

## Claim Reporting Do's and Don'ts

### Slide 1 of 25 - Claim Reporting Do's and Don'ts

**CMS**  
CENTERS FOR MEDICARE & MEDICAID SERVICES

**COB&R**  
Coordination of  
Benefits and Recovery

# MMSEA Section 111 Liability Insurance (Including Self-Insurance), No-Fault Insurance, and Workers' Compensation

## Claim Reporting Do's and Don'ts

Version 7.5. 07/01/2024  
Note: CMS reserves the right to modify this presentation. To ensure you have the most current version, verify that the version and date on this page match the version and date on the corresponding page of the PDF currently available on:  
<http://go.cms.gov/mirnghp>.

### Slide notes

Welcome to the Claim Reporting Do's and Don'ts course.

Note: This module applies to Responsible Reporting Entities (RREs) that will be submitting Section 111 claim information via an electronic file submission as well as those RREs that will be submitting this information via direct data entry (DDE).

**Slide 2 of 25 - Disclaimer**

## Disclaimer

While all information in this document is believed to be correct at the time of writing, this Computer Based Training (CBT) is for educational purposes only and does not constitute official Centers for Medicare & Medicaid Services (CMS) instructions for the MMSEA Section 111 implementation. All affected entities are responsible for following the instructions found under the *Reference Materials* menu at the following link:  
<https://go.cms.gov/mirnghp>.

**Slide notes**

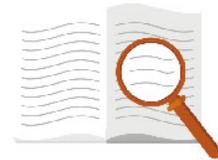
While all information in this document is believed to be correct at the time of writing, this Computer Based Training (CBT) is for educational purposes only and does not constitute official Centers for Medicare & Medicaid Services (CMS) instructions for the MMSEA Section 111 implementation.

All affected entities are responsible for following the instructions found at the following link:  
<http://go.cms.gov/mirnghp>.

**Slide 3 of 25 - Course Overview**

## Course Overview

- Identifying an injured party
  - Disposition Code 51
- Reporting
  - ORM
  - TPOC
- Claim fields
  - ICD Diagnosis Codes
  - Self-Insured Type
  - Plan Insurance Type
  - Policy Number
- Validating RRE Addresses
- Delete transactions

**Slide notes**

This module provides some helpful suggestions for RREs to consider when submitting Claim Input Files or providing claim information via DDE.

It includes information on:

identifying an injured party and Disposition Code 51;

reporting ongoing responsibility for medicals (ORM) and Total Payment Obligation to Claimant (TPOC);

submitting certain claim fields (ICD Diagnosis Codes, Self-Insured Type, Plan Insurance Type, and Policy Number); and

the importance of validating RRE addresses.

It also reviews when delete transactions should be used.

Note: Liability insurance (including self-insurance), no-fault insurance and workers' compensation are sometimes collectively referred to as "non-group health plan" or "NGHP."

The term NGHP will be used in this CBT for ease of reference.

**Slide 4 - of 25 - PAID Act**

## PAID Act

The Medicare Secondary Payer (MSP) policy is designed to ensure that the Medicare Program does not pay for healthcare expenses for which another entity is legally responsible. To aid settling parties in determining this information, Congress has enacted the Provide Accurate Information Directly Act also known as the PAID Act requiring that CMS provide Non-Group Health Plans with a Medicare beneficiary's Part C and Part D enrollment information for the past 3 years.

This information will be provided both online and offline in the NGHP Query Response File. Additionally, CMS has requested that this solution also include the most recent Part A and Part B Entitlement dates.

**Slide notes**

The Medicare Secondary Payer (MSP) policy is designed to ensure that the Medicare Program does not pay for healthcare expenses for which another entity is legally responsible. To aid settling parties in determining this information, Congress has enacted the Provide Accurate Information Directly Act also known as the PAID Act requiring that CMS provide Non-Group Health Plans with a Medicare beneficiary's Part C and Part D enrollment information for the past three years.

This information will be provided both online and offline in the NGHP Query Response File. Additionally, CMS has requested that this solution also include the most recent Part A and Part B Entitlement dates.

Note: To support the PAID Act, the Query Response File will be updated to include Contract Number, Contract Name, Plan Number, Coordination of Benefits (COB) Address, and Entitlement Dates for the last three years (up to 12 instances) of Part C and Part D coverage. The updates will also include the most recent Part A and Part B entitlement dates.

