



# MMSEA Section 111 MSP Mandatory Reporting

# Unsolicited MSP Response File GHP USER GUIDE Addendum

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## MMSEA Section 111 Unsolicited MSP Response File GHP User Guide Addendum

**Revision History** 

Date	Version	Reason for Change
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### MMSEA Section 111 Unsolicited MSP Response File GHP User Guide Addendum Table of Contents

1	About This User Guide Addendum	4
2	Overview	5
3	Benefits	6
4	Description	7
4.1	RRE Enrollment	7
4.2	Interested Party Table	7
4.3	Monthly Unsolicited MSP Response File Generation	8
4.4	Using the Unsolicited MSP Response File	.10
5	Education and Technical Assistance	.12
Арр	endix A – Unsolicited MSP Response File Layout	.13
App	endix B – Modifier Type and Change Reason Codes	.19

#### 1 About This User Guide Addendum

Section 111 of the Medicare, Medicaid, and SCHIP Extension Act of 2007 (MMSEA) requires mandatory reporting by Group Health Plan (GHP) responsible reporting entities (RREs) related to certain GHP coverage provided to Medicare beneficiaries.

As part of that process, beginning in September 2011, the Centers for Medicare and Medicaid Services (CMS) will offer an optional file transmission known as the Unsolicited MSP Response File. This guide provides information and requirements related to the Unsolicited MSP Response File and is an addendum to the MMSEA Section 111 Medicare Secondary Payer (MSP) Mandatory Reporting GHP User Guide which can be found on the GHP tab of www.cms.gov/MandatoryInsRep. We assume that the reader of this addendum has read the Section 111 GHP User Guide.

This guide is for use by any Section 111 GHP RRE that is considering or has signed up to receive the optional Unsolicited MSP Response File notifications. It provides an overview and description of the process. The Unsolicited MSP Response File layout is documented in Appendix A.

RREs are advised to refer to the GHP User Guide for complete information regarding Section 111 reporting and check the CMS Section 111 Web page (www.cms.gov/MandatoryInsRep) often for the latest versions of user guides and other important information.

#### 2 Overview

Under Section 111 of the MMSEA (P.L.110-173), GHP RREs are mandated to report certain GHP coverage provided to a Medicare beneficiary. RREs report coverage information via quarterly MSP Input File submissions to CMS' Coordination of Benefits Contractor (the COBC). The information is reviewed, processed, and if appropriate, a Medicare Secondary Payer (MSP) occurrence is created which reflects GHP coverage primary to Medicare for a particular Medicare beneficiary. MSP occurrences are posted to the Medicare Common Working File (CWF) and used in Medicare claims payment processing. MSP information is also passed to CMS' MSP Recovery Contractor (the MSPRC) for use in recovering money owed to Medicare for claims paid erroneously by Medicare.

In addition to Section 111 reporting, the COBC employs a number of other methodologies to identify and maintain MSP occurrences for Medicare beneficiaries. These methodologies have differing sources, including telephone calls to the COBC Call Center from employers, insurers, Medicare beneficiaries and attorneys. Information that could add or change an MSP occurrence may also be received from Medicare claim processing contractors, the MSPRC, responses to the IRS/SSA/CMS Data Match process, Initial Enrollment Questionnaires (IEQs), and employer Voluntary Data Sharing Agreements (VDSAs). Each of the methodologies may result in the generation of a new MSP occurrence or an update to an existing MSP occurrence on CWF, depending on the MSP hierarchy rules utilized by the COBC. See the Section 111 GHP User Guide for a complete explanation of the MSP hierarchy rules. 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 COBC Call Center, a COBC Analyst, the MSPRC, the Beneficiary Call Center (1-800-Medicare), or a Medicare Advantage (MA) Plan.

