



Beacon update on Revised Section 111 Implementation Timeline

CMS realizes that they gave little notice for this new required reporting, and were overly aggressive in their original implementation timelines. Especially in conjunction with the substantial fines for non-compliance--thus, the revised schedule. Essentially GHP's have about 6 additional months, ones with HRA plans only got some special leeway (I wonder who THEIR lobbyist is?). The text from the revision announcement memo follows. See our notes on what changed, highlighted in yellow.

Office of Financial Management/Financial Services Group

May 12, 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))

Revised Implementation Timeline

Note: "RRE" stands for "responsible reporting entity." "COBSW" stands for "Coordination of Benefits Secure Web site."

I. Group Health Plan (GHP):

- **10/01/2008 - 10/31/2008** Paper registration for RREs with an existing Voluntary Data Sharing Agreement (VDSA)/Voluntary Data Exchange Agreement (VDEA) with CMS.
- **10/01/2008 - 12/31/2008** Testing period for RREs with an existing VDSA/VDEA.
- **01/01/2009 - 03/31/2009** RREs with an existing VDSA/VDEA will submit their first production files in the Section 111 format, based upon a schedule predetermined with the Coordination of Benefits Contractor (COBC).
- **04/01/2009 - 04/30/2009** Electronic registration via the COBSW for all new GHP RREs. GHP RREs with a prior VDSA/VDEA who registered through the paper process will be invited to confirm their registration, set up online accounts and register individual users for the site through the COBSW. **See the exception below for GHP RREs that have only Health Reimbursement Account (HRA) information to report. (This last sentence added).**
- **04/01/2009 - 07/01/2009** Testing period for new GHP RREs (those that did not have a prior VDSA/VDEA).
- **07/01/2009 - 10/01/2009** New GHP RREs submit their first Section 111 production files based upon a predetermined schedule with the COBC.

- **10/01/2009** All GHP RREs (except for HRA RREs) will be submitting Section 111 production files by this date.
- **05/01/2010 - 06/30/2010** HRA-only GHP RREs must complete registration on the COBSW.
- **07/01/2010 - 09/30/2010** Claim Input File testing period for all HRA-only GHP RREs. (This date range added.)
- **10/01/2010 - 12/31/2010** HRA-only GHP RREs must submit their first Section 111 production files based upon a predetermined schedule with the COBC. . (This date range added.)

II. Liability Insurance (including Self-Insurance), No-Fault Insurance, and Workers' Compensation:

- **05/01/2009 - 09/30/2009** (old dates were 1/1/09 to 6/30) Electronic registration via the COBSW for all liability insurance (including self-insurance), no-fault insurance, and workers' compensation RREs.
- **07/01/2009** (this date added) Test and production Query Function will be available for those RREs who have completed registration and are in testing status (the RRE's signed Profile Report has been received by CMS' Coordination of Benefits Contractor (COBC)).
- **01/01/2010 - 03/31/2010** (old dates were 7/1/09 to 9/30/09) Claim Input File testing period for all liability insurance (including self-insurance), no-fault insurance, and workers' compensation RREs.
- **04/01/2010 - 06/30/2010** (old dates were 10/01/09 to 12/31/09) All liability insurance (including self-insurance), no-fault insurance, and workers' compensation RREs submit their first Section 111 production Claim Input Files based upon a predetermined schedule with the COBC.
- **07/01/2010** (old date was 1/1/2010) All liability insurance (including self-insurance), no-fault insurance, and workers' compensation RREs will be submitting their Section 111 production Claim Input Files by this date.