**Slide 5 of 25 - Identifying an Injured Party**

## Identifying an Injured Party

The BCRC attempts to determine if the submitted injured party can be identified and matched to a Medicare beneficiary based on

- Medicare ID (Field 4) or SSN (either the last 5 digits or the full 9-digit SSN) (Field 5)
- First initial of first name (Field 7)
- First 6 characters of last name (Field 6)
- Date of birth (DOB) (Field 10)
- Gender (Field 9)

If a reported individual is not identified as a Medicare beneficiary based upon the submitted information, the corresponding Claim Response File Detail Record is returned with a disposition code of 51

**Slide notes**

When a Claim Input File Detail Record is processed, the Benefits Coordination & Recovery Center (BCRC) attempts to determine if the submitted injured party can be identified and matched to a Medicare beneficiary.

First, the BCRC must find an exact match on the Medicare ID or Social Security Number (SSN) (i.e., the last five digits or full 9 digits of the SSN, whichever is submitted).

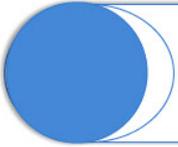
Then at least three out of four of the following fields must be matched exactly and all four must match when a partial SSN is used: first initial of the First Name, first 6 characters of the Last Name, Date of Birth (DOB), and Gender.

If a reported individual is not identified as a Medicare beneficiary based on the submitted information, the corresponding Claim Response File Detail Record is returned with a disposition code of 51.

Please note: The matching process depends on the quality of the data submitted.

**Slide 6 of 25 - Disposition Code 51**

## Disposition Code 51

-  • Found in the Applied Disposition Code (Field 27)
-  • Validate injured party information fields: Medicare ID or SSN, First Name, Last Name, Date of Birth, and Gender
-  • RRE must ensure that data entered in these fields was both correct and correctly submitted

**Slide notes**

Disposition codes are found in the Applied Disposition Code (Field 27) on the Claim Response File Detail Record.

If a disposition code of 51 is received, the RRE must validate the information submitted in the injured party information fields (Medicare ID or SSN, First Name, Last Name, Date of Birth, and Gender).

The RRE must check to ensure that the data entered in these fields was both correct and correctly submitted.

**Slide 7 of 25 - Disposition Code 51**

## Disposition Code 51

	Injured Party Information	Initial Input File Detail Record
Medicare ID	123456789A	123456789A
First Name	Jane	<i>Smithson</i>
Last Name	Smithson	<i>Jane</i>
Date of Birth	06/11/1938	06/11/1938
Gender	Female	Female

- When the BCRC processes this record, it will not find a match on Medicare’s records
  - First and Last Name fields will not match
  - Record will be returned with a disposition code 51
- RRE must check their submitted data, make appropriate corrections, and resubmit the claim report

**Slide notes**

Let’s say an RRE must submit a claim report for the following injured party:

Medicare ID: 123456789A,

First Name: Jane,

Last Name: Smithson,

Date of Birth: 06/11/1938,

Gender: Female.

On the initial Claim Input File Detail Record, the RRE submits the correct data in the Medicare ID, Date of Birth, and Gender fields.

