

ADDENDUM 6

Coordination of Benefits (COB)



ADMINISTRACION DE
SEGUROS DE SALUD

23 - 00046G

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GOVERNMENT OF PUERTO RICO
PUERTO RICO HEALTH INSURANCE ADMINISTRATION
ASES



Puerto Rico Medicaid Enterprise - Health Insurance Plans

**ASES COB Data Submissions (Third Party Liability)
Interface Control Document**

Version 1.8.3
January 01, 2023

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I. Document Information

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Approved by:	


 Edna Y. Martin Ramas, MA
 Executive Director of ASES


 Wanda J. Lorenzo Gonzalez
 Acting Director IT

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v 1.0	10/28/2022	First version published for review

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Change History

Version	Release	Author	Description of Change
1.8.1		ASES	Initial Document
			Field SSN Optional for INSURANCE_COVERAGE (C,G or F)
1.8.2	03/01/2020	ASES	Added Field MBI For Medicare Beneficiaries INSURANCE_COVERAGE (C,G or F)) please include the MBI number. The field size is 11 characters.
1.8.3	01/01/2023	ASES	Standardized Service Codes for all Insurers



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Preface

This document is prepared to comply with the 27 Act of 2010 which add a new Article VIII Section 4 of Act No. 72 of September 7, 1993, as amended, known as the "Law of Health Insurance Administration of Puerto Rico"; establish a requirement for insurers and others to share information of eligibility with the Health Insurance Administration or its duly authorized Subcontractor; allow recovery of fees paid by the Administration, and for other purposes.

The Insurer shall provide for the physical safeguarding of its Data processing facilities and the Systems and Information housed therein. The Insurer shall provide ASES with access to Data facilities upon ASES's request. The physical security provisions shall be in effect for the life of this Contract.

The Insurer shall ensure that the operation of all of its Systems is performed in accordance with Puerto Rico and Federal regulations and guidelines related to security and confidentiality of the protected information managed by the Insurer, and shall strictly comply with HIPAA Privacy and Security Rules, as amended, and with the Breach Notification Rules under the HITECH Act.

The Insurer will put in place procedures, measures and technical security to prohibit unauthorized access to the regions of the Data communications network inside of an Insurer's Span of Control.

The Insurer shall submit all reports electronically to ASES's FTP site unless directed otherwise by ASES. ASES shall provide the Insurer with access to the FTP site. The email generated by the FTP upload will be used as the time stamp for the submission of the report(s).

The Insurer Data transfers shall occur in standard format as prescribed by ASES and will be compliant with HIPAA and Federal regulations. The Insurer shall submit in formats as prescribed by ASES so long as ASES's direction does not conflict with any Federal law. With each submitted file the Insurer will include a Transmittal Sheet to indicate the record's totals submitted. See a Transmittal Sheet model in Appendix IV.

ASES will make available a secure FTP server, accessible via the Internet, for receipt of electronic files and reports from the Insurer. The Insurer shall provide a similar system for ASES to transmit files and reports deliverable by ASES to the Insurer. When such systems are not operational, ASES and the Insurer shall agree mutually on alternate methods for the exchange of files.

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1 Introduction

1.1 Coordination of Benefits (COB)

Some people who are beneficiaries of the Government Health Plan of Puerto Rico, which thrives on federal funds under certain circumstances may be eligible to receive benefits for a private plan or other health insurance funded by the Government of Puerto Rico. In accordance with applicable laws and federal guidelines, Medicaid is the payer of last resort and the rest of the remedies must be exhausted before resorting to the services under the Medicaid funds provided.

By provision of Public Law 109-171, the Federal Government will require governments of the states and territories beneficiaries of Medicaid funds, authorizing him to health insurers to share certain information with the State agency responsible for administering the program Medicaid. The collection of this information facilitates coordination of services and the sound administration of the funds received and ensures that Medicaid is not paying for care to be covered by another payer.

1.2 Data Validation Process

All files will pass through a validation process. Validation will check the basic structure of the file and its records and may result in a file being rejected. Such rejections may be caused for example, by file names which fail to follow the naming convention, a file containing wrong length records, wrong field coding or other basic tests.

All files which are rejected will be notified to the Insurer with an explanation of why the file is rejected. No records from such a file will be retained in the system and the Insurer will be required to resubmit the rejected file in its entirety before the next month's files become due. Such re-submitted files must be carefully named using the sequence number part of the naming convention to ensure the name is distinct from the rejected file and is named in the correct order.

