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Federal Department of Home Affairs FDHA
Federal Office of Public Health FOPH
Health and Accident Insurance Directorate

Fact sheet
Novel Covid-19 disease (coronavirus)
Arrangements for cost coverage for Sars-CoV-2 testing and the associated services

Date: 2 November 2020

Contents

Further information:

Federal Office of Public Health, Health and Accident Insurance Directorate, leistungen-krankenversicherung@bag.admin.ch, www.bag.admin.ch
This publication is also available in German, French and Italian.

1 Background

Since 24 June 2020 the federal government has covered the costs of outpatient molecular biological (PCR) and immunological (serological) analysis for Sars-CoV-2 antibodies and of the associated medical services for people meeting the FOPH's suspected case, testing and reporting criteria of 24 June 2020[1].

Given the rapid increase in Sars-CoV-2 infections and the associated increase in testing, molecular biological analysis has reached the limits of its capacity. From 2 November 2020, to monitor the spread of the pandemic the federal government will additionally cover diagnostic immunological analysis for Sars-CoV-2 antigens (antigen testing for Sars-CoV-2) regardless of whether it is done by means of a usual procedure or a rapid test.

The federal government will now also cover the analysis for Sars-CoV-2 antigens by means of rapid tests if the test is conducted in a doctor's office, hospital, pharmacy or test centre. To this end, these facilities are specifically and temporarily exempted from the licensing requirement to carry out analyses for communicable diseases. All these facilities may now also carry out and bill for sampling for molecular biological analysis.

Sampling for the analysis for Sars-CoV-2 antigens is the same as for molecular biological analysis.

In certain cases the federal government will continue to cover the costs of the analysis for Sars-CoV-2a antibodies. The analysis can be used for diagnosis in cases that cannot be tested in time using molecular biological analysis or analysis for Sars-CoV-2 antigens, or in cases where the results of these analyses turned out negative even though the probability of a positive result was very high. Tests for antibodies against Sars-CoV-2 allow evaluation of the immunisation of the population (either by the infection or by vaccination).

These rules and arrangements governing the coverage of costs relate to analyses for Sars-CoV-2 carried out on an outpatient basis. Tests done on an inpatient basis are included in the relevant inpatient diagnosis-related groups (DRGs, Art. 49 of the Federal Act on Health insurance [HIA]), which means they do not result in additional costs for patients and insurers.

2 Conditions for costs to be covered by the federal government

The coverage of the costs of analyses for Sars-CoV-2 by the federal government is still subject to the FOPH's criteria for suspicion, sampling and reporting. These guidelines are being amended with effect 28 October 2020[2].

2.1 FOPH's testing strategy of 28 October 2020

Testing for Covid-19 is recommended for:

- symptomatic people who meet one of the clinical criteria under the FOPH's sampling strategy of 28 October 2020[3]
    - molecular biological analysis (gold standard)

[1] See the FOPH's criteria for suspicion, sampling and reporting of 24 June 2020 in "Previous factsheets_Coverage of cost of the analyses" (in German, French and Italian), avaiable at www.bag.admin.ch > Krankheiten > Infektionskrankheiten: Ausbrüche, Epidemien, Pandemien > Aktuelle Ausbrüche und Epidemien > Neues Coronavirus > Regelungen in der Krankenversicherung

[2] See the FOPH's criteria for suspicion, sampling and reporting of 28 October 2020, available (in German, French and Italian) at www.bag.admin.ch > Krankheiten > Infektionskrankheiten bekämpfen > Meldesysteme für Infektionskrankheiten > Meldepflichtige Infektionskrankheiten > Meldeformulare.

[3] See the FOPH's criteria for suspicion, sampling and reporting of 28 October 2020, available (in German, French and Italian) at www.bag.admin.ch > Krankheiten > Infektionskrankheiten bekämpfen > Meldesysteme für Infektionskrankheiten > Meldepflichtige Infektionskrankheiten > Meldeformulare.

