

To All COBA Trading Partners:

REVISED COBVA Alert—Activation of New Beneficiary Other Insurance (BO) Error as of April 2010

The Centers for Medicare & Medicaid Services (CMS) and its Coordination of Benefits Contractor (COBC) apologize for the stress that the previous version of this announcement inadvertently caused. We hope that this revised notification will allay most of the concerns verbalized recently by members of the supplemental payer community, who also happen to be Coordination of Benefits Agreement (COBA) trading partner representatives.

Through this communication, the CMS is alerting all COBA trading partners that the COBC is activating a new “BO” error code (BO90) **effective April 5, 2010**. The COBC has been encountering numerous instances where COBA trading partners are sending overlapping eligibility periods for their members via their E-01 crossover eligibility records. These actions create problems not only for the COBA trading partners but also for their covered members, the CMS beneficiaries. Therefore, the COBC is activating the new BO90 error (“overlapping coverage”) to address either of the following scenarios, which cannot be permitted:

Scenario 1: There is an existing BOI record for the COBA trading partner and its member at CWF with open-ended coverage effective date, and the COBA trading partner is now sending another open-ended record with a coverage effective date that is different from the coverage effective date on the existing BOI record, as shown below.

Example	HICN	COBA	Effective Date	End Date	Action/Update Type (A=Add; C=Change/Update)
Current record at CWF	XXXXXXXXXA	00001	12/01/09		A
Trading partner’s record to be added	XXXXXXXXXA	00001	11/01/09		A

NOTE: Given the current condition at CWF, the record with effective date 11/1/09 would receive a BO90 error.

Scenario 2: There is an existing BOI record for the COBA trading partner and its member at CWF with coverage effective and end dates, but the COBA trading partner is now sending an open-ended record with a coverage effective date that is prior to the end date currently on file, as shown below.

Example	HICN	COBA	Effective Date	End Date	Action/Update Type (A=Add; C=Change/Update)
Current record at CWF	XXXXXXXXXA	00001	01/01/03	12/31/05	C
Trading partner’s record to be added	XXXXXXXXXA	00001	01/01/04		A

NOTE: Given the current condition at CWF, the record with effective date 01/01/04 would receive a BO90 error.

EXAMPLE OF AN ACCEPTABLE ACTION THAT WILL NOT RESULT IN A COBA TRADING PARTNER'S RECEIPT OF A BO90 ERROR

Scenario 1: COBA trading partner 00001 needs to term a span of coverage for its member and needs to add a new span of coverage (note: HICN & COBA ID remain the same).

Example	HICN	COBA	Effective Date	End Date	Action/Update Type (A=Add; C=Change/Update)
Current record at CWF	XXXXXXXXXA	00001	01/01/03		A

Acceptable COBA Trading Partner Action Via Next Bi-Weekly File	HICN	COBA	Effective Date	End Date	Action/Update Type (A=Add; C=Change/Update)
Record to be updated	XXXXXXXXXA	00001	01/01/03	12/31/05	C
Record to be added	XXXXXXXXXA	00001	01/01/06		A

IMPORTANT GENERAL ADVICE TO COBA TRADING PARTNERS

- 1) If, for example, a COBA trading partner (COBA ID 00008) seeks to terminate a member's crossover eligibility under group XVZ64756 as of 12/31/09 and reflect that member's enrollment under COBA ID 00112 effective 01/01/10 as part of another one of the COBA trading partner's retiree groups (group STU52647), that COBA trading partner may send the 12/31/09 termination action for COBA ID 00008 and the action to "add" the 01/01/10 effective date for COBA ID 00112 on the same E-01 eligibility file.
- 2) If the COBA trading partner is making an update/change to an E-01 eligibility record, and the change is for the **same** Effective Date, HICN, and COBA ID, that entity will need to submit two (2) subsequent files in the order that it wishes the action to be taken. This should not occur that often. However, if needs be, the COBC can schedule an off-cycle file acceptance to accommodate the COBA trading partner that needs this action accomplished.
- 3) "Delete" actions should be executed via the E-01 record when a member was incorrectly added to the file for crossover purposes. (**NOTE:** The CMS is planning to issue a future COBVA announcement that will outline further helpful hints concerning this subject, with the aim of mitigating overuse of "delete" actions within E-01 eligibility submissions.)

WHEN THE NEW BO90 ERROR WILL APPEAR

The COBC will begin including the new BO90 error on the Eligibility Response File (ERF) that it transmits to COBA trading partners starting with April 5, 2010.

Upon receipt of the BO90, the COBA trading partner should try to analyze what it is attempting to accomplish through its latest E-01 file submission to the COBC.

Questions relating to this communication should be directed to your designated COBC EDI representative. Thank you.

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