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Medicare Part D: Plan Sponsors Must Complete Disclosure to CMS

5-Minute Read

Online Disclosure to CMS

In addition to the annual requirement to provide all Medicare-eligible plan participants with notices of creditable and non-creditable coverage, welfare plan sponsors must also complete the Online Disclosure to CMS Form to report the creditable coverage status of their prescription drug plan.

The Disclosure should be completed annually no later than 60 days from the beginning of a plan year (contract year, renewal year), within 30 days after termination of a prescription drug plan, or within 30 days after any change in creditable coverage status. -- This requirement does not pertain to the Medicare beneficiaries for whom entities are receiving the Retiree Drug Subsidy (RDS).

For calendar year plans the disclosure to CMS is due no later than March 1. However, be aware that non-calendar year plans will have a different deadline.

The CMS online tool is the only method allowed for completing the required disclosure. Click on the link, then follow the prompts to respond to a series of questions regarding the plan. The link is the same regardless of whether the employer's plan provides creditable or non-creditable coverage. The entire process usually takes only 5 or 10 minutes to complete.

Click here for the online CMS Disclosure site: <https://www.cms.gov/Medicare/Prescription-Drug-Coverage/CreditableCoverage/CCDisclosureForm>

The employer will need to gather the following information in order to complete the online disclosure to CMS:

- Information about the plan sponsor (employer): Name, address, phone number, and federal Employer Identification Number (EIN).
- Number of prescription drug options offered (e.g., if employer offers two plan options with different benefit levels, the number is "2").
- Creditable/Non-creditable Offer: Indicate whether all options are creditable or non-creditable or whether some are creditable and others are non-creditable.
- Plan year beginning and ending dates.
- Estimated number of plan participants eligible for Medicare (and how many are participants in the employer's retiree health plan, if any).

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- Date that the plan's Notice of Creditable (or Non-creditable) Coverage was provided to participants.
- Name, title, and email address of the employer's authorized individual completing the disclosure.

Employers are advised to print a copy of the completed disclosure for their records.

What We Do

In today's world of employee benefits, staying compliant with ever-evolving laws, rules and regulations is a constant challenge. Well-versed in both federal and state legislation as well as the changes brought about by the Affordable Care Act, our expert advisors have a deep knowledge of employee benefits and a detailed understanding of healthcare laws, regulations, and standards. Contact Morris & Garritano today for a complimentary compliance assessment.

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