



Single-Source Solution
for Workers' Compensation

Government Affairs Alert

June 4, 2010

CMS Issues Alert regarding new 'Direct Data Entry' option for Small MMSEA Section 111 Reporters

On May 25, 2010, the Centers for Medicare and Medicaid Services (CMS) issued an Alert providing information on a new 'Direct Date Entry' (DDE) option for small Non-Group Health Plan (NGHP) MMSEA reporters.

The new DDE option will allow small reporters to use Section 111 Coordination of Benefits Secure Website (COBSW) at www.Section111.cms.hhs.gov to manually enter and submit individual NGHP claim reports online, instead of submitting an electronic file. A Responsible Reporting Entity (RRE) choosing to utilize the new DDE option will be required to report the same data elements and have the same responsibility/accountability as RREs sending electronic files via manual data entry on the COBSW, and individual claim reports may be saved while in progress for 30 calendar days. Small reporters may begin reporting claims using the new DDE option on **January 3, 2011**.

The new DDE option is available to small reporters which CMS defines as an RRE who submits **500 or fewer NGHP claims per calendar year**. It is important to note that a separate query function will not be available under the new DDE option. Instead, injured party information will be matched real time during entry of claim information on the COBSW. The new application will prompt users to enter injured party information first and then attempt to match it to an existing Medicare beneficiary. If there is no match, the user will be prompted that no further information is required, but if the injured party is verified as an existing Medicare beneficiary, the user will be prompted to enter additional information required under Section 111. **If information is not matched to an existing beneficiary, it will count toward the RRE's limit of 500 claims per year.** For this reason, RREs should strongly consider the number of Medicare beneficiary claims they expect to report per calendar year, as well as potential claims which may not match to an existing Medicare beneficiary.

Small reporters may register for the new DDE reporting option on COBSW beginning **October 1, 2010**. This new DDE option is available to all current and new RREs which meet definition of a small reporter. To utilize the new DDE option:

- Currently registered Section 111 RREs should have their Account Manager log on to COBSW for the applicable RRE ID on or after October 4, 2010 and change their reporting method to DDE.
- RRE's who have not registered should have their Account Manager select DDE as the reporting method during the new registration process.

The new DDE option differs from electronic file submission in several respects:

- No testing is required
- No assigned submission timeframe



- Claim information will be submitted one claim report at a time, as soon as claim reporting is required under Section 111
- Claim record submissions are required within 45 calendar days of a Total Payment Obligation to Claimant (TPOC) or Ongoing Responsibility for Medicals (ORM) being established/assumed.
 - Exception – Retroactive reporting is required for certain claims having TPOCs (October 1, 2010 to December 31, 2010) and ORM (January 1, 2010 to December 1, 2010) which may be reported outside the 45 day grace period. However, information for these ORMs and TPOCs **must be submitted during first quarter 2011**.
- ORM termination date submissions are required within 45 calendar days of ORM termination date.

RREs should keep in mind that the number of data elements required for Section 111 reporting is significant and manually entering this information may take considerable amount of time, especially when entering retroactive claims data for first quarter 2011. The DDE option is intended only for RREs who expect to have an occasional claim report, and RREs who report on a frequent/ongoing basis and rely on the query capability for Section 111 reporting should not utilize the new DDE option.

To view a copy of this CMS Alert click here

www.cms.gov/MandatoryInsRep/Downloads/DDEOptionNGHP052510.pdf

PMSI Client Recommendations

PMSI recommends that small RREs review this Alert and investigate the best reporting option for their organization. Small RREs utilizing PMSI as their reporting agent benefit from our robust reporting system, including flexible solutions for ad-hoc reporting and work-flow capabilities, which would not be available if the new DDE option is selected. In addition, PMSI can assist our clients with identification of claims for which conditional payments need to be reimbursed and/or may require a future medical allocation (i.e., Medicare Set-Aside) by screening data received for MMSEA Section 111 Reporting.

The MMSEA Section 111 reporting process is still evolving as CMS continues to implement requirements, provide further instructions and address industry questions. RREs should access CMS Section 111 web page (www.cms.gov/MandatoryInsRep/) frequently for additional updated information. PMSI will continue to provide guidance as new information is issued by CMS, but RREs can also obtain additional information by attending CMS bi-monthly teleconferences. To view the updated list of CMS teleconferences scheduled for 2010 click here: www.cms.gov/MandatoryInsRep/Downloads/Rev2010NGHPNoticeand%20Agenda040110.pdf



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PMSI Client Support

PMSI is committed to bringing our clients the most current information on MMSEA reporting requirements and offers a complete preparation and compliance program. As further information becomes available, PMSI's Government Affairs team will provide additional insight and analysis.

For more information on MSP compliance and related PMSI Government Affairs Alerts, please contact your PMSI Representative, call us at 888.MSA.PMSI or visit the [Industry Insights](#) section of our website at www.pmsisettlement.com.

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PMSI—The Only Solution You Need. Founded in 1976, today PMSI is one of the nation's largest providers of specialty managed care services and products for workers' compensation. PMSI provides a best-in-class integrated portfolio of clinically based services in Pharmacy, Medical Services and Equipment, and Settlement Solutions that promotes quality care for injured workers while helping clients contain costs and control utilization.