

## 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			

\* The CARES Act did not extend no cost sharing for vaccines to all Medicaid beneficiaries (as it did for Medicare beneficiaries). Many Medicaid beneficiaries receive vaccines without cost sharing, but this depends on their eligibility pathway, and can vary by state. Children covered by Medicaid receive vaccines without cost sharing through the Vaccines for Children program.