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- when capacity for testing with molecular biology (PCR capacity) is limited, in the following situations (see Figure 1), diagnosis by means of an analysis for Sars-CoV-2 antigens may be considered

- asymptomatic people: analysis for Sars-CoV-2 antigens by means of a rapid test or molecular biological analysis
  - In outbreak investigations and controls, ordered by a doctor
  - After notification of a contact with a case of Covid-19 by the SwissCovid App. A single test should be done from the 5th day following contact at the earliest.

Cantonal medical officers can also order analyses for Sars-CoV-2 antibodies (serology). The indication algorithm for Sars-CoV-2 antigen analysis illustrated in this fact sheet is not binding[4].

FOPH indication algorithm for rapid antigen tests for Sars-CoV-2, 28 October 2020

Valid from 2 November 2020

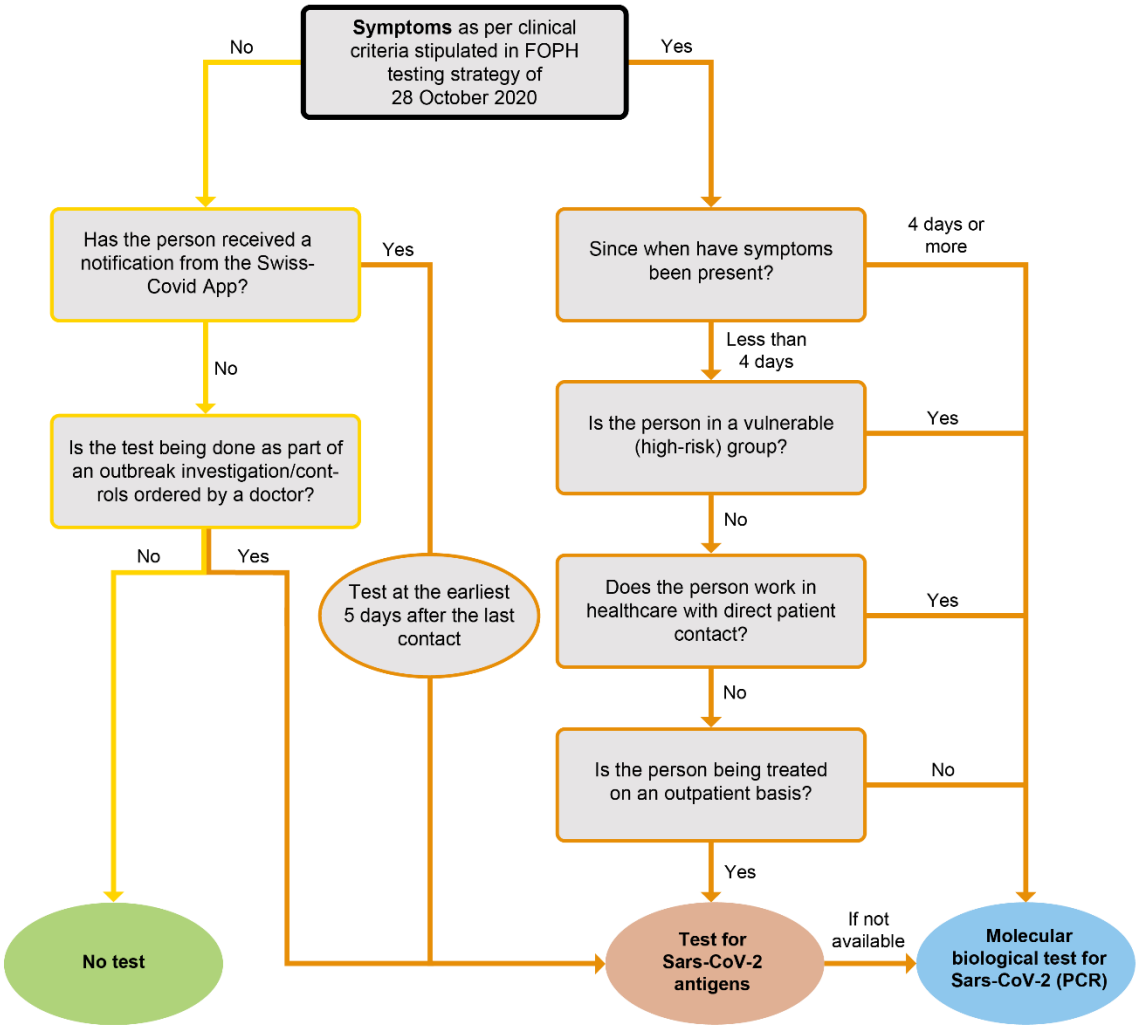

Figure 1: FOPH indication algorithm for tests for Sars-CoV-2 antigens dated 28 October 2020

[4] See the FOPH's criteria for suspicion, sampling and reporting of 28 October 2020, available (in German, French and Italian) at www.bag.admin.ch > Krankheiten > Infektionskrankheiten bekämpfen > Meldesysteme für Infektionskrankheiten > Meldepflichtige Infektionskrankheiten > Meldeformulare.

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2.2 Service providers

The costs of molecular biological and immunological analyses for Sars-CoV-2 done on an outpatient basis and the associated services (services as per Annex 6 to Covid-19 Ordinance 3) are covered by the federal government for people meeting the FOPH's criteria for suspicion, sampling and reporting of 28 October 2020 if they are performed by the following service providers as per the Federal Act on Health Insurance[5] (HIA):

- Doctors
- Pharmacists
- Hospitals
- Laboratories under the terms of Article 54 para 3 of the Health Insurance Ordinance[6] (HIO) and hospital laboratories under the terms of Article 54 para 2 HIO. Laboratories must be licensed as per Article 16 para 1 of the Epidemics Act[7].
- Test centres run by or on behalf of the canton. In the case of test centres and drive-ins, the federal government will only cover the costs if these facilities are run by the canton or on its behalf. With an eye to quality assurance, these test centres and drive-ins should at the minimum meet cantonal requirements. Services provided by test centres and drive-ins organised on a private basis without a cantonal remit will therefore not be covered by the federal government.

