Section 111 Registration Introduction

Slide 1 of 47 - Section 111 Registration Introduction



Slide notes

Welcome to the Group Health Plan (GHP) Section 111 Registration course.

Slide 2 of 47 - 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 and Medicaid Services (CMS) instructions for the MMSEA Section 111 implementation. All affected entities are responsible for following the instructions found at the following link: <u>https://www.cms.gov/medicare/coordination-benefits-rec</u> <u>overy/mandatory-insurer-reporting-group-health-plans</u>.

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 CMS instructions for the MMSEA Section 111 implementation.

All affected entities are responsible for following the instructions found at the following link: <u>CMS GHP</u> <u>Website</u>.

Slide 3 of 47 - Course Overview



Slide notes

Topics in this course include:

- registration requirements,
- purpose of the registration process,
- registration timeframes, and
- the five steps of Section 111 registration and account setup.

Slide 4 of 47 - Registration Requirements



Slide notes

Registration by the Responsible Reporting Entity (RRE) must be completed before testing between the RRE (or its agent) and the BCRC can begin.

Each applicable RRE must complete the registration process regardless of whether an agent will be submitting files on that entity's behalf.

An agent cannot complete the initial registration for you; however, the agent can complete the Account Setup and may also be the Account Manager.

Registration and account setup must be completed on the Section 111 application on the COB Secure Website (COBSW) at <u>COBSW Section 111</u>.

Slide 5 of 47 - Purpose of Registration



Slide notes

Through the registration process, the BCRC will obtain the information needed to:

- validate information provided by the RRE for Section 111,
- assign an RRE ID to each RRE,
- develop a Section 111 reporting profile for each entity including estimates of the volume and type of data to be exchanged for planning purposes,
- assign a production live date and ongoing file submission timeframe to each entity,
- establish the necessary file transfer mechanisms, and
- assign an Electronic Data Interchange (EDI) Representative to each entity to assist with ongoing communication and data exchange.

Slide 6 of 47 - Registration Timeframes



Slide notes

The registration process will remain available indefinitely if you need an RRE ID at some point in the future.

If you currently do not have Section 111 reporting responsibility, you do not need to register at this time.





Section 111 registration and account setup is a five-step process:

1. Identify an Authorized Representative, Account Manager, and other Section 111 COBSW users.

- 2. Determine reporting structure.
- 3. RRE registration on the Section 111 COB Secure Website.
- 4. RRE account setup on the Section 111 COB Secure Website by the Account Manager.
- 5. Return signed RRE profile report Authorized Representative.

The profile report summarizes the information provided on your registration and provides important information you will need for data file transmission.





Determine Reporting Structure: Before beginning the registration process, an RRE must determine how it will transmit its Section 111 files (i.e. data transmission method) to the BCRC and how many RRE IDs will be needed.

Slide 9 of 47 - Data Transmission Methods



Slide notes

There are three separate methods of data transmission that Section 111 RREs may utilize to submit their files:

- Connect: Direct via CMS EFT,
- Secure File Transfer Protocol (SFTP), or
- Hypertext Transfer Protocol over Secure Socket Layer (HTTPS).

The RRE will indicate the data transmission method and submit the applicable transmission information.

The data transmission methods are reviewed in detail in the <u>File Transmission Methods</u> course.





Before beginning the registration process, an RRE must also determine how many RRE IDs they need.

Careful consideration must be given to the number of RRE IDs you request. RRE IDs will be included on the files submitted for Section 111 reporting.

Only one MSP Input File may be submitted on a quarterly basis for each RRE ID. Due to corporate organization, GHP enrollment system structures and agents that may be used for file submission, you may want to submit more than one MSP Input File to the BCRC on a quarterly basis and therefore need more than one RRE ID in order to do so.





Claims processing Third Party Administrators (TPAs) are often the RRE. A GHP TPA RRE is not required to register and obtain separate RRE IDs for each client's GHP data.

