

Social Security Number Removal Initiative (SSNRI)



SSNRI Impacts Upon CMS's Medicare Secondary Payer Stakeholders

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Goal and Scope of Changes

- **Goal:** To minimize changes to the greatest extent possible for all Medicare Secondary Payer (MSP) stakeholders
- **Scope of Changes:**
 - There will be no file format changes to any input or response files used as part of the MSP data exchange process
 - Starting in July 2017, reference to the term HICN will be replaced by “Medicare ID”—this universally applies to all MSP processes and will be reflected in all documentation on the COB&R web site.

Agency Exception Granted for MSP

- There will be a SSNRI exception for all MSP data exchanges and processes:
 - After January 1, 2020, Section 111 MMSEA Responsible Reporting Entities (RREs) and Voluntary Data Sharing Agreement (VDSA) employer participants may provide any one of the following to Medicare's Benefits Coordination & Recovery Center (BCRC) as the beneficiary identifier for MSP reporting purposes:
 - Medicare Beneficiary Identifier (MBI)
 - Full Social Security Number (SSN)
 - HICN or RRB Medicare number

MSP Response Files

- **Important:** Non-Group Health Plans (NGHP) RREs may continue to submit a partial 5-byte SSN
- As part of the Section 111 MMSEA and VDSA MSP responses and non-MSP response file process, BCRC will return the “most current” identifier in what currently is the “HICN” field
 - The most current identifier could be the MBI on/after April 2018
- **Of critical importance:** The MBI will not be returned in MSP response files before April 2018 – this is the date that CMS will begin to mail MBI cards to Medicare beneficiaries

Other Input and Response Files

- SSN, HICN/RRB Medicare number, or MBI will be accepted on State Pharmaceutical Assistance Programs (SPAPs), AIDS Drug Assistance Programs (ADAPs), and Patient Assistance Programs (PAPs) incoming files in the renamed “Medicare ID” field
- CMS will return the “most current” Medicare beneficiary identifier in the “Medicare ID” field of response files sent to SPAPs, ADAPs, and PAPs
 - The most current identifier could be MBI on/after April 2018

Querying Options

- Group Health Plans and employers will still be able to use the SSN lookup to obtain the “most current Medicare identifier”
 - It will still be possible to include an SSN as input value
 - Most current identifier will be returned in what is currently the “HICN” field, which will be renamed “Medicare ID”; the identifier could be the MBI on/after April 2018

Querying Options

- Section 111 MMSEA Group Health Plans will still be able to use the Health Eligibility Wrapper (HEW) 270/271 query process to obtain the “most current Medicare identifier”
 - Input values in the HEW 270 will be unchanged
 - Most current Medicare identifier will be returned in what is currently the “HICN” field, which will be renamed the “Medicare ID”; the identifier could be the MBI on/after April 2018

A General Note about MBI

- CMS encourages Section 111 RREs and VDSA employer participants that receive the MBI in MSP or non-MSP response files or via query only response files to begin using the MBI to report future updates on their covered individuals

Web Portals

- MSP stakeholders that are registered and properly authorized to access the Medicare Secondary Payer Recovery Portal (MSRP), Commercial Repayment Center Portal (CRCP), and Workers' Compensation Medicare Set-aside Arrangements Portal (WCMSAP) will be able to enter either HICN/RRB Medicare number or MBI in the renamed "Medicare ID" field to report or view specific MSP case information

Web Portals

- The system supporting the portal will know by configuration which beneficiary ID is being entered for purposes of accessing the case
- SSN can still be used within the MSPRP, CRCP, and WCMSAP if the MBI or HICN/RRB Medicare number is not available

Outgoing Correspondence

- The beneficiary identifier represented under “Medicare ID” on outgoing correspondence such as Conditional Payment Letters (CPLs), Conditional Payment Notices (CPNs), and demand letters will be either HICN/RRB Medicare number or MBI based upon:
 - The beneficiary identifier most recently reported to us that resulted in the creation of an MSP record and recovery case
 - MBI will not be reflected earlier than April 2018

Outgoing Correspondence

- Correspondence relating to Workers' Compensation Medicare Set-aside Arrangements (WCMSAs) will include whatever beneficiary identifier was submitted in the WCMSA
- If a Section 111 MMSEA RRE (for example, entity ABC) updates a pre-existing MSP record that results in a recovery case and includes an MBI in that update file, any resulting CPLs, CPNs, or other outbound correspondence sent in the future to ABC will contain the MBI
 - This will be true even if the original Section 111 MMSEA RRE submission by the entity included a HICN

Treasury Letters

- All correspondence to and from the U. S. Treasury Department relating to MSP debts will no longer contain the HICN or MBI
- Treasury correspondence will now contain a recovery Case ID
- Timing of this change to be announced in the near future—likely will be before the end of CY 2017

Questions & Answers