

September 5, 2008

## Implementation Timeline

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)&(b)(8))

### I. Paperwork Reduction Act (PRA):

- 08/01/08                      Section 111 PRA Federal Register Notice.
  - 08/01/08 - 09/30/08      60 Day PRA Initial Public Comment Period.
  - 10/10/08 - 11/10/08\*      30 Day PRA Second Public Comment Period.
  - 12/10/08\*                    OMB control number assigned – Notice of Action.
- \* *projected dates*

Note: “RRE” stands for “responsible reporting entity.”  
“COBSW” stands for “Coordination of Benefits Secure Web site.”

### II. Group Health Plan (GHP):

- 10/01/08 - 10/31/08      Paper registration for RREs with an existing Voluntary Data Sharing Agreement (VDSA)/Voluntary Data Exchange Agreement (VDEA) with CMS.
- 10/01/08 - 12/31/08      Testing period for RREs with an existing VDSA/VDEA.
- 01/01/09 - 03/31/09      RREs with an existing VDSA/VDEA will submit their first production files in the Section 111 format, based upon a schedule predetermined with the Coordination of Benefits Contractor (COBC).
- 04/01/09 - 04/30/09      Electronic registration via the COBSW for all new GHP RREs. GHP RREs with a prior VDSA/VDEA who registered through the paper process will be invited to confirm their registration, set up online accounts and register individual users for the site through the COBSW.
- 04/01/09 - 07/01/09      Testing period for new GHP RREs (those that did not have a prior VDSA/VDEA).
- 07/01/09 - 10/01/09      New GHP RREs submit their first Section 111 production files based upon a predetermined schedule with the COBC.
- 10/01/09                      All GHP RREs will be submitting Section 111 production files by this date.

III. Liability Insurance (including Self-Insurance), No-Fault Insurance, and Workers' Compensation:

- 01/01/09 - 06/30/09 Recommended systems development period.
- 05/01/09 - 06/30/09 Electronic registration via the COBSW for all liability/no-fault/workers' compensation RREs.
- 07/01/09 - 09/30/09 Testing period for all liability/no-fault/workers' compensation RREs.
- 10/01/09 - 12/31/09 All liability/no-fault/workers' compensation RREs submit their first Section 111 production files based upon a predetermined schedule with the COBC.
- 01/01/10 All liability/no-fault/workers' compensation RREs will be submitting Section 111 production files by this date.