



## MEDICARE PART D DISCLOSURE NOTICE TRACKING LOG

This log has been developed to assist administrators in the documentation of mailing the Medicare Part D creditable coverage disclosure notices to Part D eligible individuals. This form is supplied as a guide. You may alter this form or devise your own.

Event Date*	Date of Notice	Date Sent	Name (including dependents)**	Home Address**	Provided by Hand/Mail	Electronic Delivery***	Provided by (Name of Personnel Office Staff Person)



\* Timing of Creditable Coverage Disclosure from Entity to Beneficiaries

42 CFR §423.56(f) specifies the times when creditable coverage disclosures must be made to Part D eligible individuals. At a minimum, disclosure must be made at the following times:

1. Prior to the Medicare Part D Annual Coordinated Election Period (ACEP) – beginning November 15<sup>th</sup> through December 31<sup>st</sup> of each year;
2. Prior to an individual's Initial Enrollment Period (IEP) for Part D, as described under §423.38(a);
3. Prior to the effective date of coverage for any Medicare eligible individual that joins the plan;
4. Whenever the entity no longer offers prescription drug coverage or changes the coverage offered so that it is no longer creditable or becomes creditable; and
5. Upon request by the individual.

If the creditable coverage disclosure notice is provided to all plan participants annually, prior to November 15<sup>th</sup> each year, CMS (the Centers for Medicare and Medicaid Services) will consider items 1 and 2 to be met.

CMS guidance clarifies that “prior to” means that the individual must have been provided the disclosure notice within the past twelve months.

\*\* The entity may provide a single disclosure notice to the covered Medicare individual and all his/her Medicare eligible dependent(s) covered under the same plan. However, the entity is required to provide a separate disclosure notice if it is known that any spouse or dependent that is Medicare eligible resides at a different address than from where the participant/policyholder materials were provided.

\*\*\* Plan sponsors may use the electronic disclosure requirements outlined in detail at 29 CFR §2520.104b-1(c)(1) to meet the creditable coverage disclosure requirements under 42 CFR §423.56(c). These requirements, though specific and detailed, allow the entity sponsoring a group health plan to provide a creditable coverage disclosure notice electronically to plan participants who have the ability to access electronic documents at their regular place of work if they have access to the plan sponsor's electronic information system on a daily basis as part of their work duties.