



MMSEA, Section 111 (SCHIP) Reporting March 8, 2010 - Notice

The Center for Medicare/Medicaid Services (CMS) issued an Alert on February 25, 2010 that addressed several aspects of SCHIP reporting. The following key changes should be noted:

- First required production data submission has been delayed until 1/1/2011. RREs that have completed registration and testing may begin submitting production data during their assigned Submission Period beginning the second quarter of 2010 (April 1 to June 30), but not sooner.
- The retroactive date for the reporting open claims with Ongoing Responsibility for Medicals has been changed to 1/1/2010. Claims closed administratively with ORM prior to this date are not reportable for MIR. This is a change from the previous 7/1/09 date.
- The retroactive date for reporting Total Payment Obligation to the Claimant (settlements/judgments/awards) has been changed to 10/1/2010. Claims closed through a settlement, judgment, or award prior to this date are not reportable for MIR. This is a change from the previous 1/1/10 date, but does not create a "safe harbor" for MSP compliance.
- Entities with a deductible plan no longer meet the definition of a Responsible Reporting Entity regardless of how their funding occurs. In deductible scenarios, the Insurer is the RRE for reporting purposes. This change will substantially impact the number of registered RRE IDs.
- Offshore RRE Registration:
 - The CMS website is undergoing a configuration change to accommodate the registration of foreign entities. These changes are expected to be in place and available on 4/5/2010. Offshore RREs are strongly encouraged to complete the registration process prior to 9/30/2010 so that sufficient time remains to complete testing with CMS.

Safety National is now the RRE for deductible policies. Insureds who have registered as the RRE for our policies will need to delete their registration in accordance with Section 8.3 in the User Guide.

TPAs administering claims on behalf of Safety National will be provided their list of deductible policies. The required data for applicable claims should be submitted to our reporting agent, Gould & Lamb. If you have any questions, please contact Tim Stanger at tim.stanger@safetynational.com