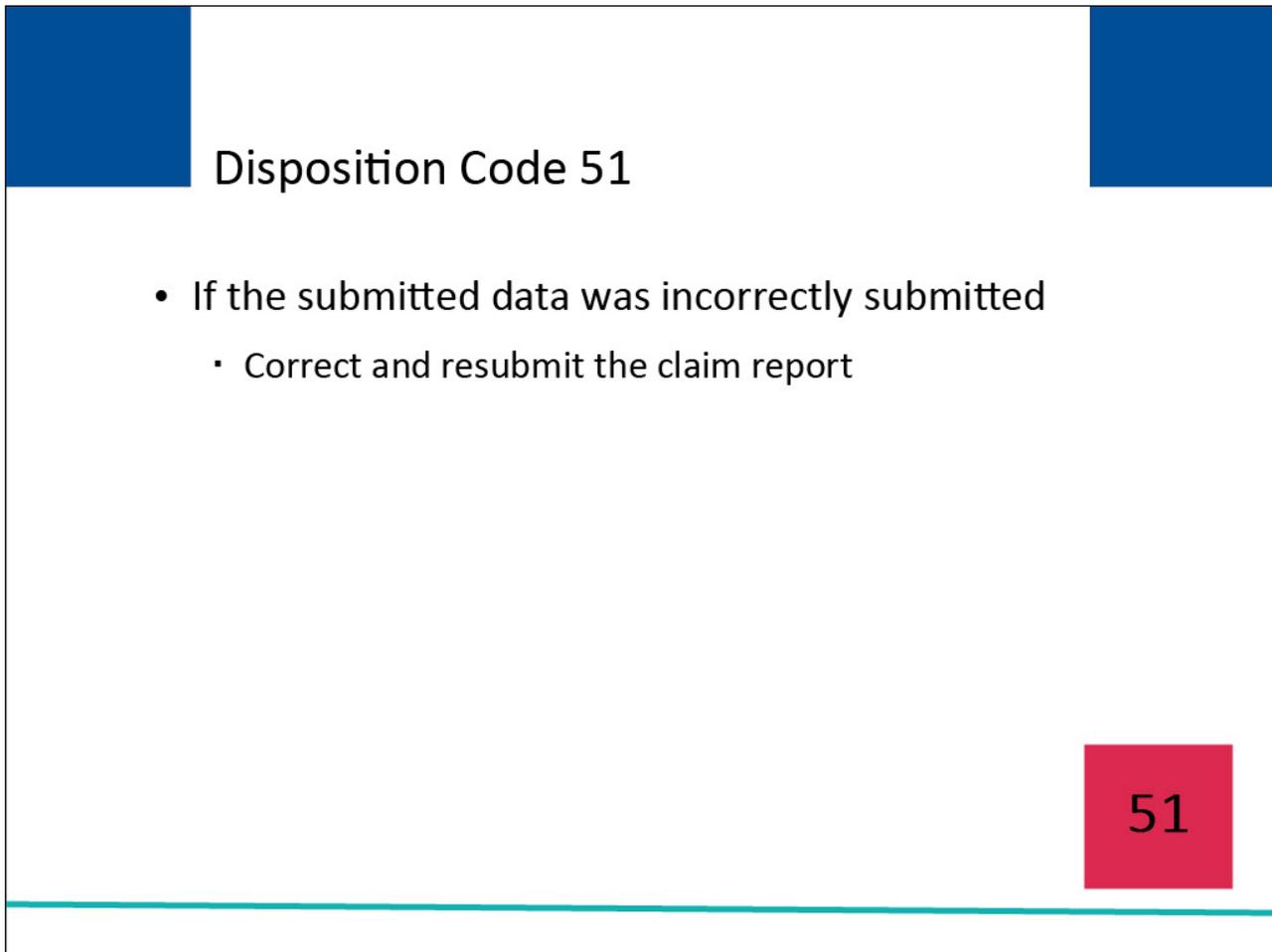
However, the RRE submits the Last Name in the First Name field and submits the First Name in the Last Name field. When this record is processed by the BCRC, a match will not be found on Medicare’s records.

Although the BCRC will find an exact match on the Medicare ID, only two of the remaining four data elements (Date of Birth and Gender) will exactly match Medicare's records.

The First and Last Name Fields will not match Medicare's records since these fields were entered incorrectly. The response record will be returned with a disposition code 51.

The RRE must then check the data submitted in the injured party fields to ensure that it was both correct and correctly submitted.

Once reviewed, the RRE will see that the first and last names were not entered in the correct fields. The RRE must make the appropriate corrections and resubmit the claim report.

**Slide 8 of 25 - Disposition Code 51**The slide features a white background with two blue rectangular accents in the top corners. The title "Disposition Code 51" is centered at the top. Below it, a bulleted list provides instructions for handling incorrectly submitted data. A red square with the number "51" is positioned in the bottom right corner. A thin teal horizontal line is located at the bottom of the slide content area.

## Disposition Code 51

- If the submitted data was incorrectly submitted
  - Correct and resubmit the claim report

