Section 111 Registration Part I Introduction

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Slide notes

Welcome to the Section 111 Registration Part I course.

Note: This module applies to Responsible Reporting Entities (RREs) that will be submitting Section 111 claim information via an electronic file submission, as well as those RREs that will be submitting this information via Direct Data Entry (DDE).

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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 & Medicaid Services (CMS) instructions for the MMSEA Section 111 implementation.

All affected entities are responsible for following the instructions found at the following link: <u>https://go.cms.gov/mirnghp</u>.

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Slide notes

Section 111 Registration Part I reviews registration requirements, purpose, and timeframes. It provides an overview of the five steps of Section 111 registration and account setup, and reviews the details for Step 1 and Step 2.

The final three steps of the process are reviewed in Section 111 Registration Part II.

NOTE: Liability insurance (including self-insurance), no-fault insurance, and workers' compensation are sometimes collectively referred to as "non-group health plan" or "NGHP". The term NGHP will be used in this CBT for ease of reference.

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PAID Act

The Medicare Secondary Payer (MSP) policy is designed to ensure that the Medicare Program does not pay for healthcare expenses for which another entity is legally responsible. To aid settling parties in determining this information, Congress has enacted the Provide Accurate Information Directly Act also known as the PAID Act requiring that CMS provide Non-Group Health Plans with a Medicare beneficiary's Part C and Part D enrollment information for the past 3 years.

This information will be provided both online, in the BCRS application, and COBSW S111/MRA and offline in the NGHP Query Response File. Additionally, CMS has requested that this solution also include the most recent Part A and Part B Entitlement dates.



Slide notes

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This information will be provided both online, in the BCRS application, and COBSW S111/MRA and offline in the NGHP Query Response File. Additionally, CMS has requested that this solution also include the most recent Part A and Part B Entitlement dates.

Note: To support the PAID Act, the Query Response File will be updated to include Contract Number, Contract Name, Plan Number, Coordination of Benefits (COB) Address, and Entitlement Dates for the last three years (up to 12 instances) of Part C and Part D coverage. The updates will also include the most recent Part A and Part B entitlement dates.





In order to comply with the requirements of Section 111 of the MMSEA, RREs are required to provide notification to the Benefits Coordination & Recovery Center (BCRC) of their intent to report data.

Registration by the Responsible Reporting Entity must be completed before testing between the Responsible Reporting Entity, or its agent, and the BCRC can begin or before reporting via DDE may commence.

Each applicable RRE must complete the registration process regardless of whether an agent will be submitting files on that entity's behalf. An agent cannot complete the initial registration; however, the agent can complete the account setup and may also be the Account Manager.

Registration and account setup must be completed on the Section 111 Coordination of Benefits Secure Website (COBSW) at https://www.cob.cms.hhs.gov/Section111.





Registration by RREs using a file submission method must be completed before testing between the RRE (or its agent) and the BCRC can begin. Once the RRE has completed testing, the RRE ID will be set to a production status.

The RRE must then commence production Claim Input File submissions. Claim Input Files are submitted once per quarter for each RRE ID during the assigned file submission timeframe unless the RRE has nothing to report in that quarter.





RREs that will be submitting via DDE must register before reporting may commence. DDE submitters will not perform testing.

DDE submitters must submit claim information via the Section 111 COBSW according to requirements documented in the NGHP User Guide.





Entities that are RREs for purposes of the Section 111 liability insurance (including self-insurance), nofault insurance, or workers' compensation are not required to register if they will have nothing to report.

For example, if an entity is self-insured (as defined by CMS) solely for the deductible portion of a liability insurance policy but always pays any such deductible to its insurer, who then pays the claim, it may not have anything to report.

However, those that do not register initially because they have no expectation of having claims to report at this time, must register in time to allow registration to be completed and a full quarter of file testing, as applicable, it they have future situations where they have a reasonable expectation of having to report.

