



Office of Financial Management/Financial Services Group

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November 18, 2010

Implementation of 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) & (8))

**ALERT: TIN Reference File Address Validation Information for Group Health  
Plan (GHP) Responsible Reporting Entities (RREs)**

This ALERT provides information related to the validation of certain TIN Reference File address fields used when reporting Group Health Plan (GHP) information mandated by Section 111 of the MMSEA.

Under the current Section 111 reporting process, RREs submit TIN Reference Files along with their MSP Input Files that contain records with insurer/TPA and employer TIN and associated address. The records on the TIN Input File are matched to records with the same insurer/TPA and employer TINs reported on MSP Input File Detail Records in Fields 21 and 22. If a TIN Reference File record has errors, it is rejected and can result in rejection of all associated records with the same insurer/TPA or employer TIN on the MSP Input File. Error codes related to the TIN Reference File address fields are posted to each rejected MSP record on its corresponding MSP Response File Detail Record.

Changes are being implemented by CMS to improve this process, including the address validation performed and the processing of both TIN Reference File and associated MSP Input File records. These changes are being implemented in a phased approach. The initial phase will include a revision to the address validation routines used in the Coordination of Benefits Contractor (COBC) system that processes Section 111 files. This initial phase will be implemented on **January 10, 2011 and should have no substantial impact on RREs.** More information on this initial phase is provided below.

The subsequent phase will involve the implementation of more rigorous address validation routines and a new TIN Reference Response File which will provide RREs with specific information regarding errors found on TIN Reference File records and an indication as to whether each TIN Reference File record was accepted or rejected. The estimated implementation date for this subsequent phase is **July 2011.** More information will be provided to RREs at a later date with adequate lead time for RREs to implement changes as necessary in their internal systems.

In the initial phase of this address validation improvement, the COBC will replace certain error codes with compliance flags. However, the edit logic applied to the address fields will remain the same. MSP Input File records **will not be rejected** due to certain address issues found in Fields 3-7 and 15-18 on associated TIN Reference File records. Instead, if errors are found with address fields on the associated TIN Reference File records, the MSP record will be returned on the MSP Response File with specific Compliance Flag Code values related to each TIN address field. For example, if an

invalid value such as spaces is supplied in the State Field 9 on an Insurer/TPA TIN Reference File Detail Record with a TIN Indicator of I, any MSP Input File Detail Records associated with the Insurer/TPA TIN on that record, will be returned with a compliance flag value of 07 rather than an error code on the MSP Response File. RREs are required to examine these compliance flags and make the necessary corrections to their TIN Reference File records and submit those corrections in the next quarterly file submission. Remember that in addition to resubmitting corrected TIN Reference File records, all the MSP Input File Detail Records, previously accepted with an '01' disposition code, associated to the corrected TIN record must be resubmitted as update transactions in your MSP Input File. This will insure that the corrected address is posted to the MSP occurrence and passed to other Medicare contractors for claims processing and recovery demand activity. These updates are to be made with your regular quarterly file submission unless otherwise instructed by your EDI Representative. Please refer to Section 7.2.2 of the Section 111 GHP User Guide for more information concerning the TIN Reference File and Section 7.2.9.6 for more information on compliance flags.

The following new Compliance Flag Codes will be added to the MSP Response File effective **January 10, 2011:**

<b>GHP Compliance Flag Codes</b>	
<b>Compliance Code</b>	<b>Description</b>
03	Future Use – not used at this time.
04	Invalid insurer/TPA Address Line 1 found on the associated TIN Reference File Detail Record with TIN Indicator of I. Insurer/TPA Address Line 1 field is missing or contains characters other than alpha, numeric and special characters A-Z, 0-9, space, &, dash, @, #, /, comma, semicolon, colon, period, quote.
05	Invalid insurer/TPA Address Line 2 found on the associated TIN Reference File Detail Record with TIN Indicator of I. If entered Address Line 2 must not contain any characters other than alpha, numeric and special characters, A-Z, 0-9, space, &, dash, @, #, /, comma, semicolon, colon, period, quote.
06	Invalid insurer/TPA City found on the associated TIN Reference File Detail Record with TIN Indicator of I. Insurer/TPA City is missing or contains characters other than alpha, numeric and special characters A-Z, 0-9, space, &, dash, @, #, /, comma, semicolon, colon, period, quote.
07	Invalid insurer/TPA State found on the associated TIN Reference File Detail Record with TIN Indicator of I. Insurer/TPA State is missing or contained a value other than a valid US postal state code.
08	Invalid or missing insurer/TPA Zip Code found on the associated TIN Reference File Detail Record with TIN Indicator of I. Zip Code must contain 5 numeric digits or 9 numeric digits.
09	Future Use – not used at this time.
10	Invalid employer Name found on the associated TIN Reference File Detail Record with TIN Indicator of E, S, F, Y or Z. Employer Name is missing or contains characters other than alpha, numeric and special characters A-Z, 0-9, space, &, dash, @, #, /, comma, semicolon, colon, period, and quote.
11	Invalid employer Address Line 1 found on the associated TIN Reference

