

## Eli's Hospice Insider

### Cares Act: Lost Fundraising Counts As Lost Revenues, HHS Clarifies

#### Get your facts organized for February reporting deadline.

If you were adversely affected by the Department of Health and Human Services' adjustment to its definition of "lost revenues" in September, a new clarification may ease your Provider Relief Fund troubles.

"There has been substantial confusion throughout the healthcare industry regarding expenses and lost revenues which will be eligible for justification of Provider Relief Funds," notes financial consulting firm The Health Group in Morgantown, West Virginia. "With every update from [HHS], more issues are identified as we prepare for the scheduled February reporting," the firm says in its electronic newsletter.

**Bad news:** Hospices and all other providers still have to adhere to a "lost revenues" definition that allows losses only as compared to last year, not what you expected revenues to be for this year.

**Good news:** On Dec. 4, HHS added or modified six questions on its PRF General Information (FAQs) webpage, including one addressing how fundraising counts toward qualifying for the funds.

"Should providers include fundraising revenues, grants or donations when determining patient care revenue?" the question asks.



"To calculate lost revenues attributable to coronavirus, providers are required to report revenues received from Medicare, Medicaid, commercial insurance, and other sources for patient care services. Other sources include fundraising revenues, grants or donations if they contribute to funding patient care services," HHS replies.

HHS was a little more specific in a response to the question it sent the National Hospice & Palliative Care Organization a few days earlier. "Providers should report fundraising and thrift store revenue in 2019 and 2020 as a revenue source if it was raised to fund patient care services," HHS said, according to the trade group.

NHPCO and others had asked HHS for clarification on this issue in November. "Hospices rely on fundraising support to provide hospice and palliative care services and bereavement services to children and others in need throughout the community. The operation of hospice thrift stores is also a source of revenue that a number of hospice providers rely on to enable patient care," NHPCO CEO **Edo Banach** said when the trade group sought the information.

**Do this:** "We encourage all providers to recognize the importance of planning for the upcoming reporting," The Health Group urges. "The first report is currently scheduled to cover the period ending December 31, 2020 with a February 15, 2021 reporting date."

Note: The PRF FAQs are at

[www.hhs.gov/coronavirus/cares-act-provider-relief-fund/faqs/provider-relief-fund-general-info/index.html](http://www.hhs.gov/coronavirus/cares-act-provider-relief-fund/faqs/provider-relief-fund-general-info/index.html).