



DEPARTMENT OF COMMERCE AND INSURANCE

P.O. Box 690, Jefferson City, Mo. 65102-0690

INSURANCE BULLETIN 20-03

Coronavirus (COVID-19)

Issued: March 3, 2020

The following Bulletin is issued by the Missouri Department of Commerce and Insurance ("Department") to inform and educate the reader on the specified issue. It does not have the force and effect of law, is not an evaluation of any specific facts or circumstances, shall not be considered a statement of general applicability and is not binding on the Department. See § 374.015, RSMo (2016).

To: Health carriers writing health insurance or health benefit plan coverage in Missouri
From: Director Chlora Lindley-Myers
Re: Coronavirus (COVID-19)

A new Coronavirus ("COVID-19") was detected in China that has not been previously found in humans. There are thousands of confirmed cases throughout the globe, with numerous cases being identified in the United States. While no cases have been identified in Missouri as of the issuance of this Bulletin, this matter is of urgent importance to public health.

All health carriers, other insurance industry representatives and other interested parties are encouraged to review the latest Missouri information about COVID-19 released by the Missouri Department of Health and Senior Services at:

<https://health.mo.gov/living/healthcondiseases/communicable/novel-coronavirus/>

The Department is issuing this Bulletin to assist individuals and entities regulated by the Department in effectuating the provision of insurance related services during this urgent public health challenge.

The Department is asking health carriers providing coverage through health benefit plans to Missouri residents to take the following immediate measures related to the potential impact of COVID-19.

1. **Preparedness.** Health carriers should review their internal processes and operations to ensure that they are prepared to address COVID-19 cases in Missouri, including by providing insureds with information and timely access to all medically necessary covered health care services. As the COVID-19 situation continues to evolve, health carriers should continually assess their readiness and make any necessary adjustments
2. **Information Access.** Access to accurate information and avoiding misinformation are critical. Therefore, health carriers are asked to inform insureds of available benefits, quickly respond to insured inquiries, and consider revisions needed to streamline responses and benefits for insureds. Health carriers should make all necessary and useful information available on their websites and staff their nurse-help lines accordingly.
3. **Testing for COVID-19.** The Department asks health carriers to waive any cost-sharing for COVID-19 laboratory tests so that cost-sharing does not serve as a barrier to access to this important testing. In addition, health carriers are also asked to waive the cost-sharing for an in-network provider office visit and an in-network urgent care center visit when testing for COVID-19, as well as for an emergency room visit when testing for COVID-19.
4. **Telehealth Delivery of Services.** Given that COVID-19 is a communicable disease, some insureds may be using telehealth services instead of in-person health care services. Health carriers are reminded to review Section 376.1900 RSMo regarding the delivery of health care services via telehealth. Health carriers are asked to review and ensure their telehealth programs with participating providers are robust and will be able to meet any increased demand.
5. **Network Adequacy and Access to Out-of-Network Services.** Health carriers are asked to verify their provider networks are adequate to handle a potential increase in the need for health care services in the event COVID-19 cases are diagnosed in Missouri. If a health carrier does not have a health care provider in its network with the appropriate training and experience to meet the particular health care needs of an insured, health carriers are asked to make exceptions to provide access to an out-of-network provider at the in-network cost-sharing.

6. **Utilization Review.** Timely decision making is essential to responding appropriately to COVID-19, and it is particularly important with respect to utilization review. Health carriers are reminded that utilization review decisions must be made in the timeframes required by Section 376.1363 RSMo. Health carriers should not use preauthorization requirements as a barrier to access necessary treatment for COVID-19, and health carriers should be prepared to expedite utilization review and appeal processes for services related to COVID-19, when medically appropriate.
7. **Immunizations.** Although a vaccine is not currently available for COVID-19, it has been reported to be in development. In the event an immunization becomes available for COVID-19, the Department requests that health carriers immediately cover the immunization at no cost-sharing for all covered members.
8. **Access to Prescription Drugs.** Health carriers are asked, where appropriate, to make expedited formulary exceptions if the insured is suffering from a health condition that may seriously jeopardize the insured's health, life, or ability to regain maximum function or if the insured is undergoing a current course of treatment using a non-formulary prescription drug.
9. **Information Sharing.** To ensure that public health officials and the public are adequately informed about what the health insurance industry is doing in response to COVID-19, the Department asks that health carriers provide information on the steps they are taking in response to this Bulletin, particularly, the issues addressed in Items 1 – 8. Health carriers may send that information to Amy Hoyt, Health Insurance Counsel at amy.hoyt@insurance.mo.gov.

In order to protect the public health, health carriers are asked to identify and remove barriers to testing and treatment for COVID-19. Health carriers must be prepared to address COVID-19 cases in Missouri and the Department extends its appreciation to health carriers in working with the State to address this public health challenge. Since the COVID-19 situation continues to evolve, health carriers should continually assess their readiness and be prepared to make any necessary adjustments.

Health carriers are advised to contact the Market Regulation Division at 573-751-2430 with questions regarding this Bulletin.

###