2026 Prescription Drug Plan Creditable Coverage Determination Tool - Non Integrated Plans

Non-Integrated Prescription Drug Benefits

Instructions: To determine creditability, first identify the pharmacy coverage type (copay/coinsurance), then find the member retail cost shares based on your pharmacy plan design. Next find the pharmacy deductible amount using the individual in-network amount on your plan. If your plan is richer (meaning it has a lower coinsurance, copays, or deductibles) than a creditable plan design listed below, then your plan will also be creditable

Note: If the plan does not have a Tier 4 copay/coinsurance, then Tier 3 copay/coinsurance is used to represent Tier 4 cost share amounts.

Definition: Non-Integrated Plan means the pharmacy deductible is not combined with the medical deductible.

			Historical Simplified Methodology (60%)		New Simplified Methodology (72%)	
Pharmacy Coverage Type	Retail Member Cost Share (Tier 1/ Tier 2/ Tier 3/ Tier 4)	Mail Order Member Cost Share (Tier 1/ Tier 2/ Tier 3/ Tier 4)	Pharmacy Deductible	2026 Creditability Result	Pharmacy Deductible	2026 Creditability Result
Copay	$30/$80/$150/$300	$90/$240/$450/$900	< $5,458	Creditable	< $2,211	Creditable
	$50/$75/$100/$100	$150/$225/$300/$300	< $6,129	Creditable	< $2,580	Creditable
	$50/$100/$150/$300	$150/$300/$450/$900	< $5,223	Creditable	< $1,942	Creditable
	$250/$250/$250/$250	$750/$750/$750/$750	< $4,026	Creditable	< $54	Creditable
	$250/$250/$250/$250	$750/$750/$750/$750	>,= $4,026	Not Creditable	>, = $54	Not Creditable
Coinsurance	10%/25%/50%/50%	10%/25%/50%/50%	< $210	Creditable	$0	Not Creditable
	10%/30%/50%/70%	10%/30%/50%/70%	$0	Not Creditable	$0	Not Creditable
	10%/30%/60%/60%	10%/30%/60%/60%	$0	Not Creditable	$0	Not Creditable
	10%/40%/40%/40%	10%/40%/40%/40%	< $326	Creditable	$0	Not Creditable
	10%/40%/40%/40%	10%/40%/40%/40%	>, = $326	Not Creditable	$0	Not Creditable
	10%/40%/40%/50%	10%/40%/40%/50%	$0	Not Creditable	$0	Not Creditable
	10%/40%/50%/50%	10%/40%/50%/50%	$0	Not Creditable	$0	Not Creditable
	10%/40%/50%/60%	10%/40%/50%/60%	$0	Not Creditable	$0	Not Creditable
	20%/20%/20%/20%	20%/20%/20%/20%	< $3,324	Creditable	< $932	Creditable
	20%/20%/20%/20%	20%/20%/20%/20%	>, = $3,324	Creditable	>, = $932	Creditable
	20%/30%/30%/30%	20%/30%/30%/30%	< $1,613	Creditable	$0	Not Creditable
	20%/30%/30%/30%	20%/30%/30%/30%	>, = $1,613	Creditable	$0	Not Creditable
	20%/30%/40%/40%	20%/30%/40%/40%	< $620	Creditable	$0	Not Creditable
	20%/30%/40%/40%	20%/30%/40%/40%	>, = $620	Creditable	$0	Not Creditable
	20%/30%/40%/50%	20%/30%/40%/50%	$0	Not Creditable	$0	Not Creditable
	20%/30%/40%/60%	20%/30%/40%/60%	$0	Not Creditable	$0	Not Creditable
	20%/30%/50%/50%	20%/30%/50%/50%	$0	Not Creditable	$0	Not Creditable
	20%/30%/50%/60%	20%/30%/50%/60%	$0	Not Creditable	$0	Not Creditable
	20%/40%/40%/40%	20%/40%/40%/40%	< $221	Creditable	$0	Not Creditable
	20%/40%/40%/40%	20%/40%/40%/40%	>,= $221	Not Creditable	$0	Not Creditable
	20%/40%/50%/50%	20%/40%/50%/50%	$0	Not Creditable	$0	Not Creditable
	25%/30%/40%/50%	25%/30%/40%/50%	$0	Not Creditable	$0	Not Creditable
	25%/30%/50%/50%	25%/30%/50%/50%	$0	Not Creditable	$0	Not Creditable
	25%/35%/45%/45%	25%/35%/45%/45%	< $36	Creditable	$0	Not Creditable
	25%/35%/45%/45%	25%/35%/45%/45%	>,= $36	Not Creditable	$0	Not Creditable
	25%/35%/50%/50%	25%/35%/50%/50%	$0	Not Creditable	$0	Not Creditable
	25%/40%/40%/40%	25%/40%/40%/40%	< $168	Creditable	$0	Not Creditable
	25%/40%/40%/40%	25%/40%/40%/40%	>,= $168	Not Creditable	$0	Not Creditable
	25%/40%/50%/50%	25%/40%/50%/50%	$0	Not Creditable	$0	Not Creditable
	28%/28%/28%/28%	28%/28%/28%/28%	< $1,862	Creditable	< $1	Creditable
	28%/28%/28%/28%	28%/28%/28%/28%	>, = $1,862	Not Creditable	>, = $1	Not Creditable
	30%/30%/30%/30%	30%/30%/30%/30%	< $1,503	Creditable	$0	Not Creditable
	30%/30%/30%/30%	30%/30%/30%/30%	>, = $1,503	Creditable	$0	Not Creditable
	30%/40%/40%/40%	30%/40%/40%/40%	< $113	Creditable	$0	Not Creditable
	30%/40%/40%/40%	30%/40%/40%/40%	>,= $113	Not Creditable	$0	Not Creditable
	30%/40%/45%/45%	30%/40%/45%/45%	$0	Not Creditable	$0	Not Creditable
	35%/35%/35%/35%	35%/35%/35%/35%	< $663	Creditable	$0	Not Creditable
	35%/35%/35%/35%	35%/35%/35%/35%	>, = $663	Creditable	$0	Not Creditable
	35%/40%/40%/40%	35%/40%/40%/40%	< $57	Creditable	$0	Not Creditable
	35%/40%/40%/40%	35%/40%/40%/40%	>,= $57	Not Creditable	$0	Not Creditable
	40%/40%/40%/40%	40%/40%/40%/40%	<$1	Creditable	$0	Not Creditable
	40%/40%/40%/40%	40%/40%/40%/40%	>, = $1	Not Creditable	$0	Not Creditable
Copay/Coinsurance	$30/30%/40%/40%	$90/30%/40%/40%	<$144	Creditable	$0	Not Creditable
	$30/30%/40%/40%	$90/30%/40%/40%	>, = $144	Not Creditable	$0	Not Creditable
	$30/40%/50%/50%	$90/40%/50%/50%	$0	Not Creditable	$0	Not Creditable
	$30/$80/40%/50%	$90/$240/40%/50%	< $817	Creditable	$0	Not Creditable
	$30/$80/40%/50%	$90/$240/40%/50%	>, = $817	Not Creditable	$0	Not Creditable
	$30/$80/50%/50%	$90/$240/50%/50%	$0	Not Creditable	$0	Not Creditable
	$30/$80/$120/28%	$90/$240/$360/28%	< $118	Creditable	< $98	Creditable

