

## HPMS E-Mail

**Date:** September 23, 2024

**Subject:** Implementation Delay: Coordination of Benefits-Other Health Insurance (COB-OHI)  
Record Updates

On July 30, 2024, CMS issued a memorandum entitled “Coordination of Benefits-Other Health Insurance (COB-OHI) Record Updates,” (revised from June 13, 2024). In the memorandum, CMS described planned changes to the data source for Non-Group Health Plan (NGHP) other health insurance (OHI) records transmitted to Part D sponsors on the COB-OHI file and addition of a date and time stamp to all OHI records on the COB-OHI file. These changes were scheduled to occur on or about August 30, 2024. On September 3, 2024, we announced that changes were postponed to September 20, 2024. **The changes are now expected to occur on or about September 30, 2024.**