

COVID-19 Provider Relief Fund – General Distribution (GD) Attestation and Application Process¹

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Background – General Distribution (GD) Payments

The Provider Relief Fund (PRF) was established through the *Coronavirus Aid, Relief, and Economic Security (CARES) Act*. Pursuant to the CARES Act and the *Paycheck Protection Program and Health Care Enhancement Act*, \$175 billion in grants will be disbursed from the Office of the Assistant Secretary for Preparedness and Response (ASPR) Public Health and Social Services Emergency Fund (PHSSEF) through the PRF. Of the \$175 billion, \$50 billion has been allocated for “General Distribution” (GD) to Medicare facilities and providers.

Overall (\$50 billion distribution)

- Available for providers who billed Medicare in 2019
- **General Distribution Payment = (Gross Receipts or Sales/\$2.5 trillion) X \$50 billion**

Round 1 (\$30 billion distribution)

- Based on 2019 Medicare fee-for-service (FFS) payments
- Distributed via automatic payments:
 - \$26 billion on 4/10; \$4 billion on 4/17
 - State-by-state breakdown available [here](#)
 - Congressional district breakdown available [here](#)
- **Round 1 Payment = (2019 Medicare FFS Payments/\$484 billion) X \$30 billion**

Round 2 (\$20 billion distribution)

- Allocated so that the *entire* \$50 billion General Distribution is allocated proportional to recipients’ share of 2018 net patient revenue across all payer sources
- Payments started to go out on 4/24 (based on Medicare cost reports)
- Payments will continue to go out on a weekly, rolling basis based on provider submissions and data validation to the [GD Portal](#)
- **Round 2 Payment = General Distribution Payment - Round 1 Payment**

¹ This guide was developed based on publicly available information from HHS, including the most recent [GD FAQs](#), information on the Provider Relief Fund [webpage](#), and the *GD Portal* [User Guide](#).

Preliminary Steps and Actions

Phase	Key Action	Additional Detail																					
Eligibility/Threshold Requirements	Received GD payment from \$30B distribution (Round 1 Payment)	These payments were delivered on April 10 and April 17																					
	Meet eligibility requirements and appropriately received the Round 1 Payment	<ul style="list-style-type: none"> Received Medicare FFS payments in 2019 Provides or provided care for individuals after January 31, 2020 Not currently terminated from participating in Medicare or precluded from receiving payment through Medicare Advantage or Part D Not currently excluded from participation in a Federal health care program Does not currently have Medicare billing privileges revoked 																					
Prior to Applying	Estimate total GD Payment: (Gross Receipts or Sales/\$2.5 trillion) X \$50 billion	<ul style="list-style-type: none"> Gross receipts or sales based on provider 2017, 2018, or 2019 tax return <table border="1"> <thead> <tr> <th>Federal Tax Classification:</th> <th>From:</th> <th>On IRS Form:</th> </tr> </thead> <tbody> <tr> <td><i>Sole Proprietor/ Disregarded Entity (LLC)</i></td> <td>Box 1</td> <td>1040, Schedule C</td> </tr> <tr> <td><i>C Corporation</i></td> <td>Box 1a</td> <td>1120</td> </tr> <tr> <td><i>S Corporation</i></td> <td>Box 1a</td> <td>1120-S</td> </tr> <tr> <td><i>Partnership</i></td> <td>Box 1a</td> <td>1065</td> </tr> <tr> <td><i>Trust</i></td> <td>Box 1</td> <td>1040, Schedule C</td> </tr> <tr> <td><i>Tax-Exempt Organization</i></td> <td>Box 9</td> <td>990</td> </tr> </tbody> </table>	Federal Tax Classification:	From:	On IRS Form:	<i>Sole Proprietor/ Disregarded Entity (LLC)</i>	Box 1	1040, Schedule C	<i>C Corporation</i>	Box 1a	1120	<i>S Corporation</i>	Box 1a	1120-S	<i>Partnership</i>	Box 1a	1065	<i>Trust</i>	Box 1	1040, Schedule C	<i>Tax-Exempt Organization</i>	Box 9	990
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Gather relevant information that must be submitted	<ul style="list-style-type: none"> TINs for entities that received prior PRF payments <ul style="list-style-type: none"> If applicable, TINs of subsidiary organizations that received prior PRF payments, but do not file separate tax forms Amount of payments received PRF payment transaction numbers/check numbers Electronic copy of most recently filed tax form 																						
Recoupment Considerations	Estimate lost revenues in March and April 2020	<ul style="list-style-type: none"> Generally, HHS does <u>not</u> intend to recoup funds as long as lost revenue and increased expenses exceed the PRF payment received “PRF payment received” <i>may</i> include GD Payments, High Impact, Rural Provider, Uninsured, and other future PRF distributions (unclear the extent to which this is limited) If a provider believes it was “overpaid” (e.g., losses/increased expenses do not exceed PRF payments) or received a payment “in error” (e.g., not associated with the correct TIN, a duplicate payment), HHS guidance states that the provider should return the funds in entirety 																					

