

CORONAVIRUS

Reimbursement for COVID-19 Testing

Pharmacies without a CLIA Certificate of Waiver (or one that is pending)*

- COVID-19 assessment (including specimen collection) is HSA/FSA eligible**. Provide patients with summary of the service provided and price for their tax records. The American Clinical Laboratory Association has a list of [member laboratories performing tests](#). Where possible, contract with the lab to be invoiced for tests performed and price the service accordingly; this arrangement avoids surprise bills from the lab.
- Pharmacies with a services contract with a Medicare-enrolled provider may perform COVID-19 assessment and/or specimen collection services for which the Medicare provider may submit a claim and subsequently pay the pharmacy according to the terms of the contract. This is known as “incident to” billing.
- Pharmacies may offer a contract with an employer for COVID-19 assessment and specimen collection at the workplace, pharmacy, or other testing site.
- Pharmacies may participate in a public-private partnerships or similar programs to collect specimens for testing.

Pharmacies WITH a CLIA Certificate of Waiver***

- All the above apply
- Enroll in Medicare Part B as an Independent Clinical Laboratory and claim [reimbursement](#) for tests performed in the pharmacy.
- Contact health plans about credentialing for testing and billing the health plan directly.
- Pharmacy may [submit a claim](#) to the patient’s prescription benefit. The claim will have a product identifier (11-digit NDC derived from the UPC or UDI on the kit) for the test plus a professional service code (e.g. PT – Performed Laboratory Test)

*The opportunity for collecting payment without a CLIA-waiver is limited. It requires the pharmacy to have a contract with a Medicare-enrolled provider, laboratory, collect cash/FSA/HSA from the patient, or participate in an employer or public health contract for specimen collection.

**Testing should be covered by health plans, but for various reasons patients may choose to pay out of pocket with HSA/FSA funds.

***As of May26, 2020, availability of tests (molecular, antigen, or antibody) with FDA authorization for the CLIA-waived point-of-care setting is extremely limited. NCPA encourages pharmacies to be prepared to quickly ramp up point-of-care testing when test kits are available by obtaining a CLIA Certificate of Waiver. Visit <https://ncpa.org/covid-testing> for more information or email covid@ncpa.org.