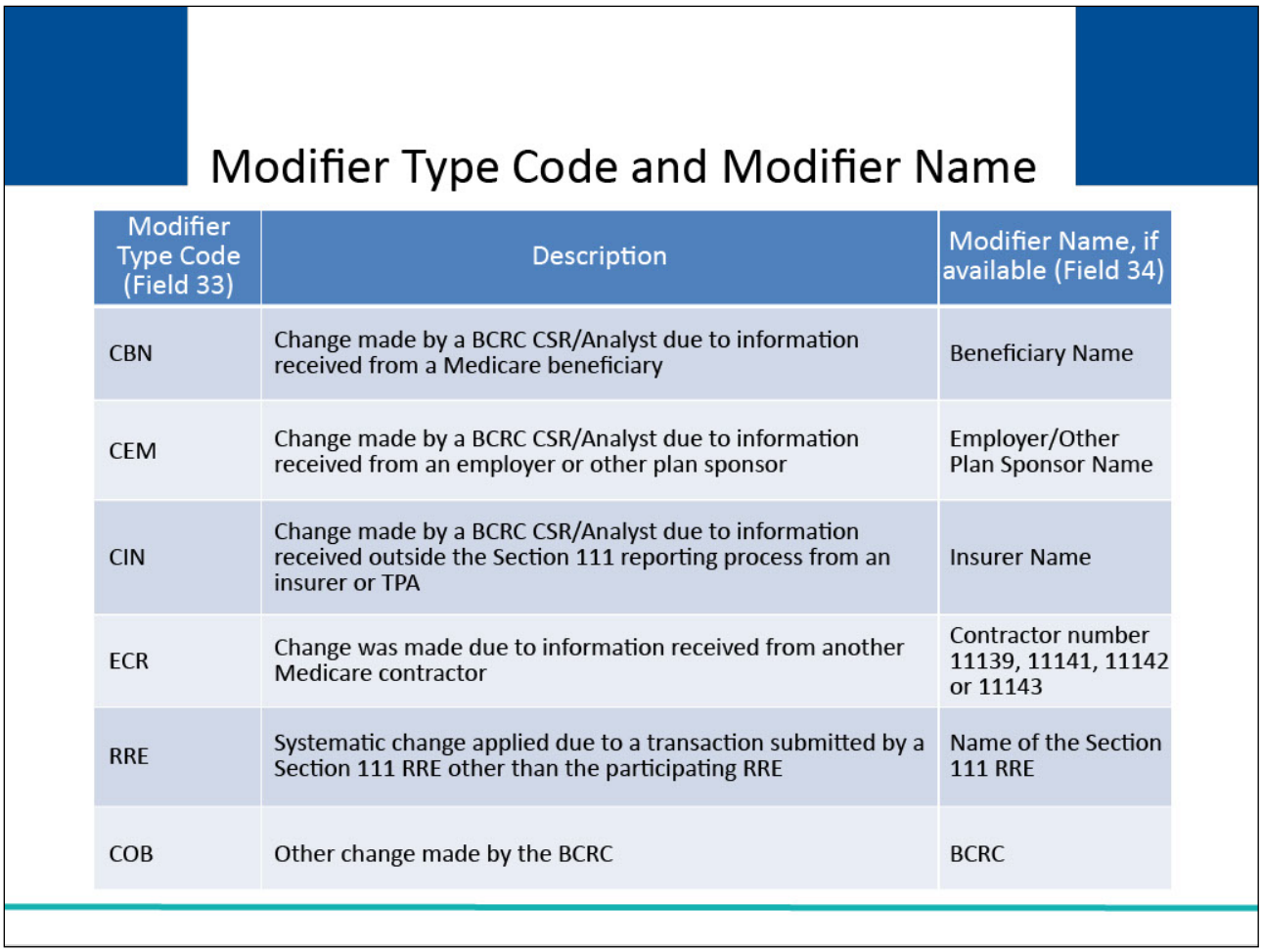
Slide notes

Information related to the updating source will be displayed in the Modifier Type Code and Modifier Name fields. The Modifier Type Code (Field 33) will indicate the type of entity that applied the modification to the MSP occurrence.

This field will always contain a value. The Modifier Name (Field 34) will identify the source of the modification.

The Modifier Name will be returned (if available), with the name of the entity that requested the modification of the MSP occurrence.

Slide 16 of 32 - Modifier Type Code and Modifier Name



Modifier Type Code and Modifier Name

Modifier Type Code (Field 33)	Description	Modifier Name, if available (Field 34)
CBN	Change made by a BCRC CSR/Analyst due to information received from a Medicare beneficiary	Beneficiary Name
CEM	Change made by a BCRC CSR/Analyst due to information received from an employer or other plan sponsor	Employer/Other Plan Sponsor Name
CIN	Change made by a BCRC CSR/Analyst due to information received outside the Section 111 reporting process from an insurer or TPA	Insurer Name
ECR	Change was made due to information received from another Medicare contractor	Contractor number 11139, 11141, 11142 or 11143
RRE	Systematic change applied due to a transaction submitted by a Section 111 RRE other than the participating RRE	Name of the Section 111 RRE
COB	Other change made by the BCRC	BCRC

Slide notes

The “Modifier Type and Modifier Name” chart identifies all of the current Modifier Type Codes and the corresponding information that would be provided in the Modifier Name on the Unsolicited MSP Response File:

CBN is a change made by a BCRC Customer Service Representative (CSR) or Analyst due to information received from a Medicare beneficiary.

If the name of the beneficiary is known, it will be placed in Field 34.

CEM is a change made by a BCRC CSR/Analyst due to information received from an employer or other plan sponsor.

If the Employer/Other Plan Sponsor Name is known, it will be placed in Field 34.

CIN is a change made by a BCRC CSR/Analyst due to information received outside the Section 111 reporting process from an insurer or Third Party Administrator (TPA).

If the Insurer Name is known, it will be placed in Field 34.

ECR is a change made due to information received from another Medicare contractor.

If the change was made due to Group Health Plan Recovery, the Modifier Name will contain the value 11139.

If the change was made due to Non-Group Health Plan Non-ORM Recovery, the Modifier Name will contain the value 11141. If the change was made due to Non-Group Health Plan ORM Recovery, the Modifier Name will contain the value 11142.

If the change was made due to a request made by a Medicare Advantage (Part C) Plan, the Modifier Name will contain the value 11143.

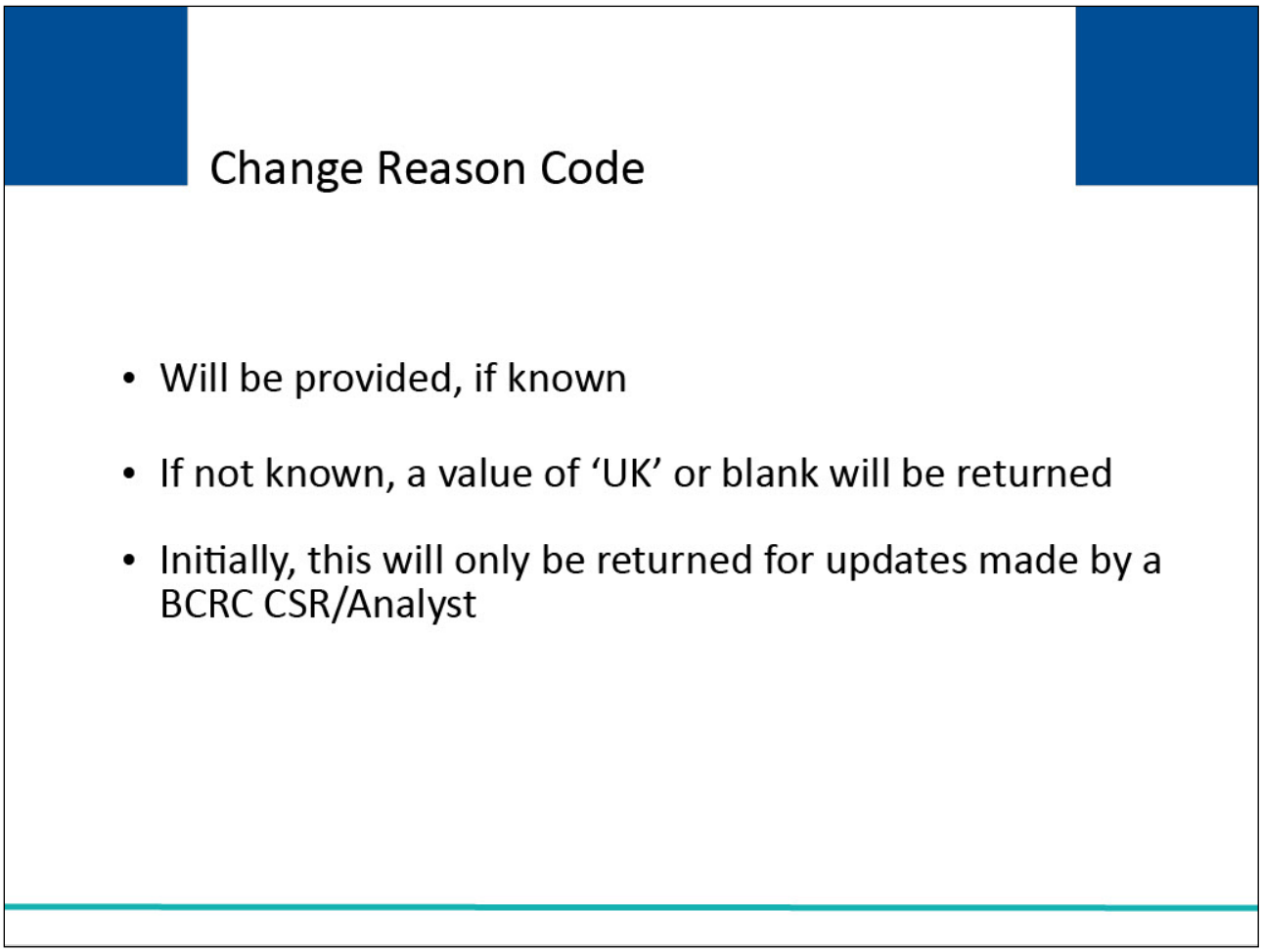
RRE is a systematic change applied due to a transaction submitted by a Section 111 RRE other than the participating RRE.

