

COVID 19 Update:

Over-the-Counter COVID Test Kit Mandated Coverage

Over-the-Counter COVID-19 Test Reimbursement Fact Sheet for Highmark ASO Clients

The Departments of Health and Human Services, Labor, and Treasury published new guidance (in the form of frequently asked questions [FAQs]) requiring commercial health insurers and group health plans to cover the cost of FDA-approved, rapid, over-the-counter (OTC) COVID-19 tests during the federally determined public health emergency. For OTC tests purchased on or after January 15, 2022, the guidance requires:

- Group health plans and health insurers to cover (reimburse) the cost of FDA-approved, over-the-counter COVID-19 diagnostic tests without a prescription.
- A list of FDA-approved tests to be available [here](#).
- A site to be established for members to be reimbursed for the cost of FDA-approved OTC tests.
- Members to be reimbursed for up to eight FDA-approved OTC tests per month.

Test Reimbursement Process

For OTC tests purchased on or after January 15, 2022, members can complete a claim form and upload a copy of their test receipt (showing the date of purchase) and universal product code (UPC) found on the test box to the [Highmark member portal](#). Members can also submit a claim by mail.

As we receive more guidance, we will provide additional options for reimbursement. We will also provide more opportunities to purchase tests from participating providers and designated retailers without any up-front costs.

Members can visit highmarkanswers.com for the latest information on the reimbursement process.

Purchasing Tests From Preferred Retailers

If a member's pharmacy coverage is administered by Highmark:

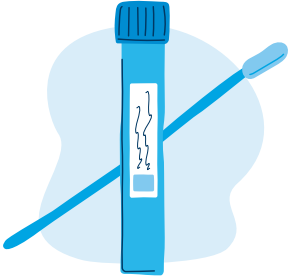
- Highmark is currently developing a preferred pharmacy network of locations and retailers where your members can obtain a test with **no up-front out-of-pocket expense**.



- Members will still have the ability to obtain tests from other retailers outside of this preferred pharmacy network of locations and retailers, and submit to Highmark for reimbursement, as outlined above.

If a member's pharmacy coverage is not through Highmark:

- For ASO clients that do not contract with Highmark for pharmacy benefits, we recommend that you work with your pharmacy benefit manager (PBM) to develop a process that allows for no up-front out-of-pocket expense for your members. If your PBM cannot or has not set up a process, members can be reimbursed through the process mentioned above. However, members will be reimbursed at cost rather than the lower cost or \$12 per OTC test.



Mandate Does Not Cover Workplace-Required Testing:

OTC testing used for employment purposes is not covered under this mandate.

Waste, Fraud, and Abuse Controls:

Highmark is committed to investigating and mitigating instances of health insurance fraud. By using our proven multi-pronged approach of pre-pay edits and post-pay analytics, we will work diligently to identify and address areas of risk for fraudulent activity.

- We will use advanced analytics to help identify suspect activity and we will investigate accordingly. The primary edits that we need are to limit the quantity of tests to eight per member per month and cap reimbursement to \$12 per test (if we or a carve-out PBM client has a preferred pharmacy network and direct retailer in place).
- We'll also monitor the proof of purchase that comes in from members (e.g., paper receipts) to help ensure they appear to be valid. Analytics will help us to monitor for members who max out the test limits on a recurring basis and we'll investigate accordingly.
- We will also look for price gouging, although there may limited options to address this if we do not have a preferred network and direct retailer in place.

Additional information can be found at highmarkanswers.com. We will continually update this site to reflect the latest information on the reimbursement process.

Thank you for your continued partnership as we work to keep all our members healthy and safe during this pandemic.

If you have any questions, please contact your Highmark client manager.

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