51

**Slide notes**

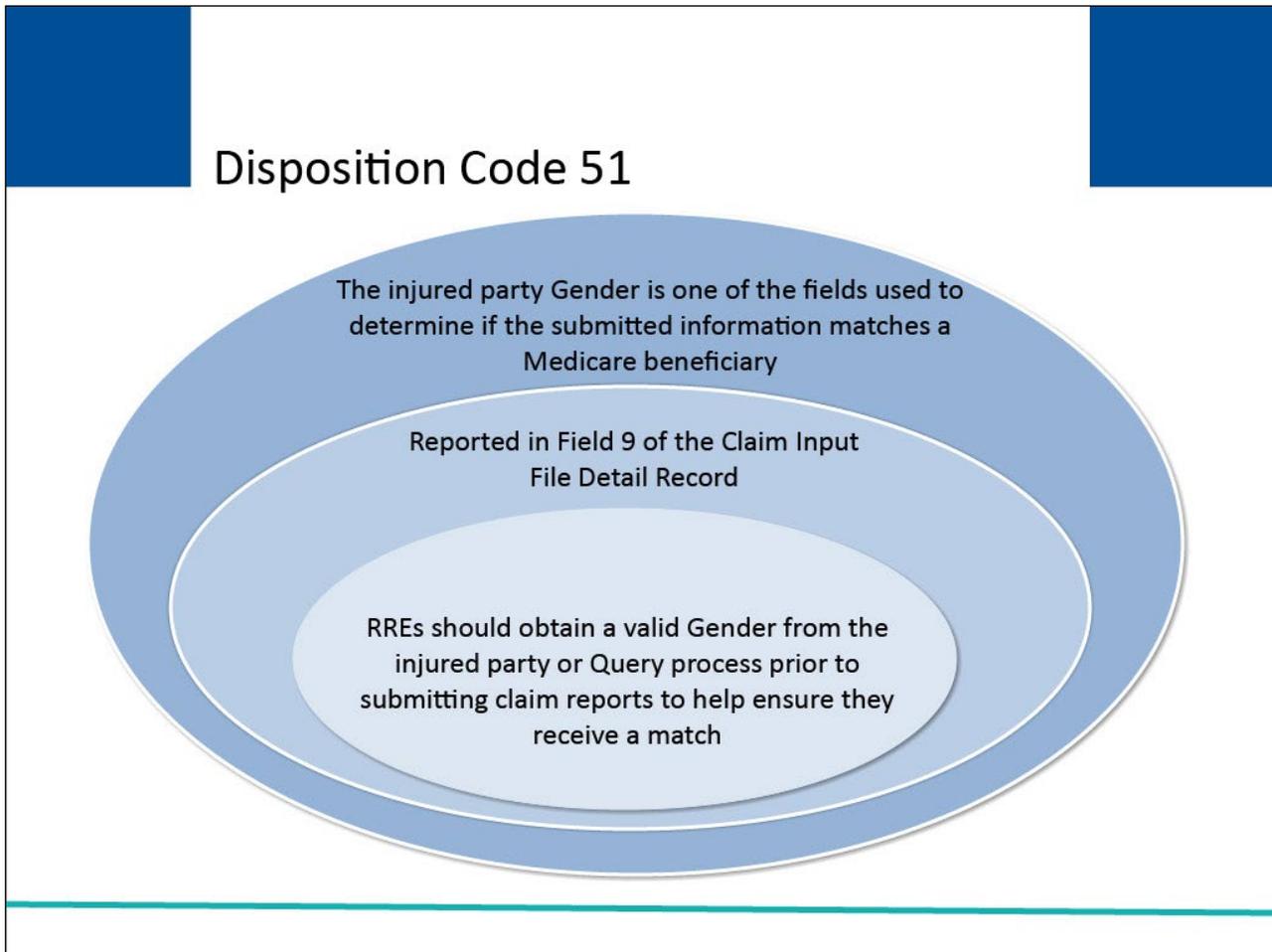
If a claim has received a disposition code of 51 and the RRE has checked the data and the data was incorrectly submitted, the claim report must be corrected and resubmitted.

Note: This disposition code will be returned on the claim and query response files if the RRE submits the SSN (i.e., the last 5 digits or full 9 digits of the SSN) on the input record and the information is not matched to a Medicare beneficiary.

RREs will also receive this disposition code if neither the Medicare ID nor SSN is submitted on the input record or if the SSN entered is not 5 or 9 digits.

In this case, the RRE must obtain a valid Medicare ID or SSN and resubmit the record on the next file submission.

**Slide 9 of 25 - Disposition Code 51**



**Slide notes**

The injured party's Gender is one of the fields used to determine if the submitted information matches a Medicare beneficiary. It is reported in Field 9 of the Claim Input File Detail Record.

RREs are advised to obtain a valid Gender from the injured party or the query process prior to submitting claim reports to help ensure they receive a match.