Section 111 GHP RREs can receive notification from the COBC of changes to their previously submitted MSP occurrences by other sources through voluntary participation in the Unsolicited MSP Response File process. Once an RRE elects to receive the Unsolicited MSP Response File on the Section 111 COB Secure Web site (COBSW), the COBC will track the MSP occurrences for which the RRE has submitted MSP Input File records that were accepted with a '01' disposition code. Whenever one of these MSP occurrences is changed by a source other than the participating RRE, a record is written to the RRE's Unsolicited MSP Response File. The COBC then transmits the Unsolicited MSP Response File to the RRE once per month. The Unsolicited MSP Response File contains information for the RRE to identify the MSP occurrence and information regarding the modifications that were subsequently applied. The RRE may then use this information to investigate the coverage information further, work with beneficiaries and employers to rectify discrepancies, and update their internal systems as deemed appropriate. This will help the RRE maintain the most up to date information, improve communication between all interested parties, and improve the RRE's compliance with Section 111 reporting requirements.

The Unsolicited MSP Response File functionality will be available to all Section 111 GHP RREs as of September 6, 2011. This functionality is **not** available to Section 111 Workers' Compensation, No-Fault Insurance, or Liability Insurance (including Self-Insurance) RREs, which are also known as non-GHP, or NGHP RREs.

#### 3 Benefits

The Unsolicited MSP Response File will:

- Allow RREs to receive prompt notification of changes made about the MSP information of Medicare beneficiaries covered by the RRE's GHP.
- Allow RREs a vehicle to confirm the accuracy of conflicting MSP information.
- Improve the overall accuracy of MSP information used and stored by Medicare, and available to RREs and employers.
- Provide the RRE information that will allow for more precise confirmation or investigation of GHP coverage and its relevance to MSP determinations.
- Provide information to RREs that may be useful in their business relationships with their employer/other plan sponsor customers. Example: An Unsolicited MSP Response may notify an RRE that the COBC has just changed the coverage status of a subscriber.
- Streamline the process to override the SPH0 hierarchy error.
- Provide the RRE with information to improve the accuracy of data reporting and its compliance with the Section 111 reporting requirements.

#### 4 Description

This section provides information on how to elect to receive the Unsolicited MSP Response File and how the file will be created and used.

#### 4.1 RRE Enrollment

RRE's electing to receive Unsolicited MSP Response Files must sign up for this program on the Section 111 COBSW at www.section111.cms.hhs.gov. Only the Account Manager assigned to the RRE ID has the ability to enroll the RRE in the Unsolicited MSP Response File program.

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 "Unsolicited Alerts".

If an RRE has not yet registered for Section 111 reporting, the Account Manager will select the option to receive the Unsolicited MSP Response File while providing RRE information during the Account Setup step of the registration process on the COBSW.

To discontinue receiving the Unsolicited MSP Response File, the Account Manager must again login to the COBSW and change this option using the "RRE Information" action.

Please see the Section 111 COBSW User Guide for more detailed information. Your EDI Representative can provide assistance as needed.

**Note:** RREs using the Connect:Direct file transmission method must contact their EDI Representative to set up the necessary parameters such as the destination dataset name to be used by the COBC. Without this information, transmission of the Unsolicited MSP Response File will fail.

#### 4.2 Interested Party Table

Once an RRE has elected to receive the Unsolicited MSP Response File, the COBC will create entries in what is referred to as the "Interested Party Table" and maintain these entries going forward. The Interested Party Table will contain information related to the MSP occurrences for which a participating RRE might be interested in receiving notifications.

The initial Interested Party Table entries will be created by the COBC on the first Sunday after the RRE's Account Manager has enrolled the RRE in the Unsolicited MSP Response File program on the COBSW. The COBC will search through the last twelve months of MSP Response Files transmitted back to the RRE. An entry will be created for each MSP occurrence associated to an add or update transaction submitted by the RRE that received

a '01' disposition code. The COBC will then continue to maintain entries in this table for the RRE. Whenever the RRE submits an add or update transaction that receives a '01' disposition code, the Interested Party Table will be updated accordingly. If the RRE submits a delete transaction that receives a '01' disposition code, the corresponding Interested Party Table entry for the associated MSP occurrence will be removed. It is assumed that if the RRE submits a delete, it is no longer interested in the associated MSP occurrence and the COBC will not produce any subsequent Unsolicited MSP Response Records for it.

