

Q&A for the SSNRI Program for NCVHS – April Meeting

Q1. SSNRI Testing – What will testing consist of for SSNRI? (The NCVHS committee is very interested in hearing more about how CMS plans to test SSNRI. They would like to see additional testing done above and beyond what was done for ICD-10.)

A1. CMS has a robust testing plan for changes resulting from the implementation of the MBI, including enhanced integration testing (EIT) for those systems that are new or pose the highest risk to CMS business operations. This plan does not include end-to-end testing with the Medicare fee-for-service claims processing systems. MBI implementation differs from ICD-10 implementation in a few key ways that mitigate the need for such end-to-end testing.

The changes required for implementation of ICD-10 were complex, including changes to a large number of National Coverage Determinations (NCD) and Local Coverage Determinations (LCD). In addition, there was a hard cutoff date for the move from ICD-9 to ICD-10, without benefit of a transition period. Submitter testing prior to implementation of the changes was critical because claims containing ICD-9 codes would no longer be accepted after the cutoff date. This is not the case with MBI.

The scope of changes for MBI are less complex than existed for ICD-10. The MBI will contain the same number of characters and be submitted in the same location as the HICN is today. There are no NCDs or LCDs that are MBI-specific, as was the case with ICD-10. In addition, there will be a 21-month transition period for MBI implementation during which both HICNs and MBIs will be accepted on transactions. Submitters can use this time as a live test and make adjustments as necessary, yet still have claims submitted and processed with HICNs until the transition period ends. CMS will monitor HICN versus MBI usage during the transition period to help assess readiness for full implementation.

Q2. What is the viability of sharing crosswalks with research organizations, data registries, etc.?

A2. Researchers or registries that have a need for a crosswalk can request beneficiary level data through the existing CMS processes. This request may require an update to your data use agreements. CMS will evaluate these requests on a case-by-case basis

Q3. Is there a check-digit concept built within the MBI? Even though the MBI is randomly generated, will there be some form of identification built into the number to alert CMS to a fraudulent number?

A3. No, there will not be a check-digit built within the new MBI. The MBI will be a randomly generated non-intelligent number. CMS is developing processes to change a person's MBI if the beneficiary has reported it as compromised or stolen.