**Slide 10 of 25 - Disposition Code 51**

## Disposition Code 51

- When a '0' (unknown) is submitted for Gender on a query transaction, the system will change this value to a '1' to attempt to get a match

Record Matching Results	Query Response Disposition Code	RRE Action
If the record is matched to a Medicare beneficiary	'01'	Use updated values returned
If the record is NOT matched to a Medicare beneficiary	'51'	Validate Gender and all other injured party information

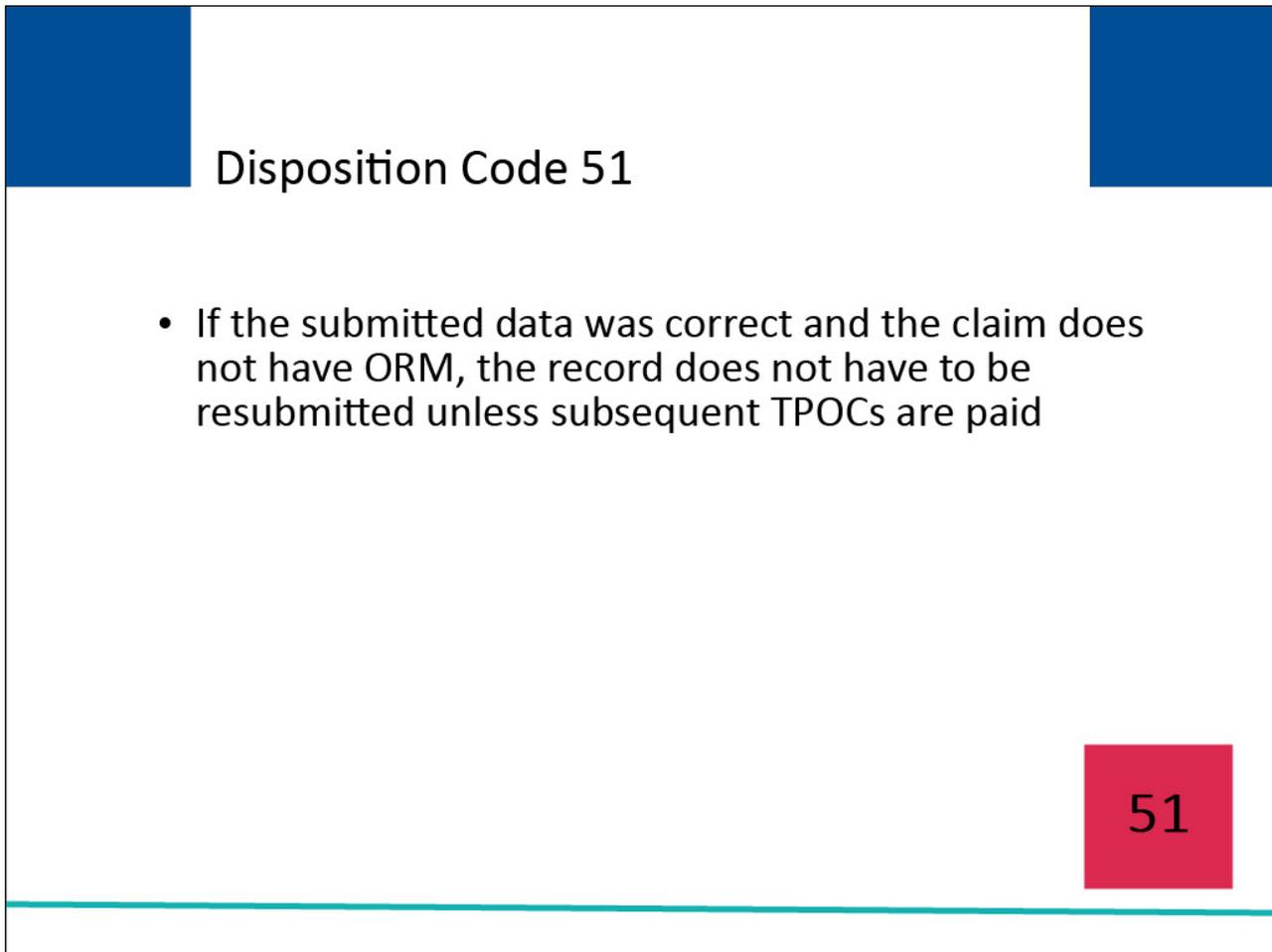
**Slide notes**

When using the query process, please be aware that when an RRE submits a query transaction with a '0' (unknown) in the Gender field, the system will change this value to '1' to attempt to get a match.

If the record is matched to a Medicare beneficiary, the Query Response File Record is returned with a '01' disposition code. In this case, the RRE should use the updated values returned in the Medicare ID, Name fields, DOB, and Gender when the corresponding Claim Input File Detail Record is submitted. However, if this record is not matched to a Medicare beneficiary, the Query Response File Record is returned with a disposition code of '51' and the converted '1' in the Gender field. The RRE should NOT use the Gender value returned in this case.

