



May 2009

Re: New Social Security Number Reporting Requirements

Dear Group Administrator,

Effective this year, federal law (Section 111 of the Medicare Modernization and SCHIP Extension Act) mandates certain changes in reporting of insurance coverage for Medicare beneficiaries, specifically when group health plans are primary to Medicare.

Blue Cross and Blue Shield of North Carolina is required to report Social Security Numbers (SSNs) for all reported enrollees with effective dates of January 1, 2009 and forward. For reported members who are effective prior to January 1, 2009, we will have until first quarter 2011 to collect and report SSNs. In 2009, the mandatory reporting is required for all members age 55+, not just those with group health plans that are primary to Medicare. Beginning January 2011, the reporting requirement will extend to any member age 45+. While the law indicates a 2011 deadline for much of this, we are focused on having our plans in place by January 2010 to ensure our mutual compliance with these requirements.

### **Step 1: Filling the Gaps**

Our analysis shows that we do have some gaps in our SSN data. To quickly close those gaps without placing a burden on our groups, we have identified a vendor to assist us in collecting missing SSNs. The vendor will retrieve the missing SSNs and we will use that information for the next reporting period to the Centers for Medicare Services (CMS) in May. Following validation of that data by CMS, or through member validation, we will populate the SSNs in our system.

This service is being provided at no charge to our groups so that we can quickly obtain SSNs without placing the entire burden on our groups. We know there will be some missing SSNs after completion of this project. After loading the SSNs into our system, we will need your assistance to collect these few remaining SSNs.

### **Step 2: Ongoing Collection**

We will begin requiring our employer groups to provide us SSNs for spouse and domestic partners, regardless of age, through their current electronic or paper eligibility process. This is in addition to the current requirement for subscribers' SSNs. Our membership systems have the necessary fields to house the SSNs for dependents and many of our groups are already submitting this information. You may begin collecting and sending this information in your existing process at any time.

Groups that use paper enrollment will need to provide dependent spouse and domestic partner SSNs beginning July 1, 2009.



Beginning in June, for groups that use eBenefitsNow, we will add a pop-up message in the eBenefitsNow tool notifying users that SSNs will be required for all spouses and domestic partners (regardless of age) in addition to the subscriber. Transactions initiated by group administrators as well as employees that have access to the self-serve features will not be completed without the missing spouse or domestic partner SSN. These fields will become mandatory on July 1, 2009, after we have completed the collection process with our vendor.

On August 1, 2009, the SSN field for spouse and domestic partners will be mandatory for new enrollees for our groups using eExchange. If you have system questions or concerns about complying with this date, please contact your Blue Cross and Blue Shield of North Carolina dedicated membership representative as they will assist you in the transition.

### **Questions**

We appreciate your assistance in helping us meet the new federal guidelines from Section 111 of the Medicare Modernization and SCHIP Extension Act. If you have any questions about the steps we are taking or your role in them, please contact your BCBSNC group representative.

Thank you.

Sincerely,

Blue Cross and Blue Shield of North Carolina.