CENTERS for MEDICARE & MEDICAID SERVICES

Office of Financial Management/Financial Services Group

Revised March 29, 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))

**Quick Reference Guide for Section 111 Registration**
**For All Responsible Reporting Entities**

**This guide is intended as a reference to assist Section 111 responsible reporting entities with the registration process. It is not a substitute for reading the applicable and existing instructions that are found in the appropriate User Guides.**

**The Registration Process and Determining the Number of RRE IDs Needed:**

| IF: | THEN: |
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| • A Section 111 Responsible Reporting Entity (RRE) wants to obtain an RRE ID: | • An individual representing the RRE **must** complete the New Registration process and provide information for the Authorized Representative on the COBSW at www.section111.cms.hhs.gov. (An Authorized Representative **may not** be a user of the Section 111 COBSW for any RRE ID.)<br>• If there is no NAIC company code applicable to the RRE or subsidiary, enter all zeroes when that information is requested.<br>• All TINs supplied for subsidiaries under one RRE ID must be unique. In other words, all TINs for the RRE ID and subsidiaries listed must be **different within one specific RRE ID**. If your underwriting companies do not have different TINs, then do not list |

| **IF:** | **THEN:** |
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| | them as subsidiaries. **You can use the same TIN for multiple, different RRE IDs**. TINs just need to be unique within the same RRE ID. For example, if you are one entity, with one TIN, registering five different RRE IDs, you can use the same TIN for all five distinct RRE IDs.<br>**NOTE**: If you have trouble with data entry on the corporate structure/subsidiary page, it is not required to complete this New Registration step. You may simply click on the Continue button to bypass this page.<br>• After obtaining a Login ID and personally agreeing to the terms of the User Agreement, the Account Manager **must** complete the Account Setup step, which includes selecting a file transmission method for each file type to be submitted on the Section 111 COBSW. |
| • An RRE wants to register for multiple RRE IDs because they:<br>  • Want to submit more than one MSP or Claim Input File per quarter; and/or<br>  • Use different data processing systems, data center locations, claim office operations, agents, subsidiaries, etc. | • The New Registration and Account Setup steps **must** be completed for each RRE ID.<br>  • The same TIN, the same Authorized Representative, and the same Account Manager **can** be named for each RRE ID.<br>  **NOTE:** Complete Connect:Direct file transmission information must be available for the Account Setup step if that method is to be used. Partial registrations or account setups may not be saved and completed later.<br>• Account Manager **must** invite and identify Account Designees that will need access to multiple accounts by RRE ID.<br>• Fewer RRE IDs are **suggested** to ease the management of reporting, account maintenance and user access. The registration process **will** remain available **indefinitely**, and one or more additional RRE IDs may be requested in the future. |
| • An RRE registers for multiple RRE IDs and wants them all assigned to one EDI Representative. | • Contact one of the assigned EDI Representatives and request a reassignment of all RRE IDs to one. |
| • Separate input files will be submitted for each subsidiary or if each/any subsidiary is handling its own reporting: | • Register and obtain an RRE ID for **each** separate subsidiary.<br>• Alternatively, the parent organization may register, obtain one |

