

HHS Provider Relief Fund Portal Is Open ... for Registration Only

The Department of Health and Human Services (HHS) opened its Provider Relief Fund (PRF) [Reporting Portal](#) today (January 15, 2021)—but for registration only.

As mentioned in our [last post](#), we have been anticipating the opening of the Reporting Portal based on prior guidance from HHS indicating that PRF recipients would be able to report on their use of funds beginning today. However, through its new [User Guide](#) (also made available today), HHS has notified PRF recipients that it is dividing the reporting process into two steps:

Step 1: Providers must register as users in the PRF Reporting Portal.

Step 2: Providers must complete reporting on the use of funds.

Today's opening of the Reporting Portal is intended to assist providers only in the completion of the first step of this process—registration. Providers will be notified separately when they should complete the second step of the process and report on their use of funds.

HHS also released a new set of [Frequently Asked Questions \(FAQs\)](#) today, specifically tailored to the Reporting Portal. These FAQs advise that there is not a deadline for the completion of this registration process at the moment and that reporting functionality regarding use of PRF funds is not available. **February 15, 2021, is no longer the deadline for submitting reports on use of PRF funds.** HHS is encouraging providers to monitor its website for further information on the reporting deadline.

HHS also released an updated [Post-Payment Notice of Reporting Requirements](#). This notice incorporates changes regarding calculation of lost revenue brought on by the Consolidated Appropriations Act, 2021.

Providers may now choose among one of three options regarding the calculation of 2020 lost revenue: (1) the difference between 2019 and 2020 actual patient care revenue; (2) the difference between 2020 budgeted and 2020 actual patient care revenue if the budget was approved prior to March 27, 2020; or (3) any reasonable method of estimating revenue.

If a PRF recipient wishes to use an alternate methodology for calculating lost revenues attributable to coronavirus (option 3), the PRF recipient must submit a description of the methodology, an explanation of why the methodology is reasonable, and establish how the identified lost revenue was in fact a loss attributable to the coronavirus, as opposed to a loss caused by any other source. All PRF recipients seeking to use an alternate methodology face an increased likelihood of an audit by the Health Resources and Services Administration.

Our Chambliss team will continue to analyze the new legislation and developing guidance on these topics.

Please contact [Jed Roebuck](#) or your relationship attorney if you have questions or need additional information.

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