

## Questions & Answers

### ***Perspectives on Returning to the Workplace Webcast***

The questions were posed during the Independence Health Group webcast on Perspectives on Returning to the Workplace held May 14, 2020.

*Please note:* Employers are advised to consult with their legal counsel and/or tax advisor to determine if their benefit offerings meet applicable state and federal requirements.

**1. What model is Independence using to track and project cases/fatalities?**

We follow several COVID-19 forecast models and data provided by the regional health care systems with which we have relationships. For national trends we follow models from the [CDC](#) and [Johns Hopkins University](#).

**2. Do you know where most of the deaths from COVID-19 have occurred? For example, what percentage of deaths have occurred in nursing homes?**

We leverage data reporting from Johns Hopkins University and State Departments of Health. Here is a link to the [PA DOH site](#) that shows that over 60% of mortality across the Commonwealth of Pennsylvania is tied to nursing homes.

**3. Is the fact that over 2/3 of cases in Pennsylvania occurred in senior living facilities taken into account in the metrics discussed today for returning to work?**

Yes, this data is taken into account. We have seen a significant testing rate difference between nursing homes versus the general population.

**4. How much of the webcast content and data was for Medicare members versus Commercial members?**

The data trends we shared during the webcast were not specific to a line of business. Instead, they reflected the population rates in the Mid-Atlantic region.

**5. Will Independence cover antibody testing, including home testing kits?**

Yes. We cover certain diagnostic (RT-PCR) and antibody COVID-19 tests, including home testing kits, for individuals if the following criteria are met:

- The test is medically appropriate in accordance with standards of current medical practice, as determined by a licensed health care professional; *and*
- The test is performed in an approved health care setting.

The FDA has approved over 120 antibody tests under Emergency Use Authorization (EUA). However, many of these tests have proven to be unreliable and have shown widespread problems.

If you have an employee that has been prescribed a test based on medical necessity, we will cover it.

**6. Can antibody testing be covered under a customer's medical benefits for its workforce as a condition of employment?**

We don't cover tests and screenings as a condition of employment, similar to drug testing and criminal background checks.

If fully insured groups would like to use broad-based public health testing as a requirement for employees to return to work, the group will be responsible for covering the costs. This type of testing is not part of covered benefits because it does not include a determination that testing is medically necessary for each employee.

For self-funded groups broad-based public health testing used as a requirement for employees to return to work is generally not covered under Independence group health plans. If a customer would like to use this type of testing and offer this as a benefit, they have two options:

1. Even though it is not medically appropriate, they can allow coverage as an out-of-contract exception; *or*
2. They can amend the plan design to allow coverage for this testing as a line item inclusion without the need for medical review.

**7. Is there a lab Independence recommends for antibody testing?**

We recommend LabCorp as they are a well-known, national brand with a good reputation and capacity to support current testing orders. As with other antibody tests, the test must be ordered by a health care professional and be medically necessary to be covered. If you have employees with HMO/POS coverage, capitation rules are being waived for COVID-19 testing during the public health emergency.

**8. What is the cost for antibody testing?**

Antibody testing averages around \$50, but we have seen costs as high as \$650 and heard anecdotal stories of out-of-network providers charging multiples of this. All testing providers must post their pricing online. CMS has not yet released a fee schedule for antibody tests. There is the possibility that it could be released by late May. Our in-network coverage would pay at the Medicare rate.

**9. How will employers ensure that they are not violating HIPAA in requiring serology or other tests as a condition of returning to the workplace?**

We cannot offer official advice, as we mentioned on the webcast. Employers should consult with their legal counsel.

**10. A vendor has approached my company about facilitating a Rapid Response COVID-19 test. The vendor claims that results can be achieved in 15 minutes with just a finger prick. Are these types of tests reliable?**

We cannot offer official advice, as we mentioned on the webcast. However, all tests should be evaluated by the published sensitivity and specificity of each test.

**11. Are there specific digital contact tracing applications you recommend for the workplace?**

We cannot offer official advice, as we mentioned on the webcast. Some contact tracing applications were discussed on the webcast. We encourage you to contact the presenters for further feedback.

**12. What was the name of the third-party vendor Cozen O'Connor uses for its online symptom screenings?**

Cozen O'Connor is working with US Wellness to screen employees via an online symptom screening service that features a series of questions employees will complete each morning before they go into the office.

