

## AT-HOME COVID-19 TESTS FAQS

Updated January 19, 2022

### Background

On January 10th, the Biden Administration announced that under the Families First Coronavirus Response Act (FFCRA), it will require insurance companies and group health plans to cover the cost of at-home over-the-counter (OTC) COVID-19 tests. Beginning January 15, 2022, members covered by private health insurance or a group health plan will be able to purchase OTC COVID-19 tests authorized by the U.S Food and Drug Administration (FDA) at no cost without a prescription.

### How long will this be in effect?

The reimbursement of OTC COVID-19 tests will remain in effect until the Public Health Emergency (PHE) is rescinded. That date has not been announced.

### Who is eligible?

Under section 6001 of the FFCRA, members covered by private health insurance or a group health plan are eligible to receive at-home, FDA-authorized OTC COVID-19 tests. This includes self-insured plans.

For Medicare members, laboratory COVID-19 (PCR) tests are covered under Medicare Part B.

State Medicaid and CHIP programs are required to cover FDA-authorized at-home tests. Members with Medicaid or CHIP coverage should contact their state agency, as coverage rules may vary by state.

### What is the reimbursement for OTC COVID tests?

The reimbursement is the lesser of the actual price or \$12 per test. We recognize that some OTC COVID-19 tests are sold in packages containing more than one test and will be reimbursed accordingly.

### How is Navitus processing claims for OTC COVID-19 tests?

Navitus is processing pharmacy claims for FDA-authorized OTC COVID-19 antigen tests. At Navitus' network of 58,000+ pharmacies, these claims will be adjudicated at the point of sale.

We highly recommend that members get OTC COVID-19 test kits at the pharmacy counter to ensure that the kits are processed properly and that members have no out-of-pocket costs at the point of sale. However, we will also be accepting all Direct Member Reimbursement (DMR) claims, including those from non-network pharmacies and non-pharmacy locations, using the reimbursement rate outlined above.

If a member does pay out of pocket, they should submit a COVID-19 OTC Test Claim Form that is available for download at [www.navitus.com/members](http://www.navitus.com/members).

To view Navitus' list of network pharmacies, click here:

[www.navitus.com/Navitus.Web/media/pdf/Navitus-Pharmacy-Network-Listing-National-and-Chains.pdf](http://www.navitus.com/Navitus.Web/media/pdf/Navitus-Pharmacy-Network-Listing-National-and-Chains.pdf)

### What qualifies as a network pharmacy?

Our goal is to minimize any disruption in your members' ability to get a COVID-19 test. For those plans using a narrow network, members can get OTC COVID-19 test kits at any Navitus-contracted pharmacy.

### How many OTC COVID-19 tests will be covered?

There is a quantity limit of eight OTC COVID-19 tests per covered individual every 30 days for test kits obtained without a health care provider's involvement or prescription. However, this quantity limit does not apply to test kits ordered by a health care provider.

Keep in mind that when supplies are limited, pharmacies and retailers may place their own quantity limits on the purchase of tests.

### [Is a prescription required to get a COVID-19 test?](#)

No. However, if a member is looking to be reimbursed from more than eight tests in a rolling 30-day period, then a prescription will be needed. If a physician prescribes more tests, the process will be as follows:

- Initially these claims will reject for Quantity Limit (QL)
- The pharmacy will need to call and member services will ask if there's a script from the provider.
- If so, member services will enter an override to allow the claim to pay.

### [Is Navitus requiring an attestation for diagnosis?](#)

No. We are not requiring an attestation for diagnosis for members to submit a DMR. This is consistent with the process at the pharmacy where no attestation is required for direct claim adjudication.

The Department of Labor (DOL) has stated that "fraud and abuse programs that require an individual to submit multiple documents or involve numerous steps that unduly delay a participant's, beneficiary's, or enrollee's access to, or reimbursement for, OTC COVID-19 tests are not reasonable."

We will be monitoring retrospectively for any concerns related to fraud or abuse and address those as needed rather than burdening individuals who are genuinely seeking tests and reimbursement. This is in line with other efforts Navitus has used to monitor fraud and abuse related to other COVID related services.

### [Can members use the member portal to submit DMR claims?](#)

No. Members cannot submit DMR claims through the portal at this time.

### [Can plans opt-in or opt-out of covering OTC COVID-19 tests?](#)

Under section 6001 of the FFCRA, plans are required to cover COVID-19 tests that have been authorized, cleared, or approved by the FDA without imposing any cost-sharing requirements, prior authorizations, or other medical management requirements.

Navitus will provide the option to opt-out of direct coverage for OTC COVID-19 tests, provided that it is being covered under the plan medical benefit. However, plans cannot

opt-out of the DMR only. They must either opt completely in or out. For plans that want to opt-out of coverage, please contact your account manager.

#### [Can members order COVID-19 tests through their mail order provider?](#)

At this time, neither Costco nor Kroger are offering tests via their mail order service. For those clients using Birdi or ServeYou as their mail order provider, they will have tests available by mail order but, like other distributors, they are likely to have a limited supply.

#### [Can members order COVID-19 tests directly through Navitus?](#)

No. Navitus does not have any Direct to Consumer programs to supply test kits.

#### [How will Navitus monitor Fraud, Waste and Abuse \(FWA\)?](#)

Navitus has a robust Special Investigations Unit (SIU) that has been monitoring COVID-19 FWA since the outbreak of the pandemic. We will be evaluating DMR and pharmacy submitted claims to monitor for any instances of overutilization/excess coverage by members.

#### [Can members use their FSA/HSA card to purchase COVID-19 tests?](#)

If a member is planning to seek reimbursement via DMR from their prescription benefit, then they cannot use their FSA/HSA card to purchase these tests.

#### [What OTC COVID-19 tests qualify?](#)

In order to qualify, OTC COVID-19 tests must be FDA-authorized. Examples include, but are not limited to:

- BinaxNOW COVID-19 Antigen Self Test
- CareStart COVID-19 Antigen Home Test
- Ellume COVID-19 Home Test
- Flowflex COVID-19 Antigen Home Test
- iHealth COVID-19 Antigen Rapid Test
- InteliSwab COVID-19 Rapid Test
- QuickVue At-Home OTC COVID-19 Test

If there are no OTC COVID-19 tests available, where can members get tested?

Demand for test kits has soared as the easily transmissible omicron variant has spread rapidly. We recognize that with the increased demand, there will likely be shortages of test kits. With such a rapidly evolving supply chain, we are unable to monitor availability.

The U.S. Department of Health and Human Services (HHS) is providing up to 50 million free, at-home tests to community health centers and Medicare-certified clinics for distribution at no cost to patients and community members. A list of community-based sites can be found here: <https://www.hhs.gov/coronavirus/community-based-testing-sites/index.html>.

In addition, the federal government also announced that it has purchased 500 million rapid tests and will be distributing them free for use at home in the coming weeks. These free tests are available to order online at [www.COVIDTests.gov](http://www.COVIDTests.gov) and <https://special.usps.com/testkits>.

#### Additional Resources

- <https://www.whitehouse.gov/briefing-room/statements-releases/2022/01/14/fact-sheet-the-biden-administration-to-begin-distributing-at-home-rapid-covid-19-tests-to-americans-for-free/>
- <https://www.cms.gov/how-to-get-your-at-home-OTC-COVID-19-test-for-free>
- <https://www.cms.gov/files/document/11022-faqs-otc-testing-guidance.pdf>