June 16, 2020

ILLINOIS HEALTH AND HOSPITAL ASSOCIATION M E M O R A N D U M

SUBJECT: Update: Provider Relief Fund Reporting Requirements

On June 13, the U.S. Department of Health and Human Services (HHS) updated the <u>Provider Relief Fund Frequently Asked Questions</u> (FAQs). Specifically, HHS notes that they are publicly posting the names of payment recipients and their payment amounts <u>here</u>, and that posting these data fulfills the reporting requirements of the CARES Act within the Provider Relief Fund terms and conditions. No additional report is due to HHS or the Pandemic Response Accountability Committee at this time. However, providers that received Provider Relief Fund payments are required to submit any reports requested by the HHS Secretary, and the FAQs state that such reports will be required in the future. HHS will provide more information on required reports, including due date(s), in the coming weeks.

The exact wording from this FAQ is below. Please send questions and comments to Cassie Yarbrough, director of Medicare policy, at 630-276-5516 or cyarbrough@team-iha.org.

The Terms and Conditions for all Provider Relief Fund payments require recipients who receive at least \$150,000 in the aggregate from any statute primarily making appropriations for the coronavirus response to submit quarterly reports to HHS and the Pandemic Response Accountability Committee. This requirement is from section 15011 of the CARES Act. What do providers need to do in order to be in compliance with this provision in the Terms and Conditions? (Added 6/13/2020)

Recipients of Provider Relief Fund payments do not need to submit a separate quarterly report to HHS or the Pandemic Response Accountability Committee. HHS will develop a report containing all information necessary for recipients of Provider Relief Fund payments to comply with this provision. For all providers who attest to receiving a Provider Relief Fund payment and agree to the Terms and Conditions (or retain such a payment for more than 90 days), HHS is posting the names of payment recipients and their payment amounts on its public website here. HHS Is also working with the Department of Treasury to reflect the aggregate total of each recipient's attested to Provider Relief Fund payments on USAspending.gov. Posting these data meets the reporting requirements of the CARES Act. See Appendix A of OMB Memo M-20-21 [Implementation Guidance for Supplemental Funding Provided in Response to the Coronavirus Disease 2019 (COVID-19)].

However, the Terms and Conditions for all Provider Relief Fund payments also require recipients to submit any reports requested by the Secretary that are necessary to allow HHS to ensure compliance with payment Terms and Conditions. HHS will be requiring recipients to

submit future reports relating to the recipient's use of its PRF money. HHS will notify recipients of the content and due date(s) of such reports in the coming weeks.