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INSIDE THIS LETTER:

Registration and Account Setup Checklist

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Registration Begins May 1, 2009

As many of you know, on August 1, 2008, the Centers for Medicare and Medicaid Services ("CMS") released a statement clarifying the Mandatory Insurer Reporting Requirements of Section 111 of the Medicare, Medicaid and SCHIP Extension Act of 2007 ("MMSEA"). Section 111 amended the Medicare Secondary Payer Statute ("MSP") to mandate data reporting by Group Health Plans ("GHP") and Non-Group Health Plans ("NGHP"). Reporting will be required on plans where:

- The Claimant is a Medicare Beneficiary;
- Responsibility for medicals occurred on or after July 1, 2009 or ongoing responsibility for medicals was assumed prior to July 1, 2009, and continued at least through July 1, 2009; and
- Claims where there is an Ongoing Responsibility for Medicals ("ORM").

Health Systems International is committed to protecting the interest of our clients. As such, we are currently finalizing the EDI necessary to exchange data with the Centers for Medicare and Medicaid Services ("CMS"). The "NGHP User Guide" was released on March 16, 2009, and our dedicated IT staff will have all of the necessary components in place to report data for those clients who elect to utilize HSI for SCHIP reporting before the mandatory testing date. We appreciate your consideration of Health Systems International as your reporting agency. A timeline of events for NGHP reporting, including registration, testing and "live data" exchange is included below:

- 03/16/09 – 06/30/09 Systems Development Begins
- 05/01/09 – 06/30/09 Electronic Registration for all NGHP Plans
- 07/01/09 – 12/31/09 EDI Testing for all NGHP Plans
- 10/01/09 – 12/31/09 Most NGHP Plans will Begin "Live Data" Exchange
- 01/01/10 – 03/31/10 All Responsible Reporting Entities Submitting Data

This issue will focus on the impending registration and how you can become prepared.

For additional information, please join us at the Tennessee Claims Association Conference being held Thursday, April 30, 2009, through Sunday, May 3, 2009. Jim Trull, MSA Specialist, will be speaking on Saturday, May, 2, 2009, regarding the new reporting requirements and how you can become better prepared. Visit www.tennesseeclaims.com for registration information.

☐ **Step 1:**

Identify an Authorized Representative, Account Manager and other COBSW Users

Assign an Authorized Representative:

This is the individual in the RRE organization who is authorized to enter into an agreement with CMS. The Authorized Representative has ultimate accountability for the RRE's compliance with Section 111 reporting requirements.

- Cannot be a user of the Coordination of Benefits Secure Website ("COBSW");
- Cannot be an agent of the RRE;
- May perform the initial registration on the COBSW, but will not be provided with a Login ID;
- Will designate the Account Manager;
- Must approve the account setup, by physically signing the profile report including the Data Use Agreement, and returning it to the COBC;
- Will be the recipient of COBC notifications related to non-compliance with Section 111 reporting requirements; and
- *Will receive the PIN and RRE ID which is to be used by the Account Manager to register to report to CMS.*

Designate an Account Manager (This can also be known as the "Agent"):

This is the individual who controls the administration of an RRE's account and manages the overall reporting process. The Account Manager may be an RRE employee or agent. 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. *This would be the most appropriate place to include Health Systems International.*

- Must register on the COBSW, obtain a Login ID and complete the account setup tasks;
- Can invite other users to register on the COBSW and function as Account Designees;
- Can manage the RRE's profile including selection of a file transfer method;
- Can upload and download files to the COBSW if the RRE has specified HTTPS as the file transfer method;
- Can use his/her Login ID and Password to transmit files if the RRE has specified SFTP as the file transfer method;
- Can review file transmission history;
- Can review file-processing status and file statistics;
- Can change account contact information; and
- Can change his/her personal information.

Decide if you want to appoint Account Designees (*if you are not going to be your own Agent, skip this section*):

The Account Manager may designate other individuals to register as users of the COBSW associated with the RRE's account known as Account Designees. Account Designees assist the Account Manager with the reporting process. Account Designees may be RRE employees or agents. There is no limit to the number of Account Designees associated with one RRE ID.

- Must register on the COBSW and obtain a Login ID;
- Can be associated with multiple RRE accounts, but only by an Account Manager invitation for each RRE ID;
- Can upload and download files to the COBSW if the RRE has specified HTTPS as the file transfer method;
- Can use his/her Login ID and Password to transmit files if the RRE has specified SFTP as the file transfer method;
- Can review file transmission history;
- Can review file-processing statuses and file statistics;
- Can change his/her personal information;
- Cannot be an Authorized Representative or Account Manager for the same RRE ID;
- Cannot invite other users to the account; and

- Cannot update RRE account information.

Note: Each user of the Section 111 application on the COBSW will have only one Login ID and password. With that Login ID and password, you may be associated with multiple RRE IDs (RRE accounts). With one Login ID, you may be an Account Manager for one RRE ID and an Account Designee for another. In other words, the role you play on the COBSW is by RRE ID.

