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HHS Updates Recently Issued Provider Relief Fund Terms and Conditions

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HHS has updated the Terms and Conditions and websites for two key portions of its Provider Relief Fund programs.

1. Provider Relief Funds. Over the weekend, HHS updated the Terms and Conditions and posted FAQs concerning the Provider Relief Fund, available here: <https://www.hhs.gov/coronavirus/cares-act-provider-relief-fund/index.html>. The new Terms and Conditions apply to the \$50 billion General Distribution funds that have gone out and will go out over the next few weeks, and reaffirm reporting requirements as well as potential fraud and abuse liability for failing to comply. See <https://www.hhs.gov/coronavirus/cares-act-provider-relief-fund/terms-conditions/index.html>. HHS also opened the portal for those entities entitled to apply for additional General Distribution funds. <https://covid19.linkhealth.com/docuSign/#/step/1>. The FAQs provide detailed information concerning eligibility, requirements, and information necessary to apply for additional funds. <https://www.hhs.gov/sites/default/files/20200425-general-distribution-portal-faqs.pdf>. Significantly, those who received the a portion of the \$20 billion disbursement last week must still provide information confirming their patient revenues as well as attest to the updated Terms and Conditions relevant to that program.

2. Treatment of the Uninsured. HRSA has also established the website and opened the portal for those providers who wish to obtain payment for testing or caring for uninsured COVID-19 patients. See <https://www.hrsa.gov/coviduninsuredclaim>. Providers wishing to participate must enroll in the program through the website. Claims may be submitted beginning May 6. Payment is anticipated in mid-May subject to available funding. Accordingly, providers wishing to claim a portion of the funds should submit claims as soon as they can. Those providers wishing to participate must agree to the associated Terms and Conditions, which are available here: <https://www.hhs.gov/sites/default/files/terms-and-conditions-ffcra-relief-fund.pdf> and <https://www.hhs.gov/sites/default/files/terms-and-conditions-uninsured-relief-fund.pdf>.

We encourage you to visit Holland & Hart's Coronavirus Resource Site, a consolidated informational resource offering practical guidelines and proactive solutions to help companies protect their business interests and their workforce. The dynamic Resource Site is regularly refreshed with new topics and updates as the COVID-19 outbreak and the legal and regulatory

responses continue to evolve. Sign up to receive updates and for upcoming webinars.

For questions regarding this update, please contact:

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