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1.3 General Notes on data layout requirements

Date Fields - All date fields in the following data layout are defined to the same size and format as YYYYMMDD. An 8 byte field where YYYY = 4 digit year, MM = 2 digit month and DD = 2 digit day. 1 digit month and day values must always have the leading zero (0). Date fields must contain a valid date with months between 01 and 12 and days between 01 and maximum day in month. July 1, 2006 will be coded as 20060701.

Amount Fields - All amount fields representing money must be numeric and are defined as 9 bytes in the format 9(7)v99 where v represents an implied decimal point. This allows a maximum of 7 digits for dollars plus the last two digits for cents. These numbers are always right justified and zero filled to the left. As examples:

\$1.23 will be coded as 000000123

\$100.00 will be coded as 000010000

All amount fields are positive and follow the above definition unless clearly specified otherwise.

End of Record Filler - All file layouts have been designed to end with a filler field of 1 byte which must always be coded as an "*" character. This is done to avoid issues between different systems when generating and transferring ASCII files in which ending field may be empty. The fixed End of Record Filler guarantees that all records in a file can be constructed to the fixed length format as defined in the layouts.

Justification and filling of Fields - The layouts have all been specified to provide fixed length fields and fixed length records. While other methods can be used, it is felt that this provides the best common ground for working with multiple entities each of which uses varying systems. To be sure everyone understands the same about the comments on justification and filling the following examples are given to help keep this concept clear.

All numeric fields must be filled completely with numeric digits. If there are exceptions these are clearly spelled out in the documentation of the layouts. Typically numeric field are right justified and to keep them numeric must be zero filled. In a field specified as numeric such a 9(7)v99 where v represents an implied decimal the following examples illustrate how data will look in the field.

Value	Field
12.50	000001250
101	0000010100
1,234.56	000123456
1,000,000	1000000000

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All alphanumeric fields must be filled completely. If the value of data in the field is less than the width of the field then care must be taken to ensure that the field is filled with blanks. Allowing "NULLS" or other special characters through may cause unexpected results and make reading, loading and validation of the data difficult. Typically alphanumeric field are left justified and filled to the right with blanks to complete the field. In a field specified as alphanumeric such a K(20) the following examples illustrate how data will look in the field where the [] characters represent the start and end of the field

<u>Value</u>	<u>Field</u>
P.R.	[P.R.]
José Rivera	[José Rivera]
Blanks	[]

2 File Naming Convention

All data files to be delivered to ASES by the Insurers must follow the naming conventions below. Files which do not fit the naming convention will be ignored and the Insurer deemed to have failed in delivery of such a file.

File names must adhere strictly to this naming convention as the structure includes information for identification of the Insurer, dates and file type. If not named correctly the file cannot be processed properly.

The general format of file names will be – cccyyymmss.fff

Where:

Character 1-3	ccc	=	Insurer Code (See attachment 1)
Character 4-5	yy	=	Last two digits of year
Characters 6-7	mm	=	Month
Character 8	s	=	sequence number of file submission.

All submissions start with s = 0 and continue in sequence if files are re-submitted to 9

If files must be re-submitted beyond 9, then alphabetic characters will be used a, b, c, ...
 Character 9 Always "1"
 Characters 10-12 Extension code identifying type of file

cccs for COORDINATION OF SERVICES

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Files are always dated for the month being reported. For example, when sending coverage information in September 2013 the yymm part of the file name will be 1309 while the file will be sent to ASES in October.

Examples of completing this naming convention are –

For imaginary Insurer 096 in the files for COB in April 2013 will be named as follows –

Coordination of Services 09613040.COB

When the COB file is rejected, the corrected file will be re-submitted as

09612041.COB

The error log generated when the COB file is rejected will reference the rejected file name with ERR extension on it. The error file name will look as

09612041.ERR

All data files submitted must include a Transmittal Sheet with the following file name format.

The general format of file names will be – Cccyyymmdss-tr.xls

Where: Character 1-3 ccc = Insurer's Code (See attachment I)
Character 4-5 yy = Last two digits of year
Characters 6-7 mm = Month
Characters 8-9
Character 10 s = sequence number of file submission.