Immunological analyses for Sars-CoV-2 by means of rapid tests can additionally be conducted outside licensed laboratories in medical practices, pharmacies, hospitals and test centres run by the canton or on its behalf (see Section 2.3.2 for further information).

2.3 Execution of analyses for Sars-CoV-2

2.3.1 Analysis for Sars-CoV-2 antigens in licensed laboratories

If there is a lack of reagents for conducting molecular biological analyses in licensed laboratories, the federal government will now cover the costs of analysis for Sars-CoV-2 antigens subject to the conditions that

- the reliability and the expected performance of the testing systems used are assured, and
- the other operational and organisational requirements to assure the quality of the results are complied with.

2.3.2 Analysis for Sars-CoV-2 antigens by means of a rapid test outside licensed laboratories

Under the terms of Article 24 para 1 of the Covid-19 Ordinance 3, sampling and the execution of immunological analysis for Sars-CoV-2 antigens by means of rapid tests is permitted, not only in laboratories with the corresponding licence, but also in medical practices, pharmacies, hospitals and test centres run by the canton or on its behalf. Subject to compliance with all requirements (set out in Article 24 para 3 of the Covid-19 Ordinance 3), these facilities are temporarily exempted from the licensing requirement under Article 16 of the Epidemics Act[8] while Covid-19 Ordinance 3 is in force:

Basic requirements (all requirements must be met):

- Humans, animals, the environment and biological diversity are not jeopardised and appropriate safety and precautionary measures are complied with.

[5] SR 832.10
[6] SR 832.102
[7] SR 818.101
[8] SR 818.101

- The tests are performed for people meeting the FOPH's criteria for suspicion, sampling and reporting of 28 October 2020[9].
- Tests are used in accordance with the FOPH's criteria for the deployment of Covid-19 rapid antigen tests.
- The testing systems used must be reliable and deliver the expected performance.
- The facility doing the testing must register with the canton before conducting analyses of this sort. The canton has a publicly accessible list of approved facilities, including the period of validity of the approval and the ZSR number.

