

THOUGHT LEADERSHIP**Service**

Healthcare Providers

Industry

Healthcare

Professionals

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LEGAL UPDATES

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HHS Begins Clarifying Reporting Requirements for Provider Relief Funds

On July 20, 2020, The U.S. Department of Health and Human Services (HHS) notified providers that if they received \$10,000 or more in funds from the general or targeted Provider Relief Fund (PRF) established under the Coronavirus Aid, Relief, and Economic Security (CARES) Act, reports on how those funds were used will be required. HHS expects to release (through the Health Resources and Services Administration [HRSA] website) detailed instructions on reporting requirements by August 17, 2020. Specifically, reports will be required of any provider who received one or more payments exceeding \$10,000 in the aggregate from:

General distributions:

Initial Medicare

Additional Medicare

Medicaid, dental and Children's Health Insurance Program (CHIP)

Targeted distributions:

High-impact area

Rural

Skilled nursing facilities

Indian health service

Safety net hospital

In the reports, providers will be asked to explain how they complied with PRF applicable terms and conditions. HRSA will provide a number of question-and-answer sessions via webinar in advance of the report's deadline. From a timing perspective, according to HHS' notice, the reporting system will become available to recipients on October 1, 2020. The deadlines are as follows:

All recipients must report within 45 days of the end of calendar year 2020 on their expenditures through the period ending December 31, 2020.

Recipients that have **expended PRF in full** prior to December 31, 2020, may submit a single final report at any time during the window that begins October 1, 2020, but no later than February 15, 2021.

Recipients with PRF **unexpended after December 31, 2020**, must submit a second and final report no later than July 31, 2021.

Contact us

We will continue to track the reporting obligations as more details become available. For more information regarding Provider Relief Funds, please contact Joe Geraci, Harvey Tettlebaum, Eric Weatherford or your Husch Blackwell attorney.

Comprehensive CARES Act and COVID-19 guidance

Husch Blackwell's CARES Act resource team helps clients identify available assistance using industry-specific updates on changing agency rulemakings. Our COVID-19 response team provides clients with an online legal Toolkit to address challenges presented by the coronavirus outbreak, including rapidly changing orders on a state-by-state basis. Contact these legal teams or your Husch Blackwell attorney to plan a way through and beyond the pandemic.