

Updated Provider Relief Fund Reporting Guidance Now Available

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This content was published prior to the combination of Dentons Davis Brown. Learn more about Dentons Davis Brown.

Health Resources and Services Administration (HRSA) has released updated reporting guidance for the Provider Relief Fund.

The updated guidance implements the Coronavirus Response and Relief Supplemental Appropriations Act which directed HHS to allow providers to calculate “lost revenues” based on prior guidance issued by HHS in June 2020. The reporting guidance provides further clarity on how providers may determine “lost revenues.” A provider may calculate lost revenues based on any of the three options:

Difference between 2019 and 2020 actual patient care revenue

Providers using this method must submit Revenue from Patient Care Payer Mix for the 2019 calendar year by quarter.

Difference between 2020 budgeted and 2020 actual patient care revenue

As long as the budget was established before March 27, 2020, providers can use this option. Providers using this method will be required to submit their 2020 budgeted amount of patient care revenue as well as their 2020 approved budget with an attestation from their CEO, CFO, or similar responsible individual that the budget submitted was approved before March 27, 2020.

Alternate methodology

An alternate, reasonable methodology of estimating revenue and submitted to HRSA for approval. Providers choosing this option must submit:

- Description of the methodology
- Calculation of lost revenues attributable to coronavirus using that methodology
- Explanation of why the methodology is reasonable
- Description establishing how lost revenue was, in fact, a loss attributable to coronavirus, as opposed to a loss caused by any other source

Providers using this methodology face an increased likelihood of an audit by HRSA. HRSA will notify a recipient if their proposed methodology is not reasonable and the provider must then resubmit its report within 30 days using one of the other two methods.

Due to the passage of the Coronavirus Response and Relief Supplemental Appropriations Act, the timeframe for

Timeframe

providers to report their use of Provider Relief Funds has been delayed. Providers may currently register for reporting; however, HRSA is not yet accepting reports. Providers who have not yet registered should do so on the HHS website.

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