

# ALERT

» **QUICK LINKS:** [Trion.com](http://Trion.com) | [Contact Us](#)

## » **UPCOMING CMS DISCLOSURE DEADLINE UNDER MEDICARE PART D**

As part of the disclosure requirements under Medicare Part D, employer sponsored group health plans that offer prescription drug coverage to Part D eligible individuals are required to submit an electronic disclosure notice to the Centers for Medicare & Medicaid Services (CMS) on an annual basis.

This annual notice provides CMS with current information regarding the plan's creditable or noncreditable coverage status. Highlights of the CMS disclosure notice requirements are outlined below.

### **TIMING OF CREDITABLE COVERAGE DISCLOSURE**

The annual CMS disclosure notice must be filed within 60 days after the first day of the plan year. For example, for plan years that end December 31, 2008, the disclosure deadline is 60 days after the first day of the plan year - January 1, 2008. Therefore, the notice for this plan year is to be filed with CMS no later than March 1, 2008.

### **FILING DEADLINES FOR CHANGES**

In addition, a new disclosure notice must be filed with CMS during the plan year if any prescription drug plan coverage change affects the plan's creditable status.

- Within 30 days after the termination of the prescription drug plan.
- Within 30 days after any change in the creditable coverage status of the prescription drug plan.

### **FORM, MANNER AND CONTENT OF CREDITABLE COVERAGE DISCLOSURE**

An entity is required to provide the Disclosure Notice through completion of the disclosure form on the CMS Creditable Coverage Disclosure web page. *Electronic filing is the sole method for compliance with the disclosure requirement.* To access this page directly, click [HERE](#).

#### **REQUIRED DATA FIELDS IN DISCLOSURE NOTICE**

- Name of entity offering coverage
- Federal tax identification number
- Street address
- Phone number
- Type of coverage
- Number of options offered by the entity
- Creditable coverage status
- Period covered by disclosure notice
- Number of Part D eligible individuals expected to be covered under this plan(s) as of the beginning date of the plan year
- Estimate number of individuals expected to be covered through an employer/union group health retiree plan
- Date of Notice of Creditable Coverage provided to Part D eligible individuals
- Change on Creditable Coverage status of previously disclosed information to CMS
- Name, title and email of the entity's authorized individual
- Date of disclosure to CMS

### **ENTITIES WITH SUBSIDIARIES**

For entities with subsidiaries (division, line of business, operating unit, control group, etc.), one disclosure form can be submitted to CMS if the plan year is the same for all subsidiaries/divisions. Because many entities will not be able to provide an exact number of Part D eligible individuals, CMS requests that an estimate be provided.

### **ADDITIONAL GUIDANCE**

To assist you in completing the Disclosure to CMS Form, instructions are provided in the publication *Creditable Coverage Disclosure to CMS Form Instructions and Screen Shots*. This guide is available on the CMS website. To access this site directly, click [HERE](#).

Information regarding the Creditable Coverage requirements under the Medicare Prescription Drug, Improvement, and Modernization Act are available on the CMS website. To access this site directly, click [HERE](#).

### **ABOUT TRION COMPLIANCE ALERTS**

Compliance Alerts are provided with the understanding that they do not provide legal, accounting or other professional advice or service. While Trion strives to ensure the accuracy and completeness of these alerts, the publisher, authors, editors, and contributors of the contents are not responsible for any errors or omissions, or for the failure to report a change in any laws, decisions, regulations, interpretations or other pronouncements. Trion does not control nor guarantee the accessibility,



accuracy, relevance, timeliness, or completeness of outside information for which links may be provided, nor does it endorse any views expressed or products or services offered by such organization or authors.

©2007 Trion. All rights reserved.

PHILADELPHIA NEW YORK CHICAGO SAN FRANCISCO BALTIMORE CHARLOTTE GREENSBORO DALLAS  
P 866 874 6847 W www.trion.com E info@trion.com

[Use this link to be deleted or to update your email address](#)

You can choose to not receive further mailings by clicking on the link above. If you have trouble with this link, simply **forward** this message to [rem@publishingdynamics.com](mailto:rem@publishingdynamics.com) with "#RM#218624,218624" in the subject line. ReachMail does not tolerate spam. Please notify us via email at [abuse@publishingdynamics.com](mailto:abuse@publishingdynamics.com) regarding any spam issues. If you have trouble with any of these methods, you can reach us toll-free at 800-404-6885.

Powered by **REACHMAIL**<sup>SM</sup>

This message was sent by Trion using [ReachMail](#). Read our [Privacy Policy](#).

Confidentiality Notice: This e-mail transmission may contain confidential or legally privileged information that is intended only for the intended recipient. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or reliance upon the content is strictly prohibited.