If the name of the Section 111 RRE is known, it will be placed in Field 34.

COB is a change made by the BCRC.

The value BCRC will be placed in Field 34.

Slide 17 of 32 - Change Reason Code

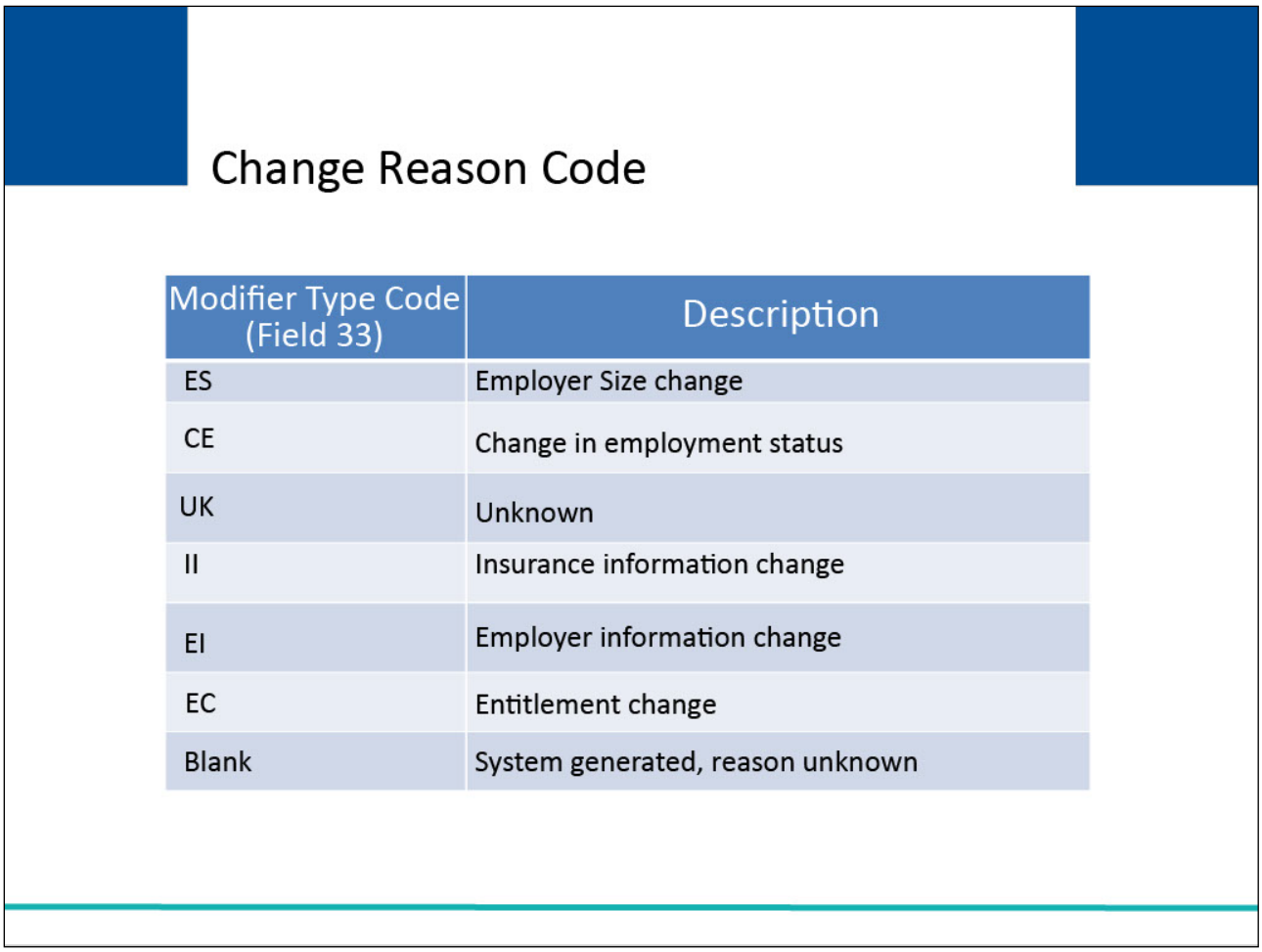


Slide notes

A Change Reason Code (Field 35) will be provided (if known). If a reason for change cannot be determined the value of 'UK' (Unknown) or blank will be returned.

Initially, Change Reason Code values will only be returned for updates made by a BCRC CSR/Analyst.

Slide 18 of 32 - Change Reason Code



Slide notes

The following chart provides a list of Change Reason codes and their descriptions.

ES indicates that the occurrence was updated due to a change in Employer Size.

CE indicates that the occurrence was updated due to a change in employment status (retirement, resignation, etc.).

UK indicates the reason for change is unknown.

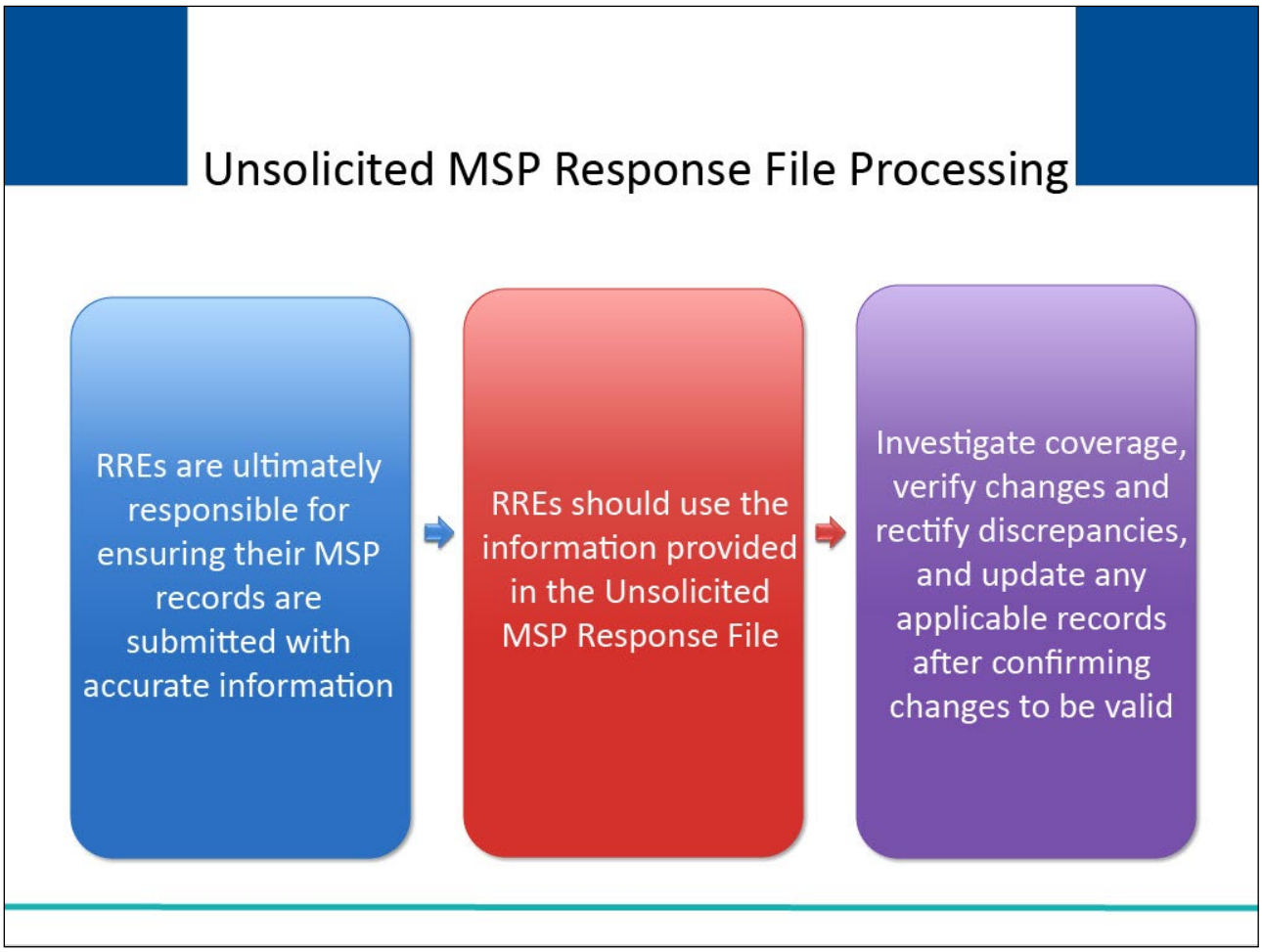
II indicates that the occurrence was updated due to a change in insurance information.