If you process all of your clients' GHP data in one system and can submit one combined file, you need only one RRE ID for the GHP TPA. One MSP Input File can be submitted per quarter.

The individual GHPs will be defined using the Employer/Plan Sponsor TINs submitted on the GHP TPA's MSP Input File. Please refer to the definitions of an RRE in the GHP User Guide.





If you register for multiple RRE IDs, you can use the same TIN for each or different TINs for each. No matching is done between the TINs supplied at registration and the TINs supplied on your input files; you can name the same Authorized Representative for each or a different Authorized Representative for each; and you can name the same Account Manager for each or a different Account Manager for each.

Slide 13 of 47 - Number of RRE IDs



Slide notes

For each unique RRE ID needed, you must complete the New Registration and Account Setup steps including selecting a file transmission method for each file type.

Careful consideration must be given to the number of RRE IDs you request. Once logged into the Section 111 COBSW, most functions are performed by RRE ID.

File transmission and viewing results of file processing is done by RRE ID. So, to ease the management of reporting, account maintenance, and user access, we suggest that fewer RRE IDs are better than many.

Slide 14 of 47 - RRE IDs – Example 1



Slide notes

If an RRE will use one agent to submit one set of GHP coverage information and another agent to submit another set of GHP coverage information, the RRE must register on the Section 111 COB Secure Website twice to obtain two RRE IDs that will be used by each agent respectively.

You may name the same Authorized Representative and Account Manager for both accounts, or use different individuals. Agents reporting for multiple RRE IDs must test and submit files by RRE ID.

However, 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).

Slide 15 of 47 - RRE IDs – Example 2



Slide notes

If you have two or more subsidiary companies that handle GHPs for different regions of the country (or different lines of business) using different enrollment systems and you will not be combining the MSP Input Files for Section 111 reporting, you must register for each file submission to obtain separate RRE IDs in order to submit multiple MSP Input Files in one quarter.

You may not set up a separate RRE ID for submission of the Query Only File or Non-MSP Input File only. You must submit MSP Input Files for every RRE ID you establish.

Please note: You are not required to obtain an RRE ID for each subsidiary separately, but you must do so if separate input files will be submitted for each or if each/any subsidiary is handling its own reporting.

Alternatively, the parent organization may register, obtain one RRE ID and report for all applicable subsidiaries under that RRE ID.

Slide 16 of 47 - Registration/Account Setup – Step 2



Slide notes

During the registration process, each RRE must assign or name an Authorized Representative and an Account Manager. Each RRE ID can have only one Account Manager.

They may also register other Section 111 COBSW users associated with the RRE's account known as Account Designees.

Slide 17 of 47 - Authorized Representative



Slide notes

The person named as the Authorized Representative for the RRE's organization has the legal authority to bind the organization to the terms of MMSEA Section 111 requirements and processing.

The Authorized Representative has ultimate accountability for the RRE's compliance with Section 111 reporting requirements.

The Authorized Representative is an individual that can enter the RRE into a contract and has the authority to commit the RRE to a contract and can sign the contract.

If you need to change your Authorized Representative after completing the New Registration step, you must contact your assigned EDI Representative.

Slide 18 of 47 - Authorized Representative



Slide notes

The Authorized Representative cannot be an agent of the RRE. The Authorized Representative also cannot be a user of the Section 111 COB Secure Website for any RRE ID.

Slide 19 of 47 - Authorized Representative

Authorized R	epresentative
Preliminary Responsibilities	 May complete the initial registration Designate Account Manager Approve account setup Sign profile report and return to the BCRC
Ongoing Responsibilites	 Overall accountability for Section 111 reporting Receive notifications of non-compliance Approve subsequent changes to RRE account

Slide notes

The Authorized Representative may perform the initial registration on the Section 111 COBSW, but will not be provided with a Login ID. The Authorized Representative will also designate the Account Manager and must approve the account setup by physically signing the profile report including the Data Use Agreement and returning it to the BCRC.

