



CENTERS FOR MEDICARE & MEDICAID SERVICES

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TO: All Medicare Advantage, Prescription Drug Plan, Medicare-Medicaid Plan, PACE, and Cost Organizations

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

Olivia Williams, Acting Director
Financial Services Group
Office of Financial Management

SUBJECT: Clarification on the Health Plan Management System (HPMS) Coordination of Benefits Contact and the PAID Act

This memo clarifies the definition of the HPMS Coordination of Benefits (COB) contact in relation to the Provide Accurate Information Directly (PAID) Act.

CMS has updated the COB contact definition as follows:

The COB contact is the organization's designated contact to work with other plans, states, SPAPs, and other providers of prescription drug coverage with respect to the payment of premiums and coverage as well as payment for supplemental prescription drug benefits. The contact information provided may be a central resource mailbox through which COB inquiries can be triaged or forwarded to the appropriate contact within the organization based on the nature of the COB-related issue needing response by the organization.

With regard to the PAID Act, this contact must be able to receive inquiries from Non-Group Health Plan (NGHP) insurers (liability insurance [including self-insurance], no-fault insurance, and workers' compensation entities) to determine if the plan made conditional payments. In complying with the provisions of the PAID Act, the mailing address will be provided to NGHPs by CMS to contact the organization regarding the recovery of payments that were made either conditionally or mistakenly, given that Medicare is the secondary payer.

Please note that a general contact that is not involved with COB-related activities must **not** be listed as the COB contact in HPMS.

To update the COB contact to be in compliance with the revised definition, please use the following navigation path in HPMS:

Contract Management > Basic Contract Management > Select Contract Number > Select Contact Data

For questions regarding the COB contact definition, please contact PartD_COB@cms.hhs.gov.

For technical assistance with HPMS, please contact the HPMS Help Desk at 1-800-220-2028 or hpms@cms.hhs.gov.