
Letter Number 2022-21

Date: December 8, 2022

Fee-for-service [18]

Experience-rated HMO [18]

Community-rated HMO [19]

Subject: COVID-19 Countermeasures

OPM appreciates the efforts of Carriers in safeguarding the health of FEHB covered individuals against SARS-CoV-2, which is the virus that causes coronavirus disease 2019 (COVID-19). This Carrier Letter explains the actions the Carriers must take with respect to the commercialization of COVID-19 countermeasures including vaccines, therapeutics, and tests; the availability of updated COVID-19 boosters; and pharmacist reimbursement for COVID-19 therapeutics.

Transition of COVID-19 Countermeasures to Private Markets

During the course of the COVID-19 pandemic, the federal government has played a “central coordinating role in buying, distributing, and ensuring equitable access to COVID-19 vaccines, therapeutics, and tests,” as noted in an [August 30, 2022 blog post](#) by the Department of Health and Human Services (HHS) Assistant Secretary for Preparedness and Response (ASPR). However, appropriated funds will soon lapse, and the federal government is in the process of transitioning its ongoing COVID-19 related efforts to the commercial marketplace. Carriers are expected to have a plan in place for this transition of COVID-19 countermeasures to the commercial marketplace.

Even when COVID-19 countermeasures become solely available through the commercial marketplace, Carriers must continue to cover, without cost-sharing, COVID-19 vaccines and tests (including over-the-counter tests) until the end of the COVID-19 [public health emergency](#) (PHE). Carriers must also

waive prior authorization or other medical management requirements for COVID-19 tests until the end of the COVID-19 PHE. See FEHB Carrier Letters [2020-08](#), [2020-19](#), and [2022-01](#).

The HHS Secretary will give 60 days' notice before ending the COVID-19 PHE, according to an [August 18, 2022 blog post](#) by the Centers for Medicare & Medicaid Services (CMS).

Updated COVID-19 Boosters

On September 1, 2022, the Director of the [Centers for Disease Control and Prevention \(CDC\) endorsed](#) the Advisory Committee on Immunization Practices' (ACIP) recommendations for use of updated COVID-19 boosters that have been [authorized by U.S. Food and Drug Administration \(FDA\)](#). As noted by the CDC, "Updated COVID-19 boosters add Omicron BA.4 and BA.5 spike protein components to the current vaccine composition, helping to restore protection that has waned since previous vaccination by targeting variants that are more transmissible and immune-evading." OPM strongly encourages FEHB Carriers to communicate with members on the importance of updated COVID-19 boosters and where they can get vaccinated.

Pharmacist Reimbursement for Therapeutics

On July 6, 2022, the [FDA revised](#) its "Emergency Use Authorization (EUA) for Paxlovid (nirmatrelvir and ritonavir), to authorize state-licensed pharmacists to prescribe Paxlovid to eligible patients, with certain limitations to ensure appropriate patient assessment and prescribing of Paxlovid." OPM expects Carriers to provide reimbursement for such assessment and prescribing of Paxlovid by state-licensed pharmacists. The availability of Paxlovid through state-licensed pharmacists is important in promoting health equity given that about 90% of Americans live within 5 miles of a pharmacy.¹

¹ Berenbrok, Lucas A., et al. "[Access to Community Pharmacies: A Nation-Wide Geographic Information Systems Cross-sectional Analysis.](#)" *Journal of the American Pharmacists Association* (July 12, 2022).

If you have any questions, please write to OPMPharmacy@opm.gov and copy your Health Insurance Specialist.

Sincerely,

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