

# **Over-the-Counter COVID-19 Testing Reimbursement**

# Overview, Questions and Answers for Blue Cross NC Sales Staff and Agents

# January 2022

#### Overview

New federal requirements expand access to COVID-19 tests by requiring health plans and issuers to reimburse members for over-the-counter (OTC) tests.

Blue Cross NC will cover over-the-counter (OTC) tests that have been approved or received emergency use authorization (EUA) by the FDA beginning on January 15, 2022, and continuing through the public health emergency. These OTC tests do not have to be ordered by a doctor and can be self-administered and self-read at home.

### **Key Details**

- Blue Cross NC is partnering with Prime Therapeutics (Prime), our pharmacy benefits manager (PBM), to cover the cost of up to eight (8) OTC COVID-19 tests per covered member per month.
  - While this partnership with Prime expands access to OTC COVID-19 tests and minimizes costs for members, Blue Cross NC is not able to control the supply of tests or operations at pharmacy and retail locations.
- OTC COVID testing coverage applies to members of Blue Cross NC's fully-insured (individual and group), Administrative Services Only (ASO) group health plans and the Federal Employee Plan (FEP).
- Some of our ASO groups get their prescription drug coverage from a different carrier.
   We are encouraging those groups to work with their pharmacy benefits manager to determine what options may be available to cover or reimburse their plan participants for the costs of these tests.
- The requirements do not apply to Medicare plans, excepted benefits (such as standalone vision or dental) or retiree-only plans.
- COVID-19 tests for general workplace health and safety (such as employee "return to work" programs) are not required to be covered.



### **Purchasing an OTC COVID Test**

- We encourage members to get their eligible OTC COVID test from an in-network pharmacy
  and present their insurance card, the same way they purchase their prescriptions. By
  purchasing at an in-network pharmacy counter, insurance is filed electronically, allowing
  members to purchase the test with no out-of-pocket costs.
- Members can also pay out of pocket and mail an eligible OTC COVID-19 test <u>claim form</u> to our pharmacy benefit manager, Prime, for reimbursement. This applies to members who purchase OTC tests without their Blue Cross NC prescription drug card at an out-of-network pharmacy or location other than a pharmacy counter.

#### Reimbursement

- Most Blue Cross NC members should not need reimbursement for their OTC COVID-19 tests. If members present their Blue Cross NC member ID card at an in-network pharmacy counter, they will pay no out-of-pocket costs.
- Reimbursement for test kits purchased from out-of-network pharmacies and retailers (any
  location other than a pharmacy counter) is limited to no more than \$12 per individual test. To
  be reimbursed for an OTC COVID-19 test, the test must be approved or have emergency
  use authorization (EUA) by the FDA.
- Members are eligible to receive up to eight OTC COVID-19 tests per month for reimbursement. Each test is counted separately regardless of how many tests are sold in one package.
- When submitting a claim to be reimbursed, members must mail a:
  - Completed OTC COVID-19 test claim form
  - o Purchase receipt documenting the date of purchase and the price of the test
  - o The test's UPC code
- The address to mail the OTC COVID-19 test claim form is:
  - Prime Therapeutics
     Mail route: Commercial
     PO Box 25136
     Lehigh Valley, PA 18002-5136
- Upon receipt of the required materials, pharmacy benefits manager Prime will issue a check reimbursing the member. The standard turnaround time for reimbursement is 21 days.
   Depending on volume, additional time may be needed to process reimbursement requests.
   Purchasing the tests through your pharmacy will eliminate the need for reimbursement.



