



COVID-19 FAQ

15. We have accepted the CARES Act funding, and the terms and conditions included a reporting requirement. What do we have to report to the government and when do we have to report it by?

Date Added: 06/19/20

Answer: The Terms and Conditions of the CARES Act provider stimulus payments include a requirement for those receiving more than \$150,000 in funding from the CARES Act and any other Act primarily making appropriations for the coronavirus response¹ to submit reports to the U.S. Department of Health & Human Services (“HHS”) and the Pandemic Response Accountability Committee (“PRAC”), within ten days of the end of each calendar quarter.² Since the first payments went out in April, that started the reporting clock ticking in quarter 2 of 2020, making the first report due on or before July 10, 2020.

However, on June 13, 2020, HHS released an FAQ stating that providers were not currently required to submit quarterly reports to HHS or PRAC as outlined in the CARES Act terms and conditions. However, the FAQ made clear that HHS will require providers who accepted the CARES Act, or other Provider Relief Fund, payments to submit reports to HHS at a later time.

While, as of the date above, HHS has not released precisely what the reporting requirements will be or if there will be some online reporting portal, one thing is clear; providers will be required to file some type of reports regarding funding they received from the CARES Act. The HHS OIG has also indicated that they will be reviewing data and reports to determine if funds were used appropriately. Therefore it is vital to track how you use CARES Act or other Provider Relief Fund payments, to ensure you can provide accurate information to the government when requested.

¹ This includes funds from the Coronavirus Preparedness and Response Supplemental Appropriations Act, the Families First Coronavirus Response Act.

² HHS has the authority to require reporting from providers who received less than \$150,000.