The Medicare Advantage Prescription Drug System (MARx) currently does not allow overlapping Notification and/or Implementation periods to be submitted for the same beneficiary, Drug Class Code, and Coverage Limitation Status (i.e., Point-of-Sale (POS) Edit Status, Pharmacy Limitation Status, or Prescriber Limitation Status). However, a sponsor may plan to change the Comprehensive Addiction and Recovery Act (CARA) Status POS Edit Code (i.e., PS1 or PS2) after implementation of a POS Edit limitation for a beneficiary.

For example, the sponsor implemented an Opioid POS Edit Code PS1 for a beneficiary and intends to change it to PS2. The sponsor wants to keep the current implemented Opioid POS Edit Code PS1 active while the beneficiary receives both the Initial and Second Notice for the new Opioid POS Edit Code PS2.

After March 8, 2020, MARx will accept a new Notification Start-date for a different CARA Status POS Edit Code when an active CARA Status POS Edit Implementation period exists. All other overlapping limitation periods for the same beneficiary, Drug Class Code and Coverage Limitation Status will continue to result in the user receiving an error (Transaction Reply Code (TRC) 381, ‘CARA Limitation Overlap Part D sponsor’). Please refer to Section 8.7.8, ‘Notification of CARA Status POS Edit Code Change during Active POS Edit Status Implementation for the Same FAD,’ of the February 2020 Plan Communication User Guide (PCUG) v14.0 for additional guidance.