#### **Additional Resources**

- We encourage members to speak to their primary care provider, pharmacist, or refer to this NCDHHS website if they have questions about COVID-19 testing.
- North Carolina residents can find a number of COVID-19 testing options, including more information about OTC COVID-19 testing, at <u>ncdhhs.gov/GetTested</u>. To find a testing location outside of North Carolina, visit <a href="https://www.hhs.gov/coronavirus/community-based-testing-sites/index.html">https://www.hhs.gov/coronavirus/community-based-testing-sites/index.html</a>.
- For general guidance on using at-home tests and what to do after you have your results, please review the <u>At-Home Testing Guidance for the General Public</u> (<u>Spanish</u>) from NCDHHS.
- To report price gouging, visit . To report suspected fraud, waste or abuse, contact Blue Cross NC at <a href="SIU@bcbsnc.com">SIU@bcbsnc.com</a> or (800) 324-4963.
- Up-to-date information and resources for our members can be found at https://bluecrossnc.com/covid-19/covid-19-testing.

#### **General Questions and Answers**

#### Where can I get a COVID-19 test?

North Carolina residents can find a number of COVID-19 testing options, including more information about OTC COVID-19 testing, at <a href="ncdhhs.gov/GetTested">ncdhhs.gov/GetTested</a>. To find a testing location outside of North Carolina, visit https://www.hhs.gov/coronavirus/community-based-testing-sites/index.html.

#### When should I get tested?

We encourage members to speak to their primary care provider, pharmacist, or refer to this NCDHHS website if they have questions about COVID-19 testing.

# How much will it cost me to get a COVID-19 test?

Health plans and issuers are required to cover at no cost-share to members (copayments, deductibles and coinsurance), COVID-19 testing methods performed in labs or at-home when ordered by a provider, are consistent with current CDC guidance and have been cleared, approved or given emergency use authorization (EUA) by the FDA.

With new federal requirements put in place to expand access to COVID-19 tests, Blue Cross NC will cover over-the-counter (OTC) tests that have been approved or received emergency use authorization (EUA) by the FDA, beginning on January 15, 2022, and continue through the public health emergency. These OTC tests do not have to be ordered by a doctor and can be self-administered and self-read at home.

Depending on where you purchase your OTC test, you will pay no out-of-pocket costs or pay and be reimbursed.

We encourage members to get their OTC COVID test from an in-network pharmacy and present their insurance card, the same way they purchase their prescriptions. By purchasing from an innetwork pharmacy counter, insurance is filed electronically, allowing members to purchase the test with no out-of-pocket costs.

Members can also pay out of pocket and mail an OTC COVID-19 test claim form to our pharmacy benefit manager, Prime, for reimbursement. This applies to members who purchase OTC tests without their Blue Cross NC prescription drug card or at a location other than a pharmacy counter.

Most Blue Cross NC members should not need reimbursement for their OTC COVID-19 tests. If members present their Blue Cross NC member ID card at an in-network pharmacy counter, they will pay no out-of-pocket costs.

Reimbursement for test kits purchased from out-of-network pharmacies and retailers (any location other than a pharmacy counter) is limited to no more than \$12 per individual test.

Pursuant to COVID-19-related legislation and regulations, Blue Cross NC will continue waiving member cost-sharing (copays, deductibles and coinsurance) for COVID-19-related provider screening visits and testing until the public health emergency is over.

COVID-19 tests for general workplace health and safety (such as employee "return to work" programs) are not required to be covered.

We encourage members to speak to their primary care provider, pharmacist, or refer to this NCDHHS website if they have questions about COVID-19 testing.

#### Is prior authorization required for COVID-19 testing?

COVID-19 tests, including over-the-counter (OTC) tests, do not need prior approval. That means your doctor doesn't need to ask us for approval before you're tested for COVID-19.

### Will I be reimbursed for my OTC COVID-19 test?

Most Blue Cross NC members should not need reimbursement for their OTC COVID-19 tests. If members present their Blue Cross NC member ID card at an in-network pharmacy counter, they will pay no out-of-pocket costs.

Any member who purchases OTC tests without their Blue Cross NC prescription drug card or at a location other than a pharmacy counter can pay out of pocket and mail an OTC COVID-19 test claim form to our pharmacy benefit manager, Prime, for reimbursement.

