



## **Financial Services Group**

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May 26, 2025

### **Non-Group Health Plan Mandatory Insurer Reporting User Guide ORM Termination Request for Feedback**

The Division of Medicare Secondary Payer Program Operations (DMPO) seeks to solicit feedback from the external stakeholder community regarding the voluntary termination of Ongoing Responsibility for Medicals (ORM), as it relates to Section 111 reporting.

Currently, Chapter III, Section 6.3.2 – ORM Termination, provides various scenarios under which an RRE may terminate their ORM status when such status appropriately ends. DMPO desires industry feedback on whether the current parameters are appropriate, reasonable, and sufficient.

DMPO requests that any person or entity desiring to share feedback, ideas, concerns, or questions do so no later than **June 9, 2026**. Feedback need not be in any formal format or follow any particular parameters. DMPO is unable to guarantee a direct response to all feedback but will take all submissions into consideration as the policy around ORM termination is reviewed. Comments received after the above date will still be considered for future enhancements.

All submissions should be e-mailed to the new DMPO-managed mailbox relating to all Coordination of Benefits and Recovery (COB&R) inquiries:

[COBR@cms.hhs.gov](mailto:COBR@cms.hhs.gov)