

## Section 111 Level Set **Changes, Updates & Watch List Items For 2015**

By: Mark Popolizio

As we head into 2015, now is the perfect time for a Section 111 level set. The four (4) charts below help you put Section 111 into focus as follows:

### Chart 1 **Current NGHP User Guide**

CMS' current NGHP User Guide is Version 4.4, dated January 5, 2015. The following outlines the agency's latest release:

Current NGHP User Guide	Highlights
<b>Version 4.4 (January 5, 2015)</b>	<ul style="list-style-type: none"> <li>• This is the 14<sup>th</sup> edition of the NGHP User Guide to date.</li> <li>• Version 4.4 replaces Version 4.3 (which was released in October 2014).</li> <li>• See the “Revision History” section contained at the beginning of each Chapter for a detailed listing of the changes made in Version 4.4.</li> <li>• In general, the updates made in Version 4.4 relate to the following:               <ul style="list-style-type: none"> <li>○ Changes related to the resetting of the liability TPOC monetary thresholds as of October 1, 2014, including an applicable CJ07 error edit (See Chart 3 for more information on the CJ07 edit).</li> <li>○ Updates related to CMS' new SSN policy (See Chart 3 for more information on the new SSN policy).</li> <li>○ Changes to other noted Fields as referenced in the applicable “Revision History” related to the Version 4.4 updates.</li> </ul> </li> <li>• Click <a href="#">here</a> for a copy of the current NGHP User Guide.</li> </ul>

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## **Chart 2**

### **Current TPOC Monetary Reporting Thresholds**

CMS' TPOC monetary reporting thresholds reset again as of October 1, 2014. As part of this reset, there are now different monetary amounts for liability and WC claims. This chart outlines the current TPOC monetary thresholds for easy reference as follows:

Claim Type	Current Monetary Threshold	Application
Liability	\$1,000	<ul style="list-style-type: none"> <li>On October 1, 2014, the TPOC monetary reporting thresholds for liability claims reset from \$2,000 to \$1,000.</li> <li>Thus, as of October 1, 2014 (and currently), liability settlements, judgments, awards, and other payments involving a Medicare beneficiary greater than \$1,000 (and that otherwise meet CMS' other TPOC criteria) must be reported through the Section 111 process.</li> </ul>
WC	\$300	<ul style="list-style-type: none"> <li>On October 1, 2014, the TPOC monetary reporting thresholds for WC claims reset from \$2,000 to \$300.</li> <li>Thus, as of October 1, 2014 (and currently), WC settlements, judgments, awards, and other payments involving a Medicare beneficiary greater than \$300 (and that otherwise meet CMS' other TPOC criteria) must be reported through the Section 111 process.</li> </ul>
No-Fault	\$0	<ul style="list-style-type: none"> <li>The no-fault monetary TPOC threshold has been \$0 since the inception of the Section 111 reporting process.</li> <li>Thus, any no-fault settlement, judgment, award, and other payment involving a Medicare beneficiary greater than \$0 (and that otherwise meets CMS' other TPOC criteria) must be reported through the Section 111 process.</li> </ul>

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## Chart 3 Changes Taking Effect in 2015

Several important changes are scheduled to become effective on a number of Section 111 fronts in 2015. This chart provides a general overview of these updates as follows:

Item	Effective Date	Highlights
1. CJ07 Edit	1/1/15	<p>As of January 1, 2015, the CJ07 edit will be returned on all Claim Input File Detail Records and Direct Data Entry (DDE) claim submissions that meet the following criteria:</p> <ul style="list-style-type: none"> <li>• If the most recent TPOC Date is on or between October 1, 2012 and September 30, 2014 and the cumulative TPOC Amount is less than or equal to \$300.</li> <li>• If the most recent TPOC Date is on or after October 1, 2014 and the cumulative TPOC Amount is less than or equal to \$1000.</li> </ul>
2. New SSN Policy	1/5/15	<ul style="list-style-type: none"> <li>• Where a NGHP RRE cannot obtain an individual's HICN or full SSN, the RRE may report the last five digits of the claimant's SSN, along with his/her first initial, surname, date of birth, and gender.</li> <li>• CMS has revised its Model Language to assist RREs in documenting their attempts to obtain a claimant's HICN or SSN.</li> <li>• For more information, click <a href="#">here</a>.</li> </ul>
3. Response File Naming Convention Change	4/6/15	<ul style="list-style-type: none"> <li>• Naming convention changes take effect pertaining to Claim Response, TIN, Response, and Query Response files.</li> <li>• For more information, click <a href="#">here</a>.</li> </ul>
4. New Recovery Agent Process	7/13/15	<ul style="list-style-type: none"> <li>• RREs may submit recovery agent information as part of the Section 111 process.</li> <li>• Both the RRE and recovery agent will be copied on recovery (Medicare conditional payments)</li> </ul>

		<p>correspondence.</p> <ul style="list-style-type: none"> <li>• Optional and voluntary process.</li> <li>• For more information, click <a href="#">here</a>.</li> </ul>
5. ICD 10 Transition	10/1/15	<ul style="list-style-type: none"> <li>• ICD 10 diagnosis codes will be required on all production Claim Input Files and DDE add and update records for all dates of incident of 10/1/15 and subsequent (per CMS' definition).</li> <li>• For more information and other related requirements, click <a href="#">here</a>.</li> </ul>

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### **Chart 4** **Watch List 2015**

Item	What to Watch for ...
1. New Recovery Agent Process	<ul style="list-style-type: none"> <li>• Starts 7/13/15</li> <li>• Will CMS release any additional information?</li> </ul>
2. ICD-10 Reporting	<ul style="list-style-type: none"> <li>• Starts 10/1/15</li> <li>• Will CMS release any additional information?</li> <li>• RREs should be preparing for this change.</li> </ul>
3. Section 111 Penalties and “Good Faith” Safe Harbors	<ul style="list-style-type: none"> <li>• <u>December 2013</u>: CMS released its Section 111 penalty ANPRM in December 2013 and opened a public comment period.</li> <li>• CMS requested industry input on establishing the Section 111 penalty provisions and “good faith” compliance safe harbors.</li> <li>• <u>February 2014</u>: Comment period closed.</li> <li>• To date, no further action from CMS.</li> <li>• Will CMS take the next steps in this process and issue its Section 111 penalty proposals in 2015?</li> </ul>

	<ul style="list-style-type: none"> <li>• For more information, click <a href="#">here</a>.</li> </ul>
<p>4. <b>Liability Monetary TPOC reporting threshold</b></p>	<ul style="list-style-type: none"> <li>• As of 10/1/14, the current liability monetary TPOC reporting threshold is \$1,000.</li> <li>• Will CMS adjust this threshold in 2015?</li> <li>• For more information, click <a href="#">here</a>.</li> </ul>

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## Going Forward ...

ISO Claims Partners will monitor all developments on the Section 111 front in 2015 and provide additional updates as warranted.

In the interim, please note that ISO Claims Partners offers state of the art Section 111 services to help you meet the Section 111 challenge – including our industry leading **MSP Navigator** Reporting program and our very popular **Section 111 Audit** service.

To learn more about our services, click [here](#).

For questions, please feel free to contact the author at: [mpopolizio@iso.com](mailto:mpopolizio@iso.com)