**13. Is the third-party screening service custom-made for Cozen O'Connor or is it widely available?**

The screening service is a generic tool that US Wellness customizes for each client.

**14. When utilizing the third-party for screening employees before returning to work, is the employee responsible to provide their own thermometer?**

It depends on the vendor and your company's agreement. We are looking into reusable thermometers and digital thermometers at Independence.

**15. What guidance can you offer for employers whose employees are reluctant to return to the office and/or, if applicable, refuse to use a symptom screening tool before entering the office? Are there repercussions?**

We encourage you to work with your human resources and legal teams to determine how to deal with these scenarios. Unfortunately, Independence cannot advise clients about these decisions.

**16. Are there plans to use data received from card access for other purposes? Attendance, etc.?**

We are using card swipes to confirm who is in the building each day, as well as where they go while in the building. This allows us to contact trace where a person who later becomes infected has been. This will also allow us to determine who they may have come in contact with while they were in the office.

**17. Does Independence recommend using thermometers to monitor employee's temperatures?**

As Independence Health Group operates across multiple states, we are following federal guidance, specifically CDC and OSHA along with the relevant State DOH guidance.

- As our Independence headquarters are in Pennsylvania, we are following Pennsylvania DOH workforce safety guidelines to operate our 1901 Market Street building. In accordance with these guidelines, we plan to implement temperature screenings before employees enter the building.
- We are looking at infrared thermometers as well as single use disposable thermometers. We are also looking at a third party to administer the temperature checks.

**18. Can you share the steps HR took with business leaders (i.e., questions asked, etc.)?**

Independence's HR department has established a workforce designation approach to prepare for and support the safe re-opening of our headquarters in Philadelphia and our satellite offices in Pennsylvania, New Jersey, and Minnesota, and the re-entry of our associates in each of those offices.

Under this approach our HR department is working closely with senior leadership to identify the roles and associates within each division of the organization that will re-enter the building in a phased approach when it is safe to do so.

Further, HR is using enterprise definitions that are aligned by corresponding mitigation levels (i.e., Essential, Groups A-D), reviewing the business justification for associates and/or roles necessary to be on-site on a given day, and compiling designations in a reporting tool that will show aggregate information compared against capacity limits established by the CDC.

**19. Is Independence experiencing the challenge of balancing the new safety PPE requirements and ADA protection? i.e., require the wearing of face masks for employees with COPD?**

We cannot offer official advice, as we mentioned on the webcast. Independence has established clinical criteria for our employees who self-identify as high risk that allows them to continue to work remotely.

**20. How has the COVID-19 pandemic changed utilization of telemedicine, especially as a result of expanding telemedicine across both primary care and specialty care?**

Since mid-March we have experienced a spike in activations (registrations) and encounters (visits) for virtual care services through MDLIVE. Activations have increased nearly 800% in March-April 2020 compared to the same two-month period last year. Further, encounters for MDLIVE services have more than doubled (4.8% vs. 2%) in this same period.

Likewise, since mid-March we have seen increased adoption among our commercial membership of virtual primary care and specialist visits, with week-over-week increases of members using these services of 111% and 90%, respectively. Additionally, we have seen a 3,000% increase in unique members utilizing mental health services via telehealth from mid-March to mid-April.

**21. Is Independence planning to comply with the new Department of Labor and Internal Revenue Service guidance on extensions to COBRA Payment and Election Timeframes?**

Yes, we are prepared to support and comply with the new DOL and IRS guidance.

**22. Is teledentistry available to all United Concordia (UCD) members?**

Yes. We are covering teledentistry for all UCD commercial members through June 30, 2020.

**23. Is Independence offering a premium rebate for group customers?**

We recognize that this is an uncertain time for many of our members and customers. Throughout the pandemic, Independence has been working to ensure our members get the testing and care they need, for COVID-19 and other health challenges they may face. We are closely monitoring the financial impacts of the pandemic and are taking all options into consideration as we make important decisions about how to move forward.

We have already taken steps to reduce the cost burden for our members by waiving cost-sharing for testing and inpatient COVID-19 treatment, as well as primary care telehealth visits. Our members also have two free months of access to an online meditation and mindfulness resource called “Stop, Breathe and Think” because we know that the pandemic is affecting not only people’s physical health, but their mental health as well.

The Affordable Care Act (ACA) also mandates consumer protections to ensure the appropriate share of premiums is spent on claims or returned to members and customers. Independence continues to monitor claim utilization to ensure we meet these requirements of the ACA.