

FIR TIMING EXAMPLES

As stated in the HPMS memo “Change to Compliance Timeframe for Automated TrOOP Balance Transfer” dated October 26, 2012:

“In order to facilitate successful transfers within the shorter compliance timeframe, CMS worked with the National Council for Prescription Drug Program’s (NCPDP) Work Group 1 Financial Information Reporting Task Group to revise the timing of the Automated TrOOP Balance Transfer (ATBT) transactions to increase the number of the transactions sent during the new 15-day compliance period. The task group also recommended rescheduling the last three transactions in the sequence to enable sponsors to report data changes that occur late in the current year or in the early months of the subsequent year.”

Based on the revised timing, FIR sequences follow the schedule below, which is called a **Series** unless a new event (e.g. beneficiary moves to another plan) restarts the Series at which time the schedule restarts based on that new event. The specific timing of each sequence in a series is listed below:

- 1 day prior to effective date if eligibility is received prior to effective date
- Effective date (or receive date if received after effective date)
- Day 8 (7 days from effective date or receive date if received after effective date)
- Day 10
- Day 12
- Day 14
- Day 21
- Day 28
- Day 73
- Day 118
- December 1st
- January 15th of subsequent year
- Feb 28th of subsequent year
- Mass retriggers will be initiated based on plan year

Per the July 2nd, 2015 CMS memo “Enhanced Automated TrOOP Balance Transfer (ATBT) Process” the FIR process was expanded to encompass a 36 month period. After the last series listed above, the mass retrigger schedule will be invoked. During mass retriggers, FIRs are only generated for beneficiaries who had at least one series during the schedule listed above. Consult the Mass Retrieger Dates document for specific dates

Note: For eligibility changes received after November 30 of a plan year (including retroactive changes received in the subsequent plan year) automated FIRs will trigger through the end of March. Plans may also continue to request manual FIR retriggers until May 31st following a plan year.

The FIR daily run is normally started at 6 p.m. ET (to accommodate daily manual FIR retrigger requests). The only exception is December 1, January 15 and February 28, when the runs are started as soon as the CMS file is received and loaded, due to the large volume of FIRs generated during these days. It is possible that the runs started on these days will continue to generate FIRs over several days.

The examples below illustrate timing for new Series that start after April 1, 2013.

Example #1

A Beneficiary is enrolled in Plan A as of January 1, 2014. The Beneficiary changes plans to Plan B as of February 1, 2014. Enrollment for the new plan (Plan B) was received on January 29, 2014 before that days FIR run. FIRs will trigger on:

- January 31, 2014
- February 1, 2014
- February 8, 2014
- February 10, 2014
- February 12, 2014
- February 14, 2014
- February 21, 2014
- February 28, 2014
- April 14, 2014
- May 29, 2014
- December 1, 2014
- January 15, 2015
- February 28, 2015
 - This is the last automated sequence for this series.
- Additional FIRs will require a manual retrigger, which may be requested up until May 31, 2015
- Mass retriggers will be initiated base on plan year

Note: this example assumes that there are no additional events that would trigger a new series.

Example #2

A Beneficiary is enrolled in Plan A as of January 1, 2014. The Beneficiary changes plans to Plan B as of September 1, 2014. Enrollment for the new plan (Plan B) was received on August 30, 2014 after that days FIR run. FIRs will trigger on:

- August 31, 2014
- September 1, 2014
- September 8, 2015
- September 10, 2015
- September 12, 2015
- September 14, 2015
- September 21, 2015
- September 28, 2015
- November 12, 2015
- December 1, 2015
- December 27, 2015
- January 15, 2015
- February 28, 2015
 - This is the last automated sequence for this series.
- Additional FIRs will require a manual retrigger, which may be requested up until May 31, 2015
- Mass retriggers will be initiated base on plan year

Note: this example assumes that there are no additional events that would trigger a new series.

Example #3

A Beneficiary is enrolled in Plan A as of January 1, 2014. The Beneficiary changes plans to Plan B as of December 1, 2014. Enrollment for the new plan (Plan B) was received on December 1, 2014 after that days FIR run. FIRs will trigger on:

- December 2, 2014
- December 9, 2014
- December 11, 2014
- December 13, 2014
- December 15, 2014
- December 22, 2014
- December 29, 2014
- January 15, 2015
- February 11, 2015
- February 28, 2015
- March 28, 2015
 - This is the last automated sequence for this series.
- Additional FIRs will require a manual retrigger, which may be requested up until May 31, 2015

Example #3 illustrates that there will be situations where due plan changes later in the year, automated FIRs may still trigger in March.

Note: this example assumes that there are no additional events that would trigger a new series.

Example #4

A Beneficiary is enrolled in Plan A as of January 1, 2014. A retroactive enrollment for a plan change is received on March 1, 2015 before the FIR run, with an effective date of December 1, 2014. FIRs will trigger on:

- March 1, 2015
- March 8, 2015
- March 10, 2015
- March 12, 2015
- March 14, 2015
- March 21, 2015
- March 28, 2015
 - This is the last automated sequence for this series.
- Additional FIRs will require a manual retrigger, which may be requested up until May 31, 2015
- Mass retriggers will be initiated base on plan year

Example #4 illustrates a situation where retroactive enrollments may be received after the plan year and will result in automated FIRs triggering in March.

Note: this example assumes that there are no additional events that would trigger a new series.