

2024 Creditable Coverage Determination for Medicare Part D For Active Employees

Description of Passing Plans:

Rx Copay Plans (where drugs are subject to copay only):

Retail copay structures all the way up to \$50 generic, \$85 brand formulary, \$110 brand non-formulary, \$220 specialty **PASS**

Higher copays should be evaluated

Rx Copay Plans (where drugs are subject to a separate Rx deductible and copays):

Rx only deductibles up to \$650 with retail copay structures all the way up to \$40 generic, \$75 brand formulary, \$110 brand non-formulary, \$220 spec

Higher deductibles or copays should be evaluated

Rx Coinsurance Plans (where drugs are subject to coinsurance only):

Coinsurance structures all the way up to the member paying 50% **PASS**

Higher levels of coinsurance should be evaluated

Rx Deductible/Coinsurance Plans (where drugs are subject to their own deductible then coinsurance):

Rx only deductibles up to \$650 with the member's coinsurance up to 40%; OOPM not to exceed \$7,400 **PASS**

Higher deductible/coinsurance/OOPM should be evaluated

Integrated Plans (where Rx is under medical deductible):*

Integrated deductibles up to \$6,000 with member's coinsurance up to 35%; integrated OOPM not to exceed \$7,400 **PASS**

Higher deductible/coinsurance/OOPM should be evaluated

With HRA plans, if the employer contributes to the HRA, higher deductible/coinsurance levels may pass. Should be evaluated.

Plan maximums:

If there is a low limit on what the plan will pay for Rx in a year, it should be evaluated

*Note on Actives vs Retirees:

Plans that cover both actives and retirees will need to be evaluated for both. Please note that for integrated plans (where the Rx is under a medical deductible), it is more difficult for retirees to pass the creditable coverage determination.

This is because retirees have Medicare as their primary medical coverage, which leads to a lower percentage of medical costs that are filling the deductible. This means more pharmacy costs are paid by the member, which lowers the plan pay portion.

The plan design guidance above is for active employees only.

Please reach out to your local actuary/analyst for testing assistance for plans that cover retiree populations.