



Office of Financial Management/Financial Services Group

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November 18, 2010

Implementation of Medicare Secondary Payer Mandatory Reporting Provisions in  
Section 111 of the Medicare, Medicaid, and SCHIP Extension Act of 2007

(See 42 U.S.C. 1395y(b)(7) & (8))

**ALERT: TIN Reference File Address Validation Information for Liability  
Insurance (Including Self-Insurance), No-Fault Insurance, and Workers'  
Compensation Responsible Reporting Entities (RREs)**

This ALERT provides information related to the validation of certain TIN Reference File address fields used when reporting liability insurance (including self-insurance), no-fault insurance, and workers' compensation (collectively referred to as Non-Group Health Plan or NGHP) information mandated by Section 111 of the MMSEA.

Under the current Section 111 reporting process, RREs submit TIN Reference Files along with their Claim Input Files that contain records with the RRE TIN/Office Code and RRE address. The records on the TIN Input File are matched to records with the same RRE TIN/Office Code reported on Claim Input File Detail Records in Fields 72 and 73. If a TIN Reference File record has errors, it is rejected and can result in rejection of all associated records with the same RRE TIN/Office Code on the Claim Input File. Error codes related to the RRE TIN/Office Code address fields are posted to each rejected claim report on Claim Response File records.

Changes are being implemented by CMS to improve this process, including the address validation performed and the processing of both TIN Reference File and associated Claim Input File records. These changes are being implemented in a phased approach. The initial phase will include a revision to the address validation routines used in the Coordination of Benefits Contractor (COBC) system that processes Section 111 files. This initial phase will be implemented on **January 10, 2011 and should have no substantial impact on RREs.** More information on this initial phase is provided below.

The subsequent phase will involve the implementation of more rigorous address validation routines and a new TIN Reference Response File which will provide RREs with specific information regarding errors found on TIN Reference File records and an indication as to whether each TIN Reference File record was accepted or rejected. The estimated implementation date for this subsequent phase is **July 2011**. More information will be provided to RREs at a later date with adequate lead time for RREs to implement changes as necessary in their internal systems.

In the initial phase of this address validation improvement, the COBC will replace certain error codes with compliance flags. However, the edit logic applied to the address fields will remain the same. Claim Input File records will **not be rejected** due to certain address issues found in Fields 6-15 on

associated TIN Reference File records. Instead, if errors are found with address fields on the associated TIN Reference File records, the claim report will be returned on the Claim Response File with specific Compliance Flag Codes related to each TIN address field. For example, if an invalid value such as spaces is supplied in the TIN/Office Code State Field 9 on a TIN Reference File Detail Record, any claim reports associated with the TIN/Office Code on that record, will be returned with a compliance flag value of 07 rather than error code CP17 on the Claim Response File. RREs are required to examine these compliance flags and make the necessary corrections to their TIN Reference File records and submit those corrections in the next quarterly file submission. Please refer to Section 12.4 of the Section 111 NGHP User Guide for more information concerning Compliance Flags.

The following new Compliance Flag Codes will be added to the Claim Response File effective **January 10, 2011:**

<b>NGHP Compliance Flag Codes</b>	
<b>Compliance Code</b>	<b>Description</b>
04	Invalid TIN/Office Code Mailing Address Line 1 on the associated TIN Reference File Detail Record and TIN/Office Code State is not equal to 'FC'. TIN/Office Code Mailing Address Line 1 field is missing or contains characters other than alpha, numeric and special characters A-Z, 0-9, space, &, dash, @, #, /, comma, semicolon, colon, period, quote.
05	Invalid TIN/Office Code Mailing Address Line 2 on the associated TIN Reference File Detail Record and TIN/Office Code State is not equal to 'FC'. If supplied, TIN/Office Code Mailing Address Line 2 must not contain any characters other than alpha, numeric and special characters, A-Z, 0-9, space, &, dash, @, #, /, comma, semicolon, colon, period, quote.
06	Invalid TIN/Office Code City on the associated TIN Reference File Detail Record and TIN/Office Code State is not equal to 'FC'. TIN/Office Code City is missing or contains characters other than alpha, numeric and special characters A-Z, 0-9, space, &, dash, @, #, /, comma, semicolon, colon, period, quote.
07	Invalid TIN/Office Code State on the associated TIN Reference File Detail Record. TIN/Office Code State is missing or contained a value other than a valid US postal state code or 'FC'.
08	Invalid TIN/Office Code Zip on the associated TIN Reference File Detail Record and TIN/Office Code State is not equal to 'FC'. TIN/Office Code Zip must contain 5 numeric digits.
09	Invalid Foreign RRE Address Line 1-4 on the associated TIN Reference File Detail Record. The TIN/Office Code State supplied was 'FC' but the Foreign RRE Address Line 1-4 fields contained all spaces or non-alphanumeric characters; or the TIN/Office Code State supplied was not 'FC' and the Foreign RRE Address Line 1-4 fields were not equal to all spaces.

Additional Information:

- The following Claim Response File Error Codes will no longer be returned: CP14, CP15, CP16, CP17, CP18, CP19, CP20, CP21, CP22, and CP23.
- TIN Reference File Detail Records without a valid value in the TIN Field 3, Office Code/Site ID Field 4 or TIN/Office Code Mailing Name Field 5 will be rejected and continue to result in the corresponding error on associated Claim Response Records.
- These changes do **NOT** affect current editing related to the various Representative, Claimant, and Claimant Representative address fields on the Claim Input File Detail Record and Auxiliary Record, only the RRE address supplied on TIN Reference File Detail Records.
- No changes will be made related to Compliance Flag Codes 01, 02, or 03.
- The NGHP User Guide will be updated to include this information in the next version. In the meantime, this information supersedes the information in Version 3.1 of the guide.
- The effective date of the changes described in this alert is January 10, 2011.