

50.3.1 – Data from CMS to Sponsors

The **BCRC** performs a daily update of information on other coverage to MBD. Part D sponsors must establish connectivity with CMS systems, which, among other things, allows them to have direct access to other payer status information as often as their business requirements indicate. Every Federal business day, the **BCRC** pushes out updated information to MBD and then CMS sends the COB file to the Part D sponsors. For more information on receiving COB files, see the Plan Communications User's Guide (PCUG) available on the CMS Website. (Refer to Appendix B for the Web address.) It is incumbent upon Part D sponsors to identify any changes to existing other payer information available in CMS systems and to send those changes to the **BCRC**.

In March 2010, CMS initiated the process of annually creating and issuing to each Part D sponsor a full replacement COB file for all the sponsor's enrollees. A full replacement file is created for each prescription drug plan based on the sponsor's Part D enrollees as of the date the file is processed. Due to file size constraints, sponsors with a large number of Part D enrollees with other coverage may receive multiple COB files over the period during which the replacement files are sent.

The combined daily update/full replacement COB files contain no special identifiers to distinguish them from the normal daily COB notification files, but they may be identifiable based on the date of receipt and the large size of the files. Each plan's file(s) include only detail records for any beneficiaries whose other coverage information has been deleted; these records normally would be in the plan's daily COB notification file. The plan's file also includes the records for all its current Part D enrollees who have at least one occurrence of either primary or supplemental coverage. Not included in the file are records for any Part D enrollee without other coverage information. As a result, for the enrollees included in the file, the information is a full-record replacement that should be processed by the plan replacing its entire existing other coverage information for these enrollees with the daily update/full replacement file data. For its remaining Part D enrollees (that is, those members without other primary or supplemental coverage), the plan must retain the members' existing detail records.

As with other COB notification files, the full replacement COB files include the last 27 months of other coverage information as of the date the file is processed. Thus, each year's full replacement files are sent not only to the current plans of record, but also to any prior plans with enrollment periods for that beneficiary within the last 27 months. *Sponsors should review the file data to identify any instances in which an SPAP or ADAP was*

previously reported as an “other” payer in a non-SPAP/ADAP series and take follow up action as indicated in section 50.2 of this chapter.

50.3.2 – Data from Sponsors to the COB system

The data provided by the **BCRC** on supplemental payers and order of payment is generally the best available information for Part D sponsors and pharmacies to act upon. However, it is important to note that Part D sponsors must coordinate benefits with *all other payers where an Information Reporting (Nx) Transaction is provided by the CMS Part D Transaction Facilitator for* covered Part D drugs. *Coordination is required* even if the **BCRC** is unaware of some payers who have submitted batched claims after the point-of-sale transaction at a network pharmacy. Once a sponsor becomes aware of these other payers, it must submit this information via ECRS to the **BCRC**.

In accordance with the regulatory requirements at § 423.464(h), Part D sponsors must report credible new or changed supplemental prescription drug coverage information to the **BCRC** according to CMS-specified processes and timeframes. By “credible,” we mean information that is consistent with conventions for how group health insurance coverage is identified, for instance, information that includes the name and address of the insurance company and the policy identification number. As noted in section 50.2 of this chapter, sponsors must report new or changes to coverage information to the **BCRC** within 30 days of receipt.

Sponsors should utilize the electronic interface established with CMS (via the MARx system) to handle plan enrollments, to transmit certain other payer data elements upon enrollment, and to receive daily transmissions of validated COB information. As new information about other prescription drug coverage is discovered, sponsors should use ECRS to send the information to CMS. Sponsors should not use the enrollment update transaction to communicate this subsequent information.

Beyond the electronic data transfers requirements described above, Part D sponsors must establish procedures for at least weekly COB file processing. Sponsors are required to not only receive information, but also to apply it to their systems.