EI indicates that the occurrence was updated due to a change in employer information.

EC indicates that the occurrence was updated due to a change in entitlement.

Blank is system generated and indicates that the reason for change is unknown.

Slide 19 of 32 - Unsolicited MSP Response File Processing

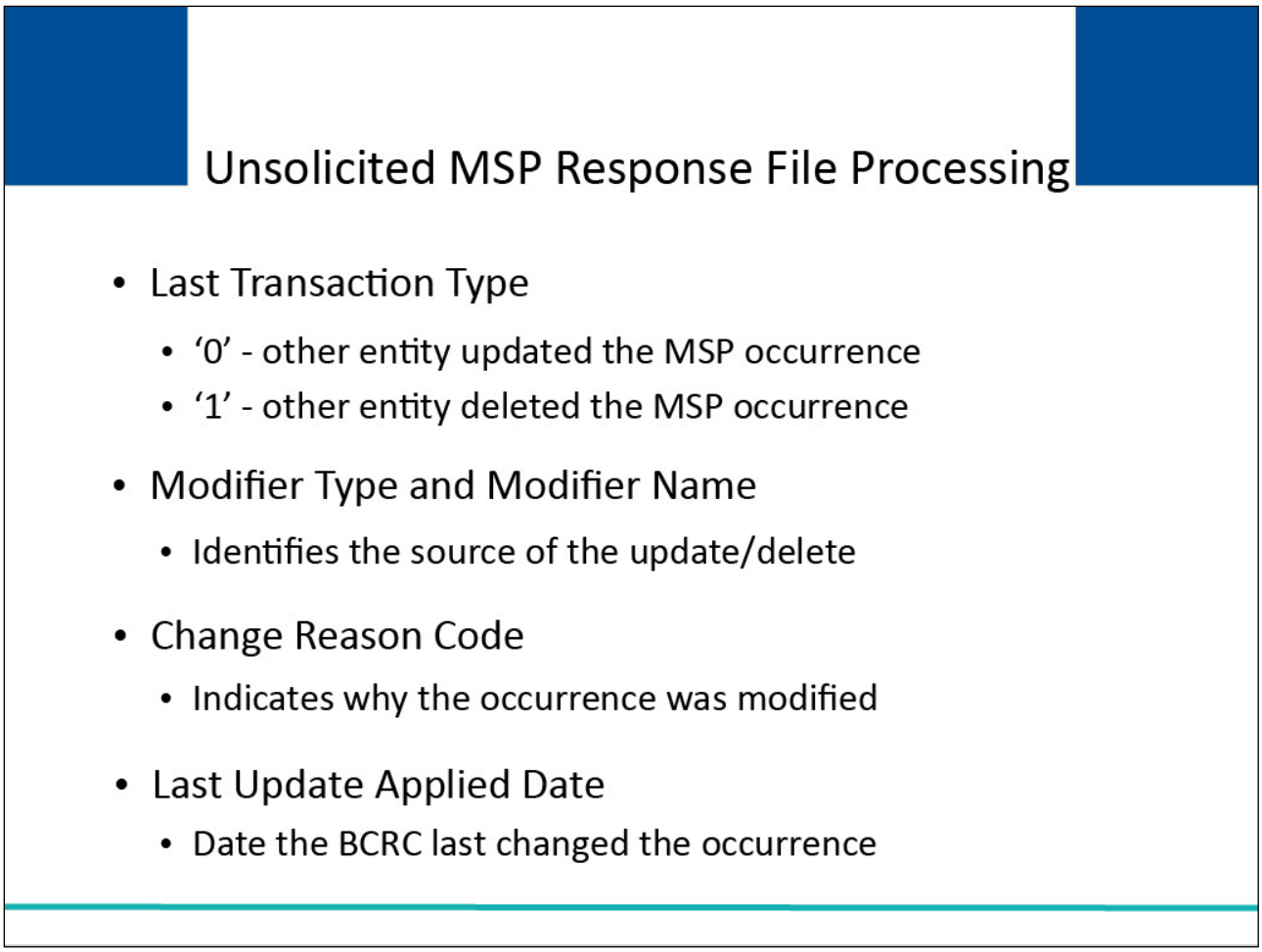


Slide notes

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 20 of 32 - Unsolicited MSP Response File Processing



Slide notes

Some particular fields of interest on the Unsolicited MSP Response File include the following:

Field 9 (Last Transaction Type).

If this field is set to '0', the other entity updated the occurrence.

If this field is set to '1', the other entity deleted the occurrence.

Fields 10-32 will contain the current MSP information for the occurrence.

Fields 33 & 34 (Modifier Type and Modifier Name).

These fields will identify the source of the update/delete.

