

# HHS Reporting Requirements for Provider Relief Fund General and Targeted Distributions

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Recently, the U.S. Department of Health and Human Services (HHS) issued reporting guidance to recipients of Health Resources and Services Administration (HRSA) Provider Relief Fund (PRF) payments. These reporting requirements apply to PRF General and Targeted Distributions [including the skilled nursing facilities (SNF) and Nursing Home Infection Control Distribution]. The reporting requirements outlined in the notice apply to all past and future PRF payments. These reporting requirements do not apply to the Rural Health Clinic COVID-19 Testing Program or claims reimbursements from the HRSA COVID-19 Uninsured Program and the HRSA COVID-19 Coverage Assistance Fund (CAF).

## Period of Availability of Funds

PRF recipients must use payments only for eligible expenses including services rendered and lost revenues during the period of availability as outlined below. The period of availability of funds is based on the date the payment is received as determined by the deposit date for ACH payments or the check cashed date.

	Payment Received Period	Deadline to Use Funds
Period 1	April 10, 2020 to June 30, 2020	June 30, 2021
Period 2	July 1, 2020 to December 31, 2020	December 31, 2021
Period 3	January 1, 2021 to June 30, 2021	June 30, 2022
Period 4	July 1, 2021 to December 31, 2021	December 31, 2022

PRF recipients may have used payments for eligible expenses incurred prior to receipt of those payments as long as they were to prevent, prepare for, and respond to coronavirus. However, HRSA expects that it would be highly unusual for providers to have incurred eligible expenses prior to January 1, 2020.

## Reporting Time Period

Recipients who received one or more payments exceeding \$10,000 in the aggregate during a Payment Received Period are required to report in each applicable Reporting Time Period as indicated in the following table. Reporting must be completed and submitted by the last date in the Reporting Time Period. If reporting is not submitted during the Reporting Time Period, recipients are considered out of compliance and the government may seek to recover the PRF payments.

	Payment Received Period (payments exceeding \$10,000 received)	Deadline to Use Funds	Reporting Time Period
Period 1	April 10, 2020 to June 30, 2020	June 30, 2021	July 1, 2021 to September 30, 2021
Period 2	July 1, 2020 to December 31, 2020	December 31, 2021	January 1, 2022 to March 31, 2022
Period 3	January 1, 2021 to June 30, 2021	June 30, 2022	July 1, 2022 to September 30, 2022
Period 4	July 1, 2021 to December 31, 2021	December 31, 2022	January 1, 2023 to March 31, 2023

Recipients must report in each Reporting Time Period for which they received payments in excess of \$10,000 during the applicable Payment Received Period.

## Reporting Entity

The Reporting Entity is the entity that registers its Tax Identification Number (TIN) and reports on payments received by that TIN and its subsidiaries. However, a parent entity cannot report on Targeted Distributions received by a subsidiary. The original recipient of a Targeted Distribution must report as a Reporting Entity regardless of whether the parent or subsidiary received the payment or the original recipient subsequently transferred the payment. The Reporting Entity that is a subsidiary must indicate the payment amount of any Targeted Distributions it received that were transferred to/by the parent entity. Transferred Targeted Distribution payments will more likely be audited by the HRSA.

There are four types of PRF recipients:

1. Received Phase 1 only General Distribution payments totaling over \$10,000 or more in any Payment Received Period
2. Received General Distribution payments totaling \$10,000 or more in any Payment Received Period and has no parent organization or subsidiaries except PRF recipients that received Phase 1 General Distributions only
3. Parent of one or more subsidiaries that received General Distribution payments during Phases 1, 2, or 3 and has associated providers that were providing diagnoses, testing, or treatment for individuals with possible or actual cases of COVID-19 on or after January 31, 2020
4. An entity at the TIN level that received Targeted Distribution payments totaling over \$10,000 in a Payment Received Period (includes SNF and Nursing Home Infection Control Distribution payments)

## Reporting

Entities will be required to report on various items such as basic entity information, subsidiary information, tax information, and Single Audit information. Additional information includes total revenues and revenue from patient care, support for lost revenue, personnel, patient, facility metrics, and other survey information.

Entities will also be required to report on other assistance received including from the Department of Treasury or Small Business Administration (including Paycheck Protection Program loans), Federal Emergency Management Agency programs, HHS testing funds, local, state or tribal assistance, business insurance, and any other assistance.

Eligible costs incurred will be reported in the following areas: SNF and Nursing Home Infection Control Distribution payments, use of general and other Targeted Distribution payments, net unreimbursed expenses attributable to coronavirus and lost revenues attributable to coronavirus. Entities that receive more than \$500,000 will be required to report on the use of these payments in greater detail. Entities should use their normal basis of accounting (cash or accrual) for reporting revenue and expenses.

## Single Audits

Entities, including commercial entities, may for the first time find themselves requiring an audit of their federal programs due to the receipt of PRF payments. All recipients of \$750,000 or more in federal funding, including PRF payments and other federal financial assistance, during their fiscal year are subject to Single Audit requirements.

Commercial organizations can elect to have a program-only audit or a single audit.

## Contact Us

If you need additional information or assistance, please contact your PKF O'Connor Davies client engagement team or Bryan Decker, CPA, Partner at [bdecker@pkfod.com](mailto:bdecker@pkfod.com).

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