

Health Care Providers Will Soon Need to Report on use of Provider Relief Funds Under the CARES Act

By **Ericka Adler**

Many health care providers received provider relief funds (“PRF”) under the Coronavirus Aid, Relief and Economic Security Act (“CARES”). Recipients of PRF payments were required to agree to certain terms and conditions which referenced the submission of reports to the Department of Health and Human Services (“HHS”). Although there was little detail on the reports that would be required, and the detailed instructions on such reports still will not be released until August 17, 2020, some information has been released by the Health Resources and Services Administration (“HRSA”), which will administer the reporting process:

1. PRF recipients will be subject to reporting requirements if they received one or more payments exceeding \$10,000 in the aggregate.
2. The reports will allow providers to demonstrate compliance with the terms and conditions, including use of the funds for allowable purposes.
3. HRSA will provide recipients with question and answer sessions via webinar in advance of the submission deadline.
4. The reporting system will become available to recipients on October 1, 2020.
5. Recipients will be required to report within 45 days of the end of calendar year 2020 on their expenditures for the period ending December 31, 2020.
6. Recipients who use up all PRF prior to December 31, 2020 will be able to submit a single final report at any time between October 1, 2020 and February 15, 2021.
7. Recipients who have not used all PRF as of December 31, 2020 will be required to submit a second and final report no later than July 31, 2021.
8. Detailed reporting instructions and a data collection template will become available through the HRSA website by August 17, 2020.

Providers who are uncertain as to whether or not they are in compliance with the HHS terms and conditions, or whether they have appropriately used the PRF, can contact Roetzel’s health care team for guidance. Additionally, certain policies were mandated by HHS as a condition of accepting PRF. Our team can also assist in the preparation of these policies.

Ericka Adler, Manager
312.582.1602 | eadler@ralaw.com

Christina Kuta
312.582.1680 | ckuta@ralaw.com

John Waters
312.582.1685 | jwaters@ralaw.com

Lesley Arca
312.582.1621 | larca@ralaw.com

Avery Delott312.582.1636 | adelott@ralaw.com**David Hochman**312.582.1686 | dhochman@ralaw.com**Lee Levin**312.580.1248 | llevin@ralaw.com**James Shaw**312.580.1258 | jshaw@ralaw.com**Judith Sherwin**312.580.1268 | jsherwin@ralaw.com