Reimbursement for test kits purchased from out-of-network pharmacies and retailers (any location other than a pharmacy counter) is limited to no more than \$12 per individual test. To be reimbursed for an OTC COVID-19 test, the test <u>must be approved or have emergency use</u> authorization (EUA) by the FDA.

Members are eligible to receive up to eight (8) OTC COVID-19 tests per month. Each test is counted separately regardless of how many tests are sold in one package.



When submitting a claim to be reimbursed, members must mail a:

- Completed OTC COVID-19 test claim form
- Purchase receipt documenting the date of purchase and the price of the test
- The test's UPC code.

The address to mail the OTC COVID-19 Test paper claim is: Prime Therapeutics
Mail route: Commercial
PO Box 25136
Lehigh Valley, PA 18002-5136

Upon receipt of the required materials, pharmacy benefits manager Prime will issue a check reimbursing the member. The standard turnaround time for reimbursement is 21 days. Depending on volume, additional time may be needed to process reimbursement requests. Purchasing the tests through your pharmacy will eliminate the need for reimbursement.

COVID-19 tests for general workplace health and safety (such as employee "return to work" programs) are not required to be covered.

# Do I have to purchase an OTC test from a specific retailer to be reimbursed? No. OTC COVID-19 tests that have been approved or received emergency use authorization (EUA) by the FDA are covered regardless of where you purchase them.

We encourage members to get their OTC COVID test from an in-network pharmacy and present their insurance card, the same way they purchase their prescriptions. By purchasing from an innetwork pharmacy counter, insurance is filed electronically, allowing members to purchase the test with no out-of-pocket costs.

Members can also purchase OTC tests at a location other than a pharmacy counter. When purchasing an OTC test from an out-of-network pharmacy or retailer, members are required to pay out of pocket and mail an OTC COVID-19 test <u>claim form</u> to our pharmacy benefit manager, Prime, for reimbursement.

Prime's preferred network for the COVID test kits is not limited to a particular chain. OTC COVID tests will be available through pharmacies (in-network or out-of-network) and retailers (any location other than a pharmacy counter).

# If I don't want to pay any up-front out-of-pocket costs for my OTC test, which pharmacies can I use?

Click here to search for a pharmacy in Prime's preferred network.

## Will all members be eligible for OTC test coverage?

OTC testing coverage applies to members of Blue Cross NC's fully-insured (individual and group), Administrative Services Only (ASO) group health plans and the Federal Employee Plan (FEP).



The requirements do not apply to Medicare plans, excepted benefits (such as stand-alone vision or dental) or retiree-only plans.

If the back of your Blue Cross NC ID card doesn't list Prime as your prescription drug plan, you may have a different pharmacy benefit manager. If this is the case, please ask your employer or benefits manager about your OTC testing reimbursement options.

COVID-19 tests for general workplace health and safety (such as employee "return to work" programs) are not required to be covered.

Members should contact the Blue plan listed on their ID card for information about their COVID-19 benefits.

#### Will FEP cover OTC COVID-19 tests?

Yes. FEP will cover member submitted claims at zero cost share for COVID-19 tests with emergency use authorization available over the counter (OTC) without a physician order through the medical benefit. Member submitted claims must include a copy of an itemized receipt indicating the specific testing performed. For more information, visit <a href="https://www.fepblue.org/">https://www.fepblue.org/</a>.

# How can I determine if an OTC test is FDA approved?

For the most updated information on tests that have emergency use authorization from the FDA to test for COVID-19, visit <a href="https://covid19.ncdhhs.gov/about-covid-19/testing/approved-covid-19-home-tests">https://covid19.ncdhhs.gov/about-covid-19/testing/approved-covid-19-home-tests</a>.

