## Frequently Asked Questions HHS Provider Relief Fund (PRF)

### What is the current status of applications for the PRF?

Eligible dentists are able to apply for 'Phase 4' funding starting September 29, 2021. The final deadline for applications is October 26 at 11:59pm eastern time.

### Who is eligible to apply for Phase 4 funding and what will the payment be?

Any dentist, regardless of Medicaid or Children's Health Insurance Program status, who directly billed or owns a subsidiary that directly billed a patient or company for oral health care-related services during the period of Jan. 1, 2019, to Dec. 31, 2020, is eligible to apply, according to HRSA.

Phase 4 payments will be based on providers' lost revenues and increased expenditures between July 1, 2020 and March 31, 2021. Phase 4 will also include new elements specifically focused on equity, including reimbursing smaller providers for their lost revenues and COVID-19 expenses at a higher rate compared to larger providers, and bonus payments based on the amount of services providers furnish to Medicaid/CHIP and Medicare patient.

### What if I believe there was a mistake in my Phase 3 payment?

To promote transparency in the PRF program, HHS has released <u>detailed information</u> about the methodology utilized to calculate Phase 3 payments. Providers who believe their Phase 3 payment was not calculated correctly according to this methodology will now have an opportunity to request a reconsideration. See HRSA for <u>further details on this</u> <u>Phase 3 reconsideration process</u>.

### What expenses or lost revenues are considered eligible for reimbursement from the Provider Relief Fund?

The term "*healthcare related expenses attributable to coronavirus*" is a broad term that may cover a range of items and services purchased to prevent, prepare for, and respond to coronavirus, including:

- Supplies & equipment to provide healthcare services for possible or actual COVID-19 patients;
- Workforce training;
- Developing and staffing emergency operation centers; and
- Acquiring additional resources, including facilities, equipment, supplies, healthcare practices, staffing, and technology to expand or preserve care delivery.

The term "*lost revenues that are attributable to coronavirus*" means any revenue that you as a healthcare provider lost due to coronavirus, these could include:

- Employee or contractor payroll;
- Employee health insurance;
- Rent or mortgage payments;
- Equipment lease payments; and
- Electronic health record licensing fees.

*Note*: Payments cannot be used to "reimburse expenses or losses that have been reimbursed from other sources or that other sources are obligated to reimburse."

### Can providers use Provider Relief Fund payment to pay taxes?

Yes. HHS considers taxes imposed on Provider Relief Fund payments to be "healthcare related expenses attributable to coronavirus" that are reimbursable with Provider Relief Fund money.

### Are expenses related to securing and maintaining adequate personnel reimbursable expenses under the Provider Relief Fund?

Yes, expenses incurred by providers to secure and maintain adequate personnel, such as offering hiring bonuses and retention payments, child care, transportation, and temporary housing are deemed to be COVID-19-related expenses if the activity generating the expense was newly incurred after the declaration of the Public Health Emergency and the expenses were necessary to secure and maintain adequate personnel.

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### I've seen one of the terms was on balance billing (surprise billing), does this apply to my dental practice? The ADA worked with HHS to set the record straight and they've now clarified that:

- Dental providers who are not caring for patients with presumptive or actual cases of COVID-19 are not subject to balance billing prohibitions. 'Presumptive' is defined as a case where a patient's medical record documentation supports a diagnosis of COVID-19.
- HHS thinks few, if any, dentists are performing dental work on **active** COVID-19 patients. So, there should be very few dental patients covered by this bar.
- Qualifying for payment from the PRF has to do with **past** treatment early in 2020 when HHS broadly viewed every patient as a possible case of COVID-19. Balance billing prohibitions apply only to treating current **active** COVID-19 patients with a medical record that supports a diagnosis of COVID-19.

### What are the reporting requirements?

HHS revised the <u>Post-Payment Notice of Reporting Requirements</u> as of June 11, 2021. This new version supersedes all previous versions of the Post-Payment Notice of Reporting Requirements documents. More <u>detailed information</u> and additional resources are provided by HHS, but key updates include:

- The period of availability of funds is based on the date the payment is received (rather than requiring all payments be used by June 30, 2021, regardless of when they were received).
- Recipients are required to report for each Payment Received Period in which they received one or more payments exceeding, in the aggregate, \$10,000 (rather than \$10,000 cumulatively across all PRF payments).
- Recipients will have a 90-day period to complete reporting (rather than a 30-day reporting period).
- The PRF Reporting Portal will open for providers to start submitting information on July 1, 2021.
- Providers are encouraged to register in the <u>PRF Reporting Portal</u> in advance of the relevant Reporting Time Period dates. The registration process will take approximately 20 minutes to complete and must be completed in one session. The entire registration form must be completed for it to be saved.

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

### Summary of Reporting Requirements

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## Can a provider choose to have their payment data omitted from the Provider Relief Fund public list on the Centers for Disease Control and Prevention (CDC) website?

No. To ensure transparency, HHS will publish the names of payment recipients and the amounts accepted and attested to by the payment recipient.

HHS has a <u>public list</u> of providers and their payments once they attest to receiving the money and agree to the Terms and Conditions. All providers that received a payment from the Provider Relief Fund and retain that payment for at least 90 days without rejecting the funds are deemed to have accepted the Terms and Conditions. Providers that affirmatively attest through the Payment Attestation Portal or that retain the funds past 90 days, but do not attest, will be included in the public release of providers and payments. The list includes current total amounts attested to by providers from each of the Provider Relief Fund distributions, including the General Distribution and Targeted Distributions.

## Am I be eligible to receive a payment from the Provider Relief Fund even if I received funding from the Small Business Administration (SBA)?

Yes. Receipt of funds from SBA (such as the Paycheck Protection Program, or PPP) for coronavirus recovery does not preclude a dental provider from being eligible for the Medicaid, Children's Health Insurance Program (CHIP), or Dental Providers Distribution of the Provider Relief Fund. However, PRF payments cannot be used to reimburse expenses that have already been reimbursed by PPP loans.

#### Where can I find help completing the application?

- Provider Support Line: 866-569-3522
  - Real-time technical support, as well as service and payment support.
  - Hours of operation are 7 a.m. to 10 p.m. Central Time, Monday Friday.
- Phase 4 Terms and Conditions
- Phase 3 Terms and Conditions
- Phase 2 Terms and Conditions
- HHS Reporting Requirements and Auditing
  - Post-Payment Notice of Reporting Requirements (June 11)
- HHS PRF Frequently Asked Questions
- HRSA Reporting Portal Frequently Asked Questions
- HRSA Reporting Portal Registration User Guide

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