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Physicians and the Social Security Number Removal Initiative

by

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In addition to repealing the flawed Sustainable Growth Rate formula and implementing the Merit-based Incentive Payment System (MIPS) and Alternative Payment Models (APMs) about which we have ongoing concerns, the Medicare Access and CHIP Reauthorization Act of 2015 (MACRA) mandated that Medicare end its 50+ years practice of using Social Security Numbers (SSNs) to identify its millions of beneficiaries by April 2019. To comply with this congressional requirement, Medicare has begun its Social Security Number Removal Initiative (SSNRI).

Under the SSNRI, the Centers for Medicare and Medicaid Services (CMS) will issue new Medicare cards to all existing beneficiaries, replacing the current Medicare Health Insurance Claim Number (HICN—usually the SSN plus a letter) with a new, randomly generated Medicare Beneficiary Identifier (MBI) that does not include any imbedded information. CMS plans to begin the card replacement program in April 2018 (approximately one and a half years from now) and finish this in time to meet its April 2019 deadline. It will also issue only MBIs to newly enrolled Medicare beneficiaries beginning in April 2018. MBIs are considered Personal Health Information (PHI) and must be protected like all other PHI.

Beginning in April 2018, all systems involved in Medicare claims and payments, as well as any other transactions involving Medicare beneficiaries, must be prepared to utilize these new MBIs. For physicians, this means that their claims systems and patient records must be able to accept, store, and utilize MBIs for Medicare patients by April 2018. Any planned system updates or new systems implemented between now and 2018 should include these capabilities to avoid another update in the near future.

CMS has already identified the format for MBIs. They will be 11 characters in length with the first character always being a number from 0 to 9. Some of the other characters will be restricted to be a number 0-9, a letter A to Z (not including B, I, L, S, O, or Z), or in a few cases either a number or a letter. These details may be important to those programming medical record or claims systems.

During the planned 18-month transition period through December 2019, Medicare will accept either the MBI or the previously assigned HICN. After the transition period, only MBIs will be accepted on Medicare claims and other transactions. One exception to this is that even after the end of the transition period, physicians will continue to use the HICN on any appeals for denied claims filed with the HICN before or during the transition period

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Even though the transition to new MBIs will not be completed until 2019, physicians should begin asking Medicare beneficiaries whether they have a new Medicare number beginning in April 2018. Once a Medicare beneficiary has received an MBI any claim utilizing the HICN during the transition period will have a message included on the Medicare response that identifies that patient's new MBI. Physicians can then use that information to update their systems even if the patient has not specifically informed the physician that his or her number has changed.

It is important that physicians identify and store the required MBIs during the transition period because as of now there are no plans for a "look-up" table or other service for physicians to use as a crosswalk between current HICNs and MBIs after the transition period ends.

Although 2018 and 2019 seem far in the future, physicians who are updating their systems now should ensure that the new systems can accommodate the new MBIs to avoid unnecessary repeat updates in the future. The ASA will provide additional information as this program gets closer to its implementation.

Additional Recourses: <https://www.cms.gov/Medicare/SSNRI/Index.html>