### How do I use an OTC COVID-19 test?

For general guidance on using at-home tests, including OTC tests, and what to do after you have your result, please review the <u>At-Home Testing Guidance for the General Public</u> (<u>Spanish</u>) from NCDHHS.

# Will Blue Cross NC cover the full cost of all OTC tests, or will they only reimburse a certain dollar amount per test?

Blue Cross NC will cover OTC tests that have been approved or received emergency use authorization (EUA) by the FDA. Members are eligible to receive up to eight (8) OTC COVID-19 tests per month. Each test is counted separately regardless of how many tests are sold in one package.

If members present their Blue Cross NC member ID card at an in-network pharmacy counter, they will pay no out-of-pocket costs. Reimbursement for test kits received from out-of-network pharmacies and retailers (any location other than a pharmacy counter) is limited to no more than \$12 per individual test.

# Does the OTC testing quantity impact my ability to have a test covered that is ordered by a health care provider?

While members are only eligible to receive coverage for eight (8) OTC tests each month, Blue Cross NC will continue to cover at no cost-share to members (copayments, deductibles and



coinsurance), COVID-19 testing methods performed in labs or at-home when ordered by a provider, are consistent with current CDC guidance and have been cleared, approved or given emergency use authorization (EUA) by the FDA.

# Can I mail a paper claim to Blue Cross NC?

No. The address to mail the OTC COVID-19 test claims is: Prime Therapeutics Mail route: Commercial PO Box 25136 Lehigh Valley, PA 18002-5136

Upon receipt of the required materials, pharmacy benefits manager Prime will issue a check reimbursing the member. The standard turnaround time for reimbursement is 21 days. Depending on volume, additional time may be needed to process reimbursement requests. Purchasing the tests through your pharmacy will eliminate the need for reimbursement.

#### Why did my paper claim get returned?

You must complete the correct OTC COVID-19 test <u>claim form</u> and mail to Prime at: Prime Therapeutics
Mail route: Commercial
PO Box 25136
Lehigh Valley, PA 18002-5136

Upon receipt of the required materials, pharmacy benefits manager Prime will issue a check reimbursing the member. The standard turnaround time for reimbursement is 21 days. Depending on volume, additional time may be needed to process reimbursement requests. Purchasing the tests through your pharmacy will eliminate the need for reimbursement.

#### What is the timing to be reimbursed for OTC tests?

The standard turnaround time for reimbursement is 21 days. Depending on volume, additional time may be needed to process reimbursement requests. Purchasing the tests through your pharmacy will eliminate the need for reimbursement.

#### Are OTC tests covered for members under their medical benefits?

For Blue Cross NC's fully-insured (individual and group) and Administrative Services Only (ASO) group health plans, Blue Cross NC will cover this under its prescription drug plan, which is administered by Prime.

If the back of the member's Blue Cross NC ID card doesn't list Prime as its prescription drug plan, the member may have a different pharmacy benefit manager. If this is the case, members should ask their employer or benefits manager about their OTC testing reimbursement options.

For Federal Employee Plan (FEP) members, FEP will cover this under their medical plan. Members must submit their claim for reimbursement along with a copy of an itemized receipt indicating the specific testing performed.

This coverage requirement doesn't apply to Medicare plans at this time.



# Who should I contact if I suspect unethical business practices?

To report price gouging, visit <a href="https://ncdoj.gov/file-a-complaint/price-gouging/">https://ncdoj.gov/file-a-complaint/price-gouging/</a>. To report suspected fraud, waste or abuse, contact Blue Cross NC at SIU@bcbsnc.com or (800) 324-4963. or (800) 324-4963.

## Sales and Agent Questions and Answers

# As an ASO group, can I opt out of this requirement?

There is no opt-out option for ASO clients.

#### Are members of ASO groups who carve out prescription benefits covered?

ASO clients who carve out prescription benefits should work directly with their PBM to determine coverage and reimbursement requirements.