All submissions start with s = 0 and continue in numeric if files are re-submitted to 9.
If files must be re-submitted beyond 9, then alphabetic characters will be used a, b, c ...

Characters 11-13 Always "-tr"
Character 14 Always ":"
Characters 15-17 Extension code identifying type of file (Always XLS)

XLS for MS EXCEL FILE FORMAT

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Examples of completing this naming convention are -

For imaginary Insurer 096 in the Transmittal Sheet for file submitted in April 23, 2013 will be named as follows -

Transmittal Sheet 0961304230-tr.xls

Data File Text Format

All files should be generated using one of the following text formats:

utf-8 o

text/plain; charset=us-ascii

Include Windows EOL (End of Line) on each record.

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3 File Layout - Insurer COB File - COB Record

#	Field	Description	Pos	Size	Deliverable Data Format	Validation Rules
1	RECORD_TYPE	Record Type	1	1	"I" for Insurance	Required.
2	TRAN_ID	Insurance status with Insurer	2	1	A=Active, I=Inactive	Required.
3	PROCESS_DATE	Date of report. Last day of month.	3	8	MMDDYYYY	Required.
4	PROCESS_BEGIN_DATE	Identify the initial date that reflects the total time covered by the reported data.	11	8	MMDDYYYY	Required.
5	HEALTH_INSURER_CODE	Code that identifies Insurance Company	19	3	(See Appendix I)	Required.
6	GROUP_NUMBER	Group number	22	20	X(20)	Required. Must be left justified, blank filled to the right.
7	POLICY_NUMBER	Policy or Contract number.	42	20	Required.	
8	POLICY_EFFECTIVE_DATE	Start Date of Covered Individual's Primary Coverage by Insurer.	62	8	MMDDYYYY	Required.
9	POLICY_TERMINATION_DATE	End Date of Covered Individual's Primary Coverage.	70	8	MMDDYYYY	Required if the policy does have a termination date, otherwise leave blank.
10	INSURANCE_TYPE	Insurance Type	78	1	1=Private; 2=Medicare; 3=Medicaid	Required.

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11	<u>INSURANCE_COVERAGE</u>	Insurance Coverage	79	20	(See Appendix II) Include all coverage codes with Insurance for covered individual. Concatenate all codes.	Required. For Medicare coverage Plans use letter C,F or G only. DO NOT USE COMMAS TO SEPARATE CODES.
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#	Field	Description	Pos	Size	Deliverable Data Format	Validation Rules
12	<u>COVERED_SERVICES</u>	Covered Services	99	20	(See Appendix III) Identify the Insurer's service type codes. Concatenate all codes.	Required. DO NOT USE COMMAS TO SEPARATE CODES.
13	<u>SSN</u>	Covered Individual's social security number.	119	9	(X9)	Required if INSURANCE_COVERAGE NOT in (C,G or F)
14	<u>LAST_NAME_1</u>	Covered Individual's first last name	128	25	X(25)	Required Must be left justified, blank filled to the right.
15	<u>LAST_NAME_2</u>	Covered Individual's second last name	153	25	X(25)	Required if the Individual has a Second Last Name. Must be left justified, blank filled to the right.
16	<u>FIRST_NAME</u>	Covered Individual's First Name	178	25	X(25)	Required Must be left justified, blank filled to the right.
17	<u>MIDDLE_INITIAL</u>	Covered Individual's Middle Initial	203	1	X(1)	Required if the Individual has a Middle Initial
18	<u>RELATIONSHIP</u>	Covered Individual's Relation to	204	1	1 = Policy Holder, 2 = Spouse, 3 = Child, 4 = Other, 5 =	Required.

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		Policy Holder		Domestic Partner	
19	DATE_OF_BIRTH	Covered Individual's Date of Birth	205	8	MMDDYYYY Required
20	GENDER	Covered Individual's Sex Code	213	1	0 - Unknown 1 - Male 2 - Female Required.
21	RX_BIN	Pharmacy Insurance BIN.	214	6	X(6) Required if INSURANCE_COVERAGE in (P,C or F)
22	RX_PCN	Pharmacy Insurance Processor Control Number (PCN).	220	10	Pharmacy Insurance Processor Control Number (PCN). Required if INSURANCE_COVERAGE in (P,C or F)

