



Financial Services Group

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Medicare Secondary Payer Mandatory Reporting Provisions in Section 111 of the Medicare, Medicaid, and SCHIP Extension (MMSEA) Act of 2007 (See 42 U.S.C. § 1395y(b)(7)&(b)(8))

Technical Alert: Modification of Matching Criteria Used When Reporting Partial Social Security Numbers for Liability Insurance (Including Self-Insurance), No Fault Insurance, and Workers' Compensation

On January 5, 2015, CMS expanded submission requirements to allow Non-Group Health Plan (NGHP) Responsible Reporting Entities (RREs) to submit partial Social Security Numbers (SSNs) for Section 111 mandatory reporting. Where NGHP RREs were unable to obtain an individual's HICN (Medicare Health Insurance Claim Number) or full SSN, the NGHP RREs were provided with the option to submit the last 5 digits of the individual's SSN.

In an effort to continually improve the accuracy and quality of matches for submissions with partial SSNs, CMS is further refining the matching process.

New Matching Criteria for Partial SSNs

In order to determine if individuals are Medicare beneficiaries, the following information is used:

- HICN or SSN
- First initial of the first name
- First 6 characters of the last name
- Date of birth (DOB)
- Gender

Effective immediately, the matching criteria for partial SSNs will be changed. When an exact match on the partial SSN is found, then four out of the four remaining data elements must be matched to the individual exactly. The matching criteria for HICNs and full SSNs will remain the same.

Reporting Compliance Considerations

NGHP RREs are encouraged to submit the HICN or full SSN when available to ensure the most accurate match is attained. Failure to match to a Medicare beneficiary with the full or partial SSN does not negate the RRE's Section 111 mandatory reporting requirement when a reportable claim exists.

The information included in this Alert supersedes the applicable language in the MMSEA Section 111 Medicare Secondary Payer Mandatory Reporting Liability Insurance (Including Self-Insurance), No-Fault Insurance, and Workers' Compensation User Guide (Version 4.6.), and the MMSEA Section 111 COBSW User Guide (Version 8.0) and will be incorporated into subsequent versions of these User Guides