# What should I do if Prime is not listed as my prescription drug plan on the back of my Blue Cross NC ID card?

If the back of your Blue Cross NC ID card doesn't list Prime as your prescription drug plan, you may have a different pharmacy benefit manager. If this is the case, please ask your employer or benefits manager about your OTC testing reimbursement options.

## What is the anticipated cost of this to ASO groups?

Blue Cross NC is working to determine this and will provide more information as soon as possible.

# For fully-insured groups, will Blue Cross NC increase rates at group renewal to account for these costs? Will there be a line item related to this on the projections page for FI groups?

Blue Cross NC is working to determine this and will provide more information as soon as possible.

#### Will Prime establish a preferred network?

Yes, Prime will establish a preferred network of Prime-contracted pharmacies to support members in obtaining at home tests from a network of providers without member cost share. Prime's solution will be built on our largest, broadest network of pharmacies, which contains approximately 65,000 pharmacies nationally.

- By using this "Broad Plus" network, Prime is able to leverage our previously negotiated discounts with pharmacies and reimburse pharmacies the lesser of their usual and customary (U&C), submitted costs, the negotiated discount off average wholesale price (AWP), or \$12 per test, plus, applicable dispensing fee.
- The preferred network is tiered above the plans other networks to capture the COVID-19 at-home tests and apply the appropriate quantity limits and member benefits.
- A preferred network allows plans to pay the lesser of submitted cost, AWP discount, or federal rates, as applicable and described in FAQ #51 in the FAQ from federal regulators (see Jan. 11 email from Prime). Without a network established, the plan is required to pay the full submitted rate.



### How will Prime manage non-preferred or out of network pharmacies?

To provide access to members and minimize the number of paper claims being submitted for reimbursement, Prime will wrap the Broad Plus network with an "adjudication set-up" for non-contracted pharmacies.

This set-up would not include any pharmacy for which Prime has fraud, waste and abuse (FWA) concerns.

Members may submit reimbursement requests for any eligible providers that are not set up for electronic submission by using the existing paper claim processes.

### Will Prime support claims from non-pharmacy retailers?

Yes, members may submit paper claims from non-pharmacy retailers following the standard paper claims process.

# Does Prime have a preferred arrangement in place with a particular chain to provide the tests?

Prime's preferred network for the COVID test kits is not limited to a particular chain. At-home COVID tests will be available through pharmacies (in-network or out-of-network) as well as other retailers. They will use the pharmacies in their Prime Broad Plus Network as in-network pharmacies, wrapped with an additional non-contracted pharmacy network.

#### Are any contracted pharmacies falling out of the network with this solution?

Electronic claims will be accepted from contracted and non-contracted pharmacies that are registered with NCPDP, other than those that Prime has excluded for FWA concerns. Because they are leveraging the Broad Plus network of ~65,000 pharmacies, the vast majority of pharmacies will be included as preferred. If a pharmacy is not contracted through Prime's Broad Plus network, claims will continue to be processed through the out-of-network adjudication set-up. The preferred network in the state of West Virginia is limited to Walgreens due to state mandated reimbursement. Members can purchase tests from other West Virginia pharmacies but will need to submit paper claims for reimbursement.

How will out-of-network pharmacies be reimbursed when submitting electronic claims? Out-of-network pharmacy claims will be paid based on the lesser of the usual and customary (U&C), submitted costs or \$12 per test, plus, with no dispensing fee.

#### Formulary and Benefits

Which specific COVID home test kits are part of the immediate solution? The following list of kits are included in the Jan. 15 solution.