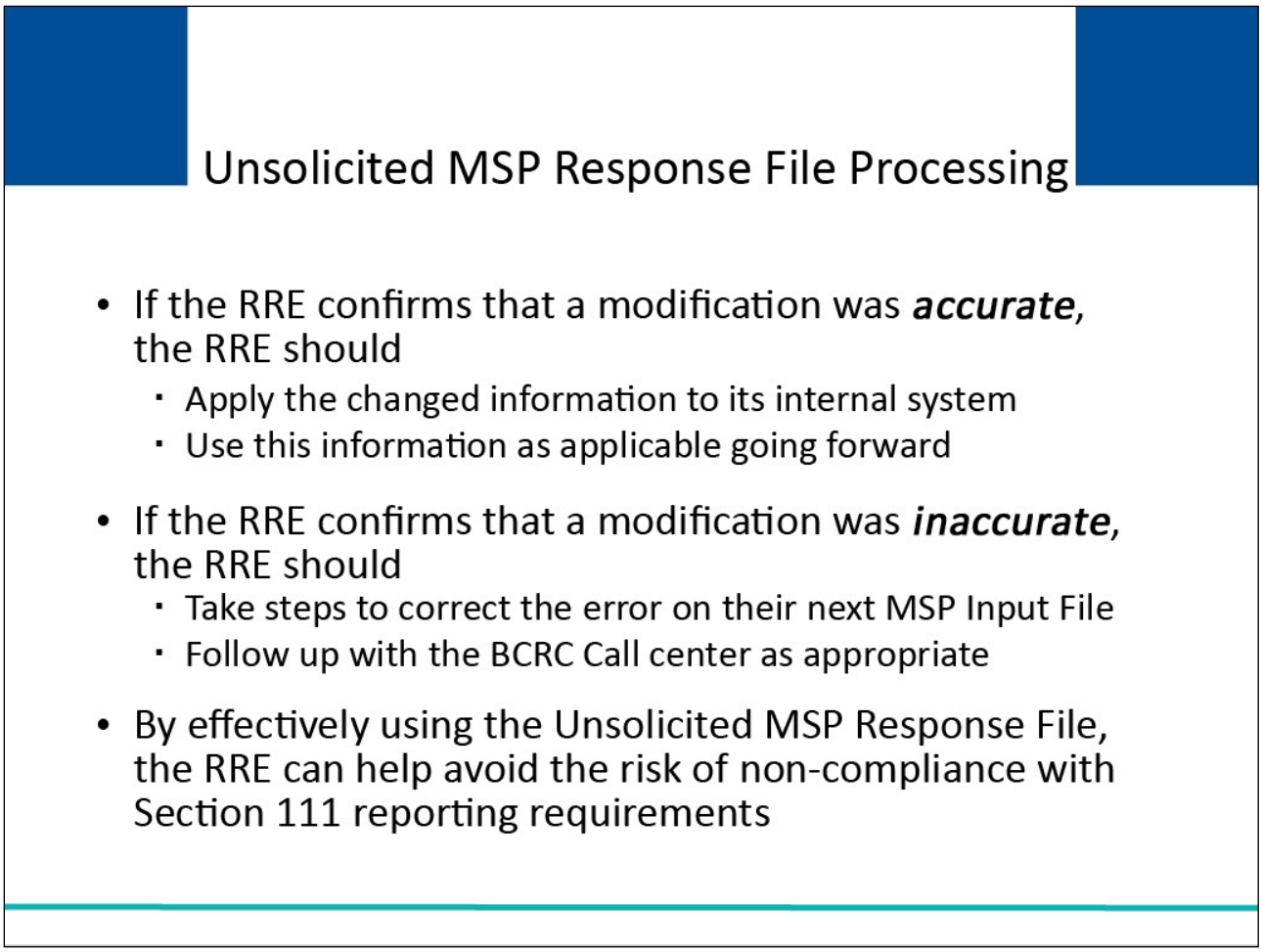
Field 35 (Change Reason Code).

This field will indicate why the occurrence was modified.

Field 36 (Last Update Applied Date).

This field will identify the date the BCRC last changed the occurrence.

Slide 21 of 32 - Unsolicited MSP Response File Processing

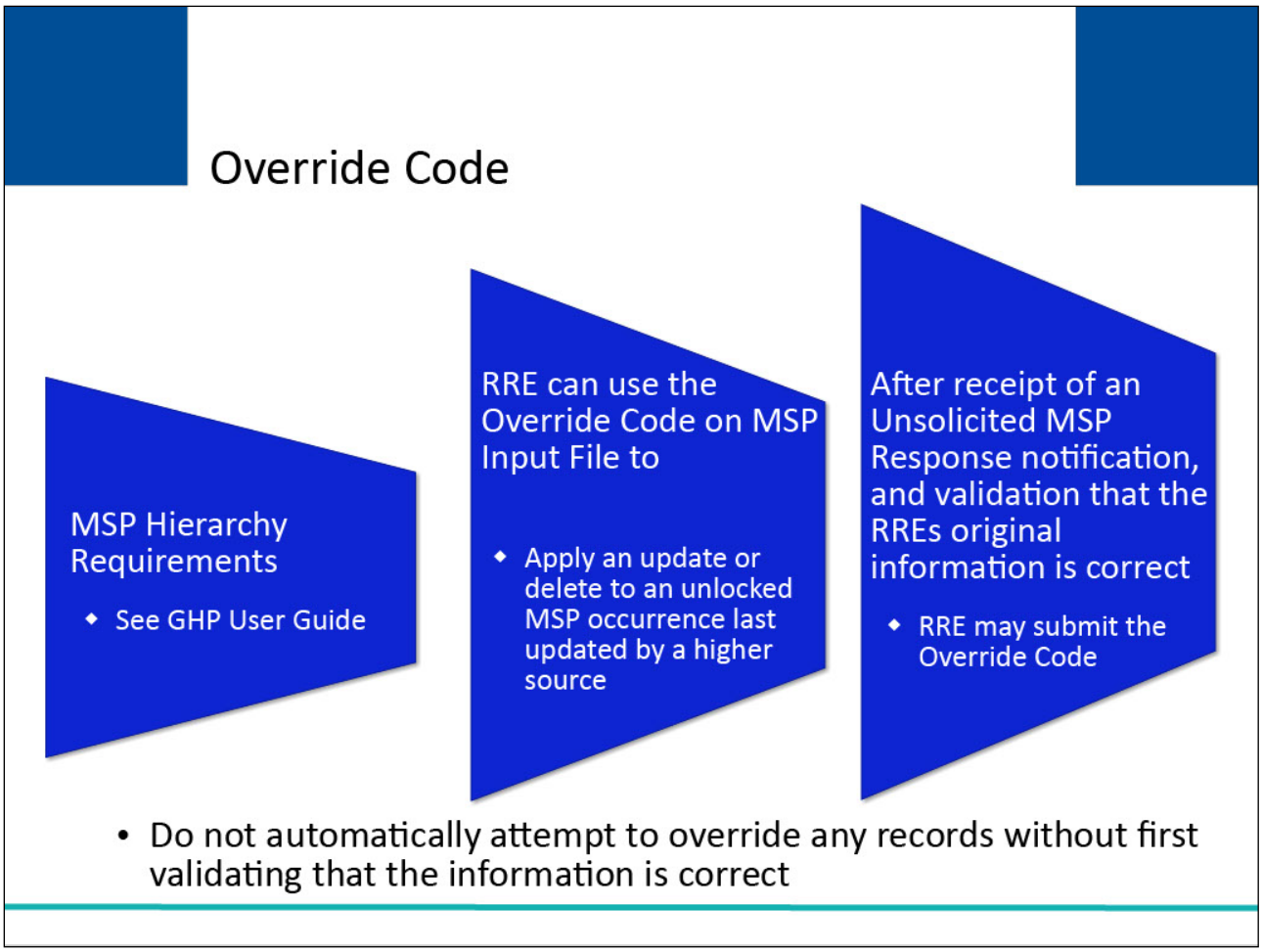


Slide notes

If the RRE confirms that a change/delete made by another entity was accurate, the RRE should apply the changed information, such as retirement or employment termination dates to its internal system and use this information as applicable for subsequent Section 111 reporting and claim processing. However, if the RRE determines that a change made by another entity was inaccurate, they should take steps to correct the error on their next MSP Input File or follow up with the BCRC Call Center as appropriate.

By effectively using the Unsolicited MSP Response File to maintain accurate records, the RRE can help avoid the risk of non-compliance with Section 111 reporting requirements.