☐ **Step 2:**

Determine Reporting Structure

Before beginning the registration process, an RRE must also determine how the RRE will submit its Section 111 files to the COBC and how many Section 111 Reporter IDs (RRE IDs) will be needed. Only one Claim Input File may be submitted on a quarterly basis for each RRE ID. Due to corporate organization, claim system structures and agents that may be used for file submission, you may want to submit more than one Claim Input File to the COBC on a quarterly basis and therefore will need more than one RRE ID in order to do so.

For example, if an RRE will use one agent to submit workers' compensation claims and another agent to submit liability and no-fault claims, the RRE must register on the COBSW 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. Likewise, if you have two or more subsidiary companies that process workers' compensation claims using different claims systems and you will not combine the claim files for Section 111 reporting, you must register for each claim file submission to obtain separate RRE IDs in order to submit multiple claim files in one quarter.

You may **not** set up a separate RRE ID for submission of the Query Input File only. You **must** submit a quarterly Claim Input File for every RRE ID you establish.

☐ **Step 3:**

RRE Registration on the COBSW

A company representative for the RRE must go to the Section 111 COBSW URL (www.Section111.cms.hhs.gov), click on the "New Registration" button, complete and submit the registration for the RRE. This step must be completed by the RRE, not an agent for the RRE.

The application will require that you submit:

- A Federal Tax Identification Number (TIN) for the RRE;
- Company name and address;
- Company authorized representative contact information including name, job title, address, phone and e-mail address;
- National Association of Insurance Commissioners (NAIC) company codes, if applicable;
- Reporter Type - Select the Liability Insurance (Including Self-Insurance)/No-Fault Insurance/Worker's Compensation option not GHP; and
- Subsidiary company information to be included in the file submission for the registration.

When a registration application is submitted, the information provided will be validated by the COBC, and the COBC will send a letter via the US Postal Service to the named Authorized Representative with a personal identification number (PIN) and the COBC-assigned RRE ID (Section 111 Reporter ID) associated with the registration. The Authorized Representative must give this PIN and RRE ID to their Account Manager to use to complete the account setup step. If you need more than one RRE ID for Section 111 reporting, this step **must** be repeated for each.

☐ **Step 4:**

RRE Account Setup on the COBSW—Account Manager

In order to perform the RRE account setup tasks, the RRE's Account Manager, on or after May 1, 2009, must go to the Section 111 COBSW URL (www.Section111.cms.hhs.gov) with the PIN and RRE ID and click on the "Account Setup" button. *It is during this process that you will name Health Systems International as the reporting agent should you choose to do so.*

The Account Manager will:

- Enter the RRE ID and associated PIN;
- Create a Login ID for the COBSW;
- Enter account information related to expected volume of data to be exchanged under this RRE ID (estimated number of annual paid claims for the lines of business that will be reported under the RRE ID);
- Enter reporting agent name, address, contact e-mail and TIN;
  - Name: Health Systems International, LLC
  - Address: 453 St. Lukes Drive
Montgomery, AL 36117
  - Contact Email: mpayne@us-hsi.com
  - TIN: 27-0083277
- Select a file transmission method;
- Provide file transmission information needed if the Connect:Direct transmission method is selected. See the later section on the Connect:Direct method to see what will be collected; and
- You must have complete file transmission information available if the Connect:Direct method is selected or this step cannot be completed and all the other data you provided will be lost.

Once the Account Manager has successfully obtained a COBSW Login ID, he/she may log into the application and invite Account Designees to register for Login IDs. *Please include the following account designees should you elect to name Health Systems International as your Reporting Agent*:

- Jim Trull: jtrull@us-hsi.com
- Melissa Payne: mpayne@us-hsi.com
- Byrian Ramsey: bramsey@us-hsi.com

In addition, after completing account setup for his/her first RRE ID, since only one Login ID is required per user, the Account Manager will bypass the steps for creating another Login ID and password when setting up subsequent RRE IDs.

☐ **Step 5:**

Return Signed RRE Profile Report—Authorized Representative

Once account setup has been completed on the COBSW (including file transmission details for Connect:Direct if that method is selected) and processed by the COBC, a profile report will be sent to the RRE's Authorized Representative via e-mail.

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;
- Your RRE ID that you will need to include on all files transmitted to the COBC;
- Your assigned production live date and ongoing quarterly file submission timeframe for the MSP Input File;

and

- Contact information for your COBC EDI Representative who will support you through testing, implementation and subsequent production reporting.

The RRE's authorized representative must review, sign and return the profile report to the COBC. At that point, you may begin testing your Section 111 files. The COBC will send an email to your Authorized Representative and Account Manager indicating that testing can begin on or after July 1, 2009.

Health Systems International will start testing through CMS once approval is received. Testing will conclude when CMS acknowledges the EDI in place is reporting accurately and completely.

For additional information regarding Mandatory Insurer Reporting Requirements, please call (800) 683-1254 and ask to speak with one of our Settlement Specialists. You may also email Jim Trull, MSA Specialist and Director of Sales, at jtrull@us-hsi.com, or Melissa Payne, CA, MSCC, Settlement Services Coordinator, at mpayne@us-hsi.com.