The Interested Party Table contains the same key matching fields as an MSP occurrence (HICN, MSP Type, MSP Effective Date, Relationship, and Insurance Coverage Type) with the addition of RRE ID. It will also be maintained with the last Document Control Number (DCN) the RRE submitted on its MSP Input File Detail Record so that can be returned on Unsolicited MSP Response File Detail Records.

#### 4.3 Monthly Unsolicited MSP Response File Generation

Unsolicited MSP Response Files will contain information concerning MSP occurrences in the participating RRE's Interested Party Table entries changed by entities other than the RRE during the course of the last month. Each Unsolicited MSP Response File Detail Record will contain the key matching fields for the MSP occurrence, the last DCN submitted by the RRE, current values for other fields associated with the MSP occurrence (including changed information), and the most recent Medicare beneficiary entitlement and enrollment information. The most current information on the MSP occurrence will be returned. If an MSP occurrence was updated multiple times during the monthly timeframe, only information from the last change made will be sent.

Detail Records will also contain a Modifier Type Code, Modifier Name and Change Reason Code that will provide information related to what entity requested the change to the MSP occurrence and the reason for the change, if known. The Modifier Type Code will always contain a value on the Unsolicited MSP Response Detail Record. However, in some cases, the Change Reason Code may be returned as blank or with a value of 'UK' when the reason for the change could not be determined. With the initial implementation of this process, Change Reason Code values will only be returned for updates made manually by a COBC CSR or Analyst.

The Unsolicited MSP Response File layout is documented in Appendix A. Values for the Modifier Type Code, Modifier Name and Change Reason Code are documented in Appendix B.

Unsolicited MSP Response Files are created for participating Section 111 GHP RREs based on the following requirements:

- Unsolicited MSP Response Files will be created and transmitted to participating RREs on a monthly basis on the second Sunday of each month.
- RREs must have signed up on the COBSW at least 9 days in advance of the file creation date in order to receive an Unsolicited MSP Response File for that month. If an RRE does not enroll in the process at least 9 days prior to the second Sunday of the month, the RRE's file transmission will commence the following month.

- Files will be transmitted to the RRE using the same file transmission method used for the RRE's MSP Response File.
  - For RREs using the SFTP file transmission method, Unsolicited MSP Response Files will be placed in the same mailbox that the MSP Response File is delivered (RREID/response/prod/msp).
  - For RREs manually downloading response files from the Section 111 COBSW using the HTTPS file transmission method, the Unsolicited MSP Response Files will be added to the RRE's COBSW File Listing page.
  - The COBC will name Unsolicited MSP Response Files according to the following convention for SFTP and HTTPS submitters:
  - PCOB.BA.MR.GHPUNS.RESP.Dccyymmdd.Thhmmsscc.TXT
  - Where '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.
  - For RREs using the Connect:Direct file transmission method, the RRE will need to contact their COBC EDI Representative to submit the Connect:Direct file transmission parameters, including the destination dataset name, for the Unsolicited MSP Response File transmission. Refer to the GHP User Guide for more information on the Connect:Direct file transmission method.
- The Unsolicited MSP Response File will contain records that reflect changes made to MSP occurrences noted in the RRE's Interested Party Table entries when these changes are were made by an entity other than the RRE.
- If more than one change is made by another entity to a particular MSP occurrence during a month, only one Unsolicited MSP Response Detail Record will be created reflecting the most recent change applied.
- If no Unsolicited MSP Response Records are generated during the course of a month for a participating RRE, an "empty" Unsolicited MSP Response File will be generated. This file will contain a Header Record, no Detail Records, and a Trailer Record with a value of all zeroes in the File Record Count (Field 5).
- Unsolicited MSP Response Files will be limited to changes made to MSP occurrences reflecting hospital and medical coverage. Changes applied exclusively to prescription drug coverage MSP occurrences will not trigger Unsolicited MSP Response Records.
- Changes to a Medicare beneficiary's Medicare entitlement and/or Medicare enrollment information will not trigger Unsolicited MSP Response Records.
- If an RRE elects to discontinue participation during the course of a month, no Unsolicited MSP Response File will be generated subsequent to the date the RRE opted out on the Section 111 COBSW. In other words, no partial files will be created and transmitted after the RRE has opted out.