Slide 22 of 32 - Override Code



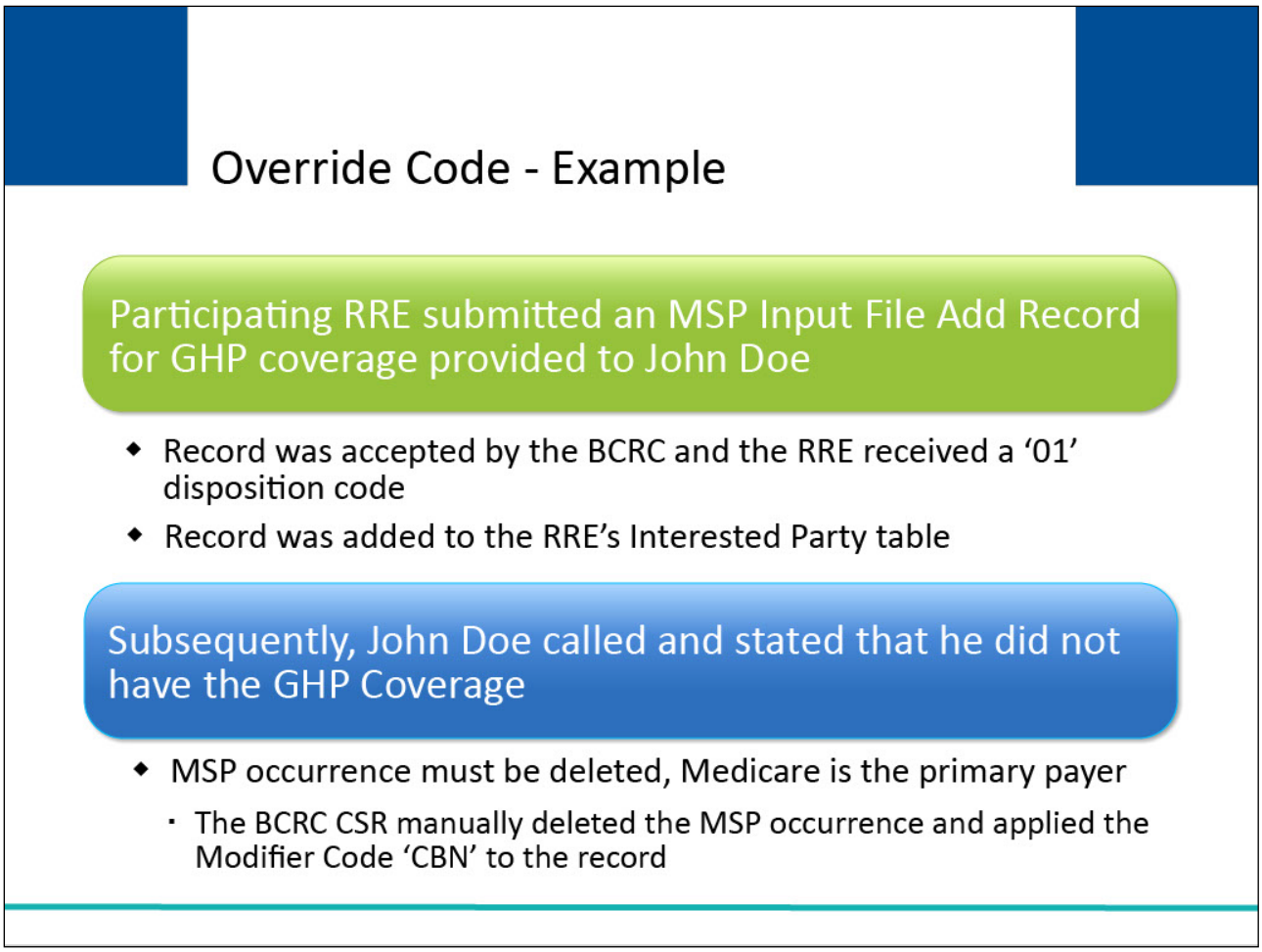
Slide notes

CMS and the BCRC implemented MSP hierarchy rules that govern updates and deletes applied to MSP occurrences. Please review the MSP Hierarchy Requirements section of the GHP User Guide.

The Override Code, Field 33 on the MSP Input File Detail Record, allows an RRE to apply an update or delete to an unlocked MSP occurrence that was last updated by a source/entity ranked higher than the RRE in terms of these MSP hierarchy rules. After receipt of an Unsolicited MSP Response notification and validation that the RREs original information is correct, an RRE may submit the Override Code on a MSP Input File Detail Record.

Please note that RREs should NOT automatically attempt to override any records without first validating that their information is correct.

Slide 23 of 32 - Override Code - Example



Slide notes

An RRE participating in the Unsolicited MSP Response File process submitted an MSP Input File Add Record for GHP coverage provided to a Medicare beneficiary, John Doe.

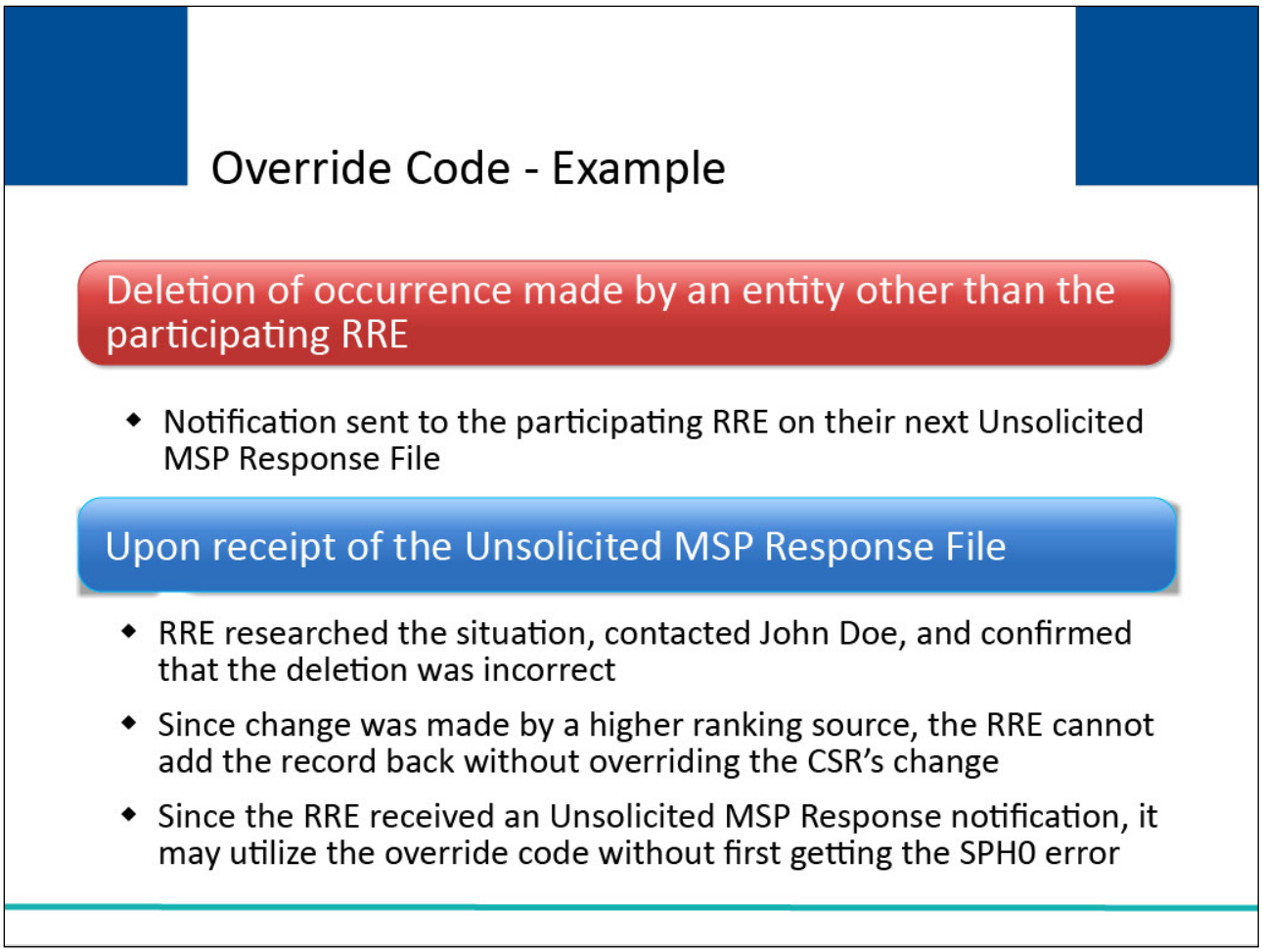
The record was accepted by the BCRC and the RRE received a '01' disposition code on its response file indicating that an MSP occurrence was created. This record was added to the RRE's Interested Party table.

Subsequently, John Doe called the BCRC Call Center and stated that he did not have the GHP coverage reflected in the MSP occurrence.

In this case, the MSP occurrence must be deleted since Medicare should be the primary payer.

A BCRC CSR manually deleted the MSP occurrence and applied the Modifier Type Code of 'CBN' (Change made by a BCRC CSR/Analyst due to information received from a Medicare beneficiary).