The RRE must validate the correct Gender and all other injured party information prior to submitting the Claim Input File Detail Record.

**Slide 11 of 25 - Disposition Code 51**

The slide features a white background with a blue header bar at the top. The title "Disposition Code 51" is centered in the header. A single bullet point is centered on the slide. A red square with the number "51" is located in the bottom right corner. A thin teal line runs horizontally across the bottom of the slide content area.

**Disposition Code 51**

- If the submitted data was correct and the claim does not have ORM, the record does not have to be resubmitted unless subsequent TPOCs are paid

51

**Slide notes**

If the RRE has ensured that the data was submitted correctly and the claim does not have ORM, the record does not have to be resubmitted, unless subsequent TPOC payments are made.

**Slide 12 of 25 - Disposition Code 51**

## Disposition Code 51

- If the submitted data was correct and the claim has ORM
  - RRE must monitor the status of the injured party as long as the ORM remains open
    - Submit claim when the injured party becomes covered by Medicare, unless ORM has ended before that time
  - RRE may cease monitoring if ORM terminates and is not subject to reopening or otherwise subject to further request for payment
- See the Query File CBT, the Beneficiary Lookup CBT and the NGHP User Guide for information on how to determine the injured party's Medicare status

**51****Slide notes**

If the RRE has ensured that the data was submitted correctly, and the claim has ORM, the RRE must monitor the status of the injured party in order to determine if/when the injured party becomes covered by Medicare.

Monitoring of the injured party must continue as long as the ORM remains open. When the individual becomes covered by Medicare, the RRE must submit a Claim Detail Record.

If the ORM terminates and is not subject to reopening or otherwise subject to further request for payment, monitoring of such individuals may cease.

One final query or claim report should be submitted after an ORM Termination Date has been reached, to ensure the RRE obtains the most up-to-date information on the individual before they stop checking.

Please refer to the Query File CBT, the Beneficiary Lookup CBT, and the NGHP User Guide for a description of how an RRE can determine the injured party's Medicare status prior to submitting claim information.

**Slide 13 of 25 - Reporting ORM**

## Reporting ORM

As soon as ORM is established, report ORM as an add record

- ORM Indicator set to 'Y'
- Don't wait until the ORM has terminated before reporting ORM
- If there is no established end date, ORM Termination Date = zeroes

For more information on ORM

- See the Ongoing Responsibility for Medicals CBT and NGHP User Guide

**Slide notes**

As soon as ongoing responsibility for medicals (ORM) is established, report the ORM as an add record (ORM Indicator set to 'Y'). Do not wait until the ORM has terminated before reporting the existence of ORM.

If there is no established end date, a value of all zeroes must be entered in the ORM Termination Date. For more information on ORM, please see the Ongoing Responsibility for Medicals CBT and the NGHP User Guide.

**Slide 14 of 25 - Reporting ORM**

**Reporting ORM**

To terminate the ORM record, submit an update record

- Include ORM Termination Date
- ORM Indicator set to 'Y'
  - If the claim ever involved ORM, it should be reported with a 'Y' in the ORM Indicator, even after ORM has terminated

Do not send a delete transaction when ORM ends

**Slide notes**

To terminate the ORM record, submit an updated record with the ORM Termination Date and a 'Y' in the ORM Indicator field.

Remember, if the claim ever involved ORM, it should be reported with a 'Y' in the ORM Indicator, even after ORM has terminated. Do not send a delete transaction when the RRE's ORM ends.

**Slide 15 of 25 - Reporting ORM**

## Reporting ORM

- When no-fault limits are reached and ORM is terminated on a no-fault insurance claim report (Plan Insurance Type 'D') submit
  - ORM Termination Date (Field 79)
  - Exhaust Date for Dollar Limit for No-Fault Insurance (Field 62)
- Failure to submit an ORM Termination Date may result in
  - Improper denial of medical claims submitted to Medicare after no-fault limits are reached

**Slide notes**

When no-fault limits are reached and ORM is terminated on a no-fault insurance claim report (Plan Insurance Type 'D'), be sure to submit an ORM Termination Date (Field 79) in addition to the Exhaust Date for Dollar Limit for No-Fault Insurance (Field 62).

Failure to submit an ORM Termination Date may result in improper denial of medical claims submitted to Medicare after no-fault limits are reached.