Operational and organisational requirements to assure the quality of results[10] (all requirements must be met):

- The personnel conducting sampling and analysis must have specific training and follow the instructions of the test manufacturer.
- The result of the test must be interpreted under the supervision of people with the necessary specific expertise. External experts may also be brought in for this purpose.
- Facilities conducting the tests must keep documentation to demonstrate the traceability and quality of the analysis systems. This documentation must be retained.

The cantons are responsible for controls and the enforcement of these requirements, if applicable with the involvement of Swissmedic.

The above-mentioned facilities can also, insofar as they fulfil the professional requirements and assume responsibility for it, carry out analyses for the Sars-CoV-2 antigen in compliance with the required safety measures in institutions or companies, e.g. in old people's homes or nursing homes.

3 Costs covered by the federal government

3.1 Basic principles

The federal government covers the costs of analysis for Sars-CoV-2 and the costs of the associated services if the requirements according to the sampling strategy of the FOPH dated 28 October 2020 are met. If these requirements are not met, the costs of the analyses on Sars-CoV-2 and the associated services are borne by the employer or the requesting person.

A medical prescription is no longer absolutely required for the federal government to pay the costs of analyses for Sars-CoV-2.

The costs of mandatory reporting to the authorities as per Article 12 para 1 and 2 of the Epidemics Act are included in the flat rates covered by the federal government. The detailed notification criteria can be found in the FOPH's criteria for suspicion, sampling and reporting of 28 October 2020, According to Article 26a of the Covid-19 Ordinance 3, the federal government can reclaim the remuneration from the service provider if the reporting obligations according to Article 12 of the Epidemics Act are violated by the service provider.

The amounts covered by the federal government are maximum amounts, which means that if the actual costs are lower, they must be billed to the federal government accordingly.

If the same person undergoes both molecular biological analysis for Sars-CoV-2 and immunological analysis for Sars-CoV-2 (antigens or antibodies) on the same day, the federal government will cover the following cost components only once:

[9] See the FOPH's criteria for suspicion, sampling and reporting of 28 October 2020, available (in German, French and Italian) at www.bag.admin.ch > Krankheiten > Infektionskrankheiten bekämpfen > Meldesysteme für Infektionskrankheiten > Meldepflichtige Infektionskrankheiten > Meldeformulare.
[10] Swissmedic may also enact technical guidelines in this regard

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- a flat rate payment covering the patient consultation, sampling, protective materials and the communication of the test results to the person tested and the authority responsible, as well as
- the cost components for order processing, overhead costs and sampling materials

Service providers may not charge persons tested or the insurers any further costs (such as night and public holiday surcharges) for analysis for Sars-CoV-2 and associated medical services.

If on the same order additional analyses are requested for the person tested, the laboratory may not charge to compulsory health insurance any order charge (item no. 4700.00 on the List of Analyses) or presence charge (item no. 4707.00 on the List of Analyses) in addition to the order processing, overhead costs and sampling materials covered by the federal government.

3.2 Sampling

Sampling encompasses the patient's medical consultation, the swab and/or blood sampling (or collection of another validated sample) and the protective materials, as well as the communication of the test results to the person tested and the mandatory report to the authorities as per Article 12 para 1 of the Epidemics Act.

All service providers receive identical amounts for the taking of samples. The indication is based on the notification of the SwissCovid App or an internet-based Covid-19 infection risk evaluation tool (CoronavirusCheck, etc.) or according to the FOPH's criteria for suspicion, sampling and reporting of 28 October 2020.

The doctor may also charge for a medical consultation. The detailed doctor-patient consultation is a real medical consultation including a possible clinical examination for the indication of the analysis for Sars-CoV-2 in connection with: Molecular biological analysis of Sars-CoV-2, immunological analysis for antibodies against Sars-CoV-2 or immunological analysis for Sars-CoV-2 antigens. These are mainly patients with risk factors or more severe symptoms.