The Authorized Representative has the overall responsibility/accountability for Section 111 reporting and will be the recipient of the BCRC notifications related to non-compliance with Section 111 reporting requirements.

The Authorized Representative will approve any subsequent changes to the RRE's account or users.

Slide 20 of 47 - Account Manager



Slide notes

The person named as the Account Manager controls the administration of an RRE's account and manages the overall reporting process.

The Account Manager may choose to manage the entire account and data file exchange or may invite other company employees or data processing agents to assist him/her.

Slide 21 of 47 - Account Manager



Slide notes

The Account Manager may be an RRE employee or an agent and may be associated with multiple RRE IDs. The Account Manager can be associated with an RRE if they receive the authorized PIN and RRE ID from the BCRC mailing associated with the registration for that entity.

This would occur when a Responsible Reporting Entity has multiple subsidiaries who will report separately for MMSEA Section 111 or when the entity chooses to name an agent as its Account Manager.

Your Account Manager must invite and identify Account Designees that will need access to multiple accounts by RRE ID.

Slide 22 of 47 - Account Manager



Slide notes

The Account manager cannot be an Authorized Representative or Account Designee for the same RRE ID.

Slide 23 of 47 - Account Manager



Slide notes

The Account Manager must register on the Section 111 COBSW, obtain a Login ID, complete the account setup tasks, and must personally agree to the terms of the User Agreement.

The Account Manager can invite other users to register on the Section 111 COBSW and function as Account Designees and can remove an Account Designee's association to an account; manage the RRE's profile including selection of a file transfer method; change account contact information (e.g. address, phone, etc.); use his/her Login ID and password to transmit files if the RRE has specified SFTP as the file transfer method or upload and download files to the Section 111 COBSW if the RRE has specified HTTPS as the file transfer method; and review file transmission history, file processing statuses and file statistics by RRE ID.

The Account Manager can also change his/her personal information.

Slide 24 of 47 - Account Designees



Slide notes

At the RRE's discretion, the Account Manager may invite other users to register on the Section 111 COB Secure Web site associated with the RRE's account.

These individuals, known as Account Designees, will assist the Account Manager with the reporting process. There is no limit to the number of Account Designees that can be associated with one RRE ID.

Slide 25 of 47 - Account Designees



Slide notes

Account Designees may be RRE employees or agents. The Account Designees may be associated with multiple RRE IDs, but only if invited by an Account Manager for each RRE ID.

Slide 26 of 47 - Account Designees



Slide notes

Account Designees cannot be an Authorized Representative or an Account Manager for the same RRE.

Slide 27 of 47 - Account Designees



Slide notes

The Account Designees must register on the Section 111 COBSW and obtain a Login ID.

The Account Designees can use his/her Login ID and password to transmit files if the RRE has specified SFTP as the file transfer method. They can also upload and download files to the Section 111 COBSW if the RRE has specified HTTPS as the file transfer method. The Account Designee can also review file transmission history, file processing statuses and file statistics by RRE ID.

The Account Designees may also change their personal information.

The following are some examples of how an RRE may choose to assign COB Secure Website responsibilities.

Slide 28 of 47 - Section 111 COBSW Roles - Example 1



Slide notes

CMS allows the submitter multiple ways to submit data. It is up to the RRE to choose how they want to split the roles. In this first example, insurer A has determined that they want one RRE ID.

They have assigned an Authorized Representative and an Account Manager but have decided not to use Account Designees.





Insurer B has determined that they want one RRE ID.

They have assigned an Authorized Representative and an Account Manager as well as an Account Designee to assist the Account Manager with the reporting process.





Insurer C has determined that they want one RRE ID. They have assigned an Authorized Representative, an Account Manager, and two Account Designees.

One of the Account Designees is Insurer C's agent who will be transferring files for Insurer C.





Insurer D has two claims systems and determines that they want to use 2 RRE IDs. Insurer D decides to use the same Authorized Representative and Account Manager for each RRE ID.

