

HENDERSON BROTHERS UPDATE

New DOL FAQs - COVID-19 Testing Coverage Required for Asymptomatic Individuals March 2021

On Friday, February 26, 2021, the Departments of Labor, Health and Human Services (HHS), and the Treasury released new [Frequently Asked Questions \(FAQs\)](#) on the implementation of the Families First Coronavirus Response Act (“FFCRA”), the Coronavirus Aid, Relief, and Economic Security Act (the “CARES Act”), and other benefit coverage issues related to the pandemic.

The new FAQ guidance (Q #1) illustrates that Plans and issuers cannot require the presence of symptoms or a recent known or suspected exposure, or otherwise impose medical screening criteria on coverage for COVID-19 testing. In general, when an individual seeks a COVID-19 test, the test should be covered without cost-sharing, prior authorization, etc., even with no physician order, unless it is determined the testing is for general workplace health and safety, for public health surveillance or for other purposes not primarily intended for individual diagnosis or treatment of COVID-19.

The new guidance also clarifies with respect to vaccine coverage (Q#7) that Plans and issuers must provide coverage without cost sharing for all COVID-19 vaccines that have received a recommendation that makes them a qualifying coronavirus preventive service with respect to the individual involved, and their administration. Plans and issuers are not permitted to exclude coverage for (or impose cost sharing on) any qualifying coronavirus preventive services.

If you have any questions, send them to sherrle@hb1893.com or reach out to your HBI consultant or analyst directly.

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