In the future the federal government will also cover the costs of sampling if it is done in a laboratory, a pharmacy or test centre. In such cases there is usually no medical indication. This regulation only applies to molecular biological analyses for Sars-CoV-2 and analyses for Sars-CoV-2 antigens. For the analyses for antibodies against Sars-CoV-2, a detailed doctor-patient consultation with medical indication is still required and a cantonal medical order is required for the federal government to assume the costs.

Sampling is preceded by a brief discussion with the patient. The federal government will also cover the costs of the analysis and associated services if the services are provided by different parties, in other words if a doctor provides the thorough patient consultation and communicates the results to the person tested and the authorities, while the sampling is done by the laboratory, hospital, pharmacy or test centre.

The materials required for the swab are made available by the laboratory and covered under order processing, except in the case of rapid tests for Sars-CoV-2 antigens, where the sterilised nasopharyngeal sampling swabs are provided in the test kit.

The service provider as specified in the HIA (doctors, laboratories, pharmacists and hospitals) and the test centre run by or on behalf of the canton does the sampling and is also responsible for completion of the laboratory order with the patient's personal details (including health insurance details and insurance number), clinical information and the indication for the analysis. Responsibility for assessing compliance with the requirements for the coverage of test costs rests with the service provider.

3.3 Performance of the analysis, including order processing

In accordance with Annex 6 of Covid-19 Ordinance 3 the federal government will pay up to the following maximum amounts for **molecular biological analysis** for Sars-CoV-2:

- If the analysis is conducted by laboratories on behalf of another approved service provider: up to a maximum of CHF 106. This sum is made up as follows: CHF 82 for the analysis and CHF 24 for order processing, overhead costs and sampling materials.
- If the analysis is conducted by a contract laboratory after sampling in the same laboratory (own order): up to a maximum of CHF 87. This sum is made up as follows: CHF 82 for the analysis and CHF 5 for order processing, overhead costs and sampling materials.
- If the analysis is conducted by a hospital laboratory for the hospital's own order: up to a maximum of CHF 87. This sum is made up as follows: CHF 82 for the analysis and CHF 5 for order processing, overhead costs and sampling materials.

In accordance with Annex 6 of Covid-19 Ordinance 3 the federal government will pay up to the following maximum amounts for **immunological analysis for Sars-CoV-2 (antigens or antibodies)**:

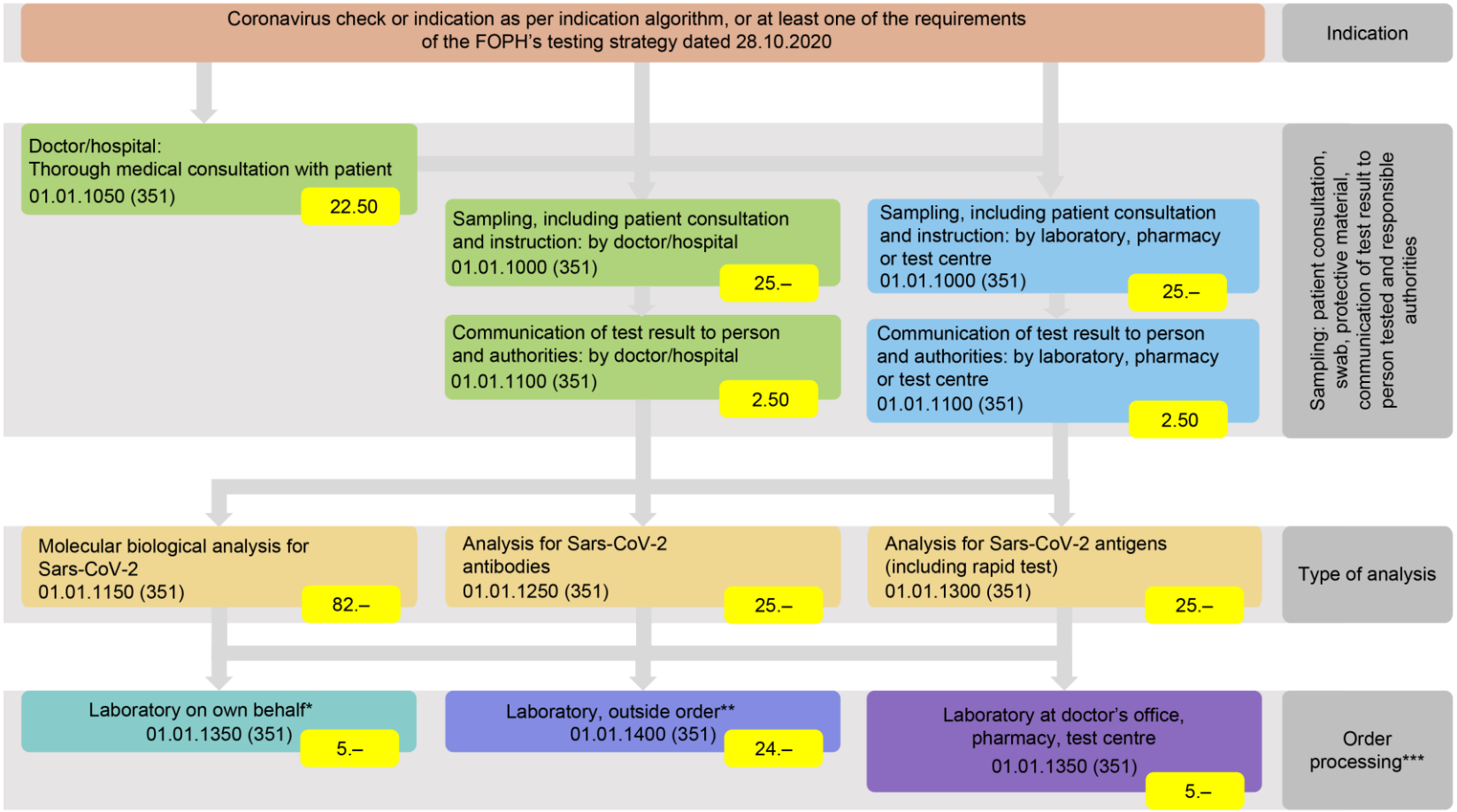
- If the analysis is conducted by a laboratory on behalf of another approved service provider: up to a maximum of CHF 49. This sum is made up as follows: CHF 25 for the analysis and CHF 24 for order processing, overhead costs and sampling materials.
- If the analysis is conducted by a contract laboratory after sampling in the same laboratory (for own order): up to a maximum of CHF 30. This sum is made up as follows: CHF 25 for the analysis and CHF 5 for order processing, overhead costs and sampling materials. This arrangement applies only for analyses for Sars-CoV-2 antigens, and not for analyses for antibodies.
- If the analysis is conducted by a hospital laboratory for the hospital's own order: up to a maximum of CHF 30. This sum is made up as follows: CHF 25 for the analysis and CHF 5 for order processing, overhead costs and sampling materials.
- If the analysis is conducted at a medical practice, in a hospital outside the hospital laboratory or at a pharmacy or test centre: up to a maximum of CHF 30. This sum is made up as follows: CHF 25 for the analysis and CHF 5 for order processing. This rule applies only to analyses for Sars-CoV-2 antigens and not to analyses for antibodies.

In cases where there is no capacity for carrying out molecular biological analyses on high-throughput equipment at licensed laboratories, the federal government will now pay an additional amount of CHF 22 for molecular biological analysis for Sars-CoV-2 done by means of a rapid molecular biological method. This is subject to the requirement that the methods used have a pure analysis time of less than 90 minutes and that the analysis is done individually (as opposed to several analyses in the same batch). This additional amount is temporary and will be discontinued immediately once sufficient capacity is available again on high-throughput equipment.