SCENARIO A: Received an automatic Round 2 Payment on April 24

Step	Key Action	Additional Details/Specific Steps
1	Compare the total GD Payment received (i.e., Round 1 + Round 2) against the estimated GD payment	<ul style="list-style-type: none"> If the total exceeds the estimated amount, be sure you can justify the amount received (e.g., ensure lost revenue and increased expenses exceed the amount of funding received) In general, HHS does not intend to recoup payments so long as lost revenue and increased expenses exceed the amount received
<i>If GD Payment exceeds lost revenue and increased expenses, proceed to SCENARIO C</i>		
2	Confirm receipt and attest to Terms and Conditions at the PRF Attestation Portal	<p>You will have to:</p> <ul style="list-style-type: none"> Confirm payment information for TIN(s) receiving payments Attest to the relevant Terms and Conditions for the Round 1 Payment and the Round 2 Payment <p>Note:</p> <ul style="list-style-type: none"> The deadline has been extended from 30 days to 45 days after receipt of payment For example, if you received payment on April 10, the attestation deadline has been extended from May 9 to May 24
3	Provide revenue and tax information at the GD Portal	<p>You will have to:</p> <ul style="list-style-type: none"> Enter relevant billing TIN(s) (up to 20 TINs at a time) <ul style="list-style-type: none"> You may submit additional, separate requests for more TINs Verify payment information (i.e., payment amounts per TIN and account/check number) Authenticate and validate an email address Complete the required Application Information fields Submit appropriate federal tax return <ul style="list-style-type: none"> This should be the most recent form filed with the IRS (2017, 2018, or 2019) aligned with your Federal Tax Classification (above) Provide estimated lost revenue for March and April 2020 <ul style="list-style-type: none"> You may use a reasonable method of estimating the revenue in March and April compared to the same period had COVID-19 not occurred (e.g., if you have a budget that does not take into account the impact of COVID-19, the estimated lost revenue could be the difference between the budgeted and actual revenue) You may also compare the revenues to the same period in 2019

SCENARIO B: Did NOT receive an automatic Round 2 Payment on April 24

Step	Key Action	Additional Details/Specific Steps
1	Compare the payment received from the Round 1 against the estimated total GD Payment	<ul style="list-style-type: none"> If the total GD Payment exceeds the Round 1 Payment, you may be eligible for the Round 2 Payment Be sure you can justify the total GD Payment (e.g., ensure lost revenue and increased expenses exceed the amount of funding received) In general, HHS does not intend to recoup payments so long as lost revenue and increased expenses exceed the amount received
2a	If the estimated total GD Payment is less than the Round 1 Payment: <ul style="list-style-type: none"> STOP – Proceed to SCENARIO D 	<i>Because of open questions and uncertainties, there are additional considerations if the estimated total GD Payment is less than the sum of payments received.</i>
2b	If the estimated total GD Payment is more than the Round 1 Payment: <ul style="list-style-type: none"> Confirm receipt and attest to Terms and Conditions for the Round 1 Payment at the PRF Attestation Portal 	You will have to: <ul style="list-style-type: none"> Confirm payment information for TIN(s) receiving payments Attest to the relevant Terms and Conditions for the Round 1 Payment Notes: <ul style="list-style-type: none"> The deadline has been extended from 30 days to 45 days after receipt of payment For example, if you received payment on April 10, the attestation deadline has been extended from May 9 to May 24
3	Provide revenue and tax information at the GD Portal	See SCENARIO A, Step 3
4	Within 45 days of receiving the Round 2 Payment, confirm receipt and attest to Terms and Conditions at the PRF Attestation Portal	You will have to: <ul style="list-style-type: none"> Confirm payment information for TIN(s) receiving payments Attest to the relevant Terms and Conditions for the Round 2 Payment

