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DATE: February 24, 2023

TO: All Prescription Drug Plans, Medicare Advantage-Prescription Drug Plans, Section 1876 Cost Plans, Medicare-Medicaid Plans, and PACE Organizations

FROM: Amy Larrick Chavez-Valdez
Director, Medicare Drug Benefit and C & D Data Group

SUBJECT: Annual Coordination of Benefits-Other Health Insurance (COB-OHI) Full Replacement File for 2023

The purpose of this memorandum is to notify Part D sponsor staff responsible for the receipt and processing of coordination of benefits files from the Centers for Medicare & Medicaid Services (CMS) of the upcoming annual Coordination of Benefits-Other Health Insurance (COB-OHI) full replacement file.

As a reminder, the Part D plan's annual COB-OHI file includes records for all its Part D beneficiaries who are active or have been active within the last 36 months *and* have at least one occurrence of either primary (PRM) or supplemental (SUP) coverage. Part D plans will not receive any records for beneficiaries whose enrollment has been terminated greater than 36 months from when the annual COB-OHI file is generated. Additionally, Part D plans will not receive any records for beneficiaries enrolled within the prior 36 months who have no PRM or SUP OHI records in the CMS Benefits Coordination & Recovery Center (BCRC) system. Unlike the daily COB-OHI files, the annual COB-OHI file *does not* contain Detail (DTL)-only records for beneficiaries whose other coverage information has been deleted from the BCRC system.

2023 Annual COB-OHI Full Replacement File Transmission

Beginning **March 27, 2023**, each Part D plan will receive an annual COB-OHI file for all enrollees with other coverage. Due to file size constraints, plans with a large number of Part D enrollees with other coverage may receive multiple COB-OHI files over a three to four-day interval. The annual COB-OHI file uses a distinct naming convention which includes "MARXCOBA" to indicate that the file is the annual COB-OHI file. A reconciliation file is sent at the end of the annual COB-OHI file transmission to provide each file name that was sent. This allows plans to validate that all files were received. The summary file naming convention will include "MARXCOBS" to indicate that the file is a summary of the files transmitted.

To support Medicare Part D plans' and pharmacy benefit managers' ability to verify receipt of all files, a list of full replacement file names transmitted to the Medicare Part D plans will be posted once transmission is complete. This list can be found at the following web address:

https://www.cms.gov/medicare/prescription-drug-coverage/prescriptiondrugcovcontra/coordination_of_benefits.

The daily COB-OHI file transmission will cease while the annual files are being generated and processed and CMS confirms there are no outstanding issues. Therefore, the annual COB-OHI files will not include record updates that would normally be included in the daily COB-OHI files. Any record updates occurring during the week beginning March 27, 2023, will be sent in the daily COB-OHI files once those files resume following completion of the annual COB-OHI file transmission.

Once the full file process is complete, CMS will send an email notification containing the number of full replacement files transmitted and indicate when daily COB-OHI files will resume.

Additional Resources

Specific file names and record layouts can be found in section 3.7 "Coordination of Benefits" in the Plan Communication User Guide (PCUG).¹

Part D plans should refer to Chapter 14 of the Medicare Prescription Drug Benefit Manual, for general guidance on using COB-OHI data for Part D COB-related activities.²

Please send any questions to PartD_COB@cms.hhs.gov.

¹ https://www.cms.gov/Research-Statistics-Data-and-Systems/CMS-Information-Technology/mapdhelpdesk/Plan_Communication_User_Guide

² <https://www.cms.gov/Medicare/Prescription-Drug-Coverage/PrescriptionDrugCovContra/PartDManuals>