			Historical Simplified Methodology (60%)		New Simplified Methodology (72%)	
Pharmacy Coverage Type	**Retail Member Cost Share (Tier 1/ Tier 2/ Tier 3/ Tier 4)**	**Mail Order Member Cost Share (Tier 1/ Tier 2/ Tier 3/ Tier 4)**	**Pharmacy Deductible**	**2026 Creditability Result**	**Pharmacy Deductible**	**2026 Creditability Result**
	$30/$80/$120/28%	$90/$240/$360/28%	>, = $118	Not Creditable	>, = $98	Not Creditable
	$30/$80/$120/50%	$90/$240/$360/50%	< $118	Creditable	$0	Not Creditable
	$30/$80/$120/50%	$90/$240/$360/50%	>, = $118	Not Creditable	$0	Not Creditable

Disclaimer:
Cigna Healthcare is providing this information as a courtesy to clients and brokers to be used for annual creditability requirements.

Note: This tool cannot be used if your plan qualifies for Retiree Drug Subsidy (RDS). This determination is not sufficient for collection of retiree drug subsidy. Per CMS, the employer is ultimately responsible for determining the creditability of the plan, and may wish to engage an actuarial consulting firm to incorporate additional information to determine creditability. Incorporating a plan's actual experience may cause this guidance to differ. Therefore, this guidance is not to be interpreted as a formal actuarial attestation.

The Cigna Healthcare creditability tests were calculated using the 2026 Medicare Part D defined standard benefit parameters and assumes Cigna Healthcare is primary carrier in accordance with Medicare Secondary Payer rules. This determination may differ for Medicare-eligible retirees/former employees when Medicare Part A and B is the primary payer.

This information does not constitute legal advice or a legal opinion on any specific facts or circumstances. It is intended for general information purposes only, and you are urged to consult a lawyer concerning your own situation and any specific legal questions you may have. Cigna Healthcare assumes no responsibility for any circumstances arising out of the use, misuse, interpretation, or application of any information supplied in this publication, and clients remain solely responsible for assessing whether any plan is creditable under Medicare requirements.

*For 2026 only, CMS is allowing employers a choice to use the current simplified methodology or the revised methodology to determine creditability for non-RDS plans. Beginning CY 2027, CMS will no longer allow the existing simplified determination methodology, requiring non-RDS group health plans to determine creditable coverage through actuarial equivalence testing or the revised simplified determination methodology. Under this revised methodology, group health plan coverage must pay at least 72 percent of participants' prescription drug expenses, compared to 60 percent under the existing methodology. CMS revised this due to changes in Part D, as the 60 percent value no longer accurately reflects the value of the Part D benefit. Group health plan coverage must average at least 72 percent of participants' prescription drug expenses to meet the actuarial value requirement of standard Part D coverage, as mandated by section 1860D-13(b)(5) of the Act.

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