**Slide 16 of 25- Reporting TPOC**

## Reporting TPOC

- Add records submitted with ORM Indicator = 'N'
  - Must contain TPOC Amounts that exceed the applicable reporting thresholds
- No circumstance under which an RRE would submit an 'N' in the ORM Indicator field and no TPOC information
  - Record would reject with the CJ07 error
- Information is to be reported after the RRE assumes ORM or after there is a TPOC settlement, judgment, award, or other payment
- See the Mandatory Reporting Thresholds CBT, Total Payment Obligation to Claimant CBT, and NGHP User Guide

**Slide notes**

Add records submitted with 'N' in the ORM Indicator (Field 78) must contain TPOC Amounts that exceed the applicable reporting thresholds.

There is no TPOC threshold applied to no-fault claims. There is no circumstance under which an RRE would submit 'N' in the ORM Indicator and not include TPOC information.

This would result in rejection of the record with the CJ07 error. Claim information is to be reported after the RRE assumes ORM or after there is a TPOC settlement, judgment, award, or other payment.

Please see the Mandatory Reporting Thresholds CBT, the Total Payment Obligation to Claimant CBT and the NGHP User Guide for more information on these topics.

**Slide 17 of 25 - ICD Diagnosis Codes**

## ICD Diagnosis Codes

- Must exactly match the first 5 positions of a valid ICD codes
- Partial codes are not accepted
- Retain leading and trailing zeroes
  - Do not add leading or trailing zeroes if they are not shown for the code in the list of valid ICD-9 and ICD-10 codes
- Do not include the decimal point
  - Do include any digits that follow the decimal point
  - Example: ICD-9 code 038.42 should be submitted as 03842

**Slide notes**

Be sure to submit ICD Diagnosis Codes (starting in Field 18) that exactly match the first 5 positions of a code on the list of valid ICD codes (See Section 6.2.5 (ICD-9 and ICD-10 Codes) in the NGHP User Guide Technical Information Chapter for more information). Partial codes are not accepted. Retain leading and trailing zeroes, but do not add leading or trailing zeroes if they are not shown for the code in the list of valid ICD-9 and ICD-10 codes.

Do not include the decimal point but be sure to include any digits that may follow the decimal point. For example, ICD-9 diagnosis code 038.42 should be submitted as 03842.

The excluded and no-fault excluded ICD-10 diagnosis codes have been updated, Diagnosis Code describing the alleged injury/illness. These codes are special defaults for liability reporting.

Note: Excel spreadsheets of the ICD-9/ICD-10 excluded and valid codes for FY 2023 are now available for download on CMS.gov at <https://www.cms.gov/medicare/coordination-benefits-recovery-overview/icd-code-lists> (Appendix A, Appendix F, and Appendix I).

**Slide 18 of 25 - Self-Insured Type**

## Self-Insured Type

- Must correspond to the Self-Insured Indicator

Self-Insured Type (Field 45)	Self-Insured Indicator (Field 44)
'I' (Individual) or 'O' (Other than Individual)	'Y'
Blank	'N' or blank

**Slide notes**

The value in the Self-Insured Type (Field 45) must correspond to the value in the Self-Insured Indicator (Field 44).

The Self-Insured Type must be 'I' (Individual) or 'O' (Other than Individual) if the Self-Insured Indicator is 'Y' (Yes). The Self-Insured Type must be blank if the Self-Insured Indicator is 'N' (No) or blank.

Records submitted incorrectly will be rejected with CS02 error.

**Slide 19 of 25 - Plan Insurance Type**

## Plan Insurance Type

- Must correspond with the Self-Insured Indicator

Plan Insurance Type (Field 51)	Self-Insured Indicator (Field 44)
'E' (Workers' Compensation) or 'L' (Liability)	'Y' or 'N'
'D' (No-Fault)	'N' or blank

- If you are a liability insurer (self-insurer) that is administered as a no-fault plan, the Plan Insurance Type must be entered as 'L' (Liability)

**Slide notes**

Values in the Plan Insurance Type (Field 51) must correspond with the Self-Insured Indicator (Field 44).

If the Plan Insurance Type is 'E' (Workers' Compensation) or 'L' (Liability), the Self-Insured Indicator must equal 'Y' (Yes) or 'N' (No). If the Plan Insurance Type is 'D' (No-Fault), the Self-Insured Indicator must equal 'N' or blank. Please note: If you are a liability insurer (self-insurer) that is administered as a no-fault plan, the Plan Insurance Type must be entered as 'L' (Liability).

