

**SHIP Communications with Customer Service Representatives (CSRs) for
1-800 MEDICARE, Medicare Advantage, Coordination of Benefits and Part D Plan Sponsors**

Standard Operating Procedure

I. Background

The HIPAA Privacy Rule sections 164.510(b)(i) and 164.510(b)(2)(iii) allow for certain entities to provide information to another entity for their involvement in an individual's care or payment related to the individual's health care. Since many SHIP encounters are to assist people with Medicare (beneficiaries) resolve Medicare claims-related payment issues/questions, SHIPs are recognized as one of these entities.

II. Procedures for Communicating with CSRs

- A. All 1-800-MEDICARE customer service representatives, participating Medicare Advantage plans, Coordination of Benefits and Part D Plan sponsors are instructed to disclose Medicare entitlement and claims payment-related information to a SHIP director/counselor/volunteer (counselor) when one of the two following mandatory conditions are met:
1. The CSR has written or verbal authorization from a beneficiary or their caregiver/representative to provide information to a SHIP counselor; **or**,
 2. The counselor is listed on a national SHIP roster of Unique IDs issued by CMS.
- B. If section II A.1 above is met, the CSR will ask questions to verify the identity of the beneficiary, i.e., full name, DOB, Medicare number, and one additional piece of information, e.g., address, phone number, effective date (s) of Medicare A and/or B.
- C. If section II A.2. above is met, the CSR will ask questions to verify the identity of the SHIP counselor, i.e., her/his full name, State program name of the SHIP, and State from which they are calling. The CSR will also ask questions to verify the identity of the beneficiary, i.e., full name, DOB, Medicare number, and one additional piece of information, e.g., address, phone number, effective date(s) of Medicare A and/or B.
- D. If neither II A1. nor A2. above are met, 1-800-MEDICARE and participating Medicare Advantage and Part D Plan Sponsor CSRs are instructed **NOT** to disclose any information pertaining to a Medicare beneficiary to a SHIP director /counselor/volunteer (counselor).
- E. NOTE: These procedures do NOT replace nor supercede those situations where a Medicare beneficiary 1.) is sitting in the SHIP office with a counselor and is able to speak to the CSR to verify disclosure authorization, or 2.) calls the SHIP

and the counselor, in turn, brings the CSR into the call and the CSR confirms authorization while on that 3-way call.

III. Assigning SHIP Counselor Unique Ids

CMS has developed a nomenclature for State-specific SHIP counselor unique identifiers. The Unique ID is a semi-intelligent, 7-character authorization code. The first 2 positions of this code are alpha characters that denote the United States Postal Service recognized two-letter State abbreviation. The remaining 5 characters are numeric and are automatically generated via SHIPTalk.org. The ID, along with other qualifying information about the counselor (see section II C above), allows the CSRs to disclose certain beneficiary eligibility and claims payment-specific information to the SHIP Director or counselor when sections II A.1. or II A.2. and II B. above are met.

The SHIP Director is responsible to directly register, via SHIPTalk.org (Admin>User>Add User), those key counselors whom they authorize to contact the Call Centers. Since the information to be disclosed is personally identifiable information, key counselors must be those that are held accountable to the standards to protect the privacy and confidentiality of the information that is disclosed to them. Upon registration, the SHIPTalk.org will automatically generate a Unique ID to be used only by the specific registered counselor.

After registering all key counselors, the SHIP Director is responsible to download (as necessary) their registry roster and personally and verbally convey the Unique ID to each counselor to whom a Unique ID is assigned. Before conveying the Unique ID to a respective SHIP counselor, the SHIP Director is responsible to have a protocol in place requiring a SHIP counselor to sign a written statement that she/he understands their accountability for the Unique ID and that it is not to be shared with others.

The SHIP Director is responsible to ensure that their SHIPTalk.org Unique ID registry roster is kept confidential. The SHIP Director is responsible to keep the SHIPTalk.org registry current.

The SHIP Director is responsible for bi-annually confirming to CMS (via email) that SHIP counselors (paid and volunteer), who have been assigned a Unique ID, have signed a confidentiality agreement stating they have been trained in privacy. This document must be kept on file in the SHIP Director's office. CMS will send a reminder to SHIP Directors when the confirmation is due.

The SHIP Director is responsible to delete a counselor's registration data from the registry file within 2 working days after a counselor leaves the SHIP or no longer has 1-800-MEDICARE, Medicare Advantage and Part D Plan Sponsor responsibilities; and, to notify CMS of the deletion via email to ship@cms.hhs.gov. Deleted Unique IDs will be retired and not re-generated for future use. Deletions will occur during the next scheduled monthly download.

IV. Downloads of *Unique Ids*

Monthly (the last Thursday of each month), CMS Division of SHIP Relations will download the complete SHIP *Unique ID* registry file from SHIPTalk.org and forward the complete data to appropriate channels to update the call center SHIP roster information.

SHIP Directors may update the registry file as necessary between monthly downloads. However, the updates will not be recognized or forwarded to 1-800-MEDICARE, Medicare Advantage and Part D Sponsors until the next scheduled monthly download. The CSR will recognize the new registry file approximately 1 week following the CMS monthly download.

CMS will provide all 1-800-MEDICARE, and participating Medicare Advantage and Part D Sponsors a “national” SHIP roster of *Unique IDs*.

V. Privacy and Confidentiality

Per the SHIP grant terms and conditions, the authorized SHIP counselors are accountable to adhere to protecting the privacy and confidentiality of any information that is disclosed to them by the beneficiary and Medicare contractors.

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