

SCHIP REGULATIONS



Broadspire May, 2010 Update MMSEA Section 111 (SCHIP)

On February 24, 2010 The Center for Medicare/Medicaid Services (CMS) published alerts for Liability Insurance, Self Insurance, No-Fault Insurance, and Workers Compensation (NGHP), including the following alert [**"RREs Who Must Report"**](#).

Previously a "follow the money/funds" approach was a key factor in determining which entity was the "Responsible Reporting Entity" (RRE). The major change with this alert was in a deductible policy situation. The insurer/carrier is now identified as the RRE for deductible policies.

CMS has confirmed the alert contains conflicting information and a revised alert will be issued. Below are general guidelines for determining RRE designation, subject to the qualification that the alert is not yet finalized and is subject to change. Broadspire recommends that you seek guidance directly from your carrier should you have any questions as to their interpretation as to "Who is the RRE" on self-insured retention (SIR) programs.

For your reference below is the CMS definition for Deductible and Self-Insured Retention (SIR) programs:

"Deductible" vs. "Self-Insured Retention" (SIR):

"Deductible" refers to the risk the insured retains with respect the coverage provided by the insurer.

"Self-Insured Retention" refers to the risk the insured retains that is not included in the coverage provided by the insurer.

RRE Designation Chart

<i>Insurance Type</i>	<i>Program Description</i>	<i>RRE Designation</i>
Guaranteed Cost Policy	Customer is fully insured with no deductible or SIR	Carrier/Insurer
Deductible Plan	A deductible plan - customer pays within the policy deductible	Carrier/Insurer
(Qualified) Self-Insured	Self-Insured	Self-Insured
Self-Insured Retention (SIR)	Customer is self-insured up to a defined layer - excess coverage provided by the insurer(s)/carrier(s)	Awaiting CMS clarification Clients with questions may want to discuss with their insurer

Next Steps:

Once you've made a final determination on your RRE designation, next steps include:

- ✓ If your entity has not already registered and you determine you are the "RRE" for at least one of your programs, you will need to register with the Coordination of Benefits Contractor (COBC) - see "*RRE Registration Tips*" below. If you have already registered and no RRE designation changes are needed, you do not need to take further action at this time.
- ✓ If you have determined that you are No Longer the RRE for any Broadspire programs, it is critical that you follow the steps outlined below to delete or change your RRE ID.

RRE Designation Changes

- ✓ Insured has determined that the insurance carrier is now the designated RRE and your entity's RRE ID has not been used to submit "**Production Files**".
 - Note: If you have submitted Production Files, contact your EDI (Electronic Data Interchange) representative and refer to the [CMS User Guide Version 3.0](#) Section 8.3.2 *Ceasing and Transitioning Reporting*.

****Broadspire is currently not submitting "production files" to CMS, we are currently only submitting "Medicare Beneficiary queries".***

- ✓ Insured has determined insurance carrier is now the designated RRE and your RRE ID has been used only to submit "**Medicare Beneficiary Queries**" refer to the [CMS User Guide Version 3.0](#) Section 8.3.1 "Abandoned RRE IDs, steps highlighted below:

Section 8 - 3.1 Abandoned RRE IDs

*If you erroneously registered for an RRE ID that you no longer need or have abandoned due to starting the registration process over, and you will not use the RRE ID for Section 111 file submission, please contact your assigned EDI Representative to have that number deleted. Unused RRE IDs may trigger automated warning notifications and follow-up by the COBC to the associated Authorized Representative and/or Account Manager. **Delete** requests should only be made for RRE IDs that have **not** been used for production file submission.*

- ✓ Your EDI representative is the person assigned to your RRE ID. The EDI contact information can be located on your **Section 111 Mandatory Reporting Profile Report** on Page -1- (contact information listed just below your official RRE ID).
- ✓ Notify your Broadspire Account Executive and submit an email to SCHIP@ChooseBroadspire.com if you submit a "Delete" request. Please be sure to include the following information:
 - RRE ID(s)
 - Registered Company Name
 - EDI representative contacted to initiate delete process
 - Your contact information for questions
- ✓ Once you have received a confirmation from CMS that this RRE ID has been deleted, please forward the notification to SCHIP@choosebroadspire.com.

*Note: If you are no longer the RRE for any of your Broadspire programs and previously signed a Broadspire **Medicare Secondary Payer Reporting Acknowledgement and Agreement** this agreement will become null and void upon your official request to the COBC and notification to Broadspire at SCHIP@ChooseBroadspire.com to delete your RRE ID.*

RRE Registration Tips

- ✓ To register log onto the COBSW (COB secure website) [MMESEA Section 111 Registration](#). Be sure to have all necessary information available when you access the website to register.
- ✓ Broadspire has created the Registration Reference Guide: "[Broadspire 5 Steps to a Successful Registration with the COBC](#)" to further assist you with this process.
- ✓ Whether you have selected Broadspire and PMSI as your reporting agent, or selected an Alternative Reporting agent, **Broadspire requires receipt of all RRE registration information to submit your claim data to your selected reporting agent**. Please forward your RRE ID, **Section 111 Mandatory Reporting Profile Report** to schip@choosebroadspire.com or fax to 770-777-6479.
- ✓ In addition to providing Broadspire with your RRE registration information, if you have chosen an alternative reporting agent OR you have designated an individual at your company as Account Manager and require Broadspire and PMSI to provide claim data to your selected reporting agent, please complete the PMSI online RRE setup at <http://rresetup.pmsionline.com>.
- ✓ If you have not yet received your RRE ID and PIN letter, contact your EDI (Electronic Data Interchange) representative and provide your RRE ID/company information to obtain your PIN. This is required to complete the Account Setup phase of registration. Be sure to forward your RRE ID and PIN letter to your designated Account Manager.

- ✓ If you choose to have Broadspire as your designated Account Manager, you can forward the RRE ID and PIN letter to Broadspire at schip@choosebroadspire.com. Please indicate you are requesting Broadspire to be your designated "Account Manager."

As new information regarding this alert becomes available, Broadspire will continue to provide further updates and we will provide instructions for any actions that you may need to take.

At Broadspire, our clients are important to us. We appreciate your business. Please send comments and feedback to SCHIP@choosebroadspire.com or contact Suzanne.jordan@choosebroadspire.com