Insurer D decides not to use any Account Designees.





Insurer E has two claims systems and determines that they want to use 2 RRE IDs.

However, they have determined that they will assign a separate Authorized Representative and Account Manager for each RRE ID. Insurer E decides not to use any Account Designees.

Slide 33 of 47 - Registration/Account Setup - Step 3



Slide notes

GHP RREs will register on the Section 111 COBSW using an interactive, web portal designed for this purpose. The website URL is <u>COBSW Section 111</u>.

For more information on the registration process, please see the User Guide or click on the "How To" tab on the main page of the Section 111 COBSW where you will see a link called "How to Get Started".

Slide 34 of 47 - RRE Registration on the Section 111 COBSW



Slide notes

A company representative for the RRE must go to the <u>Section 111 COBSW URL</u> and click on New Registration and follow the prompts to create an account by completing and submitting the registration for the RRE. This step must be completed by the RRE.

Note: If you need more than one RRE ID for Section 111 reporting, you must repeat this step for each RRE ID.

Slide 35 of 47 - RRE Registration on the Section 111 COBSW



Slide notes

The registration application will require that you submit:

- RRE Federal Tax Identification Number (TIN);
- company name and address;
- company Authorized Representative contact information (that is, name, job title, address, phone, and email);
- a National Association of Insurance Commissioners or NAIC company code, if applicable (if there is no NAIC company code applicable to the Responsible Reporting Entity or subsidiary, then you may enter all zeroes when that information is requested); and
- Reporter Type (GHP for Group Health Plans).

Slide 36 of 47 - RRE Registration on the Section 111 COBSW



Slide notes

During the New Registration step, you will be asked to provide information regarding subsidiary companies for which you will be reporting under the RRE ID you are requesting.

Information for subsidiaries is optional. CMS encourages you to supply this information. Doing so will assist us in our efforts to help assure that you are in compliance with the Section 111 reporting requirements.

Further, CMS may require this information at a later date during subsequent recovery efforts. However, all TINs supplied for subsidiaries under one RRE ID must be unique.

In other words, all TINs for the RRE ID and subsidiaries listed in the New Registration step must be different within one specific RRE ID.

If your subsidiaries do not have different TINs, then do not list them on the corporate structure page of the New Registration step on the COB Secure Website. 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.

If you have trouble with data entry on the corporate structure/subsidiary page, it is not required to complete the New Registration step. You may simply click on the Continue button to bypass this page.

Slide 37 of 47 - RRE Registration on the Section 111 COBSW



Slide notes

When a registration application is submitted, the information provided will be validated by the BCRC. Once this is completed, the BCRC will send an email to the named Authorized Representative. The email will include a personal identification number (PIN). The BCRC-assigned RRE ID (Section 111 Reporter ID) associated with the registration should be recorded on the thank you page upon submission of registration. Your Authorized Representative should receive the email with the PIN within 7 business days after the New Registration step was completed.

The Authorized Representative must give this PIN and RRE ID to their Account Manager to use to complete the Account Setup step on the Section 111 COB Secure Website. Each time this step is completed, a new RRE ID is generated by the system. If you need more than one RRE ID for Section 111 reporting, this step must be repeated for each. If you erroneously completed this step for more RRE IDs than needed, please contact the EDI Department to have the RRE IDs that you will not be using deleted.

Slide 38 of 47 - Registration/Account Setup – Step 4



Slide notes

The RRE Account Manager must set up the RRE account on the Section 111 COBSW.

The individual who completes the Account Setup will be the Account Manager for the RRE, so plan for this step accordingly.

In order to perform the RRE account setup tasks, the RRE's Account Manager must go to the following Section 111 COBSW URL (<u>COBSW Section 111</u>) with the PIN and RRE ID and click on Account Setup.

