



# CARR ALLISON MEDICARE COMPLIANCE ALERT

September 9, 2009

## CMS Issues Alert Regarding Collection of HICNs and/or SSNs for Non-Group Health Plan

### Contents

CMS Issues Alert Regarding Collection of HICNs and/or SSNs for Non-Group Health Plan

CMS has recently issued an alert offering compliance guidance in obtaining an individual's HICN and/or SSN. CMS has published model language to assist RREs in obtaining this information to ensure compliance with Section 111 reporting. If an individual refuses to provide a HICN or SSN, the RRE can use the model language as part of its file submission, which CMS will consider to be compliant if:

- A signed copy of the model language in the format provided is obtained (even if the individual is later discovered to be a Medicare beneficiary).
- With respect to that same individual, the reporting entity has the model language (with the picture of the Medicare ID card) re-signed and dated at least once every 12 months in cases where ongoing responsibility for medicals (ORM) applies.

The reporting entity should retain this documentation.

Although the model language will ensure the RRE is compliant with Section 111, CMS states that "[t]his process does not provide a 'safe harbor' to any reporting entity attempting to use it to avoid reporting MSP data about an individual known to the reporting entity to be a Medicare beneficiary."

To view the alert [click here](#).

To download the model language [click here](#).

### Quick Links

[Carr Allison News](#)

[Section 111 News](#)

[Lawyers](#)

[Contact Us](#)

Alabama State Bar Association rules require the following disclosure: "No representation is made that the quality of legal services to be performed is greater than the quality of legal services performed by other lawyers."

[Click here](#) to be removed from this mailing list.