

## **Medicare Part D Enrollment Period Shifts, Requiring Employers to Issue Notice a Month Earlier**

By Robert Ellerbrock on July 26, 2011

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#### Summary of this no

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The Affordable Care Act shifted the annual enrollment period for Medicare Part D a month to October 15th through December 7th. Prior to the change, annual enrollment began on November 15th.

CMS guidance, issued in 2009, provided that plans must provide Notices of Creditable (or Non-Creditable) Coverage at the following times:

- Prior to the Medicare annual enrollment period (which period the Affordable Care Act moved up a month earlier),
- Prior to an individual's initial opportunity to enroll in Part D,
- Prior to the effective date of coverage for any Medicare-eligible individual that joins the plan,
- When the plan's prescription drug coverage changes (i.e., ends, is no longer creditable or becomes creditable), and
- Upon request by an individual.

As the Medicare annual period change is effective for the 2012 Part D enrollment, which takes place in Fall 2011, plan sponsors must prepare to provide the Notice earlier this year and, of course, prior to October 15th.

Plan sponsors should determine if they must modify their Notices to reflect the Affordable Care Act change.

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