

COVID-19 Test Prices: Questions for State Insurance Regulators

Presentation to NAIC Health Innovation Working Group

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Filling the need for trusted information on national health issues.

COVID-19 Testing is Evolving Rapidly

- **Three main types of test today**
 - Molecular diagnostic test (PCR): detects viral genetic material in sample
 - Highly accurate for symptomatic and asymptomatic patients
 - Results within 1-3 days, longer if capacity constraints, other factors
 - Rapid PCR tests deliver results in minutes
 - Usually provider administered using nasal swab
 - At-home tests (saliva/nasal swab) have also been authorized
 - Antigen diagnostic test: detects proteins on surface of virus in sample
 - Designed for faster results; typically within 15 minutes
 - Authorized for use in patients with symptoms or suspected exposure, other screening uses
 - Provider administered; not a direct-to-consumer product
 - Antibody test (serological): identifies people who were infected and have recovered
 - Provider administration (at-home tests under development)
- **Rapid Acceleration of Diagnostics (RADx) initiative funds new technologies, innovations**

Figure 2

CARES Act: Private insurance coverage of COVID-19 test

- Medically appropriate COVID-19 diagnostic and antibody tests, and related items and services, must be covered 100% by private health plans and issuers, with no cost sharing, no prior authorization, no medical management requirements applies
- Covered COVID-19 tests include those with FDA approval or EUA (including at-home tests ordered by health care provider), tests developed by states, other tests determined appropriate by Secretary of HHS
 - No limit on number of covered tests patient can receive
 - COVID-19 testing for surveillance or employment purposes is not required to be covered
- Related items and services can include visit (including professional and facility fee) to evaluate patient for test, other tests (e.g., for influenza) or procedures (e.g., chest x-rays) the provider may order to determine appropriateness of COVID-19 test, so long as these result in an order for or administration of a test
- CARES Act coverage requirement applies whether COVID-19 test and related items and services are provided in-network or out-of-network
- COVID-test providers must post “cash price” on a public website, or face \$300/day civil money penalty
- For non-network tests/services, plans and issuers can negotiate price, or must pay cash price posted online
 - No prohibition on balance billing by providers; law silent on what must be paid if no price is posted
- States may impose additional standards that do not prevent application of federal law

Source: CMS, FAQs about Families First and CARES Act Implementation, Part 42, April 11, 2020, available at <https://www.cms.gov/files/document/FFCRA-Part-42-FAQs.pdf>; and Part 43, June 23, 2020, available at <https://www.cms.gov/files/document/FFCRA-Part-43-FAQs.pdf>

