

COMPLIANCE BULLETIN



Federal Agencies Issue More FAQs on Coronavirus-related Changes for Health Plans

The Departments of Labor, Health and Human Services and the Treasury (Departments) have provided answers to a second set of [frequently asked questions](#) (FAQs Part 43) about health coverage issues related to COVID-19, including implementation of the Families First Coronavirus Response Act (FFCRA) and the Coronavirus Aid, Relief and Economic Security Act (CARES Act).

The FAQs provide guidance on a variety of topics related to health plan coverage. For example, the FAQs:

- Provide that COVID-19 testing for surveillance or employment purposes is not subject to the coverage mandate under the FFCRA and CARES Act;

- Confirm that the FFCRA and the CARES Act generally prohibit balance billing for COVID-19 diagnostic testing;

- Allow health plans to revoke the temporary COVID-19-related coverage changes without satisfying certain notice deadlines, provided participants are notified within a reasonable time frame in advance of the reversal of the changes; and

- Allow large employers to offer coverage for telehealth and other remote care services to employees who are not eligible for any other group health plan offered by the employer during the public health emergency.

This Compliance Bulletin contains the Departments' FAQs.

Action Steps

Employers that sponsor group health plans should become familiar with the FFCRA's and CARES Act's changes for their health plans. The Departments' FAQs provide helpful guidance on implementing these changes.

Highlights

The FFCRA and the CARES Act include a number of changes for health plans and health insurance issuers.

Health plans and issuers must cover COVID-19 testing without any cost-sharing requirements.

Specific rules apply to provider reimbursement rates.

The Departments have issued two sets of FAQs ([Part 42](#) and [Part 43](#)) on these coverage changes.

Important Dates

March 18, 2020

Families First Coronavirus Response Act (FFCRA) enacted.

March 27, 2020

Coronavirus Aid, Relief and Economic Security Act (CARES Act) enacted.



PIERCE GROUP BENEFITS