#	Field	Description	Pos	Size	Deliverable Data Format	Validation Rules
23	RX_GROUP	Pharmacy Insurance Group ID.	230	15	Alternate Insurance Group ID	Required if INSURANCE_COVERAGE in (P,C or F)
24	MBI	Medicare Beneficiary Identifier (MBI)	245	11	X(11)	Required if INSURANCE_COVERAGE in (C,G or F)
25	FILER	End of Record Filler	256	1	*	Required.
			256			

*** All are Text Fields

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4 File Layout - Error COB File

# Field	Pos	Size	Deliverable Data Format	Notes
1 RECORD_LINE	1	6	X(6)	Record line number.
2 ERROR_CODE	7	5	X(3)	Three digits error code
3 FIELD_NAME	12	25	X(25)	Field Name
4 DESCRIPTION	37	50	X(50)	Description
5 FILLER	87	1	*	End of Record Filler
		88		



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5 Appendixes**Appendix I - Insurer Codes**

ASES Insurer Code	Legal Name	Contrato Número
001	MEDICARE HOSP. Y AMBULATORIO - Parte A B	
002	MMM HEALTHCARE, LLC	
003	MEDICARE HOSP. - PARTE A	
004	MMM HEALTHCARE, LLC	
005	MCS ADVANTAGE, INC.	
006	TRIPLE S ADVANTAGE, INC.	
007	LA CRUZ AZUL DE PUERTO RICO	
008	TRIPLE-S	
009	MEDICARE AMBULATORIO - PARTE B	
010	INTERNATIONAL MEDICAL CARD	
011	ASOCIACION DE MAESTROS	
012	HUMANA INSURANCE OF PUERTO RICO, INC.	
013	COSVI DE P.R.	
014	MCS	
015	HOSPITAL DE LA CONCEPCIÓN	ADMINISTRACION DE SEGUROS DE SALUD
016	HUMANA	
017	SERVICIOS DE SALUD BELLA VISTA	23 - 00046G
018	AUXILIO MUTUO	
019	UNION TRABAJADORES DE MUELLES	
020	GOLDEN CROSS HEALTH PLAN	
021	PLAN DE SALUD MENONITA DE P. R.	
022	AETNA LIFE INS. CO.	
023	AMERICAN CENTRAL INVESTOR LIFE	
024	AMERICAN FAMILY LIFE INSURANCE	

025	AMERICAN HOME ASSURANCE	
026	ALL STATES INSURANCE CO.	
027	AMERICAN HARDWARE LIFE INS.	
028	AMERICAN NATIONAL INS. CO.	
029	ATLANTIC SOUTHERN INS. CO.	
030	AMERICAN CENTRAL INVESTOR INS. CO.	
031	ARGONAUT INS. CO.	
032	CONFEDERATION LIFE INS. CO.	
033	COMBINED INS. CO.	
034	CROWN LIFE INSURANCE CO.	
035	CONNECTICUT GENERAL LIFE INS. CO.	
036	COOPERATIVA SEGUROS MULTIPLES	
037	COMMONWEALTH INS. CO.	
038	CONTINENTAL ASSURANCE CO.	
039	CHAMPURS, BLUE SHIELD OF CALIFORNIA	
040	CONFEDERATION LIFE GROUP HEALTH CLAIMS	
041	GENERAL ACCIDENT AND INSURANCE CORP.	
042	INTERCONTINENTAL LADIES GARMENT WORKERS	
043	JOHN HANCOCK	
044	LINCOLN NATIONAL LIFE INS. CO.	
045	LA ATLANTICA	ADMINISTRACION DE SEGUROS DE SALUD
046	LINCOLN INCOME LIFE INS. CO.	
047	MUTUAL LIFE INC.	23 - 000466
048	MUTUAL LIFE INC.	Contrato Número
049	MASSACHUSETTS MUTUAL LIFE INS. CO.	
050	METROPOLITAN LIFE INS.	
051	MONEY MUTUAL LIFE INS. OF N. Y.	
052	NATIONAL LIFE INS. CO.	
053	N.M.U. PENSION AND WELFARE PLAN	
054	NEW ENGLAND MUTUAL LIFE INS. CO.	