Slide 24 of 32 - Override Code - Example

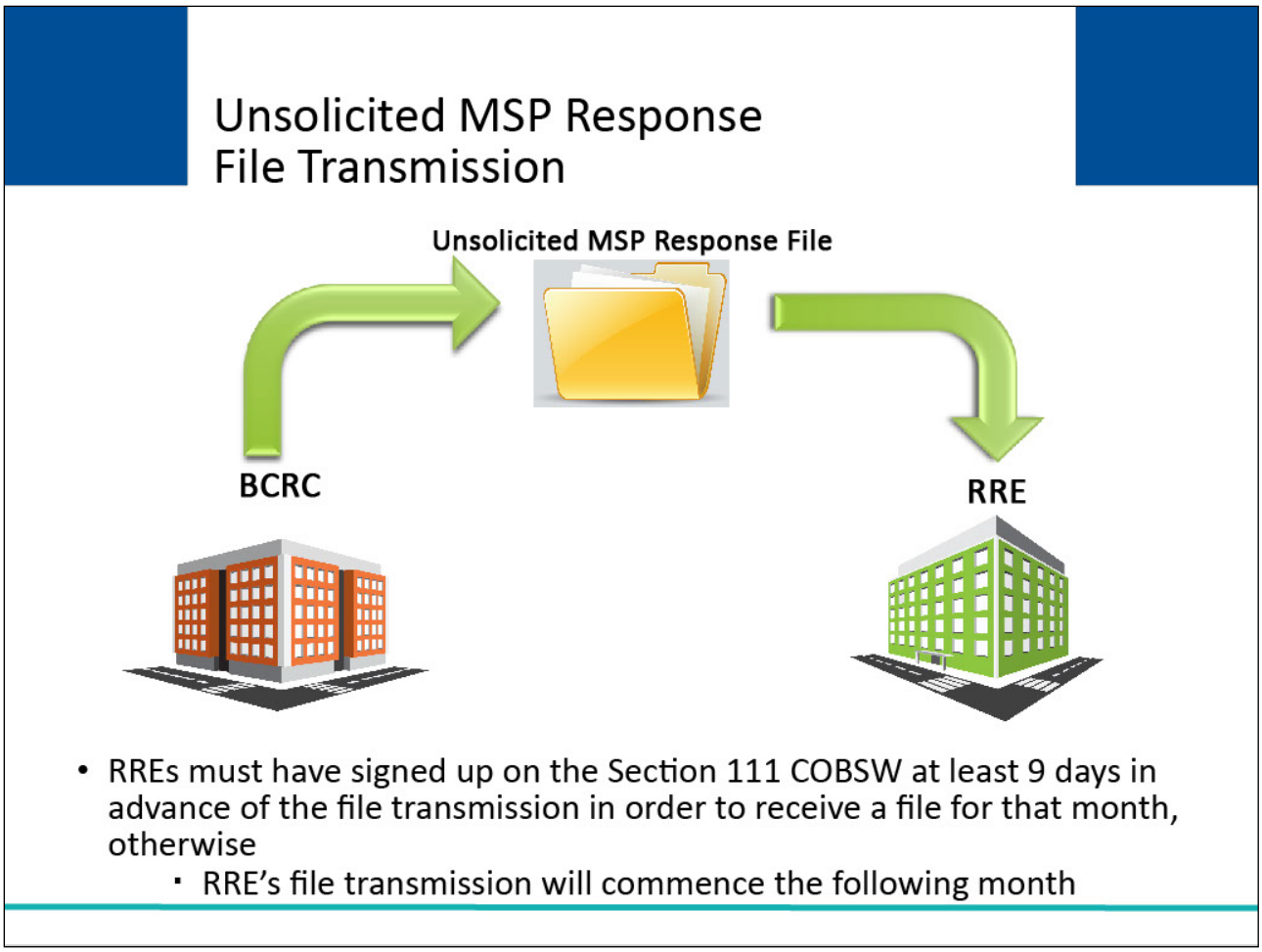


Slide notes

Since the change (i.e., the delete) to this occurrence was made by an entity other than the participating RRE (change was made by the BCRC CSR), a notification for this deletion was sent to the participating RRE on their next Unsolicited MSP Response File.

When the RRE received their Unsolicited MSP Response File, they researched this situation, contacted John Doe, and were able to confirm that this deletion was incorrect. Since the change (deletion) was made by a BCRC CSR which is ranked higher than Section 111 in the MSP hierarchy rules, the RRE cannot add this record back without overriding the CSR's change. However, since the RRE received an Unsolicited MSP Response notification, it may utilize the override code without first getting the SPH0 error.

Slide 25 of 32 - Unsolicited MSP Response File Transmission



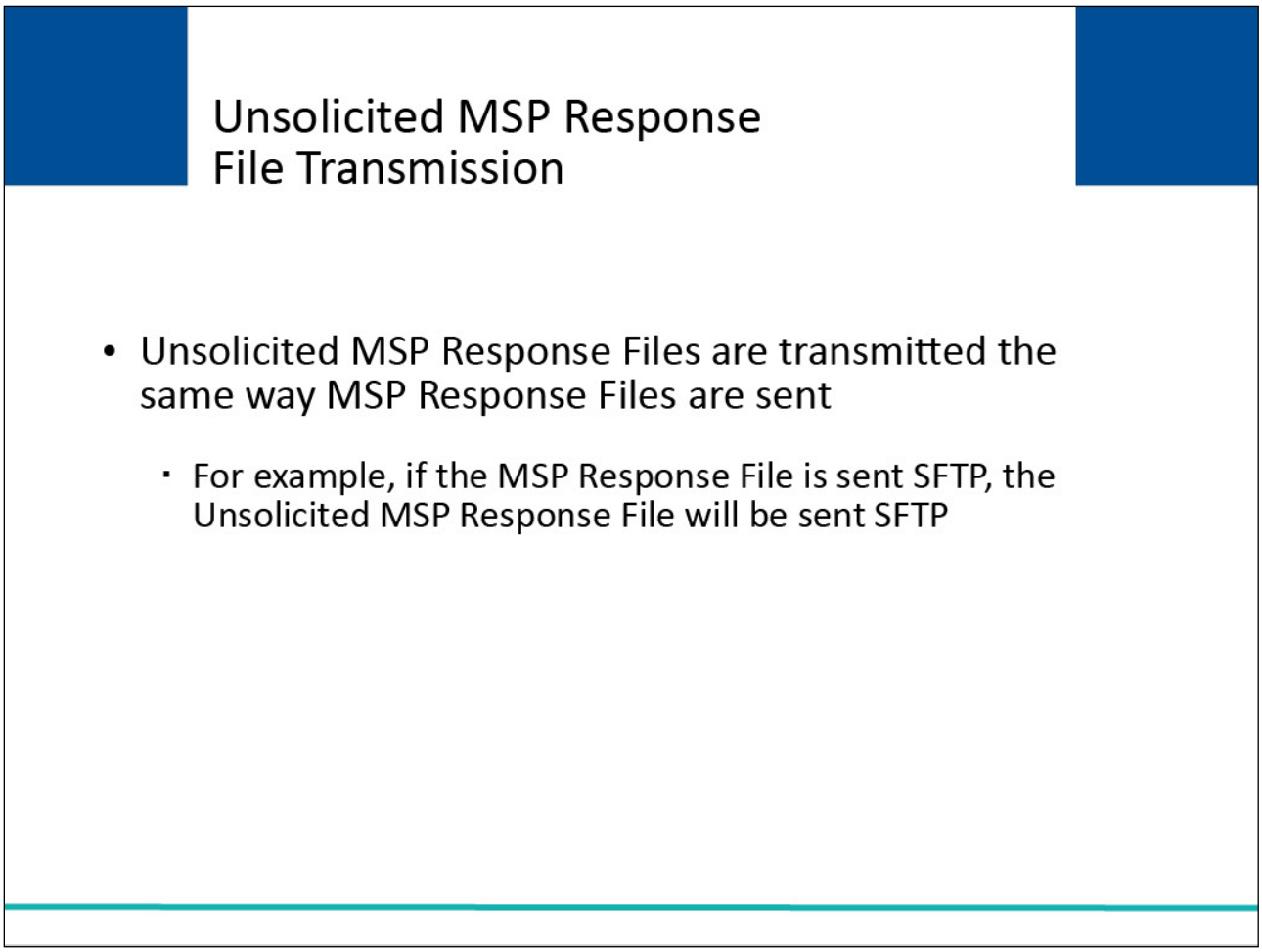
Slide notes

The Unsolicited MSP Response File will be created and transmitted from the BCRC to each participating RRE on the 2nd Sunday of each month. This file will not be created for test file transmissions.

RREs must have signed up on the Section 111 COBSW at least 9 days in advance of the file transmission date in order to receive an Unsolicited MSP Response File for that month.

If an RRE does not enroll in the process at least nine days prior to the second Sunday of the month, the RRE's file transmission will commence the following month.