| **IF:** | **THEN:** |
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| | RRE ID, and report for all applicable subsidiaries under that RRE ID. |
| • Separate input files will be submitted for each line of business: | • Register and obtain an RRE ID for **each** separate line of business.<br>• One Claim Input File with a mix of Liability, No-Fault and Workers' Compensation claims **may** be submitted under the same RRE ID; or when using separate RRE IDs, separate files **may** be submitted for each or any combination by line of business. |
| • Agents are reporting for multiple RRE IDs: | • Agents **must** test and submit files by RRE ID.<br>  • 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). |
| • The RRE is a claims processing **GHP TPA** (that meets the definition of an RRE in the GHP User Guide): | • The **GHP TPA** RRE is **not** required to register and obtain separate RRE IDs for each client's GHP data.<br>  • If all of the clients' GHP data is processed in one system and can be submitted in one combined file, only one RRE ID is needed.<br>  • The individual GHPs will be defined using the Employer/Plan Sponsor TINs submitted on the GHP TPA's MSP Input File. |
| • It is a GHP RRE that will be reporting ***only*** Health Reimbursement Account (HRA) data: | • HRA data will not be collected for Section 111 reporting until after October 1, 2010. HRA registration must be completed by June 30, 2010 to allow enough time for testing to be completed before production files are due. |
| • An entity is an RRE for the purposes of Section 111 but will have nothing to report: | • It is not required to register at this time.<br>  • Example- If an entity is self-insured (as defined by CMS) solely for the deductible portion of a liability insurance policy it may not have anything to report as its insurer will be responsible for reporting in most cases. However, those that do not register initially because they have no expectation of having information to report at this time, must register in enough time to allow for a full quarter of data exchange testing if, in the future, they have a reasonable expectation of a requirement to report. |

| **IF:** | **THEN:** |
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| • A User experiences problems during the registration process;<br>• An RRE ID was erroneously requested or is no longer needed; or<br>• The Authorized Representative and/or Account Manager needs to be changed: | • Contact your assigned EDI Representative or the COBC EDI Department at 646-458-6740. |
| • An entity based in a country outside the United States that has no IRS-assigned TIN and/or US mailing address needs to register as a Section 111 NGHP RRE: | • Starting April 5, 2010, complete the New Registration step on the Section 111 COBSW<br>  • Refer to NGHP User Guide V3.0 Section 8.2.1 Foreign RRE Registration<br>  • May use pseudo-TIN in the format 9999xxxxx if RRE has no TIN<br>  • Must provide valid e-mail addresses for Authorized Representative and Account Manager<br>  • May fill RRE, Authorized Representative, Account Manager State Code with 'FC' for international addresses<br>  • **Contact your assigned EDI Representative or the COBC EDI Department at 646-458-6740 to validate RRE, provide international contact information** |

**Documentation for the Registration Process:**

| **Document Title:** | **Link:** | **Overview:** |
|---|---|---|
| GHP User Guide | http://www.cms.hhs.gov/MandatoryInsRep/Downloads/GHPUserGuideV3.pdf | For GHP RREs- Refer to Section 7.1.6, Section 111 Registration, in Version 3.0. |
| Non-GHP User Guide | http://www.cms.hhs.gov/MandatoryInsRep/Downloads/NGHPUserGuideV3022210.pdf | For Non-GHP RREs- Refer to Section 8, Registration and Account Setup, in Version 3.0. |
| ALERT for Liability Insurance (Including Self-Insurance), No-Fault Insurance, and Workers' Compensation: WHO | http://www.cms.hhs.gov/MandatoryInsRep/Downloads/NGHPAlertRREsWhoMustReport.pdf | For Non-GHPs- Refer to this Alert to identify who must report and determine if an entity is a RRE. |

| **Document Title:** | **Link:** | **Overview:** |
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| MUST REPORT | | |
| COBSW "How To" Menu | www.section111.cms.hhs.gov | Click "I Accept" on this link and the homepage will display; a Login ID is not needed. Information on the registration and account setup process can be found. The "How to Get Started" and "How to Invite Designees" documents are particularly useful. |
| COBSW Help Pages | www.section111.cms.hhs.gov | Click on the link for the Help page and a new window will open with instructions and information needed to complete the page being worked on. |
| COBSW User Guide | www.section111.cms.hhs.gov | When a Login ID is obtained, the User must log in to obtain the detailed Section 111 COBSW User Guide available under the "Reference" menu option. |
| Computer Based Training (CBT) Modules | http://www.cms.hhs.gov/mandatoryinsrep/ | Sign-up information for the cost-free CBTs is available on the CMS Section 111 Mandatory Insurer Reporting website. Click on the MMSEA 111 Computer Based Training (CBT) left menu option. Once enrolled, CBTs take Users step by step through the New Registration and Account Setup processes on the Section 111 COBSW. |