

SUMMARY OF THE COVERAGE PROVISIONS RELATED TO THE COVID-19 PANDEMIC

The chart below summarizes the statutory and regulatory actions taken to provide for rapid coverage and access to testing, vaccines, and therapies to treat COVID-19.










The systems in place during a pandemic for the deployment of an eventual COVID-19 vaccine ensure that **initially, vaccines will be distributed for free by the government, without regard to insurance coverage.** The coverage provisions of FFCRA and CARES provide for eventual coverage of these vaccines through insurance without cost sharing. These provisions mean that patient **affordability** for vaccines will not be an issue.



Immediate concerns will focus more on **access** – how limited supplies of treatments and vaccines will be allocated. Long term affordability concerns could arise to the extent that patients seek care from out-of-network providers.



Additionally, the **coverage at no cost sharing requirements of FFCRA and CARES are in force only during the declared public health emergency.** Once the president allows the emergency declaration to expire, the un- and under insured could face heightened access and affordability concerns.

	MEDICARE	MEDICAID	COMMERCIAL	UNINSURED
Diagnostic Testing	 All tests covered at no cost sharing			 Indirect coverage for some available through a patchwork of programs; can vary by state
Serological Testing	 All tests covered at no cost sharing	 No legislation or regulatory guidance to date; varies by state	 All tests covered at no cost sharing	
Vaccines (see bullet #1 above)	 Covered with no cost sharing			
Treatments	 MA/Managed Medicaid/Commercial plans have option to waive cost sharing for COVID treatment, but not required			