Slide 9 of 41 - Purpose of Registration



Slide notes

Through the registration process, the BCRC will obtain the information needed to:

validate information provided by the RRE for Section 111;

assign an RRE ID to each RRE;

develop a Section 111 reporting profile for each entity including estimates of the volume and type of data to be exchanged for planning purposes;

set up an RRE for DDE if this data submission method has been selected;

assign a file submission timeframe for Claim Input File submission and establish the necessary file transfer mechanisms to each entity selecting an electronic file submission method;

assign an Electronic Data Interchange (EDI) Representative to each entity to assist with ongoing communication, use of the Section 111 COBSW and data exchange; and

assign Login IDs to individual users associated with each RRE ID account.

Slide 10 of 40 - Registration Timeframes



Slide notes

The registration process will remain available indefinitely for existing and new RREs. You may alter your reporting structure subsequently if needed.

You may request one or more additional RRE IDs in the future if changes in your business operations require changes in your data reporting requirements.

Note: If you have registered for an RRE ID that you later determine you will no longer need, then contact your EDI Representative to have it deactivated.

Slide 11 of 41 - Registration and Account Setup Process



Slide notes

Section 111 registration and account setup is a five-step process:

First, identify an Authorized Representative, Account Manager, and other Section 111 COBSW users;

second, determine reporting structure;

third, register on the Section 111 COBSW;

fourth, setup account on the Section 111 COBSW; and

fifth, return signed RRE profile report.





The first step in the registration and account setup process is to identify an Authorized Representative, Account Manager, and other Section 111 COBSW Users known as Account Designees.

Slide 13 of 41 - Authorized Representative



Slide notes

The person named as the Authorized Representative for the RRE's organization has the legal authority to bind the organization to the terms of MMSEA Section 111 requirements and processing. This is normally a person at the executive level of the organization.

The Authorized Representative has ultimate accountability for the RRE's compliance with Section 111 reporting requirements. The Authorized Representative is an individual that can enter the RRE into a contract and has the authority to commit the RRE to a contract and can sign the contract.

If you need to change your Authorized Representative after completing the New Registration step, you must contact your assigned EDI Representative.

Please refer to the Data Use Agreement in the NGHP User Guide Registration Chapter to make sure the person you name as your Authorized Representative has the authority to sign this agreement.

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Slide notes

The Authorized Representative cannot be an agent of the RRE. The Authorized Representative also cannot be a user of the Section 111 COBSW for any RRE ID.

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Authorized	Representative	
Preliminary Responsibilities	 May complete the initial registration Designate Account Manager Approve account setup Sign profile report and return to the BCF 	RC
Ongoing Responsibilities	 Overall accountability for reporting Receive notifications of non-compliance Approve changes to RRE account or users 	

Slide notes

Section 111 registration and account setup is a five-step process.

First, identify an Authorized Representative, Account Manager, and other Section 111 COBSW users;

second, determine reporting structure;

third, register on the Section 111 COBSW;

fourth, setup account on the Section 111 COBSW; and

fifth, return signed RRE profile report.

The Authorized Representative has the overall responsibility and accountability for Section 111 reporting and will be the recipient of BCRC notifications related to non-compliance with Section 111 reporting requirements.

The Authorized Representative will approve any subsequent changes to the RRE's account.

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Slide notes

The person named as the Account Manager controls the administration of an RRE's account and manages the overall reporting process.

The Account Manager may choose to manage the entire account and data exchange or may invite other company employees or data processing agents to assist him/her.

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Slide notes

The Authorized Representative will approve any subsequent changes to the RRE's account.

This can occur when an RRE has multiple RRE IDs under which they will report separate Claim Input Files or when the RRE chooses to name a recovery agent as its Account Manager.

Your Account Manager must invite and identify Account Designees who will need access to multiple accounts by RRE ID.

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Slide notes

The Account Manager cannot be an Authorized Representative for any RRE ID. For example, if you are an Account Manager for RRE 3, you cannot be the Authorized Representative for RRE 7.

The Account Manager cannot be an Account Designee for the same RRE ID.