Additional federal guidance on coverage of COVID-19 test

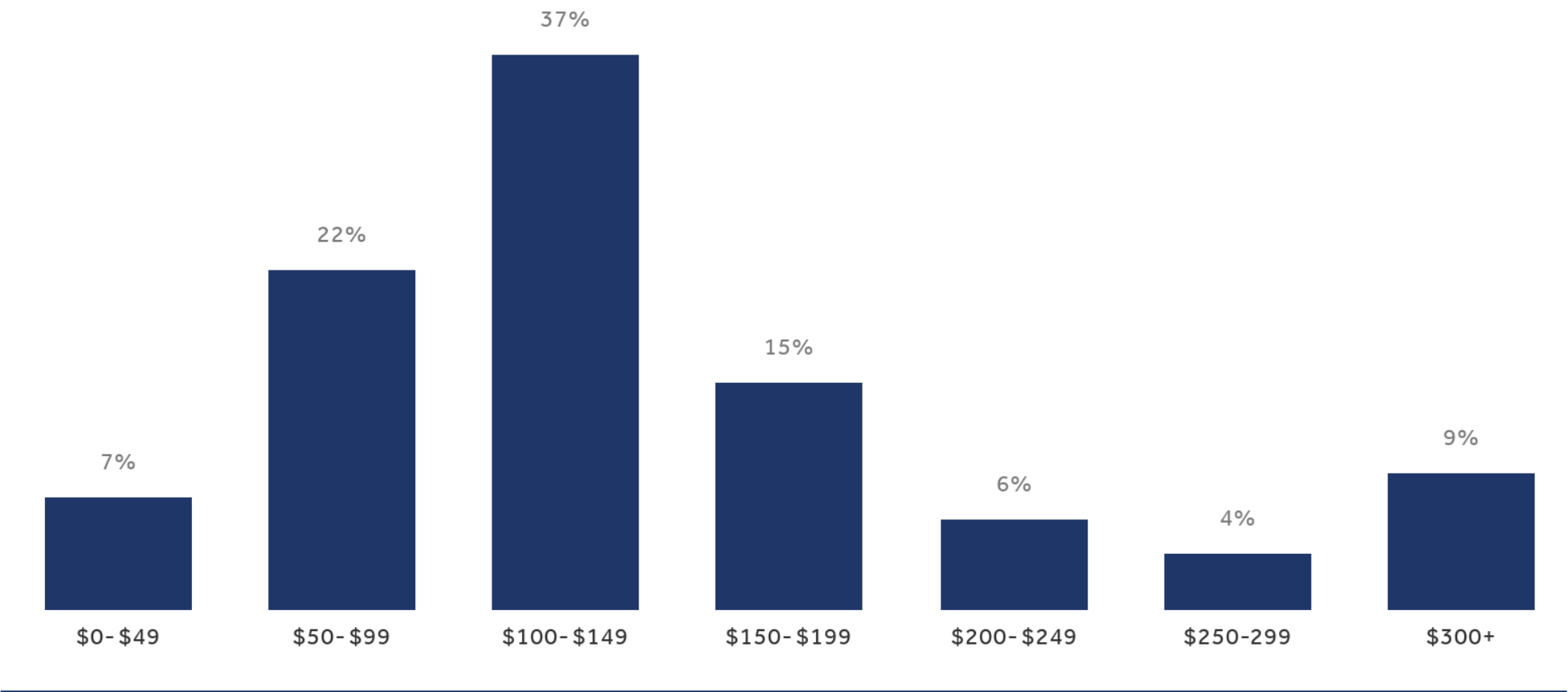
- Providers that accept any payment from the Provider Relief Fund must agree to not balance bill patients more than in-network cost sharing amount for any care, including testing, for a presumptive or actual case of COVID-19
- Fourth COVID-19 interim final rule (released October 28) provides additional guidance on transparency of COVID-19 test prices
 - Online price posting required in conspicuous location on a searchable homepage; along with specific terms: “price” “cost” “test” “COVID” and “coronavirus”
 - Posting must include plain language description of each COVID-19 test, its price, billing codes, and other information necessary for public to be certain of the cash price for a particular diagnostic test
 - Providers without website must post price information on signs in prominent locations
 - Posting a cash price does not prevent a provider from offering free or further discounted rates as charity care or for other reasons
- CMS monitoring and enforcement of COVID-19 test price transparency rules will be conducted primarily via complaints from the public, individuals, issuers and plans

What are providers charging for COVID-19 test?

- Charges vary by provider, also based on type of test, site of test, other factors
- Not all providers post prices online
- Other inconsistency in posted information
 - Bundled price for related services vs. separate charges for test, administration, related services
 - Availability/amount of discount for uninsured
- Medicare reimbursement rates:
 - \$51 for standard molecular tests
 - \$100 for high throughput molecular tests
 - As of 1/1/2021, \$75 for high throughput molecular test with \$25 payment add-on for results \leq 2 days
 - Rate for antigen test determined by local MACs until national reimbursement rate developed

Figure 5

Of the 2 largest hospitals in each state plus D.C. (102 total), 78 hospitals posted prices for COVID-19 diagnostic tests. This is the distribution of those prices:



Source: KFF analysis of COVID-19 diagnostic test prices from the public websites of top two largest hospitals in each state and D.C.

Peterson-KFF
Health System Tracker

Source: KFF. COVID-19 Test Prices and Payment Policy. July 15, 2020. Available at <https://www.healthsystemtracker.org/brief/covid-19-test-prices-and-payment-policy/>





Frequently Asked Questions

Schedule Test

Quick & Easy At-Home COVID-19 Testing

Albertsons Companies Pharmacies are now offering COVID-19 at home saliva tests through Phosphorus Diagnostics*

Skip the long lines at testing drive-thru & get tested in the comfort of your own home.

NOTE: The COVID test we offer does not currently meet the requirements for pre-travel testing to Hawaii.

Tests for Alaska and Hawaii- Due to FedEx shipping Samples must be collected and shipped on the same day. Samples can only be shipped through Wednesday.

After requesting your test online, you will receive a link to complete an online medical questionnaire.
This questionnaire must be completed before you can receive your test.

