



BULLETIN 20-09

TO: ALL INSURERS AUTHORIZED TO TRANSACT HEALTH INSURANCE IN THE STATE OF ALASKA AND OTHER INTERESTED PARTIES

RE: REQUIREMENTS FOR COST SHARING AND COVERAGE RELATED TO RESPIRATORY ILLNESSES INCLUDING COVID-19 (CORONAVIRUS)

This Bulletin supersedes Bulletin 20-04. The following items are revisions or additions to Bulletin 20-04:

- 1) Effective March 20, 2020, respiratory panel tests are no longer subject to the zero cost-sharing requirement.
- 2) Under Internal Revenue Service (IRS) Notice 2020-15 issued on March 11, 2020, health plans that otherwise qualify as High Deductible Health Plans (HDHPs) will not lose that status merely because they cover the cost of testing for treatment of COVID-19 before plan deductibles have been met.
- 3) In Section 6001 of HR6201 of US Congress signed by the President on March 18, 2020, health insurance insurers offering group or individual health insurance coverage shall not impose prior authorization or other medical management techniques for COVID-19 testing products, items, and services.

All health insurers, insurance industry representatives and other interested parties are encouraged to review the latest information about COVID-19 released by the Alaska Department of Health and Social Services at: <http://dhss.alaska.gov/dph/Epi/id/Pages/Human-Coronavirus.aspx>

The Alaska Division of Insurance is issuing this bulletin to assist regulated individuals and entities in effectuating the provision of insurance related services during this urgent public health challenge.

The Division requires health insurers providing coverage through health care insurance plans to Alaska residents to take the following measures related to the potential impact of COVID-19 in addition to the coverage of early refills referenced in Bulletin 20-03.

Respiratory Illness Diagnostic Testing

Health insurers shall waive any cost-sharing for laboratory diagnostic testing for respiratory syncytial virus (RSV), influenza, and COVID-19. Cost-sharing should not be a barrier to access this testing to confirm illness. In addition, health insurers are also asked to waive the cost-sharing for an office visit and urgent care center visit with the above testing, as well as for an emergency room visit with testing for the above. This waiver is applicable for in-network **and** out-of-network providers, facilities, and laboratories.

HDHPs covering COVID-19 testing without cost-sharing will maintain HDHP status as allowed under IRS bulletin 2020-15. Insurers should provide the greatest benefit to consumers while maintaining eligibility for HDHP and health savings accounts.

Standard medical necessity requirements for RSV and influenza testing remain in effect. To be entitled to a cost-sharing waiver for COVID-19 testing the patient must meet the criteria set forth by the Alaska Division of Public Health/Epidemiology and the U.S. Centers for Disease Control and Prevention (CDC) at the time of service. Under Section 6001 of HR6201 insurers shall not impose prior authorization or other medical management techniques for COVID-19 testing.

Telehealth Delivery of Services

Given that COVID-19 is a communicable disease, some insureds may be using telehealth services instead of in-person health care services. Health insurers are encouraged to liberalize telehealth benefits during this period of increased infection. In addition to contracted telehealth services, insurers are reminded that group insurance contracts cannot contain a provision requiring services to be provided by a particular provider or facility under AS 21.54.020. Consumers should have access to telehealth benefits through their current health care provider. Health insurers are asked to review and ensure their telehealth programs are robust and will be able to meet any increased demand.

Summary

To protect the public health, health insurers are asked to identify and remove barriers to testing and treatment for COVID-19. Health insurers must be prepared to address COVID-19 cases in Alaska and the Division extends its appreciation to health insurers in working with the State to address this public health challenge. Since the COVID-19 situation continues to evolve, health insurers should continually assess their readiness and be prepared to make any necessary adjustments.

Due to the evolving nature of the COVID-19 outbreak, the recommendations are subject to change. Insurers are advised to verify best practices in accordance with the CDC. The requirements of this bulletin are in effect until April 30, 2020, unless otherwise updated.

If you have any questions relating to this bulletin, please contact Sarah Bailey, Life and Health Section Supervisor at sarah.bailey@alaska.gov or (907) 465-4608.

Dated March 19, 2020 in Juneau, Alaska



Lori Wing-Heier, Director