DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, Maryland 21244-1850

CENTER FOR MEDICARE

DATE: March 26, 2021

TO: All Part D Plans

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

SUBJECT: Coordination of Benefits (COB) File Update

The purpose of this memo is to notify Part D sponsor staff responsible for the receipt and handling of Coordination of Benefits files from the Centers for Medicare & Medicaid Services (CMS) of the upcoming annual full replacement file refresh and announce a new naming convention for the files.

2021 Full Replacement Coordination of Benefits File

Beginning May 24, 2021, each Part D plan will receive an Annual Full Replacement Coordination of Benefits-Other Health Insurance (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 the three to four day interval. CMS is implementing a new naming convention to distinguish them from the normal daily COB-OHI notification files.

The daily COB process will cease while full replacement files are being generated. Therefore, the full replacement files will not include record updates that would normally be included in the daily COB-OHI notification files. Any record updates occurring during the week beginning May 24, 2021 will be sent in the daily notification files once those files resume following completion of the full replacement file process.

Naming Convention for the COB-OHI Annual File

The annual COB-OHI file has the same layout as the daily files as defined in the Plan Communications User Guide (PCUG).[1] However, beginning with the May 24, 2021 annual

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[1] See Plan Communications Users Guides (PCUG) layouts 3-30 for COB-OHI detail records, 3-31 for primary records and 3-32 for supplemental records.

COB-OHI file, a new naming convention will include an "A" following MARXCOB, to indicate that the file is the annual COB-OHI file to appear as follows:

P#EFT.ON.RXXXXX.MARXCOBA.Dyymmdd.Thhmmsst

New Summary File for COB-OHI Annual File Process

In addition, in response to Part D plan request, CMS is including a new reconciliation file at the end of the annual COB-OHI full replacement file process to provide each file name that was transmitted. This will allow plans to validate that all files were received. This new file will be transmitted in the same manner as the annual file, and the new file naming convention will include an "S" to indicate that the file is a summary of the files received. The summary file naming convention will be as follows:

P#EFT.ON.RXXXXX.MARXCOBS.Dyymmdd.Thhmmsst

The layout and a sample file are outlined in the attachment to this memo. This information will also be updated in a future version of the PCUG.

Please send any questions about this initiative to PartD_COB@cms.hhs.gov.

ATTACHMENT
SUMMARY FILE LAYOUT AND SAMPLE FILE

The summary file will be a text file (five fillers for each column)

Annual COB-OHI Summary File Report Header Record

Shows the field name, size position format and Valid Values
Item	Field Name	Size	Position	Format	Valid Values/Description
1	Filler	26	1-26	CHAR	Spaces
2	Report-Name	34	27-60	CHAR	"Annual COB-OHI Summary File Report"
3	Filler	20	61-80	CHAR	Spaces

Annual COB-OHI Summary File Report Sub-Header Record

Annual COB-OHI Summary File Report Sub-Header Record
Item	Field Name	Size	Position	Format	Valid Values/Description
1	Filler	36	1-36	CHAR	Spaces
2	Report- Creation-Date	10	37-46	CHAR	MM/DD/YYYY Date that the report is generated.
3	Filler	34	47-80	CHAR	Spaces

Annual COB-OHI Summary File Report Column Header Record

Annual COB-OHI Summary File Report Column Header Record
Item	Field Name	Size	Position	Format	Valid Values/Description
1	Contract-ID- Column-Heading	11	1-11	CHAR	"Contract ID"
2	Filler	5	12-16	CHAR	Spaces
3	File-Name- Column-Heading	9	17-25	CHAR	"File Name"
4	Filler	40	26-64	CHAR	Spaces
5	File-Count- Column-Heading	10	65-74	CHAR	"File Count"
6	Filler	5	75-80	CHAR	Spaces

Annual COB-OHI Summary File Report Detail Record

Annual COB-OHI Summary File Report Detail Record
Item	Field Name	Size	Position	Format	Valid Values/Description
1	Contract-ID	5	1-5	CHAR	This field contains the Contract Number from CMS.
2	Filler	11	6-16	CHAR	Spaces
3	File-Name	44	17-60	CHAR	File Name (P.Rxxxxx.MARXCOBA.Dyymmdd.Thhmmsst)
4	Filler	9	61-69	CHAR	Spaces
5	File-Count	1	70	NUM	File Count
6	Filler	10	71-80	CHAR	Spaces

Annual COB-OHI Summary File Report Summary Total Record

Item	Field Name	Size	Position	Format	Valid Values/Description
**Annual COB-OHI Summary File Report Summary Total Record**
1	Contract-ID	5	1-5	CHAR	This field contains the Contract Number from CMS.
2	Filler	11	6-16	CHAR	Spaces
3	Total-File-Count	16	17-32	CHAR	"TOTAL FILE COUNT"
4	Filler	33	33-65	CHAR	Spaces
5	File-Count	5	66-70	PIC 9,999	Total files contained in report.
6	Filler	10	71-80	CHAR	Spaces

Sample File:


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P.Rxxxxx.MARXCOBS.Dyymmdd.Th...
1  |······························Annual·COB-OHI·Summary·File·Report····················|
2  ·······································MM/DD/YYYY··································|
3  Contract·ID·····File·Name··································File·Count·····|
4  Hnnnn··········P.Rxxxxx.MARXCOBA.Dyymmdd.Thhmmsst··················n·········|
5  Hnnnn··········P.Rxxxxx.MARXCOBA.Dyymmdd.Thhmmsst··················n·········|
6  Hnnnn··········P.Rxxxxx.MARXCOBA.Dyymmdd.Thhmmsst··················n·········|
7  Hnnnn··········P.Rxxxxx.MARXCOBA.Dyymmdd.Thhmmsst··················n·········|
8  Hnnnn··········P.Rxxxxx.MARXCOBA.Dyymmdd.Thhmmsst··················n·········|
9  Hnnnn··········TOTAL·FILE·COUNT····························9,999·········|
10 ································································|
11
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