Slide 39 of 47 - RRE Account Setup on the Section 111 COBSW



Slide notes

The Account Manager will:

- enter the RRE ID and associated PIN;
- enter personal information including name, address, phone, and email address;
- create a Login ID for the Section 111 COBSW;
- enter account information related to expected volume of data to be exchanged under this RRE ID (estimated number of covered individuals and estimated number of covered individuals age 45 and over);
- if the RRE is using an Agent to report, enter reporting agent name, address, contact email, and TIN (if applicable); and
- select a file transmission method and provide dataset naming information needed if the Connect:Direct via CMS EFT transmission method is selected.

Refer to Section 8.1.1 in the GHP User Guide for more information on Connect:Direct via CMS EFT.

Be sure to have destination dataset names available if the Connect:Direct via CMS EFT method is selected, or this step cannot be completed and all the other data you provided will be lost.

Slide 40 of 47 - RRE Account Setup on the Section 111 COBSW



Slide notes

Note: Once the Account Manager has successfully obtained a Section 111 COB Secure Website Login ID, he/she may log into the application and invite Account Designees to register for Login IDs.

Slide 41 of 47 - Registration/Account Setup – Step 5



Slide notes

Once account setup has been completed on the Section 111 COB Secure Website (including file transmission details) and processed by the BCRC, a profile report will be sent to the RRE's Authorized Representative and Account Manager via email. You should receive your profile report within 10 business days after completing the Account Setup step on the COB Secure Website.

The Profile Report contains:

- a summary of the information you provided on your registration and account setup;
- important information you will need for your data file transmission;
- the RRE ID that you will need to include on all files transmitted to the BCRC;
- your assigned production live date and ongoing quarterly file submission timeframe for the MSP Input File; and
- contact information for your EDI Representative who will support you through testing, implementation, and subsequent production reporting.

The system randomly assigns EDI Representatives to RRE IDs. If you register for multiple RRE IDs and want them all assigned to one EDI Representative, then contact one of the assigned EDI Representatives and request a reassignment of all RRE IDs to one EDI Representative.

Slide 42 of 47 - Return Signed RRE Profile Report



Slide notes

The RRE's Authorized Representative must review and approve the account setup by physically signing the profile report, including the Data Use Agreement and return it to the BCRC.

At that point, you may begin testing your Section 111 files. The BCRC will send an email to the RREs Authorized Representative and Account Manager indicating that testing can begin.

Note: An RREs RRE ID status will be updated by the system as each step of the registration process is completed.

Once the BCRC receives the signed profile report, the RRE ID will be placed in a "testing" status.

Once testing is completed the RRE ID will be placed in a "production" status.

RRE IDs are expected to move to a production status within 60 days after initiation of the registration process (completion of the New Registration step).

Slide 43 of 47 - Return Signed RRE Profile Report



Slide notes

The RRE's profile report will be emailed to the Authorized Representative annually, based upon the receipt date of the last signed profile report.

The RRE will be asked to confirm via email that their current information is correct. Failure to confirm this information may result in deactivation of the RRE ID.

Slide 44 of 47 - Additional Information



Slide notes

If you experience problems during the registration process, please contact your assigned EDI Representative or the EDI Department at 646-458-6740.

For more information on what to do when changes occur after your initial Section 111 Registration is completed, please see the CBT titled <u>Modifying Your Section 111 Registration</u>.

Slide 45 of 47 - Course Summary



Slide notes

Topics in this course included:

- registration requirements,
- purpose of the registration process,
- registration timeframes and the five steps of Section 111 registration, and
- account setup.

Slide 46 of 47 - Conclusion



Slide notes

You have completed the Section 111 Registration course.

Information in this presentation can be referenced by using the GHP User Guide's table of contents and any subsequent alerts.

These documents are available for download at the following link: <u>CMS GHP Website</u>.

Slide 47 of 47 - GHP Training Survey



Slide notes

If you have any questions or feedback on this material, please go the following URL: <u>GHP Training</u> <u>Survey</u>.