The maximum amounts covered by the federal government for analyses for Sars-CoV-2 and the associated services are described in detail in Annex 6 of Covid-19 Ordinance 3 and illustrated in the diagram below.

Molecular biological analyses for Sars-CoV-2 and analyses for Sars-CoV-2 antigens (including rapid test)/antibodies

Maximum amount in CHF covered by the federal government



If there is no capacity for molecular biological analysis on high-throughput equipment, an additional amount can temporarily be paid for a rapid molecular biological method (for contract laboratories and hospital laboratories for the hospital's own use) provided that the method has a pure analysis time of less than 90 minutes and analyses are conducted individually (not several at once)
01.01.1200 (351)
22.–

*Conducted for own use, swab done at same place as analysis
**On behalf of another approved service provider
***Molecular biological analysis: order processing, overhead costs and sampling material, analysis for Sars-CoV-2 antigens/antibodies: if conducted by laboratories on behalf of an outside party: order processing, overhead costs and sampling material; otherwise only order processing

4 Technical procedure

4.1 Invoicing

The service providers submit the invoice, specifying the ZSR number/GLN number, to the insurer responsible (health insurer, Military Insurance), or to the Common Institution. The canton is responsible for applying for the ZSR numbers of the test centres operated by the canton or on its behalf and approved by the canton to SASIS AG and for the use of these ZSR numbers in invoicing the responsible insurer. The tariff headings, for sampling on the one hand and laboratory analysis on the other hand, must be listed individually on the invoice with the corresponding tariff codes and invoiced separately by the respective service provider, i.e. the invoice does not include services outside tariff code 351. The insurer responsible is the provider of coverage against illness for the person tested. For those not insured in Switzerland, the Common Institution under Article 18 of the HIA is responsible.

For analyses on Sars-CoV-2 outside of these federal guidelines, which for example are at the expense of the requesting person or the employer (self-payers), the self-payer tariffs defined by the tariff partners are to be used. For self-payers, the maximum amount may differ from the amounts defined by the federal government[11].

Invoices are to be submitted in a standardised form, as specified in Article 26*a* para 1 of Covid-19 Ordinance 3, including the administrative and medical information specified in Article 59 HIO, to the insurer responsible, or to the Common Institution, under the *tiers payant* system, in accordance with Article 42 para 2 HIA. The insurer, or the Common Institution, communicates the number of medical and laboratory standard charges financed in advance and the number of insured persons, and submits invoices quarterly to the federal government. The person tested is not liable for **any copayment** for services in accordance with Article 26 para 7 of Covid-19 Ordinance 3.

For additional investigations or services which are not required for Sars-CoV-2 sampling and which are performed during or as a result of the coronavirus consultation (e.g. treatment for Sars-CoV-2 infection), the act applicable in each case (HIA, AIA, MIA and federal Act on invalidity insurance) is to be applied. Service providers must inform the person concerned of any costs arising which are not covered by the federal government's flat rate coverage and which thus give rise to additional costs (e.g. a copayment) for the patient. Such services are to be invoiced separately from the analysis by the service provider in accordance with the applicable provisions in the relevant federal act.

Invoices are generally to be submitted electronically (applicable standard: General Invoice Request of the Data Exchange Forum).

While Covid-19 Ordinance 3 is in force (until 31 December 2021), item no. 3186.00 of Annex 3 to the Health Insurance Benefits Ordinance must not be applied for testing for Sars-CoV-2 (Article 26*a* para 2 of Covid-19 Ordinance 3).

[11] See pandemic tariff of 28 October 2020, available (in German, French and Italian) at www.bag.admin.ch > Krankheiten > Infektionskrankheiten: Ausbrüche, Epidemien, Pandemien > Aktuelle Ausbrüche und Epidemien > Neues Coronavirus > Regelungen in der Krankenversicherung.

