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DATE: February 13, 2025

TO: All Prescription Drug Plans, Medicare Advantage-Prescription Drug Plans, Section 1876 Cost Plans, Medicare-Medicaid Plans, and PACE Organizations

FROM: Vanessa S. Duran, Director
Medicare Drug Benefit and C & D Data Group

SUBJECT: Annual Coordination of Benefits-Other Health Insurance (COB-OHI) Full Replacement File for 2025

The purpose of this memorandum is to notify Part D sponsors of the upcoming annual Coordination of Benefits-Other Health Insurance (COB-OHI) full replacement file.

Annual COB-OHI Full Replacement File Reminders

The Part D sponsor's annual COB-OHI file includes records for all its Part D beneficiaries who are active or have been active in the Part D sponsor's plan within the last 36 months **and** have at least one occurrence of either primary (PRM) or supplemental (SUP) prescription drug OHI coverage with an OHI termination date within the prior 7 years. Part D sponsors will not receive any records for beneficiaries whose Part D enrollment has been terminated greater than 36 months from when the annual COB-OHI full replacement file is generated.

Due to logic constraints and volume considerations, unlike the daily COB-OHI files, the annual COB-OHI full replacement file **does not** contain Detail (DTL)-only records for beneficiaries whose other coverage information has been deleted from the CMS Benefits Coordination & Recovery Center (BCRC) system. As such, Part D sponsors should not receive any OHI records for beneficiaries enrolled within the prior 36 months who have no PRM or SUP OHI records in the BCRC system.

Part D sponsors should investigate unexpected or missing OHI records and update the beneficiary OHI profiles accordingly. Scenarios that may prompt investigation include:

- Part D sponsors have OHI for beneficiaries in their internal systems but do not receive OHI records in the annual COB-OHI full replacement file
- Part D sponsors receive OHI records on the annual COB-OHI full replacement file that were already deleted from the BCRC system

2025 Annual COB-OHI Full Replacement File Transmission

Beginning **March 17, 2025**, each Part D sponsor will receive an annual COB-OHI full replacement file for all beneficiaries with OHI. Due to file size constraints, Part D sponsors may receive multiple COB-OHI files over a one- to four-day interval. The annual COB-OHI full replacement file uses a distinct naming convention which includes “MARXCOBA” to indicate that the file is the annual COB-OHI full replacement file. A summary file is sent at the end of the annual COB-OHI full replacement file transmission to provide each file name that was sent. This allows Part D sponsors to validate that all files were received. The summary file naming convention will include “MARXCOBS” to indicate that the file is a summary of the files transmitted. Part D sponsors should be sure their file transfer processes are searching for the correct file names. CMS has received inquiries from Part D sponsors claiming they have not received their annual files because they are not searching for the correct file name.

Additionally, to support Part D sponsors’ and pharmacy benefit managers’ (PBMs) ability to verify receipt of all files, a list of full replacement file names transmitted to the Part D sponsors will be posted once transmission is complete. This list can be found at the following web address: https://www.cms.gov/medicare/prescription-drug-coverage/prescriptiondrugcovcontra/coordination_of_benefits.

The daily COB-OHI file transmission will cease while the annual COB-OHI full replacement files are being generated and processed and CMS confirms there are no outstanding issues. Therefore, the annual COB-OHI full replacement files will not include record updates that would normally be included in the daily COB-OHI files. Any record updates occurring during the week beginning March 17, 2025, will be sent in the daily COB-OHI files once those files resume, following completion of the annual COB-OHI full replacement file transmission. Generally, daily COB-OHI files will resume approximately 1 week after the annual COB-OHI full replacement file transmission.

Once the full file process is complete, CMS will send an email notification containing the number of full replacement files transmitted and indicate when daily COB-OHI files will resume.

Additional Resources

Specific file names and record layouts can be found in section 3.7 “Coordination of Benefits” in the Plan Communication User Guide (PCUG).¹

Part D sponsors should refer to Chapter 14 of the Medicare Prescription Drug Benefit Manual, for general guidance on using COB-OHI data for Part D COB-related activities.²

¹ <https://www.cms.gov/data-research/cms-information-technology/access-cms-data-application/mapd-plan-communication-user-guide>

² <https://www.cms.gov/Medicare/Prescription-Drug-Coverage/PrescriptionDrugCovContra/PartDManuals>

For assistance on technical topics, such as instruction on accessing files, email the MAPD Help Desk at MAPDHelp@cms.hhs.gov. Please send any other questions or report any issues to PartD_COB@cms.hhs.gov.