COVID-19 OTC AT HOME TESTING

On Jan. 10, 2022, the Departments of Labor, Treasury and Health and Human Services released guidance to support the Administration's directive that health insurers and group health plans cover the cost of FDA-authorized or approved over-the-counter (OTC) at-home COVID-19 tests purchased on or after Jan. 15, 2022.

What are the highlights of the at-home COVID-19 test purchased on or after Jan. 15, 2022? New 1/14/22

- Beginning January 15, 2022, UnitedHealthcare will cover most commercial individual and group health plan members' FDA authorized or approved over-the-counter (OTC) at-home COVID-19 diagnostic tests without a doctor's prescription. This at-home COVID-19 test benefit includes up to 8 tests per member per month. This new benefit does not apply to Medicare Advantage. However, Medicare members should check their plan coverage for specific OTC benefits. Medicaid benefits apply in the following states at this time: New Jersey, New York, North Carolina, Michigan, Texas, and Washington.
- UnitedHealthcare's initial preferred OTC retailer for at-home COVID-19 tests is Walmart Pharmacy, where members who have UnitedHealthcare Pharmacy benefits administered by OptumRx will have no up-front cost and will not have to submit a form for reimbursement. UnitedHealthcare is working to add additional preferred retailers.
- If the member purchases an at-home COVID-19 test at any in-store or online retailer other than the in-store Walmart Pharmacy counter, they may submit purchase receipt(s) for reimbursement at the UnitedHealthcare member portal for a maximum reimbursement of \$12 per test. Reimbursement for tests purchased at Walmart.com and the Walmart checkout counters found at the front of the store also must be submitted through the UnitedHealthcare member portal. Many COVID-19 tests are sold as a two-pack so that means the test pack would be reimbursed at \$24 (\$12 for each test).
- A member must be a UnitedHealthcare commercial individual or group health plan member and have UnitedHealthcare's Pharmacy benefit, to purchase over-the-counter at-home COVID-19 tests at the Walmart Pharmacy counter at no cost. Members may determine their eligibility by locating the OptumRx logo on the front of the member ID card. This informs the member they are part of the UnitedHealthcare pharmacy benefit through OptumRx and may go to any Walmart Pharmacy with available inventory to get a COVID-19 over-the-counter test at no cost. The member would then purchase the COVID-19 test/s at the pharmacy counter.
- For groups that do not have the UnitedHealthcare pharmacy benefit through OptumRx (Optum RX is
 not displayed on the ID card), the member may purchase an at-home COVID-19 test at any in-store
 or online location and submit a claim for reimbursement in the UnitedHealthcare member portal. You
 may receive more specific guidance from your employer on this benefit in the future.
- Visit <u>UHC.com</u> or go to the <u>COVID-19 external FAQs</u> for more information about COVID-19 vaccines and tests.

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Coverage

Under the Jan. 10 Tri-Agency FAQ 51, what is considered an at-home test? New 1/14/22

These are tests that have been authorized, cleared, or approved for use without a doctor's prescription. The tests may be purchased without the need for a provider or clinical assessment.

How do we know which kits are FDA approved? New 1/14/22

The list continues to evolve as additional FDA emergency use authorizations occur. Authorized or approved OTC at-home tests are listed on the FDA website. Test kits purchased from a non-authorized seller are not eligible for reimbursement.

How many COVID-19 tests will be allowed per patient, per month? New 1/14/22

Each covered member is able to be reimbursed for 8 over-the-counter COVID-19 tests every 30 days per covered member. Some test kits contain 2 tests per kit — each of those tests is counted individually toward the limit of 8 per month. For example, if a covered member purchases 4 tests kits with 2 tests in each kit, that equals 8 tests for the month for that member.

Does UnitedHealthcare offer direct purchase through a preferred retailer as well as reimbursement through claim/receipt? New 1/14/22

Yes. For fully insured and self-funded customers with a carve in pharmacy program, UnitedHealthcare offers a preferred retailer program (Walmart Pharmacy). When the member purchase from the pharmacy at the retailer with their ID card, it will be paid directly. UnitedHealthcare is working to add more preferred retailers.

Scope

Who is covered under the guidance? New 1/14/22

Commercial fully insured and group health plans, level-funded plans, many individual plans including exchange, FEHB, COBRA and Student Resources.

The at-home test kit coverage through PHE is not applicable to retiree plans, Medicare Advantage, Medicare, excepted benefit plans, and STLD.

