



Proven Solutions for Cost Containment

## *Government Affairs Alert*

April 20, 2011

### **CMS Issues TIN Reference Response File and Address Validation Alert**

On April 1, 2011, the Centers for Medicare and Medicaid Services (CMS) issued an alert providing information pertaining to Non-Group Health Plans (NGHP), classified as Responsible Reporting Entities (RREs) under Section 111 of the Medicare, Medicaid and SCHIP Extension Act (MMSEA). The alert addressed revisions being made to validation of tax identification numbers (TINs) and related name and address information effective October 1, 2011.

#### **Background**

Tax Identification Numbers (TINs) and associated name and address information submitted on the TIN Reference File represent critical information used by Medicare. Changes are being made to the process which validates information to improve the integrity of data collected and provide RREs with better feedback on TIN and TIN address errors.

Initially when the Section 111 MMSEA process was established, if a TIN Reference File had errors individual TIN records were rejected and errors were recorded on a report used by Electronic Data Interchange (EDI) Representatives to assist the RRE in error correction. The Claim Input File would continue processing, but since the matching TIN records were in error, the address information was not merged with claim records.

To address this issue, the first phase of changes was implemented in January 2011 which involved returning compliance flag codes on Claim Response Files to inform RREs of errors found on their TIN Reference File. Claim records were not rejected for identified issues, but RREs were given more specific information relating to TIN record errors. The second phase of changes will be effective October 1, 2011 and will involve implementation of a new TIN Reference Response File and more rigorous editing of TIN addresses by COBC using postal software to ensure address is actually deliverable.

For specific information regarding basic field and address validations, TIN Reference Response File details, Claim Input File processing information, Direct Data Entry (DDE) changes, Pre-Implementation TIN Record Clean-up, Response File errors and TIN Reference File Record layouts please review the Alert in its entirety [here](#).

#### **PMSI MMSEA Section 111 Reporting Clients**

The updates outlined in this alert will drive several changes within MedicareConnect, including new screens to interact and review TIN record data, and the issuance of a new file specification for the communication of TIN issues to our electronic and hybrid clients. From a client and datasource perspective, the changes in the alert will also drive a new level of data cleansing activity. The TIN records will need to meet not only the current set of data structure validations, but will also need to be valid against the USPS published address list. TINs must pass both sets of validations in order for CMS to consider it valid.



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### **PMSI Client Support**

PMSI is committed to providing our clients the most current information on MMSEA reporting requirements and will continue to deliver updates as new information is issued by CMS. RREs should attend CMS teleconferences and consult the MMSEA Section 111 dedicated web site at <http://www.cms.gov/MandatoryInsRep/> to obtain additional information about reporting requirements.

For more information on Medicare Secondary Payer related Government Affairs Alerts, please contact your PMSI Representative at 888.MSA.PMSI, or visit the [Knowledge Center](#) section of our website at [www.pmsionline.com](http://www.pmsionline.com).

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