

New October 15 Deadline for Medicare Part D Creditable / Non-Creditable Coverage Notices

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Group health plans that offer prescription drug coverage are required to issue a notice of creditable or non-creditable coverage to Medicare-eligible participants and beneficiaries each year prior to the annual Medicare Part D open enrollment period. In the past, the Medicare Part D open enrollment period ran from November 15 through December 31, so the notice had to be provided by November 15. **The Patient Protection and Affordable Care Act moved the Medicare Part D open enrollment period earlier, beginning in 2011, to October 15 through December 7.** Therefore, this year's notice of creditable or non-creditable coverage must be provided by **October 15, 2011.**

A plan's **notice of creditable or non-creditable coverage describes whether prescription drug coverage under the plan is "creditable"** — i.e., expected to pay out at least as much as standard Medicare prescription drug coverage, on average for all participants. This information is designed to help Medicare-eligible individuals avoid late enrollment penalties, which can apply when an individual who does not have creditable coverage fails to enroll in Medicare Part D when first eligible.

Plan sponsors will need to update their notices of creditable or non-creditable coverage to reflect the new dates for the Medicare Part D open enrollment period. The Centers for Medicare and Medicaid Services have updated their model notices of creditable and non-creditable coverage to reflect the new dates. No other substantive changes were made to the model notices. The updated notices are available [here](#).

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