- No Unsolicited MSP Response Files will be created in a test environment.
- Unsolicited MSP Response File Records will be formatted as documented in Appendix A.

#### 4.4 Using the Unsolicited MSP Response File

The Unsolicited MSP Response process provides an RRE notification of changes made by another entity to MSP information that may conflict with information submitted by the RRE on its Section 111 MSP Input File. Although RREs are not required to develop processing to react to the Unsolicited MSP Response File, RREs should use the information it provides to investigate the coverage information further, work with beneficiaries and employers to rectify discrepancies, and update their internal systems as deemed appropriate.

If the RRE confirms that a change 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 must take steps to correct the error on their next MSP Input File, or follow up with the COBC Call Center as appropriate.

#### Override Code Usage Based on Unsolicited MSP Response Files

CMS and the COBC implemented MSP hierarchy rules in April 2011 that govern updates and deletes applied to MSP occurrences. Please review the MSP Hierarchy Rules 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.

RREs not participating in the Unsolicited MSP Response program cannot use the Override Code until they first receive an SPH0 error (i.e., attempt to update/delete an MSP occurrence last updated by a higher ranking source) on an MSP Input File Detail Record. As a result, these RREs would have to potentially submit two quarterly MSP Input Files (taking approximately six months to apply their change) if their first attempt to submit an update or delete rejects with an SPH0 error. The first submission would be when they attempted to update/delete an MSP occurrence. The second attempt would be to submit the record with the Override Code in its next quarterly MSP Input File if the record previously rejected with the SPH0 error.

By opting to use the Unsolicited MSP Response File, an RRE can streamline this hierarchy override process and apply the necessary change in one quarterly MSP Input File submission. After receipt of an Unsolicited MSP Response notification, an RRE may submit the Override Code on a MSP Input File Detail Record without first getting the SPH0 error.

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

#### Example:

- An RRE submitted an MSP Input File add record for GHP coverage provided to a Medicare beneficiary, John Doe. The record was accepted by the COBC and the RRE received a '01' disposition code on its response file indicating that an MSP occurrence was created.
- Subsequently, John Doe called the COBC Call Center, stated that he did not have the GHP coverage reflected in the MSP occurrence, that Medicare should be primary, and requested that it be deleted. A COBC CSR manually deleted the MSP occurrence applying the Modifier Type Code of 'CBN'. The COBC then generated and returned a notification for this deletion on the RRE's next Unsolicited MSP Response File.
- The RRE researched the situation and in talking with the beneficiary John Doe, confirmed that this deletion was incorrect.
- Since the change (deletion) was made by a COBC 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 override without getting the SPH0 error. In its next quarterly MSP Input File, the RRE submitted an add record for the GHP coverage with 'HB' in the Override Code. The COBC accepted the record, added the MSP occurrence back, and returned a '01' disposition code to the RRE on its MSP Response File. Note that the COBC logged these changes in its audit trail so this information can be used for reference purposes related to subsequent change requests.

#### 5 Education and Technical Assistance

CMS has made available a curriculum of computer-based training (CBT) courses for Section 111 GHP RREs and agents. These courses provide in-depth training on Section 111 reporting requirements, file transmission, file formats, file processing, the Section 111 COBSW, and general MSP topics. Courses covering the Unsolicited MSP Response File program are available under the GHP curriculum.