C&S should follow their state guidelines, use approved C&S language here

Is Medicare Advantage covered? New 1/14/22 No.

Are All Savers/Level Funded plans in scope? New 1/14/22

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Yes

Is Bind in scope? New 1/14/22

Yes.

Are COBRA members eligible? New 1/14/22

Yes.

Preferred Retailer and Non-Preferred OTC Purchases and Reimbursement

The following response explains how it will work for the member

How can I purchase approved Over the Counter (OTC) at home Covid Test kits without any OTC pocket expense or having to submit a claim? New 1/14/22

UnitedHealthcare's initial preferred OTC retailer for at-home COVID-19 tests is Walmart Pharmacy, where members who have UnitedHealthcare Pharmacy benefits administered by OptumRx will have no up-front cost and will not have to submit a form for reimbursement. UnitedHealthcare is working to add additional preferred retailers.

You must be a UnitedHealthcare commercial individual or group health plan member **and** have UnitedHealthcare's Pharmacy benefit, to purchase over-the-counter at-home COVID-19 tests at the Walmart Pharmacy counter at no cost to you. To determine if you are eligible, locate your UnitedHealthcare member ID card. If you see OptumRx on the front of your card, you are part of the UnitedHealthcare pharmacy benefit through OptumRx and may go to any Walmart Pharmacy with available inventory to get a COVID-19 over-the-counter test at no cost. You must purchase your COVID-19 test/s at the pharmacy counter. Be sure to have your UnitedHealthcare member ID card with you.

What does a card with UnitedHealthcare Pharmacy (OptumRx) vs a card without pharmacy look like? New 1/14/22





The card on the left shows the OptumRx logo where the card on the right does not have pharmacy with OptumRx.

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What happens if the at home COVID test kit is purchased at a store that is not a preferred retailer (including Walmart front of store register or online instead of the pharmacy counter? New 1/14/22

The following response explains how it will work for the member.

If you purchase an at-home COVID-19 test at any in-store or online retailer, other than the in-store Walmart Pharmacy counter, you may submit your purchase receipt(s) for reimbursement at the UnitedHealthcare member portal for a maximum reimbursement of \$12 per test. Reimbursement for tests purchased at Walmart.com and the Walmart checkout counters found at the front of the store also must be submitted through the UnitedHealthcare member portal. Many COVID-19 tests are sold as a two-pack so that means the test pack would be reimbursed at \$24 (\$12 for each test).

What if my pharmacy coverage is not with Optum Rx will my COVID test kits be covered at the pharmacy counter? New 1/14/22

The following response explains how it will work for the member.

If you are a UnitedHealthcare member who does not have a pharmacy benefit through OptumRx (OptumRx is not displayed on your ID card), you may purchase an at-home COVID-19 test at any in-store or online location and submit a claim for reimbursement in the UnitedHealthcare member portal. You may receive more specific guidance from your employer on this benefit in the future.

How many COVID-19 tests can be purchased and reimbursed to a member? New 1/14/22

UnitedHealthcare will reimburse for a total of 8 COVID-19 tests 30 days per covered member. Some test kits contain 2 tests per kit—each of those tests is counted individually toward the limit of 8 per month. For example, if a covered member purchases 4 tests kits with 2 tests in each kit, that equals 8 total tests for the month for that member.

Which COVID-19 over-the-counter tests are part of this program? New 1/14/22

Any FDA authorized and approved OTC at-home test is covered as part of the program.

How do UnitedHealthcare members submit over-the-counter at-home COVID-19 test costs for reimbursement? New 1/14/22

The member must provide a receipt showing the over-the-counter at-home COVID-19 test purchase date and cost on the member portal. The maximum reimbursement is \$12 per test.

Paper reimbursement forms will be available if necessary. Call the number on the back of your member ID card with any questions.

Where can COVID-19 tests be purchased? New 1/14/22

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Many trusted retailers, such as pharmacies, sell OTC COVID-19 tests both online and in stores. It is important for a member to purchase the at-home COVID-19 test from a trusted source and beware of buying fake or high-priced testing kits from unreputable sources and secondary sources.

Are there state-specific differences that apply to the reimbursement of at-home OTC COVID-19 test? 1/14/22

Yes. In certain situations, state-based guidelines may impact coverage to plans regulated by state law. Please check with your state and plan administrator for additional detail.

