



**DEPARTMENT OF INSURANCE, FINANCIAL
INSTITUTIONS AND PROFESSIONAL REGISTRATION**

P.O. Box 690, Jefferson City, Mo. 65102-0690

INSURANCE BULLETIN 18-02

Medicare Access and CHIP Reauthorization Act (MACRA) of 2015

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The following Bulletin is issued by the Missouri Department of Insurance, Financial Institutions and Professional Registration ("Department") to inform and educate the reader on the specified issue. It does not have the force and effect of law, is not an evaluation of any specific facts or circumstances, shall not be considered a statement of general applicability and is not binding on the Department or an insurer. See §374.015, RSMo.

To: All insurers writing Medicare Supplement insurance in the State of Missouri

From: Chlora Lindley-Myers, Director

Re: MACRA, Medicare Beneficiary Identifiers (MBI) and Application Forms

The Department is issuing this Bulletin to provide guidance to insurers who are actively writing Medicare Supplement insurance in the State of Missouri regarding potential impacts from recently enacted federal legislation.

The Medicare Access and CHIP Reauthorization Act (MACRA) of 2015 requires CMS to remove Social Security Numbers from all Medicare cards and replace them with a new, unique Medicare Beneficiary Identifier (MBI) by April 2019. CMS is issuing the new MBIs to its beneficiaries to protect seniors from the fraudulent use of social security numbers and illegal use of Medicare benefits.

The Department understands that beginning in April 2018, CMS will start mailing out the new cards in phases by geographic location. Following this initial distribution, there will be a 21-month transition period, ending Dec. 31, 2019, during which CMS will accept either the Social Security Number-based cards or the new identifier.

The Department has recently received inquiries regarding previously approved Medicare Supplement application forms. Specifically, if an insurer needs to revise the application form to revise the label “Social Security Number” or “SSN” to “Medicare Beneficiary Identifier” or “MBI” because of the new MACRA and CMS requirements, the Department has been asked if that would require a new application to be filed for prior approval under Missouri law.

If the **only** change being made to an application form is to reflect the change from SSN to MBI because of federal requirements, the Department does not believe any additional filing is required under Missouri law. Both the SSN and MBI are issued by the federal government and are intended to identify beneficiaries. The MBI is intended to replace the SSN in terms of this identification process. Therefore, in this instance, it is not a substantive change in a previously approved form that would require a new approval.

However, if **any** other changes or revisions are made to the application form, then all other filing requirements under Missouri law would still apply and the application form should be submitted for prior approval.

The Department also reminds insurers that since this identifier change will also impact claims adjudication, they should be preparing their systems for these changes **now**. The Department encourages insurers to take whatever steps they can to ensure a smooth transition so that beneficiaries and medical providers are not adversely impacted by this change. The Centers for Medicare and Medicaid Services has additional information and resources available on its website at: <https://www.cms.gov/Medicare/New-Medicare-Card/Health-and-Drug-Plans/Health-and-drug-plans.html>.

Any insurers who have additional questions may contact the Market Regulation Division at 573-751-3365.

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