Tests are \$139.99**



HOME > NEWSROOM > PRESS RELEASES

PRESS RELEASES

BACK TO PRESS RELEASES

ABBOTT'S FAST, \$5, 15-MINUTE, EASY-TO-USE COVID-19 ANTIGEN TEST RECEIVES FDA EMERGENCY USE AUTHORIZATION; MOBILE APP DISPLAYS TEST RESULTS TO HELP OUR RETURN TO DAILY LIFE; RAMPING PRODUCTION TO 50 MILLION TESTS A MONTH

Now Offering Saliva Virus Testing

Apply Here
Jobs

Contact
Drop Us A Line

Locations
Diversey - Chicago
Downers Grove
Lincoln Ave - Chicago

Hours
Diversey/7 Days a Week: 8:00 am-8:00 pm
Downers Grove: M-F 8:00 am-4:00 pm
Lincoln Avenue: M-F 8:00 am-5:00 pm

COVID-19 Testing 7 Days a Week in Chicago & Downers Grove

Saliva Test – NEW
PCR Testing
Rapid Test
Antibody Test

HOW CAN WE HELP?

I HAVE SYMPTOMS OR HAVE BEEN EXPOSED TO COVID-19

Schedule online: Appointment Required

– How much does the rapid swab test for COVID-19 cost?

We accept insurance for the Rapid COVID-19 test. This test is only available to patients who are currently experiencing symptoms, or who have had a known virus exposure. We require a PCR virus swab test in addition to the rapid test in order to ensure accuracy. We do feel the rapid swab is a good test (per their self-reported data of 99.5% agreement with molecular/PCR testing per the FDA EUA), however it is not as good as the PCR lab test. The rapid is optional. We usually get the lab test back in 2-4 days, and the rapid result will be given to by 9 PM on the same day (we will text you with the results).

Innovative Express Care accepts most insurance plans (PPOs, Medicare, and the Advocate hospital system HMO). If you do not have medical insurance, you may receive the COVID-19 virus swab test FREE under the (CARES) Act. Patients who have an insurance plan we do not accept, such as Medicaid, may self-pay \$250 for the examination and COVID-19 test, or \$400 if you also want to get the rapid test.

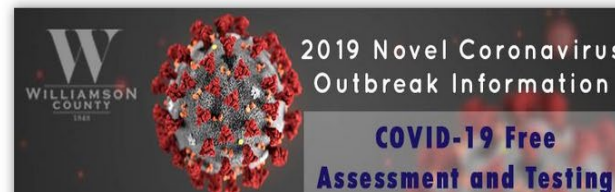


Home Patient Portal (512) 766-1400 Book Appointment

– How much does the test cost?

- Commercial insurance companies are waiving co-pays and deductibles so, there will be no out-of-pocket costs to you.
- If you are a uninsured and are a Williamson county resident the county will pay for your test.
- If you have no insurance and live outside of Williamson the test will cost

- PCR Test \$300 per person
- Antibody Test \$150 per person



Steps

1. Book an appointment
2. Complete all of the required documents

Figure 7

Incidents of abusive charging practices, coverage problems

TheUpshot

Two Friends in Texas Were Tested for Coronavirus. One Bill Was \$199. The Other? \$6,408.

It's an example of the unpredictable way health prices can vary for patients who receive identical care.

By Sarah Kliff

Published June 29, 2020 Updated July 15, 2020



TheUpshot

Coronavirus Tests Are Supposed to Be Free. The Surprise Bills Come Anyway.

Congress sought to ensure that patients would not face costs connected to the virus. But rules are not always being followed.



Available at <https://www.nytimes.com/2020/06/29/upshot/coronavirus-tests-unpredictable-prices.html?searchResultPosition=2> and <https://www.nytimes.com/2020/09/09/upshot/coronavirus-surprise-test-fees.html>

Issues for state insurance regulators

- Promote/improve price transparency of COVID-19 test prices?
 - Development of standard transparency test pricing information template
 - Encourage complaints reporting, CMS share complaints data on COVID-test price transparency
 - Identify outlier prices/provider billing practices (e.g., insurer data reporting)
- Monitor/enforce/build on private health plan consumer protections?
 - Reporting by plans on denials, partial denials, partial payment of COVID-test claims
 - State laws to limit balance billing (amend state surprise billing statutes to include OON COVID tests)
- Partnership with CMS/HHS?
 - Regular update on new COVID-test EUAs, coding, Medicare pricing; discuss implementation
 - Request additional guidance, e.g. what must insurers pay if no posted OON price?
 - MOU on monitoring, enforcement of insurance coverage/price transparency requirements
- Partnership with other state / local agencies?

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Thank you.