What if a member cannot find an authorized over-the-counter at-home COVID-19 test? 1/14/22

If you are experiencing COVID-19 symptoms, you should consult your health care provider or local health department.

Will the result of COVID-19 test have to be reported in order to receive reimbursement? 1/14/22 No.

What if I purchased other items with my COVID-19 tests and those items appear on my receipt? 1/14/22

Only the purchase of over-the-counter at-home COVID-19 tests will be reimbursed.

Where can I go for additional information? 1/14/22

Refer to <u>UHC.com</u> for additional information on reimbursement for over-the-counter at-home COVID-19 tests.

CMS has information on its website about the Biden Administration's at-home COVID-19 testing program.

General Questions

Can the member use their FSA, HSA and how is the reimbursement made?

Yes. If FSA or HSA funds are used to purchase over-the-counter at-home COVID-19 tests, members will need to submit for reimbursement.

How will a member receive reimbursement? New 1/14/22

Members will be reimbursed either by direct deposit if they have indicated that is their preference or the member will receive a check in the mail.

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How long will it take for a member to receive reimbursement? New 1/14/22

Typically, reimbursement is mailed within 10-20 days assuming all requested information is complete.

Can members submit a COVID-19 home test purchased prior to January 15? New 1/14/22 No.

Is a physician order or clinical assessment required for reimbursement for COVID-19 home test?

New 1/14/22

No.

How is handled if other items are purchased with my COVID-19 tests and those items appear on my receipt? New 1/14/22

Only the purchase of over-the-counter at-home COVID-19 tests will be reimbursed.

Can members submit a photo of a receipt? New 1/14/22

Yes.

Do costs go towards the members deductible? New 1/14/22

No.

Will UHC reimburse clients who purchase OTC at home COVID-19 kits and distribute to members? New 1/14/22

No

Fully Insured - Administrative Support

How does coverage for OTC at home test work for fully insured and self-funded groups? New 1/14/22

Fully Insured and Level Funded Customers.

If you are a fully insured customer or level-funded we have members covered.

Members may go through the preferred retail pharmacy and use their ID Card or purchase the at-home test at a location of their choice, submit the receipt for the purchase and UnitedHealthcare will handle the reimbursement based on the 8 tests per member per 30 days.

Does adding at-home COVID-19 testing to coverage require a change to the COC? New 1/14/22 No.

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Self-funded - Administration and Support

How does coverage for OTC at home test work for fully insured and self-funded groups? New 1/14/22

Self-funded customers

For ASO customers with carve in Optum pharmacy, members may go to the preferred retail pharmacy (currently Walmart and other retail stores when added) and use their ID Card to purchase the at-home test at a location of their choice. If the member does not use the Walmart Pharmacy but purchases the test at a Walmart store, other retail store or online, the member submits the reimbursement based on the 8 tests per member per 30 days and reimbursement will be up to \$12 per test.

Self-funded customers with carve out pharmacy (who do not have UnitedHealthcare Pharmacy benefits administered by OptumRx) have two options.

- 1. Work with their PBM to set up program, potentially including a direct reimbursement program for employees at their PBM's pharmacy.
- 2. Reimburse the COVID-19 home tests purchased at the member's choice of retailer at retail costs through their UnitedHealthcare administered medical benefit.

UnitedHealthcare assumes that most employer customers will select option 1 and use their PBM to set up the program for the members. The customer must let their UnitedHealthcare representative know if they want the program to go through the medical benefit not the PBM by Friday, January 21, 2022. If your client does not have the UnitedHealthcare pharmacy benefit with OptumRx, for an interim period, UnitedHealthcare will pay claims submitted in the member portal through the medical benefit.

If the client chooses option 2, to use the medical benefit, UnitedHealthcare will reimburse a member purchase of at home tests when they submit the receipt through the member portal. The member would be reimbursed based on the cost of the test they purchase within the guideline of 8 tests per member per 30 days.

See any changes I made to prior documents

Can an ASO Client chose to cover at home tests only through the Pharmacy Benefit?

Yes. ASO clients with pharmacy benefits through OptumRx will see this benefit applied through their pharmacy policy.

Does adding at-home COVID-19 testing to coverage require the self-funded group to change to the SPD? New 1/14/22

No.

Can a self-funded customer choose to ONLY cover this under the Rx policy? New 1/14/22 Yes.

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