



# National Compliance Update

## USI EMPLOYEE BENEFITS

January 8, 2026

## Medicare Part D CMS Notification Reminder

Employers sponsoring a group health plan (whether insured or self-insured) need to report information on the creditable (or non-creditable) status of the plan's prescription drug coverage to the Centers for Medicare and Medicaid Services ("CMS").

In order to provide this information, employers must access CMS's online reporting system at: <https://www.cms.gov/medicare/employers-plan-sponsors/creditable-coverage/disclosure-form>.

As a reminder, notice must be provided by the following deadlines:

- Within 60 days after the **beginning** date of each plan year;
- Within 30 days after the **termination** of the prescription drug plan; and
- Within 30 days after any **change** in the creditable coverage status of the prescription drug plan.

For example, an employer with a **calendar year plan** (January 1 – December 31, 2026) must complete this reporting **no later than March 1, 2026**.

**USI Note.** If there was a change in the creditable coverage status of a prescription drug plan offered by the employer (e.g., from creditable to non-creditable, or vice versa), notice should be provided to CMS within 30 days of the change. For example, if a change occurred in connection with the January 1, 2026 plan year, CMS should be notified by January 31, 2026.

### EMPLOYER NEXT STEPS

- For **calendar year 2026 plans**, timely complete reporting with CMS. For **non-calendar year plans**, timely complete reporting with CMS following the start of your 2026 plan year.
- You will need to have the following information ready to include when you complete the CMS online reporting:
  - The creditable (or non-creditable) status of prescription drug coverage provided by all plan options available to employees.

- The date that the annual creditable (or non-creditable) coverage notice was furnished to Part D eligible individuals. You may have included this notice with open enrollment materials or sent it following the start of the plan year.
- An estimate of the number of Medicare Part D eligible individuals covered under the plan. This does not have to be an exact number.

## RESOURCES

Additional resources for completing the form are available at:

- <https://www.cms.gov/medicare/employers-plan-sponsors/creditable-coverage/disclosure-form>
- Disclosure to CMS Form User Guide with screenshots:  
<https://www.cms.gov/medicare/prescription-drug-coverage/creditablecoverage/downloads/ccuserguide.pdf>

**USI** [usi.com/locations](http://usi.com/locations)

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