



A UNISON RISK ADVISORS Company

GROUP HEALTH PLAN ADVISORY

Feb. 22, 2022

Medicare Part D Reporting of Prescription Drug Coverage

In addition to the notice of Creditable or Non-Creditable coverage to Medicare-eligible employees by October 14 annually, employers must also report to the Centers for Medicare and Medicaid Services (CMS) Online as to the plan(s)' Creditable or Non-Creditable prescription drug status.

These notification and CMS reporting requirements apply to all employers offering medical benefit plans that include prescription drugs. Reporting is due to CMS within 60 days of the beginning of the plan year; within 30 days after termination of a prescription drug plan; or within 30 days after any change in Creditable or Non-Creditable coverage status.

Creditable means the coverage is "as good as" and comparable to Medicare Part D coverage.

[Model Creditable Coverage Disclosure Notice](#)

[Model Non-Creditable Coverage Disclosure Notice](#)

[CMS Reporting Form Link](#)

CMS REPORTING REFERENCE CHART

TIMELINE TO REPORT CREDITABLE OR NON-CREDITABLE RX COVERAGE TO CMS ONLINE

If the Plan Year Begins:	Report Online to CMS By:	If the Plan Year Begins:	Report Online to CMS By:
Jan. 1	Mar. 1	July 1	Sept. 1
Feb. 1	April 1	Aug. 1	Oct. 1
Mar. 1	May 1	Sept. 1	Nov. 1
Apr. 1	June 1	Oct. 1	Dec. 1
May 1	July 1	Nov. 1	Jan. 1
June 1	Aug. 1	Dec. 1	Feb. 1

The disclosure submission process is composed of the following steps to complete the online Creditable Coverage Disclosure Form:

- Step 1 -Enter the Disclosure Information
- Step 2 -Verify and Download Disclosure Information
- Step 3 -Submit Disclosure Information

Please contact your Oswald client team representative or the Compliance team for further information.

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