DATE: December 22, 2020
TO: Health Plan Issuers and Interested Parties
FROM: Mark V. Afable, Commissioner of Insurance
SUBJECT: COVID-19 Immunization Coverage

The Office of the Commissioner of Insurance (OCI) is issuing this Bulletin to inform consumers regarding the coverage available for COVID-19 vaccinations and to provide guidance to agents, insurers, and self-funded plans regarding the coverage requirements for the COVID-19 vaccine.

The Federal Coronavirus Aid, Relief, and Economic Security (CARES) Act and the Public Health Service Act, and the Interim Final Rule issued on October 28, 2020, require coverage without cost sharing of COVID-19 vaccination administration costs by health insurance issuers offering group and individual health insurance. COVID-19 vaccination coverage without cost sharing is applicable to small-group and large-group health plans, fully insured and self-insured plans.

In consideration of these federal requirements, the Commissioner expects that all self-funded and fully insured group health plans, individual health plans, and short-term limited duration plans cover, without cost sharing, all costs associated with administration of COVID-19 vaccinations. During the public health emergency, this coverage without cost sharing applies even if the vaccine is administered by an out-of-network provider.

Reference to “out-of-network provider” applies to any private health care facility, as well as local public health agencies, tribal health facilities, designated mass vaccinator sites, or any setting where the COVID-19 vaccine has been authorized to be administered.

These requirements apply if a consumer is receiving a single dose COVID-19 vaccination or a COVID-19 vaccination that requires a series of two or more doses.

Any questions concerning this Bulletin may be directed to Sarah Smith, Director of Public Affairs, at Sarah.Smith2@wisconsin.gov.