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Slide notes

The Account Manager must:

register on the Section 111 COBSW,

obtain a Login ID,

complete the account setup tasks, and

must personally agree to the terms of the User Agreement.

The Account Manager can:

invite other users to register on the Section 111 COBSW;

function as Account Designees and can remove an Account Designee's association to an RRE ID account;

manage the RRE's profile including selection of a data submission method;

change account contact information (e.g., address, phone, etc.);

use his/her Login ID and password to transmit files if the RRE has specified Secure File Transfer Protocol (SFTP) as the file transfer method or upload and download files to the Section 111 COBSW if the RRE has specified Hypertext Transfer Protocol over Secure Socket Layer (HTTPS) as the file transfer method;

submit and view claim information if the RRE has specified the DDE option; and

review file transmission history, file processing statuses and file statistics by RRE ID.

The Account Manager can also change his/her personal information.

Slide 20 of 41 - Account Designees

Account Designees

- Assist the Account Manager with reporting
- No limit to the number associated with RRE ID
- May be associated with multiple RRE IDs
 - If invited by Account Manager



Slide notes

At the RRE's discretion, the Account Manager may designate other individuals, known as Account Designees, to assist the Account Manager with the reporting process. Account Designees may be RRE employees or agents.

There is no limit to the number of Account Designees associated with one RRE ID. The Account Designees may be associated with multiple RRE IDs, but only by an Account Manager invitation for each RRE ID.

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Slide notes

Account Designees cannot be an Authorized Representative for any RRE ID or an Account Manager for the same RRE ID.

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Slide notes

The Account Designees must register on the Section 111 COBSW and obtain a Login ID.

The Account Designee:

can use his/her Login ID and password to transmit files if the RRE has specified SFTP as the file transfer method;

upload and download files to the Section 111 COBSW if the RRE has specified HTTPS as the file transfer method;

submit and view claim information if the RRE is using the DDE option; and

review file transmission history, file processing statuses, and file statistics by RRE ID.

The Account Designees may also change their personal information.

Following are some examples of how an RRE may choose to assign Section 111 COBSW responsibilities.

Slide 23 of 41 - Section 111 COBSW Roles - Examples

Slide notes

CMS allows the submitter multiple ways to submit data. It is up to the RRE to choose how they want to split the roles.

In this first example, Insurer A has determined that they want one RRE ID. They have assigned an Authorized Representative and an Account Manager but have decided not to use Account Designees.

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Slide notes

Insurer B has determined that they want one RRE ID. They have assigned an Authorized Representative and an Account Manager as well as an Account Designee to assist the Account Manager with the reporting process.

Insurer C has determined that they want one RRE ID. They have assigned an Authorized Representative, an Account Manager, and two Account Designees. One of the Account Designees is Insurer C's agent who will be transferring files for Insurer C.

Slide 26 of 41 - Section 111 COBSW Roles - Examples

Slide notes

Insurer D has two claims systems and determines that they want to use two RRE IDs. Insurer D decides to use the same Authorized Representative and Account Manager for each RRE ID. Insurer D decides not to use any Account Designees.

Insurer E has two claims systems and determines that they want to use two RRE IDs. However, they have determined that they will assign a separate Authorized Representative and Account Manager for each RRE ID. Insurer E decides not to use any Account Designees.

The second step in the registration and account setup process is to determine the reporting structure. Before beginning the registration process, an RRE must determine how it will transmit its Section 111 claim information to the BCRC and how many RRE IDs are needed.

Most DDE submitters will only need one RRE ID, since multiple users can have access to the same RRE ID account.

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Slide notes

Careful consideration must be given to the number of RRE IDs requested. The RRE ID is the unique code assigned by the BCRC to be used by file submitters when submitting files and DDE submitters when submitting claim information on the Section 111 COBSW.

Each RRE may have multiple RRE IDs if they will be using multiple accounts to submit claim information, or they may choose to use one RRE ID.

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Slide notes

File submitters can only submit one Claim Input File on a quarterly basis for each RRE ID.

