

September 19, 2018

Medicare Part D Notice Action Items for Employers

By *Blake Babcock*

It's that time of year again, Medicare Part D compliance. Employers must send employer-sponsored, health plan Medicare-eligible members a Medicare Part D Notice (Notice) notifying them whether their prescription drug (Rx) benefits qualify for coverage.

The Notice is due before **October 15, 2018**. There have been no changes in the Model Part D Coverage Notice since last year—thus you can use your 2017 Notice (although you will need to update your 2017 notice with corresponding 2018 dates).

The Notice is intended for individuals who are covered (or seeking to be covered) for employer-sponsored Rx coverage, including active employees, retirees, and COBRA continuants (and their dependents) who are eligible for Medicare as the result of age or disability. The only exception to providing the Notice is for those employers who provide Rx coverage through a qualified Employer Group Waiver Plan (EGWP).

Rather than try to identify Medicare-eligible individuals for targeted distribution, many employers simply provide the Notice to all their plan participants. If you need a copy of the Model Notice, you can use this link:

<https://www.cms.gov/Medicare/Prescription-Drug-Coverage/CreditableCoverage/Model-Notice-Letters.html>

You will recall that in addition to distributing the Notice, there is also a requirement to notify the Centers for Medicare & Medicaid Services (CMS), by March 1, 2019, (for calendar year plans) of whether your coverage is creditable or non-creditable.

Questions? Please contact the Findley consultant you regularly work with or Blake Babcock at Blake.Babcock@findley.com or 216.875.1904.