055	NORTH AMERICAN CO. LIFE INS. CO.	
056	NATIONAL HOME LIFE INS.	
057	NEW YORK LIFE INS. CO.	
058	OCCIDENTAL LIFE INS.	
059	PROVIDENT LIFE AND ACCIDENT INS. CO.	
060	PRUDENTIAL LIFE INS. CO.	
061	PACIFIC MUTUAL LIFE INS. CO.	
062	PUERTO RICAN AMERICAN INS. CORP.	
063	PLAN UNION MARINOS MERCANTES	
064	PILOT LIFE INS. CO.	
065	PAN AMERICAN LIFE INS. CO.	
066	PLAN DE SALUD U.I.A.	
067	REPUBLIC NATIONAL LIFE INS. CO.	
068	SEAFARERS WELFARE MEDICAL PLAN	
069	SUN LIFE ASSURANCE CO.	
070	SALUD PREVENTIVA, INC.	
071	SECURITY NATIONAL LIFE INS. CO.	
072	STATE MUTUAL LIFE INS. CO. OF AMERICA	
073	THE PRUDENTIAL INS. CO.	
074	TRANS OCEANIC LIFE INS.	
075	TRANS WORLD INS. CO.	ADMINISTRACION DE SEGUROS DE SALUD
076	THE BANKERS LIFE	
077	THE CARBORUNDUM CO. OF P.R.	
078	THE NEW YORK LIFE INS. CO.	Contrato Número 23 - 000464
079	THE HARRFORD INS. CO.	
080	THE MUTUAL LIFE INS. CO. OF NEW YORK	
081	THE GUARDIAN LIFE INS. CO.	
082	THE EQUITABLE LIFE ASSURANCE	
083	THE TRAVELERS INS. CO.	
084	THE MONEY MUTUAL LIFE INS. CO.	
085	UNITED BENEFITS LIFE INS. CO.	

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086 UNITED OF OMAHA
087 UNITED LIFE INS. CO.
088 SERVI MEDICAL
089 PLAN DE LA POLICIA
090 FIRST MEDICAL ADVANTAGE
091 AUXILIO MUTUO ADVANTAGE
092 RYDERS HEALTH PLAN
093 CIGNA
094 COSVI ADVANTAGE
095 MAPFRE ADVANTAGE
096 AMERICAN HEALTH MEDICARE
097 SALUD DORADA ADVANTAGE
098 MEDICARE PLATINO
099 OTRAS COMPAÑIAS ASEGURADORAS
100 ACCA
101 COVEL
102 FONDO DEL SEGURO DEL ESTADO
103 TRICARE
104 CIGNA PREFERRED
105 CIGNA EXCLUSIVE
106 CANADA LIFE
107 CHAMPUS/CHAMPUA
108 MEDPLUS
109 COLVER
110 GLOBAL HEALTH PLAN
111 HOFFA
112 INTEGRATE COMMUNITY HEALTH
113 PROSALUD
114 INTERNATIONAL MANAGED CARE
115 MMM
116 NIÑOS LISIADOS (DEPT DE SALUD)

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117 OPTIONS
118 PALIC
119 PROSAM
120 UTM
121 UTI
122 UIA
123 UNITEDHEALTHCARE INS. CO.
124 SDM HEALTH MANAGEMENT, INC.
125 PHARMACY INSURANCE CORPORATION OF AMERICA
126 MCS ADVANTAGE, INC.
127 PROSALUD HMO, CORP.
128 FEDERACION DE MAESTROS DE PUERTO RICO
129 FIRST PLUS
130 DELTA DENTAL
131 CONSTELLATION HEALTH
132 MOLINA HEALTHCARE
133 ENVISION RX
134 CORRECTIONAL HEALTH SERVICES CORP
135 OPTIMA HEALTH PR
136 MEDICARE FARMACIA - PARTE D
137 PLATINO - CONSTELLATION HEALTH
138 HUMANA HEALTH PLANS OF PUERTO RICO, INC.
139 PLATINO - MCS CLASSICARE
140 MMM HEALTHCARE, LLC
141 PLATINO - PREFERRED MEDICARE CHOICE (PMC)
142 TRIPLE S ADVANTAGE, INC.