SCENARIO C: Estimated GD Payment is more than lost revenues or increased expenses

Step	Key Action	Additional Details/Specific Steps
1	Compare the estimated total GD Payment against lost revenues or increased expenses	<ul style="list-style-type: none"> This will give you an estimated amount that should be returned (or may be subject to recoupment/could be owed back if not returned)
2	Return funds	<p>Current HHS guidance states: <i>If a provider believes it was overpaid or may have received a payment in error, it should reject the <u>entire</u> General Distribution payment and submit the appropriate revenue documents through the General Distribution portal to facilitate HHS determining their correct payment.</i></p> <p>Note: <i>providers may want to contact the CARES Provider Relief Hotline (866-569-3522) and/or consult with counsel for guidance prior to rejecting the entire GD Payment.</i></p> <p>Further:</p> <ul style="list-style-type: none"> You may return the GD Payment by going into the PRF Attestation Portal within 45 days of receiving payment and indicate why the funds are being rejected The PRF Attestation Portal is expected to guide you through the attestation process to reject funds <ul style="list-style-type: none"> Contact financial institution and ask the institution to refuse the payment by initiating an ACH return using the ACH return code of “R23 – Credit Entry Refused by Receiver” If payment is received via paper check, reject the payment in the PRF Attestation Portal and destroy the check (if not deposited) or mail a paper check to UHG with a notification of the request to return the funds
3	To receive the appropriate payment, provide revenue and tax information at the GD Portal	<p>See SCENARIO A, Step 3</p> <p>Current HHS guidance states: <i>If a provider believes it was overpaid or may have received a payment in error, it should reject the entire General Distribution payment and submit the appropriate revenue documents through the General Distribution portal to facilitate HHS determining their correct payment.</i></p>

SCENARIO D: Estimated GD Payment is less than Round 1 Payment

Step	Key Action	Additional Details/Specific Steps
1	Compare the estimated total GD Payment against Round 1 Payment	<ul style="list-style-type: none"> This will give you an estimated amount that may be subject to recoupment or that could be owed back
2	Compare Round 1 Payment against lost revenues or increased expenses	<ul style="list-style-type: none"> If lost revenues or increased expenses exceed Round 1 Payment, you may still be eligible to retain these funds HHS guidance states: <i>If a provider believes it was overpaid or may have received a payment in error, it should reject the entire General Distribution payment and submit the appropriate revenue documents through the General Distribution portal to facilitate HHS determining their correct payment.</i>
3a	If lost revenues or increased expenses are less than the Round 1 Payment: <ul style="list-style-type: none"> Return funds 	See SCENARIO C, Step 2
3b	If lost revenues or increased expenses are more than the Round 1 Payment: <ul style="list-style-type: none"> Confirm receipt and attest to Terms and Conditions for the Round 1 Payment at the PRF Attestation Portal 	See SCENARIO B, Step 2b
4a	If you do not complete Step 3b , you may still have to provide revenue and tax information at the GD Portal	<i>Current guidance is still unclear as to whether providers receiving Round 1 Payments are obligated to submit revenue information at the GD Portal. The Terms and Conditions for the Round 1 Payment do not require providers to submit revenue information, but the HHS GD FAQs leave this ambiguous.</i>
4b	If you complete Step 3b and believe you are still underpaid, you may apply for additional payments by providing revenue and tax information at the GD Portal	See SCENARIO A, Step 3 <i>According to HHS, if a provider believes they are underpaid, they should accept the payment and submit their revenues in the GD Portal to determine the correct payment.</i>

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