



## **Financial Services Group**

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**July 16, 2025**

### **Medicare Secondary Payer (MSP) Mandatory Reporting Provisions Section 111 of the Medicare, Medicaid, and SCHIP Extension Act (MMSEA) of 2007 (See 42 U.S.C. 1395y(b)(7)&(b)(8))**

#### **Technical Alert: New Rx Error for Overlapping Drug Records**

This alert serves to notify Group Health Plan (GHP) Responsible Reporting Entities (RREs) of a new RX error code for overlapping drug records effective January 5, 2026.

Currently an RX19 error code is returned when a newly submitted record overlaps with an existing drug record for the beneficiary. Effective January 5, 2026, a new RX20 soft error code is being introduced to address scenarios where there may be overlapping drug records, but the reporting RRE cannot address the situation as they did not report the original record. In these cases, the overlapping incoming record will be accepted and applied while the new RX20 code will inform the RRE of the overlap to maintain data integrity.

It is important to note that the existing RX19 error code will still be returned, and the record rejected for overlapping drug coverage when the submitting RRE matches the RRE on the existing record.

Additional information on these changes will be available in version 7.5 of the Group Health Plan User Guide available on the [GHP User Guide](#) page on [CMS.gov](https://www.cms.gov). Please see chapter 1 for a summary of updates.