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Appendix 2 - Insurance Coverage

Code	Definition
A	Ambulance Services
R	Ambulatory Rehabilitation Services
D	Dental Services
T	Diagnostic Testing Services
E	Emergency Room Services
H	Hospitalization Services
M	Maternity and Prenatal Services
S	Medical and Surgical Services
C	Medicare Advantage Plans with prescription drug coverage
G	Medicare Advantage Plans without prescription drug coverage
F	Medicare stand-alone Part D Plans for prescription drug coverage
V	Mental Health Hospitalization Services
W	Mental Health Services
N	Non-Emergency Transportation Services (NEMT)
P	Pharmacy Services

Appendix 3 - Services Type Codes

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Code	Definition	COB Industry Code Equivalence (834)
A	Medical Care	1
B	Dental Care	35
C	Hospital Inpatient	48
D	Hospital Outpatient	50
E	Long Term Care	54

F	Free Standing Prescription Drug	89
G	Mail Order Prescription Drug	90
H	Psychiatric	A4
I	Skilled Nursing Care	AG
J	Vision (Optometry)	AL
	Partial Hospitalization	
K	(Psychiatric)	BB

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Appendix 4 - Error Codes

Error	Description	
DTE	Data Type Error	
EOL	End Of Line Error: Bad Filler	
LEN	Unexpected Record Length	
R1202	Unexpected NULL value for TRAN_ID field	
R1204	Unexpected NULL value for PROCESS_DATE field	
R1206	Unexpected NULL value for INSURANCE_TYPE field	
R1208	Unexpected NULL value for INSURANCE_COVERAGE field	
R1210	Unexpected NULL value for COVERED_SERVICES field	
R1212	Invalid value for HEALTH_INSURER_CODE field	
R1214	Unexpected NULL value for GROUP_NUMBER field	
R1216	Unexpected NULL value for POLICY_NUMBER field	
R1218	Unexpected NULL value for RELATIONSHIP field	
R1220	Unexpected NULL value for RX_BIN field based on COVERED_SERVICES Field	ADMINISTRACION DE SEGUROS DE SALUD
R1222	Unexpected NULL value for RX_PCN field based on COVERED_SERVICES Field	23 - 000469
R1224	Unexpected NULL value for RX_GROUP field based on COVERED_SERVICES Field	Contrato Número
R1459	Unexpected NULL value for PROCESS_BEG_DATE field	
R1479	Unexpected NULL value for GENDER field	
R1481	Unexpected NULL value for SSN field	
R1483	Unexpected NULL value for POLICY_TERMINATION_DATE field	
R1485	Unexpected NULL value for POLICY_EFFECTIVE_DATE field	
R1499	Invalid value for COVERED_SERVICES field	
R562	Invalid value for GENDER field	
R563	Invalid value for INSURANCE_COVERAGE field	
R564	Invalid value for HEALTH_INSURER_CODE field	
R565	Unexpected NULL value for RECORD_TYPE field	

- R566 Invalid value for RELATIONSHIP field
- R567 Invalid value for TRAN_ID field
- R568 PROCESS_DATE is not set to the last day of the month
- R569 Invalid value for PROCESS_BEG_DATE field
- R570 Invalid value for GROUP_NUMBER field
- R572 Unexpected NULL value for LAST_NAME_1 field
- R573 Unexpected NULL value for FIRST_NAME field
- R574 Invalid value for DATE_OF_BIRTH field
- R575 Invalid value for POLICY_EFFECTIVE_DATE field
- R576 Invalid value for POLICY_TERMINATION_DATE field
- R577 Invalid value for INSURANCE_TYPE field
- R578 Invalid value for SSN field
- R579 Invalid value for POLICY_NUMBER field
- R5632 Invalid value for COVERED_SERVICES field



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Appendix 3 - Transmittal Sheet

NOMBRE DE ASEGURADORA
HOJA DE TRAMITE ARCHIVOS COB
ENVIO DE ARCHIVOS

FECHA DE ENVIO:**ENVIADO A:** ASES COB/IMM/AA**ENVIADO POR:**

USO ASEGURADORA				USO DE ASES		
	Nombre del Archivo	Número de Records	Tamaño Archivo	Vía FTP	Proceso en ASES COB/IMM/AA	Imp. Operador
1		0	0	FTP Server		
2				FTP Server		
3				FTP Server		

PARA USO DE ASES

RECIBIDO EN ASES POR:

FECHA:

INSTRUCCIONES ESPECIALES:

SE ENVIA ESTA HOJA DE TRAMITE ADJUNTA AL ARCHIVO POR FTP
 TIENE QUE LLENAR TODOS LOS ENCARTILLADOS QUE LE CORRESPONDE A LA ASEGURADORA.

*RGS.*ADMINISTRACION DE
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