Due to corporate organization, claim system structures, data processing systems, data centers, and agents that may be used for data submission, an RRE may want to submit more than one Claim Input File to the BCRC on a quarterly basis and therefore will need more than one RRE ID in order to do so.

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Slide notes

If an RRE wants to use one agent to submit workers' compensation claim information and another agent to submit liability and no-fault claim information, the RRE must register on the Section 111 COBSW twice to obtain two RRE IDs that will be used by each agent respectively.

Agents reporting for multiple RRE IDs that are submitting files, must test and submit files by RRE ID. However, each individual Account Designee will only need one Login ID and can access multiple RRE ID accounts after being invited by the respective Account Manager(s).

Slide 32 of 41 - RRE IDs - Example

Slide notes

If a file submitter has two or more subsidiary companies that process workers' compensation claims using different claims systems and it will not combine the claim files for Section 111 reporting, the RRE must register for each claim file submission to obtain separate RRE IDs in order to submit multiple claim files in one quarter.

Slide 33 of 41 - RRE IDs - Example

Slide notes

Alternatively, you may use one agent to report Claim Input Files and another agent to report Query Input Files using the same RRE ID. In addition, the RRE may choose to report one file type (claim or query) and have an agent report the other under the same RRE ID.

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Slide notes

File submitters may not set up a separate RRE ID for submission of the Query Input File only. RREs must submit Claim Input Files or provide claim information using the DDE option for every RRE ID established.

Note: File submitters do not need to submit a file for a particular quarter if they have nothing to report according to the requirements specified in the NGHP User Guide.

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- For each RRE ID
 - Must complete New Registration and Account Setup
- Section 111 COBSW functions
 - Performed by RRE ID

Slide notes

You must complete the New Registration and Account Setup steps for each RRE ID you want, so careful consideration must be given to the number of RRE IDs you request.

Once logged into the Section 111 COBSW, most functions are performed by RRE ID. Your Account Manager must invite and identify Account Designees that will need access to multiple accounts by RRE ID. File transmission and viewing the results of file processing is done by RRE ID.

So, to ease the management of reporting, account maintenance, and user access, we suggest that fewer RRE IDs are better than many.

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Slide notes

You are not required to register and obtain an RRE ID by line of business, but file submitters must do so if separate input files will be submitted for each. For example, under the same RRE ID you may submit one Claim Input File with a mix of liability, no-fault, and workers' compensation claims.

Or, using separate RRE IDs, you may submit separate files for each or any combination by line of business that suits your reporting structure.

If you register for multiple RRE IDs, you can use the same Tax Identification Number (TIN) for each or different TINs for each. No matching is done between the TINs supplied at registration and the TINs supplied on your claim input files/claim submission.

The RRE TIN supplied during registration is used by the BCRC to authenticate the RRE prior to establishing the reporting account.

The RRE TINs supplied on Claim Input Files/DDE submissions are used to associate the claim report to contact information for the RRE that is used by Medicare for coordination of benefits and recovery efforts as needed.

If you register for multiple RRE IDs, you can name the same Authorized Representative for each or a different Authorized Representative for each. You can also name the same Account Manager for each or a different Account Manager for each; and you can invite the same Account Designee to be associated with multiple RRE IDs or invite different Account Designees to different RRE IDs.

Slide 39 of 41 - Course Summary

Slide notes

Section 111 Registration Part I reviewed registration requirements, purpose, and timeframes. It provided an overview of the five steps of Section 111 registration and account setup, and reviewed the details for Step 1 and Step 2.

The final three steps of the process are reviewed in Section 111 Registration Part II.

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Slide notes

You have completed the NGHP Section 111 Registration Part I course. Information in this presentation can be referenced by the Liability Insurance (Including Self-Insurance), No-Fault Insurance, and Workers' Compensation User Guide's table of contents and any subsequent alerts.

These documents are available for download at the following link: <u>http://go.cms.gov/mirnghp</u>.

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Slide notes

If you have questions or feedback on this material, please go to the following URL: <u>http://www.surveymonkey.com/s/NGHPtraining</u>.