

March 13, 2020

It's Official: Coronavirus Screening and Treatment Covered Pre-Deductible for HDHPs

The Internal Revenue Service and the U.S. Treasury issued guidance this week to employers stating coronavirus testing and treatment can be provided through a high deductible health plan (HDHP) without participants first having to satisfy the plan's deductible.

According to the American Benefits Council, many companies have been seeking assurances from the federal government that by providing COVID-19 screening on a pre-deductible basis would not disqualify the HDHP from being coupled with an HSA. [IRS Notice 2020-15](#) affirms that an HDHP will not fail to be an HDHP because it provides screening and treatment of the 2019 Novel Coronavirus (COVID-19) without a deductible, or with a deductible below the minimum deductible for an HDHP.

For self-insured organizations with an HDHP, this notice allows the plan to cover coronavirus testing at 100% pre-deductible. The guidance also allows the plan to consider costs for coronavirus treatment to be pre-deductible.

Fully-insured organizations should check with your insurance provider to find out how they will be administering coronavirus testing and treatment.

Set Benefit Coverage with Your Plan Administrator

To set the benefit coverage for coronavirus testing and treatment, self-insured organizations will need to determine the coverage level desired (e.g. 100% for screening) and contact the plan administrator. Confirm that the benefits coverage should be applied to all of your organization's medical plans – not just the HDHP.

Once you've made the decision to cover COVID-19 testing at 100%, be sure to include that message as you remind employees how to prevent the spread of the coronavirus. Participants in your medical plans should be told:

- Coronavirus screening is covered at 100% without the deductible
- Benefits for treatment of coronavirus are included in the plan, without having to satisfy the annual deductible

Vaccinations Continue to Be Preventive Care

Included in IRS Notice 2020-15 is confirmation that vaccinations continue to be considered preventive care and can be covered pre-deductible. Plan participants should be reminded of the importance to receive immunizations according to the [CDC's recommended schedule](#)

For questions about this topic, contact your Findley consultant or info@findley.com

Communicate with Employees