

MDS Alert

Reader Questions: Gain Compliance with PRF Reporting Before Nov. 30

Question: My facility accepted provider relief fund (PRF) money but I'm worried we aren't in compliance with all of the reporting requirements. Are we out of luck?

Arkansas Subscriber

Answer: The Department of Health and Human Services is trying to lend a helping hand to providers buried under COVID-19 and other pressures.

"In light of the challenges providers across the country are facing due to recent natural disasters and the Delta variant, HHS is announcing ... a final 60-day grace period to help providers come into compliance with their PRF Reporting requirements if they fail to meet the deadline on September 30, 2021, for the first PRF Reporting Time Period," HHS says in a Sept. 10 release.



Reminder: Back in June, the Health Resources and Services Administration announced four PRF reporting periods and related due dates, with the first due date set for Sept. 30. If providers can't substantiate their COVID costs and losses with their reports, they must pay back the funds.

"The grace period should help relieve time pressure for those PRF recipients struggling to prepare their reports before September 30, 2021," praise attorneys **Alexis Finkelberg Bortniker, Thuong (Amy) Nguyen, and Anil Shankar** with law firm Foley & Lardner in online analysis.

The announcement is "a welcome reprieve," cheers **Ryan O'Grady** with CPA and advising firm BKD.

However, don't think the grace period is carte blanche to ignore the reports. "The deadlines to use funds and the Reporting Time Period will not change," HHS emphasizes. But "HHS will not initiate collection activities or similar enforcement actions for noncompliant providers during this grace period," the agency allows.

HRSA is still urging providers to get their reports in on time, observes **Dave Macke** with CPA and advisory firm Von Lehman & Co. in Fort Mitchell, Kentucky. But the good news is providers don't have to supply a reason if they miss the deadline, he adds.

Additional details about the grace period:

- "This grace period only pertains to the Reporting Period 1 report submission deadline," HRSA says on its PRF reporting and auditing webpage. "There is no change to the Period of Availability for use of PRF payments."
- The grace period begins Oct. 1, 2021, and ends Nov. 30, 2021, HRSA specifies.
- "Providers should return unused funds as soon as possible after submitting their report," HRSA stresses. "All unused funds must be returned no later than 30 days after the end of the grace period" - Dec. 30, 2021.

Note: More PRF reporting information is at www.hrsa.gov/provider-relief/reporting-auditing.