To sign up for the CBTs, go to www.cms.gov/MandatoryInsRep. On the left side of the page, click on the link for MMSEA 111 Computer Based Training (CBT) and follow the instructions on that page. You will receive an e-mail invitation to the CBTs shortly after you provide enrollment information. These courses are offered to Section 111 RREs free of charge.

Please contact your COBC EDI Representative for technical assistance related to the Unsolicited MSP Response File program. If you have not yet registered as an RRE for Section 111 and need assistance, please call the COBC EDI Department number at 646-458-6740.

#### Appendix A – Unsolicited MSP Response File Layout

Refer to the Section 111 GHP User Guide for more information on general file and data formatting standards.

Sectio	Section 111 GHP Unsolicited MSP Response File Header Record – 600 bytes							
Field	Name	Size	Starting Pos.	Ending Pos.	Data Type	Description		
1	Header Type Code	4	1 1	4	Alphanumeric	Contains a value of 'USOH'.		
2	RRE ID	9	5	13	Numeric	Section 111 RRE ID.		
3	File Type	4	14	17	Alphanumeric	Contains a value of 'USOL'.		
4	File Date	8	18	25	Numeric Date	Date file created by COBC in CCYYMMDD format.		
5	Filler	575	26	600	Alphanumeric	Not Used. Filled with spaces.		

	on 111 GHP Un				ile Detail Reco	
Field	Name	Size	Starting Pos.	Ending Pos.	Data Type	Description
1	Transaction Type	4	1	4	Alphanumeric	'USOL'
2	HIC Number (HICN)	12	5	16	Alphanumeric	Beneficiary Health Insurance Claim Number.
3	Beneficiary Surname	6	17	22	Text	First six characters of the beneficiary's last name.
4	Beneficiary First Initial	1	23	23	Text	First letter of the beneficiary's first name.
5	Beneficiary Date of Birth	8	24	31	Numeric Date	Beneficiary DOB in the format of CCYYMMDD.
6	Bene Sex Code	1	32	32	Alphanumeric	Beneficiary Gender Code
7	Interested Party DCN	15	33	47	Text	Most recent Document Control Number successfully submitted by the interested party RRE on its MSP Input File. Use this field to assist in matching the Unsolicited MSP Response Detail Record to your previously submitted coverage records.
8	Filler	2	48	49	Alphanumeric	Not Used. Filled with spaces.
9	Last Transaction Type	1	50	50	Alphanumeric	Last action performed on the MSP occurrence by the COBC based on information

Sectio	on 111 GHP Un	solicite	ed MSP Re	sponse F	ile Detail Reco	rd – 600 bytes
Field	Name	Size	Starting Pos.	Ending Pos.	Data Type	Description
						from the entity identified in the Modifier Type Code and Modifier Name (Fields 33 and 34). Values: '0' = Update '1' = Delete
10	Entitlement Reason	1	51	51	Alphanumeric	Reason for beneficiary's Medicare Entitlement: 'A' = Aged 'B' = ESRD 'G' = Disabled
11	Coverage Type	1	52	52	Alphanumeric	Type of insurance coverage reflected on the MSP occurrence. Values: 'J' = Hospital Only 'K' = Medical Only 'A' = Hospital and Medical 'R' = Health Reimbursement Arrangement (HRA)
12	Insurers Name	32	53	84	Text	Name of the most current insurer/TPA Medicare has associated with the MSP occurrence.
13	Insurer's Address 1	32	85	116	Text	Address Line 1for the most current insurer/TPA Medicare has associated with the MSP occurrence.
14	Insurer's Address 2	32	117	148	Text	Address Line 2 for the most current insurer/TPA Medicare has associated with the MSP occurrence.
15	Insurer's City	15	149	163	Text	City for the most current insurer/TPA Medicare has associated with the MSP occurrence.
16	Insurer's State	2	164	165	Alpha	State for the most current insurer/TPA Medicare has associated with the MSP occurrence.
17	Insurer's Zip Code	9	166	174	Alphanumeric	Zip Code for the most current insurer/TPA Medicare has associated

