Updated HHS Provider Relief Fund FAQ Highlights As of January 29, 2021

• Ownership Structures & Financial Relationships:

- Parent organization may allocate Targeted Distributions to any of its eligible (healthcare provider) subsidiaries.
- The <u>Parent entity must attest</u> to any allocated Targeted Distributions from its subsidiaries. However, the <u>subsidiary entity must report on the use of funds</u> if they were the <u>original recipient</u> of the Targeted Distribution.
- To determine whether an entity is the parent organization, the entity must follow the <u>methodology used to determine a subsidiary in their financial statements</u>. If there are none, the entity with a <u>majority ownership (greater than 50 percent</u>) will be considered the parent organization.
- The parent organization with subsidiary billing TINs that received General Distribution payments may attest and keep the payments.

• Use of Funds:

- Reporting Entities that received General and Targeted Distribution payments will <u>submit</u> <u>a consolidated report</u> via the Reporting Portal.
- Any interest generated by PRF funds is considered reportable revenue:
 - The interest earned on PRF funds may be applied toward reportable use of funds (COVID-related expenses and loss of revenue).
 - Any interest not fully expended must be calculated, reported, and returned.
- Reporting Entities may use budgeted revenues if the budget(s) and associated documents covering calendar year 2020 were established and approved on or before <u>March 26, 2020</u>. To be considered an approved budget, the budget must have been <u>ratified, certified, or adopted</u> by the Reporting Entity's <u>financial executive or executive</u> <u>officer as of that date</u>, and the Reporting Entity will be required to attest that the budget was established and approved on or before March 26, 2020.

• COVID-19 Vaccine Distribution & Administration:

- The costs associated with administering a vaccine to a patient with Medicare Part A but not Part B, coverage would be considered unreimbursed under the Provider Relief Fund, and payments could be used to cover incurred expenses.
- PRF payments may be used to support expenses associated with distribution of a COVID-19 vaccine licensed or authorized by the Food and Drug Administration (FDA) that have not been reimbursed from other sources or that other sources are not obligated to reimburse.

• Phase 3 Overview & Eligibility:

 Providers will be paid the greater of up to 88 percent of their reported losses (both lost revenue and health care-related expenses attributable to coronavirus incurred during the first half of 2020) or two percent of annual revenue from patient care. Some applicants will not receive an additional payment, either because they experienced no change in revenues or net expenses attributable to COVID-19, or because they have already received funds that equal or exceed reimbursement of 88 percent of reported losses or two percent of revenue from patient care.

 If an applicant has not yet received and kept a payment that is approximately two percent of annual revenue from patient care as part of either Phase 1 or 2 of the General Distribution, then they will receive at least that amount in Phase 3 payment. In addition to this amount, providers will be paid up to 88 percent of their reported losses (both lost revenue and health care-related expenses attributable to coronavirus incurred during the first half of 2020) if losses exceeded two percent of annual revenue from patient care.