



## COVID-19 Update CARES Act—Q&A about Health Plan Provisions

**April 28, 2020**

The federal government has passed two key pieces of legislation to help ease some of the health and economic consequences of the COVID-19 (coronavirus) pandemic: the **Families First Coronavirus Response Act (FFRCA)** and the **Coronavirus Aid, Relief, and Economic Security Act (CARES Act)**. This Q&A summarizes some of the health-related provisions of these pieces of legislation.

### **Q: I have heard that testing for COVID-19 is free—is that correct?**

**A:** Generally, yes. The FFCRA required group health plans (such as HealthFlex) to cover testing for FDA-approved COVID-19 testing products—without any cost sharing (out-of-pocket costs) by participants—during the emergency period. The CARES Act expanded this to include certain tests even prior to FDA approval, but the application of this expanded definition has yet to be fully determined. Services furnished during a visit to a provider that results in an order for such a test should also be covered without cost-sharing, to the extent they relate to the administration of a test, or the evaluation of the person to determine the need to administer such a test. (This would include an office visit, an urgent care visit, or an emergency room visit.)

### **Q: Is treatment for COVID-19 free under the CARES Act?**

**A:** No. Treatment is generally payable under the terms of the individual's health plan. The IRS has issued guidance *permitting (but not requiring)* high-deductible health plans to provide testing and treatment without satisfying the deductible, until further guidance is issued.

- HealthFlex has determined that treatment of COVID-19 by an in-network provider will be covered without cost-sharing or applying a deductible until **May 31, 2020**. This will be the case for all benefit plan options, including the high-deductible plans.

### **Q: Is telemedicine free?**

**A:** Generally, no. However, the CARES Act suspended restrictions on high-deductible health plans, so those plans are *permitted (but not required)* to cover telemedicine without applying a deductible, during plan years beginning on or before **December 31, 2021**. HealthFlex in turn has determined to cover MDLIVE telemedicine visits—without applying a deductible or participant cost sharing—until mid-June. (Other telemedicine providers would be subject to normal plan terms.)

**Q: Did the CARES Act expand any other health plan coverage options?**

**A:** Yes. The CARES Act provides that over-the-counter medicines can qualify as “medical care” that can be reimbursed from health reimbursement accounts (HRAs), health savings accounts (HSAs), or health flexible spending accounts (FSAs), even in the absence of a doctor’s prescription. In addition, the CARES Act provided that menstrual products qualify as medical care that can be reimbursed by these accounts. WageWorks is prepared to process these reimbursements for HealthFlex participants.

- A more detailed summary of the FFCRA is [here](#).
- A more detailed summary of the CARES Act is [here](#).

**MORE INFORMATION**

Wespath is closely monitoring developments related to COVID-19. Please check our [webpage](#) for periodic updates at Wespath.

***The information above should not be considered legal or tax advice. Plan participants, annual conferences, local churches, or other employers or parties affiliated with The United Methodist Church (UMC) should consult with counsel in considering the application of the CARES Act to their circumstances.***

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