FEHB Program Carrier Letter
All FEHB Carriers

U.S. Office of Personnel Management
Healthcare and Insurance

Letter No. 2020-02   **Date: March 11, 2020**

Fee-for-service [2]   Experience-rated HMO [2]   Community-rated HMO [2]

PURPOSE

This letter provides information to FEHB Program Carriers on issues surrounding SARS-CoV-2, the novel coronavirus, which has caused COVID-19 disease in China and other countries, including the United States.

OPM believes that FEHB Carriers have an important role in responding to this outbreak by providing information to their members on the most effective ways to prevent spread of this disease and how to seek care if they believe they might be infected, as well as by promoting access to testing and treatment as appropriate for those affected. We also urge Carriers to review their preparedness for this outbreak and take necessary steps to provide services for FEHB members without interruption. Many of you have already responded to this request by including FEHB members in public statements. We thank you for your efforts to ensure that FEHB members have access to necessary services.

INFORMATION FOR FEHB CARRIERS

Member Education

Carriers should refer members to the CDC Coronavirus website[1] for the most up-to-date and accurate information on where COVID-19 cases have been confirmed. Carriers should also advise any person who has returned from an impacted location or who has had close contact with someone who has recently returned from an impacted location and who develops fever and/or respiratory symptoms to contact a medical provider immediately, either by phone or electronically, for instructions on how to be tested and seek further medical care. By encouraging the use of available telehealth services, we can reduce the number of potentially infectious patients in medical waiting rooms and help limit the spread of the disease.

Member communication may include newsletters, letters, emails, text messaging, social media and/or website information.

Member Access to Testing and Treatment

FEHB Carriers should review plan benefits to minimize barriers to testing and treatment for FEHB members who are affected by the COVID-19 outbreak.

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[1] CDC Coronavirus website https://www.cdc.gov/coronavirus/index.html

Specifically:

- On a case-by-case basis, in consultation with the relevant public health authority(ies) and OPM, we encourage Carriers to be prepared to relax referral or pre-authorization requirements to provide benefits for:
    - o SARS-CoV-2 virus testing
    - o Care at specialized centers
    - o Medical ambulance transportation reimbursement
    - o Early refills of prescription medications for displaced individuals

- We encourage Carriers to consider the following:
    - o Contracted medical transportation providers are equipped to handle the transport of potentially infectious patients
    - o Members who require treatment for COVID-19 disease have access to needed services in-network or to consider authorizing access to out-of-network services with in-network cost sharing
    - o Implementation of solutions such that out-of-pocket costs are not a barrier to people seeking testing for COVID-19, including waiving cost sharing for testing and telemedicine/ telehealth visits.

- Carriers that offer a health savings account (HSA)-qualified high deductible health plan (HDHP) should review IRS Notice 2020-15[1], and strongly consider providing health benefits associated with testing for and treatment of COVID-19 without a deductible, or with a deductible below the minimum deductible for an HDHP.

- Should new treatments or vaccines become available (e.g., FDA approval of new drugs or vaccines, or peer-reviewed publications demonstrating the effectiveness of existing anti-viral medications), OPM expects that Carriers would rapidly review and approve these therapeutics consistent with previous guidance (Carrier Letter 2019-10[2]).
    - o Carrier Letter 2018-10[3] provides guidance on coverage of medications or vaccines authorized under FDA Emergency or compassionate use provisions.
    - o Carrier Letter 2012-09[4] (Section II, Subsection B) provides guidance on experimental or investigational therapies provided under the auspices of an approved clinical trial.

- In the event of a work-related exposure that may be payable by the Office of Workers' Compensation Programs (OWCP), FEHB Carriers should provide immediate payment and seek subsequent reimbursement from OWCP.

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[1] https://www.irs.gov/pub/irs-drop/n-20-15.pdf

[2] Carrier Letter 2019-10 https://www.opm.gov/healthcare-insurance/healthcare/carriers/2019/2019-10.pdf

[3] Carrier Letter 2018-10 https://www.opm.gov/healthcare-insurance/healthcare/carriers/2018/2018-10.pdf

[4] Carrier Letter 2012-09 https://www.opm.gov/healthcare-insurance/healthcare/carriers/2012/2012-09.pdf

<u>Carrier Readiness</u>

The Federal government has released information on [workplace preparedness for COVID-19 disease](#).[5] Carriers should prepare as necessary to enable continuity of operations and closely monitor the impact of the outbreak on their workforce. As you would for reporting any significant event, if you experience any disruption to normal services, you must immediately contact your Health Insurance Specialist.

CONCLUSION

OPM has issued [guidance](#)[6] to all agencies whose employees may be impacted by the spread of the virus on appropriate human resources flexibilities and updates will be released as necessary. As always, thank you for your attention to the health of our Federal workforce and families.

If you have any questions about the information provided in this letter, please contact your Health Insurance Specialist.

Sincerely,

Laurie Bodenheimer
Acting Director
Healthcare and Insurance

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[5] https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html

[6] Guidance to Federal Agencies https://www.chcoc.gov/content/preliminary-guidance-agencies-during-coronavirus-disease-2019-covid-19; and
https://www.chcoc.gov/content/human-resources-flexibilities-available-federal-employees-impacted-2019-novel-coronavirus