	Brand Name	Tests/		Number of
NDC		Pk	GPI Name	tests
	ELLUME COVID-19		COVID-19 AT HOME ANTIGEN	
56964000000	HOME TEST	1	TEST KIT	8 tests per 30
	BINAXNOW COVID-19		COVID-19 AT HOME ANTIGEN	days
11877001140	AG CARD HOME TEST	2	TEST KIT	cumulative
	ELLUME COVID-19		COVID-19 AT HOME ANTIGEN	across
50021086001	HOME TEST	1	TEST KIT	Generic



	Brand Name	Tests/		Number of
NDC		Pk	GPI Name	tests
	INTELISWAB COVID-19		COVID-19 AT HOME ANTIGEN	Product
08337000158	RAPID TEST	2	TEST KIT	Identifier
	QUICKVUE AT-HOME		COVID-19 AT HOME ANTIGEN	(GPI)
14613033968	COVID-19 TEST	5	TEST KIT	
	QUICKVUE AT-HOME		COVID-19 AT HOME ANTIGEN	
14613033972	COVID-19 TEST	2	TEST KIT	
	ON/GO COVID-19		COVID-19 AT HOME ANTIGEN	
60006019166	ANTIGEN SELF-TEST	2	TEST KIT	
	FLOWFLEX KIT HOM		COVID-19 AT HOME ANTIGEN	
82607066026	TEST	1	TEST KIT	

# How will Prime respond to claim submissions for other COVID test kits not on the list above?

Prime's solution is intended to cover COVID-19 home antigen test kits that are available without a prescription and do not require a lab to read the results. Because molecular products mostly require a prescription and are lab-based tests, Prime considers them to be a medical benefit. Prime's claim process for electronic or paper claims will deny coverage for tests that are not on Prime's list of covered test kits.

*NOTE*: Prime's listing of covered test kits may change or be expanded in the future as more tests are approved or more guidance is issued.

Will there be a control in the system to limit the quantity of tests a member receives? Yes, there will be a benefit limit of 8 individual tests every 30 calendar days. The system will look back 30 days during adjudication of the claim to determine if the claim is eligible for coverage.

# How will Prime distinguish who has a "doctor's order" to get more than 8 tests per month?

Prime's approach applies to the new requirements to cover non-prescribed at home COVID-19 tests with results that can be read at home without the use of a lab. Members obtaining test kits via a prescription would continue to submit claims as they do currently, with coverage through the medical benefit.

### How is Prime preparing to handle paper claims?

Prime strongly encourages plans to direct members to the pharmacy counter so that the pharmacy submits an electronic claim. Recognizing that members may pay cash, Prime's paper claims team is highly engaged. They will be monitoring and managing resources for paper claims as needed.

Will members be reimbursed if they submit paper claims from a contracted pharmacy? Yes, members will be reimbursed if they submit a paper claim after purchasing test kits at the retail counter of a pharmacy, like Walgreens. In these situations, Walgreen's NPI would be entered to ensure accurate pricing.

Will members be reimbursed if they submit paper claims from a non-contracted pharmacy?

Yes, members will be reimbursed if they submit a paper claim after purchasing test kits at the retail counter of a non-contracted pharmacy or from a pharmacy that is not set up for electronic claims processing. Claims will be reimbursed up to \$12 per individual test.

### Will retail pharmacies be able to ship COVID home test kits?

Yes, all pharmacies will be able to ship COVID home test kits to members, including retail pharmacies, retailers and online retailers.

# Will contracted pharmacies be directing or otherwise encouraging members to go to the pharmacy counter?

Prime is in the process of reaching out to our key pharmacy partners to understand their inventory, supply chain plans, how members will be directed to the pharmacy rather than the retail counter, and to confirm understanding that COVID home test kits required by employers are not eligible to insurance payments.

Most pharmacies contacted to date have shared they plan to have the COVID home test kits available at the pharmacy counter for insured patients. Kits will also be available in the retail space for members not using insurance.

Prime is educating the pharmacies, and in standard member communication, that members should obtain COVID home test kits from the pharmacy counter to obtain \$0 coverage at the point of sale without the need to submit a paper claim.

Pharmacies will be allowed to limit quantities based on their inventory management protocols to service all members. These pharmacy specific limitations may be less than 8 individual tests per person.

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