Slide 26 of 32 - Unsolicited MSP Response File Transmission

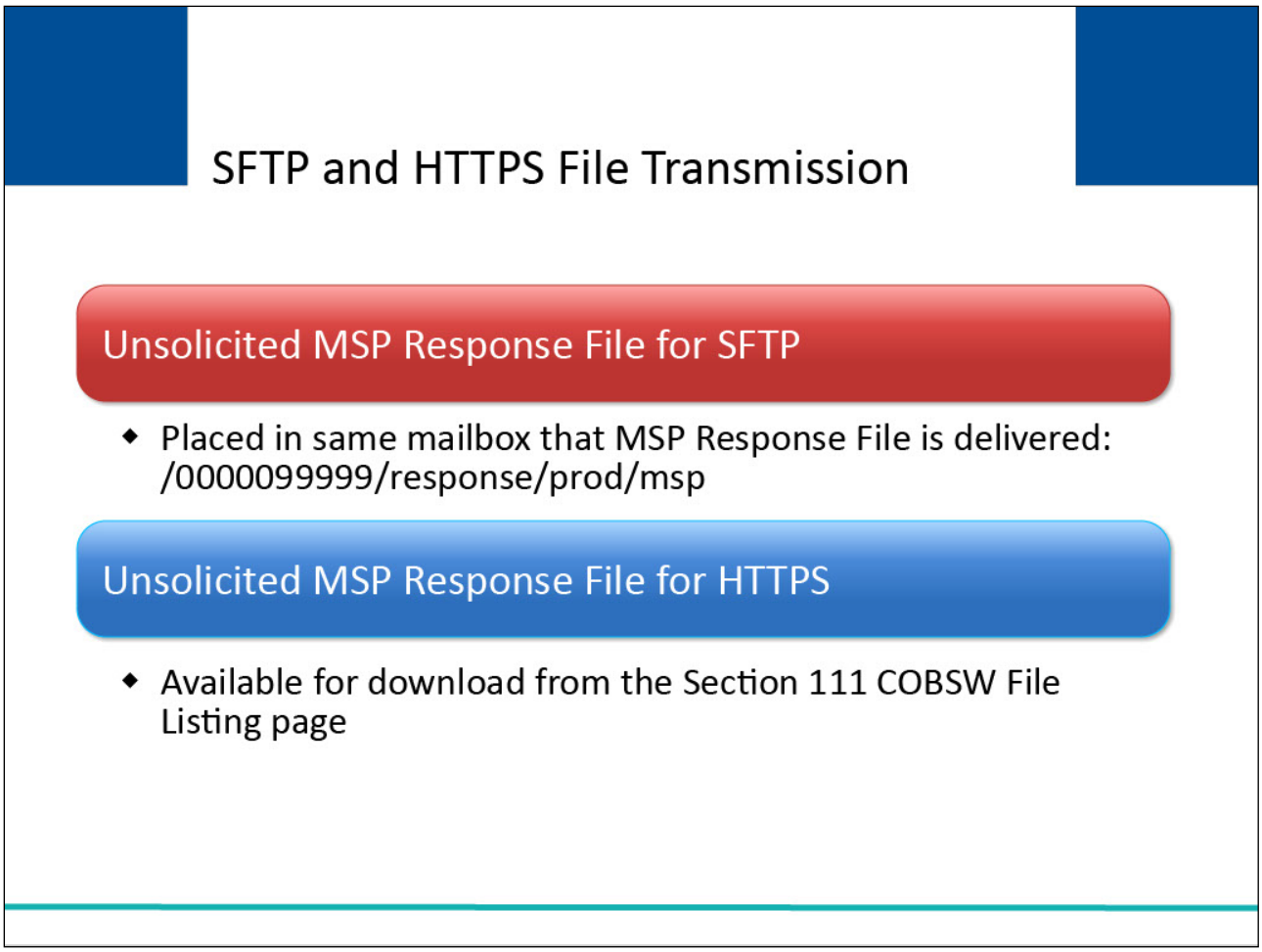


Slide notes

Unsolicited MSP Response Files will be transmitted the same way MSP Response Files are sent to the participating RRE.

For example, if the MSP Response Files are delivered via Secure File Transfer Protocol (SFTP), the Unsolicited MSP Response Files will be transmitted via SFTP.

Slide 27 of 32 - SFTP and HTTPS File Transmission

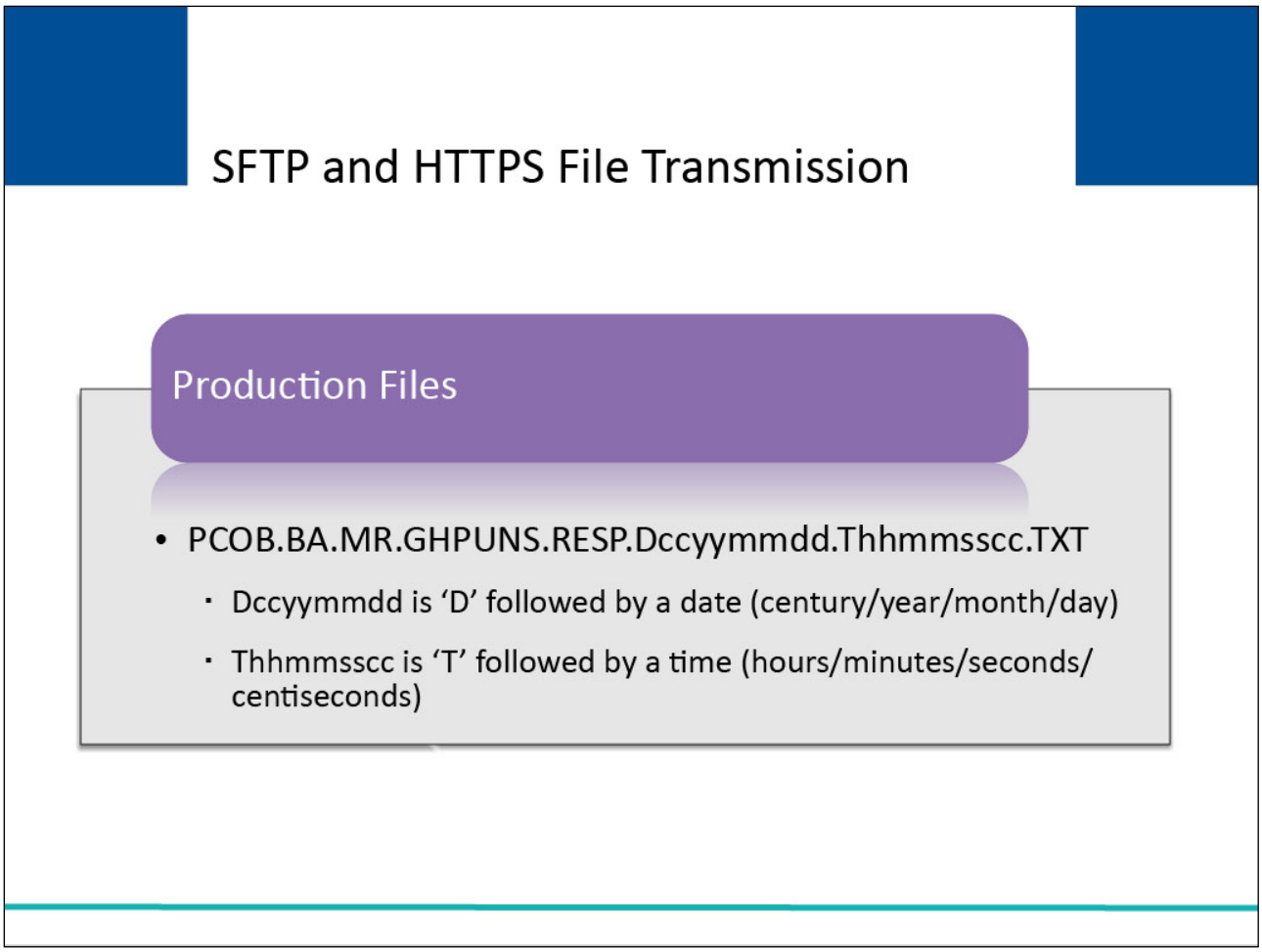


Slide notes

For RREs using SFTP, the Unsolicited MSP Response File will be placed in the same mailbox that the MSP Response File is delivered: /0000099999/response/prod/msp.

For RREs using Hypertext Transfer Protocol over Secure Socket Layer (HTTPS), the Unsolicited MSP Response File will be available for download from the Section 111 COBSW File Listing page.