**Slide 20 of 25 - Policy Number**

## Policy Number

- Required data element
- For self-insurance where the RRE has no policy number
  - Fill with all zeroes
  - Cannot be left blank
- Policy number should be entered exactly as it was entered on the original submission

Note: To support previous system changes, Policy Number (Field 54) has been added as a key field. If this field changes, RREs must submit a delete Claim Input File record that matches the previously accepted add record, followed by a new add record with the changed information (i.e., delete/add process).

**Slide notes**

The Policy Number (Field 54) is a required data element. In the case of self-insurance where the RRE has no policy number associated with the claim, this field must be filled with all zeroes, not left blank.

Records submitted with all blanks in the Policy Number field will be rejected with the error CP04.

The policy number should be submitted with a consistent format. When sending updates, enter the policy number exactly as it was entered on the original submission, whether zeros or a full policy number.

Note: To support previous system changes, Policy Number (Field 54) has been added as a key field. If this field changes, RREs must submit a delete Claim Input File record that matches the previously accepted add record, followed by a new add record with the changed information (i.e., delete/add process).

**Slide 21 of 25 - Delete Transactions**

## Delete Transactions

Remove an entire record that was created in error

Correct a key field

- CMS Date of Incident (Field 12)
- Plan Insurance Type (Field 51)
- ORM Indicator (Field 78)

- Do not perform a delete/add to correct or change any other fields, instead submit an update transaction
- See the Event Table in the NGHP User Guide Technical Information Chapter for more information

**Slide notes**

Delete transactions should only be submitted to remove an entire record that was created in error or to correct a key field (i.e., CMS Date of Incident (Field 12), Plan Insurance Type (Liability, No-Fault, Workers' Compensation in Field 51), ORM Indicator (Field 78)). Do not perform a delete/add to correct or change any other fields.

Simply submit an update transaction to correct non-key fields. For more information on this topic see the Event Table in the NGHP User Guide Technical Information Chapter.

**Slide 22 of 25 - TIN Reference File - RRE Addresses**

## TIN Reference File - RRE Addresses

- Pre-validate RRE addresses using postal software or online tools such as those found here:  
[https://tools.usps.com/go/ZipLookupAction\\_input](https://tools.usps.com/go/ZipLookupAction_input).
- Use standard abbreviations, limit data submitted in these fields, and adhere to USPS standards

**Slide notes**

RREs are encouraged to pre-validate RRE addresses using postal software or online tools available on the United States Postal Service (USPS) Web site pages such as the link shown here:  
[https://tools.usps.com/go/ZipLookupAction\\_input](https://tools.usps.com/go/ZipLookupAction_input).

RREs should try to use standard abbreviations and attempt to limit data submitted in these fields and adhere to USPS standards.

The address validation enhancements in place will “scrub” addresses submitted on the TIN Reference File using USPS standards, and we recommend that RREs also attempt to meet these standards, to improve results. Although NGHP DDE reporters do not submit TIN Reference Files, they do submit the same TIN information online. It is recommended that DDE reporters also pre-validate RRE addresses.

**Slide 23 of 25 - Course Summary**

## Course Summary

- Identifying an injured party
  - Disposition Code 51
- Reporting
  - ORM
  - TPOC
- Claim fields
  - ICD Diagnosis Codes
  - Self-Insured Type
  - Plan Insurance Type
  - Policy Number
- Validating RRE Addresses
- Delete transactions

**Slide notes**

The address validation enhancements in place will “scrub” addresses submitted on the TIN Reference File using USPS standards, and we recommend that RREs also attempt to meet these standards, to improve results. Although NGHP DDE reporters do not submit TIN Reference Files, they do submit the same TIN information online. It is recommended that DDE reporters also pre-validate RRE addresses.

**Slide 24 of 25 - Conclusion**



You have completed the Claim Reporting Do's and Don'ts course. Information in this course can be referenced by using the NGHP User Guide's table of contents. This document is available for download at the following link:  
<https://go.cms.gov/mirnghp>.

**Slide notes**

You have completed the Claim Reporting Do's and Don'ts course. Information in this course can be referenced by using the NGHP User Guide's table of contents. This document is available for download at the following link: <https://go.cms.gov/mirnghp>.

**Slide 25 of 25 - NGHP Training Survey**



If you have any questions or feedback on this material,  
please go to the following URL:  
<https://www.surveymonkey.com/s/NGHPTraining>.

**Slide notes**

If you have any questions or feedback on this material, please go to the following URL:  
<https://www.surveymonkey.com/s/NGHPTraining>.