

## HPMS E-Mail

**Date:** March 31, 2023

**Subject:** Delay of Coordination of Benefits-Other Health Insurance (COB-OHI) Record Updates Due to New Hierarchy Rules

In the March 20, 2023 HPMS memorandum titled “Coordination of Benefits-Other Health Insurance (COB-OHI) Record Updates Due to New Hierarchy Rules,” CMS announced that hierarchy rules governing the addition, update, and deletion of primary and supplemental Part D prescription drug OHI records would be implemented on April 3, 2023. **The implementation of hierarchy rules has been delayed until April 24, 2023.**

The Benefits Coordination & Recovery Center (BCRC) will complete the first round of deletion of duplicate records (“clean-up”) from the Medicare Beneficiary Database (MBD) over the weekend of April 21 to April 23, 2023. A second round of deletions will take place on April 25, 2023 to capture any duplicate records that were actively ‘in-process’ at MBD during the first round of the clean-up.

Part D plans should expect to see updated OHI profiles in the daily COB-OHI files sent after the MBD changes are applied. Part D plans may see a higher than usual volume of updated COB records on daily COB-OHI files transmitted the week of April 23, 2023.

Email [PartD\\_COB@cms.hhs.gov](mailto:PartD_COB@cms.hhs.gov) with any questions.