Slide 28 of 32 - SFTP and HTTPS File Transmission



Slide notes

The BCRC will name Unsolicited MSP Response Files according to the following convention for SFTP and HTTPS submitters:

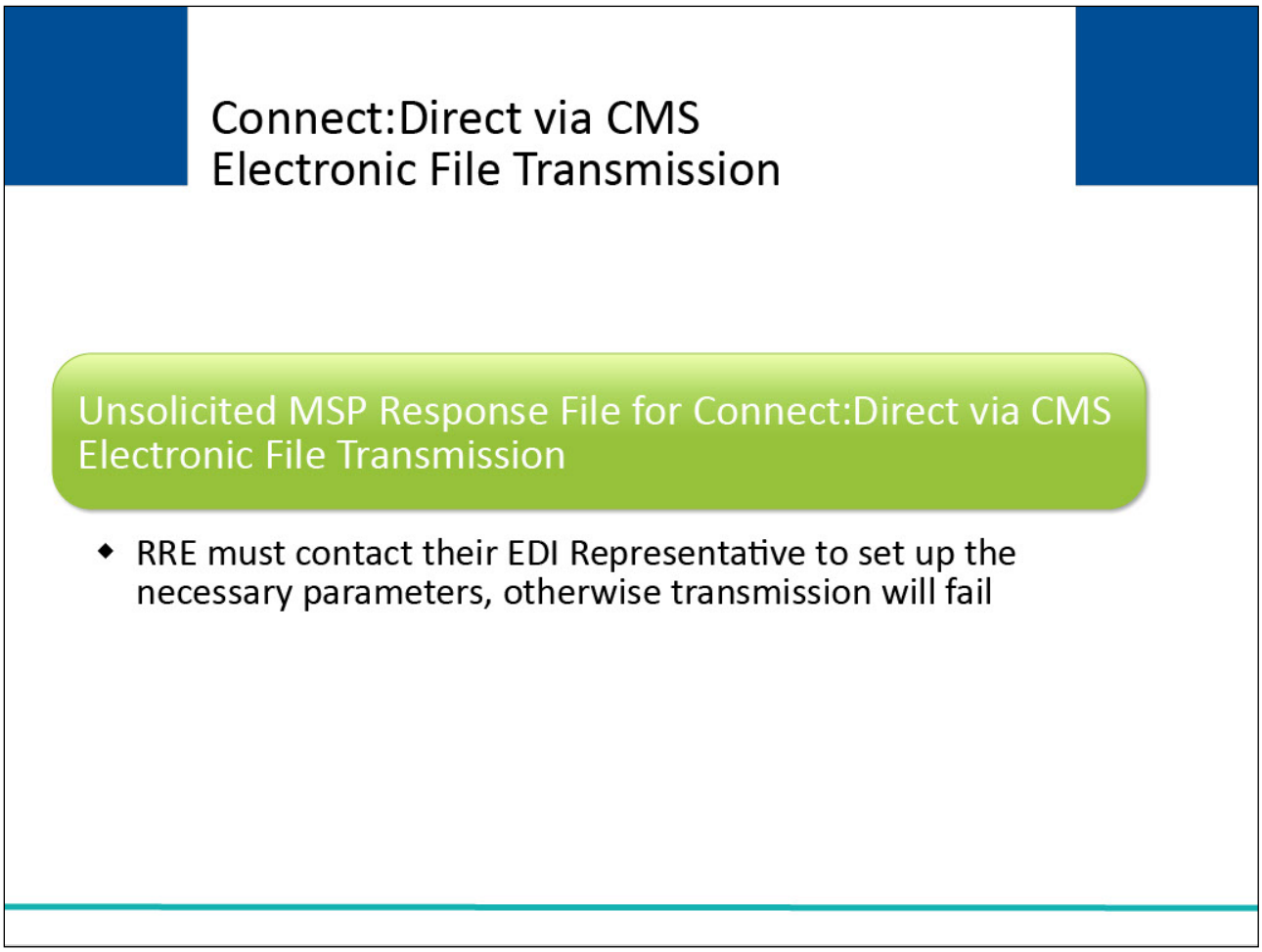
PCOB.BA.MR.GHPUNS.RESP.Dccyymmdd.Thhmmsscc.TXT

'Dccyymmdd' is 'D' followed by a date as century/year/month/day and

'Thhmmsscc' is 'T' followed by a time as hours/minutes/seconds/centiseconds.

The date and timestamp used in the response file names are generated by the BCRC when it creates the response file.

Slide 29 of 32 - Connect:Direct via CMS Electronic File Transmission

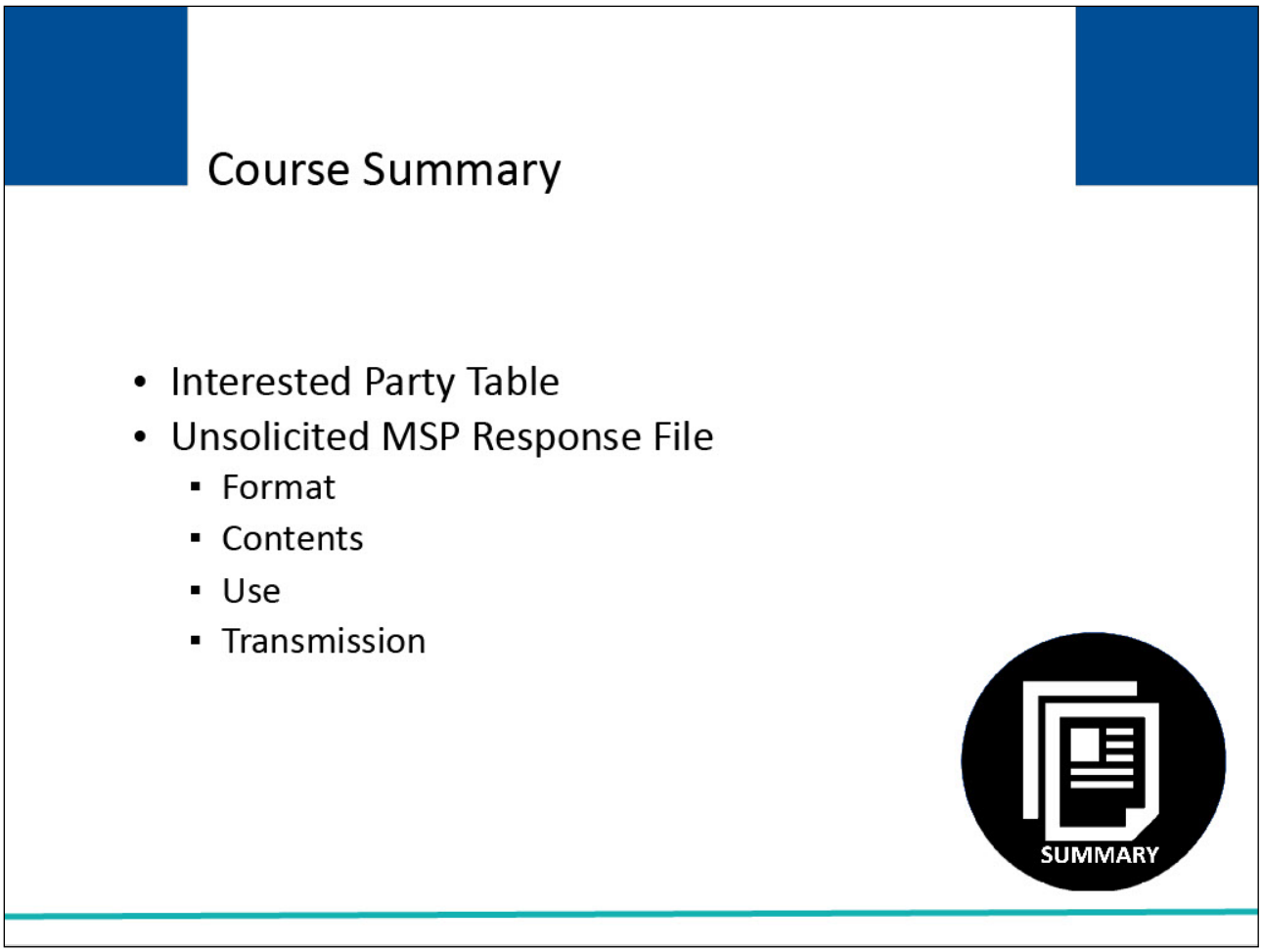


Slide notes

RREs using the Connect:Direct via CMS electronic file transmission method must contact their Electronic Data Interchange (EDI) Representative to set up the necessary parameters including the destination dataset name to be used by the BCRC.

Without this information, transmission of the Unsolicited MSP Response File will fail.

Slide 30 of 32 - Course Summary



Slide notes

This course explained the Interested Party table, reviews the Unsolicited MSP Response File format and contents, provides insight on how to use the Unsolicited MSP Response File, and explains when and how it will be transmitted.

Slide 31 of 32 - Conclusion

Slide notes

You have completed the Unsolicited MSP Response File Processing 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: http://go.cms.gov/mirghp.

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Slide 32 of 32 - GHP Training Survey

Slide notes

If you have any questions or feedback on this material, please go the following URL: https://www.surveymonkey.com/s/GHPTraining.