

## Medicare Part D and Medicare Secondary Payer Developments

1. Medicare Part D creditable coverage model notices were updated. From the CMS website: "The first disclosure requirement is to provide a written disclosure notice to all Medicare eligible individuals annually who are covered under its prescription drug plan, prior to October 15th each year and at various times as stated in the regulations, including to a Medicare eligible individual when he/she joins the plan." See

<https://www.cms.gov/creditablecoverage/> and

<http://www.cms.gov/CreditableCoverage/Model%20Notice%20Letters.asp#TopOfPage>.

Prescription drug plan sponsors may be interested in the following information:

<http://www.cms.gov/MedicareAdvtgSpecRateStats/Downloads/Announcement2012.pdf>.

2. Medicare Secondary Payer guidance for group health plans was updated:

<http://www.cms.gov/MandatoryInsRep/Downloads/GHPUserGuideV3.2.pdf>. After the date of the update, additional guidance was issued regarding Health Reimbursement Arrangements:

<https://www.cms.gov/MandatoryInsRep/Downloads/HRACoverage.pdf>. The new guidance changes the thresholds for reporting Health Reimbursement Arrangements.

### What should employers do?

1. Evaluate what the guidance means for their plans and whether notices are required. Customize notices, if necessary.

2. Note that Medicare Part D reporting is earlier this year (October 14).

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