



KIM REYNOLDS  
GOVERNOR

DOUG OMMEN  
COMMISSIONER OF INSURANCE

ADAM GREGG  
LT. GOVERNOR

**BULLETIN 20-10**

To: All Health Insurance Companies Writing in the State of Iowa  
From: Doug Ommen, Iowa Insurance Commissioner  
RE: Serologic or Antibody COVID-19 Testing  
Date: June 22, 2020

The COVID-19 pandemic is unprecedented in the speed of its global spread and the widespread extraordinary economic upheaval that has resulted from public health actions primarily intended to protect the wellbeing of older citizens and individuals with impaired immune systems.

So that many Americans who have been severely impacted by the public health actions are able to once again pursue economic prosperity, while simultaneously protecting their health and well-being, widespread serologic testing that is safe, effective and accurate is needed. Public health data has revealed that a majority of Americans who contract COVID-19 have no signs or symptoms, therefore requiring no medical care. However, if tested for exposure to COVID-19, individuals who had contracted the virus could be identified to assist in managing the potential spread to those who, if infected, might experience life-threatening symptoms.

Unless otherwise covered as part of the testing criteria of Iowa's State Hygienic Laboratory, testing to diagnose and treat people with symptoms of COVID-19 under a healthcare providers' order (i.e., a healthcare provider with prescribing authority under state law) is appropriately covered by health insurance. Broad population-based serologic or antigen testing may be a public health responsibility of county and state health officials and may be supported by the federal government; the Iowa Department of Public Health has identified several such testing options in its June 11, 2020 update.<sup>1</sup> Similarly, employers are required to provide a workplace free of known health and safety hazards, and employee screening and testing of asymptomatic individuals or those with minor symptoms may be an employer's strategy for fulfilling these obligations, but is generally not "medically necessary" for these persons being tested. Therefore, these testing programs typically are not a covered service under Iowa health care plans and are not the types of tests or services required to be covered under the Families First Coronavirus Response Act and the Coronavirus Aid, Relief, and Economic Security Act.

Under most health care plans "medically necessary" health care services or supplies are those needed to diagnose or treat an illness, injury, condition, disease or its symptoms and that meet accepted standards of medicine. For example, patients can expect coverage for testing when they are under the care of a physician or other licensed practitioner who recommends testing based on direct exposure (e.g., family member), relevant symptoms or asymptomatic patients for whom the testing would alter the course of care.

<sup>1</sup> See: <https://idph.iowa.gov/Portals/1/userfiles/61/covid19/resources/COVID-19%20Testing%20Considerations%20for%20Iowa%20Businesses.pdf>

As testing programs evolve, we may need to continue to evaluate this guidance. The U.S. Center for Disease Control recently issued Interim Guidelines for COVID-19 Antibody Testing. <https://www.cdc.gov/coronavirus/2019-ncov/lab/resources/antibody-tests-guidelines.html>. Carriers and providers are advised to also consider CDC guidelines.

Questions regarding this process can be directed to Assistant Commissioner Andria Seip at [marketregulation@iid.iowa.gov](mailto:marketregulation@iid.iowa.gov).