## **Social Security Number Removal Initiative (SSNRI)**



SSNRI Impacts Upon the COBA
Medicare Crossover Process
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# Presentation Objectives

- To explain SSNRI impacts on the COBA crossover claims and other files
- To explain the circumstances under which a SSN-based Medicare number (HICN or RRB Medicare number) may appear on crossover claims even after January 1, 2020
- To highlight the various technical tools available to COBA trading partners so they can accept either the HICN/RRB Medicare number or the Medicare Beneficiary Identifier (MBI) on COBA crossover claims

# Goal and Timing of Changes

- Goal: To minimize impacts on our COBA trading partners to the greatest extent possible
- Scope of Changes and Timing:
  - The format of only one (1) COBA response file will be modified so that both HICN and MBI will be returned; this change will be moved to production in January 2018

## **COBA Claims**

- All 837 institutional and professional Coordination of Benefits (COB) claims will continue to feature the qualifier "MI" in the 2010BA NM108 and 2330A NM108 segments during and after the transition period
- COBA trading partners that submit supplemental ID (or State Medicaid ID) for their covered members/benefit recipients via the COBA E01 eligibility file will continue to receive this identifier in the 2010BA NM109 segment
- COBA trading partners will receive either a HICN or MBI in the 2330A NM109 segment within Medicare's 2320 loop based upon the provider-submitted beneficiary identifier or identifier used in paying the claim during the "transition period" with one noted exception

### **COBA Claims**

- Exception to HICN or MBI inclusion during transition period on outbound 837 COB claims (applicable for DMEPOS 837 Professional COB Claims):
  - If multiple DMEPOS claims are being crossed over in a given claims cycle for the same trading partner, billing provider and beneficiary, and those claims were submitted to Medicare with a mixture of HICN and MBI, the BCRC will cross the claims over with an MBI reflected as the beneficiary identifier in 2330A NM109 within Medicare's 2320 loop
    - Note: If a COBA trading partner does not provide a supplemental ID/State ID to the BCRC via the COBA E01 eligibility file, then the MBI also will be reflected in 2010BA NM109 under this scenario

## COBA Claims—NCPDP D.0 Batch Claims

- National Council for Prescription Drug Programs (NCPDP)
   D.0 batch COB claims will feature reporting of the MBI in the same area of the claim where HICN is currently reported when the MBI is reported to Medicare during the transition period and on/after January 1, 2020
- The MBI will be reported in NCPDP D.0 batch claims with a new qualifier "04" (non-SSN based patient ID)

# **COBA Claims Recovery**

- COBA claims recoveries (recoveries that are necessary because Medicare beneficiaries were missing on incoming COBA E01 eligibility files for a period of time) will still be possible even with the new HICN to MBI changes
- COBA trading partners may receive recovered Part A and B claims that contain a mixture of HICN and MBI depending upon how the claims were originally submitted to Medicare
- Medicare will always include the MBI on COBA recovery claims for those Medicare beneficiaries who became entitled to Medicare on/after April 2018

# COBA Claims—Exceptions to Exclusive Usage of MBI

- On/after January 1, 2020, CMS will continue to include a HICN on outbound 837 institutional and professional COB claims under the following circumstances:
  - 1) To allow for the run-out of claims submitted to Medicare with HICN or RRB Medicare number and held on the payment floor until January 1, 2020, or thereafter;
  - 2) To accommodate certain span date claims (inpatient hospital, home health, and religious non-medical) that may be billed to Medicare using either HICN or MBI;
  - 3) To accommodate claims containing a HICN or RRB Medicare number that were held in suspense, or placed on provider alert status, and the issues allowing for release of the claims are resolved on/after January 1, 2020;
  - 4) To accommodate adjustment claims, as well as appeal/re-openings, whereby the associated original claim included a HICN or RRB Medicare number; and
  - 5) To fulfill COBA Medicare claims recoveries as initiated by the BCRC when the claims originally were submitted to Medicare and paid using a HICN or RRB Medicare number

## Tools for COBA Trading Partners--COBA Crosswalk Files

- CMS and BCRC are planning to transmit HICN—to—MBI crosswalk files to each individual COBA trading partner in January 2018 (tentatively projected to occur between January 9 and 27)
- **Proposed Minimum Crosswalk Data Elements:** COBA trading partner's name and COBA ID (within file header), beneficiary's name, HICN and associated MBI
  - Date of birth likely will also be included
  - Note: A crosswalk will be created for each COBA ID maintained by a COBA trading partner

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#### **COBA Crosswalk Files**

- COBA crosswalk file layout will be made available as a download document to COBA trading partners for their review no later than July 2017 on CMS's COBA web site:
  - https://www.cms.gov/Medicare/Coordination-of-Benefits-and-Recovery/COBA-Trading-Partners/Whats-New/Whats-New.html
- The crosswalk files will prove invaluable to COBA trading partners that currently use the HICN from COBA crossover claims, and not a supplemental ID, as part of their claims processing routines
- Crosswalk files may be used in combination with COBA eligibility file responses (to be discussed) to equip COBA trading partners to be able to handle either HICN or MBI as received on COBA crossover claims

## **COBA Crosswalk Files**

- CMS and BCRC plan to transmit the crosswalks to COBA trading partners through their established connectivity path with us—
  - For Connect:Direct customers, BCRC will collect and manage a list of filenames for the trading partners. We will transmit the crosswalk files to the provided names (supplied by the COBA trading partners) using the existing Connect:Direct processing for each trading partner
    - This activity needs to begin by October 1, 2017, to ensure COBA trading partner readiness to receive the files in January 2018
    - More details will be made available on CMS's COBA web site around July 2017

### **COBA Crosswalk Files**

- **For SFTP GENTRAN and TIBCO** customers, BCRC will transmit the crosswalk files to each COBA trading partner's existing CMS mailbox(es), modifying the 4<sup>th</sup> node of the trading partner's filename to allow for differentiation from normal files
  - Note: The 4<sup>th</sup> node for the COBA crosswalk file will be modified to an "M"; currently, BCRC transmits a "T" in the 4<sup>th</sup> node of all SFTP files transmitted to COBA trading partners

# Tools for COBA Trading Partners—Modified COBA Eligibility Response File

- January 2018: CMS will modify the COBA Eligibility Response File (ERF) layout so that both the "most current HICN" and "current MBI" will be returned to COBA trading partners
  - New Current MBI field will be created using Filler at the end of the file
  - Modified COBA ERF will supplement the COBA crosswalks and assist COBA trading partners with exception scenarios in which the HICN will still be included in COBA crossover claims on/after January 1, 2020
    - <u>Important:</u> If the beneficiary only ever had an MBI (i.e., became entitled on/after April 2018), we will only return the MBI via the ERF
  - Record layouts illustrating the changes to the COBA ERF will be made available no later than July 2017—6 months before the changes go into effect

# Tools for COBA Trading Partners—Querying Processes

- For COBA E02 and Health Eligibility Wrapper (HEW) query processes, COBA trading partners can still query the Benefits Coordination & Recovery Center (BCRC) to obtain the "most current Medicare identifier"--
  - Input values needed to conduct the query unchanged
  - The most current identifier assigned will be returned in the repurposed "Medicare ID" field
    - Earliest that an MBI could be returned is April 2018
  - If the beneficiary only ever had an MBI (i.e., became entitled on/after April 2018), we will only return the MBI

# **Questions & Answers**