Sectio	on 111 GHP Un	solicite	ed M <u>SP Re</u>	spo <u>nse</u> F	ile Detail Reco	rd – 600 bytes
Field	Name	Size	Starting Pos.	Ending Pos.	Data Type	Description
						with the MSP occurrence.
18	Filler	9	175	183	Alphanumeric	Not Used. Filled with spaces.
19	MSP Effective Date	8	184	191	Numeric Date	Effective date of the MSP occurrence posted on the Medicare CWF.
20	MSP Termination Date	8	192	199	Numeric Date	End date of the MSP occurrence posted on the Medicare CWF. All zeros if open-ended.
21	Relationship Code	2	200	201	Alphanumeric	Covered Individual's Relationship to Active Employee: '01' = Covered Individual is Active Employee '02' = Spouse or Common Law Spouse '03' = Child '20' = Domestic Partner '04' = Other Family Member
22	Policy Holder's First Name	9	202	210	Text	Active Employee's/Subscriber's First Name Medicare has associated with the MSP occurrence.
23	Policy Holder's Last Name	16	211	226	Text	Active Employee's/Subscriber's Last Name Medicare has associated with the MSP occurrence.
24	Policy Holder's SSN	12	227	238	Alphanumeric	Subscriber/Employee SSN Medicare has associated with the MSP occurrence. May contain all spaces if none was supplied by an RRE or other entity.
25	Employer's Name	32	239	270	Text	Name of the most current employer or other plan sponsor Medicare has associated with the MSP occurrence.
26	Employer's Address 1	32	271	302	Text	Address Line 1 of the most current employer or other

Sectio	on 111 GHP Un	solicite	ed MSP Re	sponse F	ile Detail Reco	rd – 600 bytes
Field	Name	Size	Starting Pos.	Ending Pos.	Data Type	Description
						plan sponsor Medicare has associated with the MSP occurrence.
27	Employer's Address 2	32	303	334	Text	Address Line 2 of the most current employer or other plan sponsor Medicare has associated with the MSP occurrence.
28	Employer's City	15	335	349	Text	City of the most current employer or other plan sponsor Medicare has associated with the MSP occurrence.
29	Employer's State	2	350	351	Alpha	State Code of the most current employer or other plan sponsor Medicare has associated with the MSP occurrence.
30	Employer's Zip Code	9	352	360	Alphanumeric	Zip Code of the most current employer or other plan sponsor Medicare has associated with the MSP occurrence.
31	Group Policy Number	20	361	380	Text	Group number Medicare has associated with the MSP occurrence.
32	Individual Policy number	17	381	397	Text	Individual policy number Medicare has associated with the MSP occurrence.
33	Modifier Type Code	3	398	400	Alphanumeric	Code indentifying the type of entity that last changed the MSP occurrence.
34	Modifier Name	32	401	432	Text	Modifier Name/Description of the last entity that changed the MSP occurrence.
35	Change Reason Code	2	433	434	Alphanumeric	Code indentifying the reason for the last change to the MSP occurrence (if known).
36	Last Update Applied Date	8	435	442	Numeric Date	Date the COBC last changed the MSP occurrence in CCYYMMDD format.
37	Filler	51	443	493	Alphanumeric	Not Used. Filled with spaces.
38	Current Medicare Part A Entitlement Date	8	494	501	Numeric Date	Effective Date of Medicare Part A Coverage (CCYYMMDD).