<b>GHP Compliance Flag Codes</b>	
<b>Compliance Code</b>	<b>Description</b>
	File Detail Record with TIN Indicator of indicator of E, S, F, Y or Z and State is not equal to FC. Employer Address Line 1 field is missing or contains characters other than alpha, numeric and special characters A-Z, 0-9, space, &, dash, @, #, /, comma, semicolon, colon, period, and quote.
12	Invalid employer Address Line 2 found on the associated TIN Reference File Detail Record with TIN Indicator of indicator of E, S, F, Y or Z and State is not equal to FC. If entered, Employer Address Line 2 must not contain characters other than alpha, numeric and special characters, A-Z, 0-9, space, &, dash, @, #, /, comma, semicolon, colon, period, quote.
13	Invalid employer City found on the associated TIN Reference File Detail Record with TIN Indicator of indicator of E, S, F, Y or Z and State is not equal to FC. Employer City is missing or contains characters other than alpha, numeric and special characters A-Z, 0-9, space, &, dash, @, #, /, comma, semicolon, colon, period, quote.
14	Invalid employer State found on the associated TIN Reference File Detail Record with TIN Indicator of indicator of E, S, F, Y or Z. Employer State is missing or contained a value other than a valid US postal state code or FC.
15	Invalid employer Zip Code found on the associated TIN Reference File Detail Record with TIN Indicator of indicator of E, S, F, Y or Z and State is not equal to FC. Employer Zip Code field must contain 5 numeric digits or 9 numeric digits.
16	Missing or invalid Foreign Employer Address Line 1-4 on the associated TIN Reference File Detail Record. The State code supplied was FC but the Foreign Employer Address Line 1-4 fields contained all spaces or non-alphanumeric characters; or the State code supplied was not FC and the Foreign Employer Address Lines 1-4 were not equal to all spaces.
<b>17</b>	Invalid Insurer/TPA Demand Mailing Name found on the associated TIN Reference File Detail Record. The field contains a value but the TIN Indicator was not equal to I. The TIN Indicator is I, but the field contains characters other than alpha, numeric and special characters A-Z, 0-9, space, &, dash, @, #, /, comma, semicolon, colon, period, quote.
<b>18</b>	Invalid Insurer/TPA Demand Address Line 1 found on the associated TIN Reference File Detail Record. The field contains a value but the TIN Indicator was not equal to I. The TIN Indicator is I and the Insurer/TPA Demand Mailing Name was found, but the Insurer/TPA Demand Address Line 1 is missing or the field contains characters other than alpha, numeric and special characters A-Z, 0-9, space, &, dash, @, #, /, comma, semicolon, colon, period, quote.
<b>19</b>	Invalid Insurer/TPA Demand Address Line 2 found on the associated TIN Reference File Detail Record. The field contains a value but the TIN Indicator was not equal to I. The TIN Indicator is I, but the field contains characters other than alpha, numeric and special characters A-Z, 0-9, space, &, dash, @, #, /, comma, semicolon, colon, period, quote.
<b>20</b>	Invalid Insurer/TPA Demand Mailing City found on the associated TIN

<b>GHP Compliance Flag Codes</b>	
<b>Compliance Code</b>	<b>Description</b>
	Reference File Detail Record. The field contains a value but the TIN Indicator was not equal to I. The TIN Indicator is I and the Insurer/TPA Demand Mailing Name was found, but the Insurer/TPA Demand Mailing City is missing or the field contains characters other than alpha, numeric and special characters A-Z, 0-9, space, &, dash, @, #, /, comma, semicolon, colon, period, quote.
<b>21</b>	Invalid Insurer/TPA Demand Mailing State found on the associated TIN Reference File Detail Record. The field contains a value but the TIN Indicator was not equal to I. The TIN Indicator is I and the Insurer/TPA Demand Mailing Name was found, but the Insurer/TPA Demand Mailing State is missing or contained a value other than a valid US postal state code.
<b>22</b>	Invalid Insurer/TPA Demand Mailing Zip found on the associated TIN Reference File Detail Record. The field contains a value but the TIN Indicator was not equal to I. The TIN Indicator is I and the Insurer/TPA Demand Mailing Name was found, but the Insurer/TPA Demand Mailing Zip does not contain 5 numeric digits followed by 4 spaces or 9 numeric digits.

Additional Information:

- The following MSP Response File Error Codes will no longer be returned on MSP Response Files: SP26, SP27, SP28, SP29, SP39, SP40, SP41, SP42, and SP43.
- No changes will be made to SP25. The SP25 error will continue to be returned for insurer/TPA TIN name errors and may also be returned if an MSP record cannot be matched to an insurer/TPA TIN Reference File Detail Record. Please refer to the Section 111 GHP User Guide for more information on SP25.
- TIN Reference File Detail Records without valid values in the TIN (Field 1), Name (Field 2), or TIN Indicator (Field 8) will continue to be rejected and result in corresponding errors on associated MSP Response Detail Records.
- Current logic for Compliance Flags 01 and 02 will remain the same.
- Up to ten Compliance Flag Codes will be returned on MSP Response File Records. No changes are being made to the file layouts.
- The Section 111 GHP User Guide will be updated to include this information in the next version. In the meantime, this information supersedes the information in Version 3.1 of the guide.
- The effective date of the changes described in this alert is January 10, 2011.