



Office of Financial Management/Financial Services Group

Revised December 21, 2010

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)&(b)(8))

Revised Implementation Timeline

Note: "RRE" stands for "responsible reporting entity."
"COBSW" stands for "Coordination of Benefits Secure Website."
"COBC" stands for CMS' Medicare "Coordination of Benefits Contractor."
"TPOC" stands for "Total Payment Obligation to Claimant."
"DDE" stands for "Direct Data Entry."

I. Group Health Plan (GHP):

- 10/01/2008 - 10/31/2008 Paper registration for RREs with a former Voluntary Data Sharing Agreement (VDSA)/Voluntary Data Exchange Agreement (VDEA) with CMS.
- 10/01/2008 – 12/31/2008 Testing period for RREs with a former VDSA/VDEA.
- 01/01/2009 – 03/31/2009 RREs with a former VDSA/VDEA submitted initial Section 111 MSP Input production files to the COBC according to assigned file submission timeframes for their RRE IDs.
- 04/01/2009 – 04/30/2009 Electronic registration via the Section 111 COBSW for all new GHP RREs excluding those with only Health Reimbursement Arrangement (HRA) information to report.
- 04/01/2009 – 07/01/2009 Testing period for new GHP RREs (those that did not have a prior VDSA/VDEA).
- 07/01/2009 – 10/01/2009 New GHP RREs submitted initial Section 111 MSP Input production files to the COBC according to assigned file submission timeframes for their RRE IDs.

- 10/01/2009 All GHP RREs (except for HRA-only RREs) must be reporting production Section 111 MSP Input Files on a quarterly basis by this date.
- 05/01/2010 – 06/30/2010 HRA-only GHP RREs must complete registration on the Section 111 COBSW.
- 07/01/2010 MSP Input File testing commences for HRA reporting.
- 10/01/2010 – 12/31/2010 HRA reporting commences for HRA plan years beginning October 1. GHP RREs submit initial Section 111 MSP Input production files to the COBC with HRA information according to assigned file submission timeframes for their RRE IDs.
- 01/01/2011 – 03/31/2011 HRA reporting commences for HRA plan years beginning January 1. GHP RREs submit initial Section 111 MSP Input production files to the COBC with HRA information according to assigned file submission timeframes for their RRE IDs.

II. Liability Insurance (including Self-Insurance), No-Fault Insurance and Workers' Compensation (Non-GHP or NGHP):

- 05/01/2009 Electronic registration via the Section 111 COBSW began for all NGHP RREs - liability insurance (including self-insurance), no-fault insurance and workers' compensation RREs (excluding foreign RREs – see “04/05/2010”, below).
- 07/01/2009 Test and production Query Input Files accepted for NGHP RREs that completed registration and are in a testing status (the RRE's signed Profile Report has been received by the COBC).
- 01/01/2010 – 12/31/2010 Claim Input File testing period for all NGHP RREs.
- 04/05/2010 Electronic registration commenced via the Section 111 COBSW for foreign NGHP RREs (those that are based in countries outside the United States and have no Internal Revenue Service-assigned tax identification number and/or US mailing address).
- 10/4/2010 NGHP RREs may select or change to Direct Data Entry (DDE) reporting option on the COBSW.

- 01/01/2011 – 03/31/2011

All NGHP RREs, excluding those with only liability insurance (including self-insurance) TPOCs to report, must submit initial production Section 111 Claim Input Files to the COBC according to assigned file submission timeframes for their RRE IDs.

- 03/01/2011

DDE reporting available on the COBSW. All NGHP RREs that selected the DDE reporting option must commence production claim reporting on the Section 111 COBSW, excluding those with only liability insurance (including self-insurance) TPOCs to report.

- 01/01/2011 – 12/31/2011

Extended testing period for RREs with only liability insurance (including self-insurance) TPOCs to report.

- 04/01/2011

All NGHP RREs, excluding those with only liability insurance (including self-insurance) TPOCs to report, must be reporting production Claim Input Files on a quarterly basis by this date or be reporting via DDE.

- 01/01/2012 – 03/31/2012

NGHP RREs are required to commence reporting of liability insurance (including self-insurance) TPOCs, with TPOC Dates of 10/1/2011 and subsequent, on quarterly production Claim Input Files according to assigned file submission timeframes for their RRE IDs or report via DDE.