Field	Name	Size	Starting Pos.	Ending Pos.	Data Type	Description
39	Current Medicare Part A Termination Date	8	502	509	Numeric Date	Termination Date of Medicare Part A Coverage (CCYYMMDD). * All zeros if open-ended.
40	Current Medicare Part B Entitlement Date	8	510	517	Numeric Date	Effective Date of Medicare Part B Coverage (CCYYMMDD).
41	Current Medicare Part B Termination Date	8	518	525	Numeric Date	Termination Date of Medicare Part B Coverage (CCYYMMDD). * All zeros if open-ended.
42	Current Medicare Part C Plan Number	5	526	530	Alphanumeric	Contractor Number of the current Medicare Part C Plan in which the beneficiary is enrolled.
43	Current Medicare Part C Entitlement Date	8	531	538	Numeric Date	Effective Date of coverage provided by current Medicare Part C Plan (CCYYMMDD).
44	Current Medicare Part C Termination Date	8	539	546	Numeric Date	Termination Date of coverage provided by current Medicare Part C Plan (CCYYMMDD).
						* All zeros if open-ended (i.e., if coverage is not terminated).
45	Filler	54	547	600	Alphanumeric	Not Used. Filled with spaces.

	Section 111 GHP Unsolicited MSP Response File Trailer Record – 600 bytes							
Field	Name	Siz e	Starting Pos.	Ending Pos.		Description		
1	Trailer Type Code	4	1	4	Alphanumeric	Contains a value of 'USOT'.		
2	RRE ID	9	5	13	Numeric	Section 111 RRE ID.		
3	File Type	4	14	17	Alphanumeric	Contains a value of 'USOL'.		

		Sectior bytes	111 GHP	Unsolicite	d MSP Response File T	railer Record – 600
Field	Name	Siz e	Starting Pos.	Ending Pos.		Description
4	File Date	8	18	25	Numeric Date	Date file created by COBC in CCYYMMDD format.
5	File Record Count	9	26	34	Numeric	Number of response detail records contained in this file. Does not include the header and trailer records in the count.
						Will contain a value of all zeroes if there were no Unsolicited MSP Response records to transmit to the RRE for the month.
6	Filler	566	35	600	Alphanumeric	Not Used. Filled with spaces.

Modifier Type Code	Value in Modifier Name	Description
CBN	Beneficiary Name	Change made by a COBC CSR/Analyst due to information received from a Medicare beneficiary.
CEM	Employer/Other Plan Sponsor Name	Change made by a COBC CSR/Analyst due to information received from an employer or other plan sponsor.
CIN	Insurer Name	Change made by a COBC CSR/Analyst due to information received outside the Section 111 reporting process from an insurer or TPA.
ECR	Medicare contractor number 11141 = MSPRC 11143 = Medicare Advantage (MA) Plan/Part C Plan	Change was made due to information received from another Medicare contractor. If the change was made due to a request made by the MSPRC, the Modifier Name will contain the value '11141'. If the change was made due to a request made by a MA (Part C) Plan, the Modifier Name will contain the value '11143'.
RRE	Name of the Section 111 Responsible Reporting Entity	Systematic change applied due to a transaction submitted by a Section 111 RRE other than the participating RRE.
DSA*	Name of the Voluntary Data Sharing Agreement (VDSA) entity	Systematic change applied by the COBC employer/other plan sponsor VDSA process.*
IEQ*	Medicare beneficiary name	Systematic change applied by the COBC Beneficiary Initial Enrollment Questionnaire (IEQ) response process.*
DTM*	Name of employer submitting the Data Match Questionnaire Response	Systematic change applied by the COBC employer IRS/SSA/CMS Data Match Questionnaire response process.*
COB	COB Contractor	Other change made by the COBC.

#### Appendix B – Modifier Type and Change Reason Codes

<u>\*Note:</u> Due to MSP hierarchy rules applied by the COBC when applying updates and deletes to MSP occurrences, these Modifier Type values will not be returned to Section 111 RREs on Unsolicited MSP Response Files.

Change Reason Code	Description			
ES	Employer Size			
CE	Change in employment status (retirement, resignation, etc.)			
UK	Unknown			
II	Insurance Information change			
EI	Employer Information change			
EC	Entitlement change			
Blank	System generated, reason unknown			