



Office of Financial Management/Financial Services Group

March 25, 2009

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

ALERT – Common Section 111 GHP Reporting Errors

The purpose of this document is to inform you of some reporting issues and errors CMS has identified during the first quarter of Section 111 GHP reporting. We hope by providing you this list, you will be able to avoid these mistakes and successfully participate in Section 111 GHP reporting.

Please Avoid These Common Errors

File Submission

- **Retiree Records on MSP Input Files**

Do not include ANY Non-MSP records on the MSP Input File. For example: **DO NOT include ANY retiree records on the MSP Input File.** Please notify your EDI Representative immediately if you become aware of any Non-MSP records included on an MSP Input File.

- **Untimely Test Files**

Test file processing is performed on Mondays. Test files must be received by the close of business on Friday for processing on the following Monday.

- **Bad Test Data**

Test files should contain real data. During the testing phase, please include records for Active Covered Individuals 65 years of age and older, thus assuring more “hits”.

- **Lack of Communication**

Continued communication with your EDI Rep is critical to success. Contact your EDI Rep as soon as possible to initiate communication. Let your EDI Rep know when you are ready to submit test files.

Deleting Records

- **Inappropriate Deletion of Records**

Deletes should be used **ONLY** under the following circumstances:

- To delete an entire record that was created in error.

If an MSP record was created and posted (you received an '01' disposition code in your MSP Response File) and it never should have been created.

Note: If a record was submitted in error but you never received an "01", there is no need to submit a Delete for that record.

- To correct one of the following key fields in a previously successfully added MSP record:
 - HICN
 - SSN
 - Effective Date
 - Insurance Coverage Type
 - Patient Relationship

In these cases the Delete is only used to **remove** a previously accepted record, not to change/update the record.

Deletes should be followed by Add transactions containing the correct information.

If other information changes, (for example, Termination Date) follow standard Update procedures.