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4.2 Tariffs and tariff numbers to be used by service providers (valid from 2 November 2020)[12]

The following tariffs and tariff numbers may only be used for tests carried out in accordance with the FOPH testing strategy. For self-payers, the maximum amount may differ from the amounts defined by the federal government[13].

Subsection	Code Item	Service	Service provider	Cannot be cumulated with which items?	Can be cumulated with which items?	Limitation	Value [CHF]
Sampling	351 01.01.1000	Flat fee covering sampling, swab, smear and / or blood collection (or collection of another validated sample),, protective material, patient consultation	Doctor's office Hospital Laboratories Pharmacist Test centre			1/patient/day	25
Doctor	351 01.01.1050	Medical flat fee for thorough patient consultation with doctor	Doctor's office Hospital			1/patient/day	22.5
Communication	351 01.01.1100	Communicating test result to person tested and clinical notification to authorities	Doctor's office Hospital Laboratories Pharmacist Test centre			1/patient/day	2.5
Analysis	351 01.01.1150	Molecular biological analysis for Sars-CoV-2	Hospital Laboratories			1/patient/day	82

[12] Analyses carried out before 2 November 2020 must be billed in accordance with the invoicing instructions given in the 18 September 2020 fact sheet.

[13] See pandemic tariff of 28 October 2020, available (in German, French and Italian) at www.bag.admin.ch > Krankheiten > Infektionskrankheiten: Ausbrüche, Epidemien, Pandemien > Aktuelle Ausbrüche und Epidemien > Neues Coronavirus > Regelungen in der Krankenversicherung.

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Supplement to analysis	351 01.01.1200	Temporary additional amount for a molecular biological rapid test if there is insufficient capacity on high-throughput equipment, provided that this rapid test involves a pure analysis time of less than 90 minutes	Hospital Laboratories		Can be cumulated with 01.01.1150 molecular biological analysis for Sars-CoV-2	1/patient/day	22
Analysis	351 01.01.1250	Immunological analysis for antibodies against Sars-CoV-2	Hospital Laboratories			1/patient/day	25
Analysis	351 01.01.1300	Immunological analysis for Sars-CoV-2 antigens (including rapid test)	Doctor' s office Hospital Laboratories Pharmacist Test centre			1/patient/day	25
Order processing	351 01.01.1350	Flat fee in the event of own order for processing, overhead costs and sampling material	Doctor's office Hospital Laboratories Pharmacist Test centre	Cannot be cumulated with 01.01.1400 flat fee in the event of outside order for order processing, overhead costs and sampling material	Only billable with an analysis	1/patient/day	5
Order processing	351 01.01.1400	Flat fee in the event of outside order for order processing, overhead costs and sampling material	Laboratories	Cannot be cumulated with 01.01.1350 flat fee in the event of own order for order processing, overhead costs and sampling material	Only billable with an analysis	1/patient/day	24

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4.3 Invoice control

Insurers and the Common Institution check invoices for the following points:

- Entitlement of service provider to submit invoices (based on the ZSR number, cf. Art. 26 para 4 of Covid-19 Ordinance 3)
- Compliance with flat rates (amounts specified in Annex 6 of Covid-19 Ordinance 3)
- whether the same analysis has been charged for more than once per day per person
- no items other than the flat rate envisaged are included in the invoice

If the legal requirements for invoicing are not fulfilled, the invoice is to be returned to the service provider and not settled. The burden of proof lies with the service provider. The service provider must then rectify and resubmit the invoice.

4.4 Reporting to the FOPH

Insurers or the Common Institution report quarterly to the FOPH the number of analyses for which they have covered service providers, and the amount covered, at the beginning of January, April, July and October (cf. Art. 26*a* para 5 Covid-19 Ordinance 3). Each report should include details of the number of cases in the previous quarter.

5 Entry into force

This fact sheet supersedes the fact sheet “Covid-19 (novel coronavirus disease): Rules for coverage of the costs of testing for Sars-CoV-2 and of associated medical care” dated 18 September 2020 and is valid from 2 November 2020.

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