March 31, 2022

Carole Johnson Administrator Health Resources and Services Administration U.S. Department of Health and Human Services 5600 Fishers Lane Rockville, MD 20857

Re: Reopening the reporting Period 1 for Provider Relief Fund

Dear Administrator Johnson:

On behalf of our members, the American Medical Association (AMA) and the undersigned national medical specialty societies urge the Health Resources and Services Administration (HRSA) to reopen Reporting Period for at least 60 days to applicable Provider Relief Fund¹ (PRF) recipients who did not report through the HRSA PRF Reporting Portal by the November 30, 2021, deadline. A number of physician practices have reached out to us with their serious concerns about the Period 1 funding they received being recouped and have provided greater insight into the many reasons why reporting by the deadline did not occur. We offer greater insight into the challenges the physician practices face which have impeded their ability to comply with the deadline, but moreover, offer our assistance to work with HRSA in an effort to reach those who have yet to report.

Small and rural physician practices appear to be particularly impacted by the reporting deadline and the potential recoupment of funds. These practices, often under-resourced even while they provide critical health care services, cannot afford to have the funds they received recouped. During the late fall when the Delta variant was surging, these physician practices and others were greatly impacted by the COVID-19 surges in many ways that may have prevented or delayed the required reporting:

- Practices reported they were not contacted about the requirement to report and were thus unaware of the deadline;
- Medical and administrative staff contracted COVID-19 or were acting as a caregiver and, therefore, were out of off the office which caused them to miss the reporting deadline; and
- Staffing challenges and turnover resulted in the practice's point of contact no longer being affiliated with the practice.

We are hearing that the practices out of compliance simply did not know about the requirement to report. It is possible that the emails that HRSA sent did not reach a number of the recipients and a broader communications strategy will be needed to connect with physician practices. As we are very connected to our members, we would like to work with HRSA on best ways to identify and reach the remaining practices that have not reported to bring them into compliance. We ask that HRSA reopen the Period 1 reporting window for at least 60 days and engage in a targeted campaign to reach those who have yet to comply.

¹ Funds appropriated to reimburse eligible healthcare providers for healthcare related expenses or lost revenues attributable to coronavirus include the Coronavirus Aid, Relief, and Economic Security (CARES) Act (P.L. 116-136), the Paycheck Protection Program (PPP) and Health Care Enhancement Act (P.L. 116-139), and the Coronavirus Response and Relief Supplemental Appropriations (CRRSA) Act (Division M of P.L. 116-260), and are collectively distributed through the HRSA Provider Relief Fund.

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We stand ready to work together with HRSA on getting physician practices to report on Provider Relief Funding so they can retain the PRF funds they so desperately needed to stay afloat during the COVID-19 pandemic. We thank you for your consideration and are happy to discuss outreach strategies in greater detail with you. If you have any questions regarding this letter, please contact Margaret Garikes, Vice President of Federal Affairs, at <u>margaret.garikes@ama-assn.org</u> or 202-789-7409.

Sincerely,

American Medical Association AMDA-The Society for PALTC Medicine American Academy of Dermatology Association American Academy of Family Physicians American Academy of Otolaryngology- Head and Neck Surgery American Academy of Physical Medicine & Rehabilitation American Association of Neurological Surgeons American College of Cardiology American College of Emergency Physicians American College of Obstetricians and Gynecologists American College of Osteopathic Internists American College of Physicians American College of Rheumatology American College of Surgeons American Psychiatric Association American Society for Clinical Pathology American Society for Gastrointestinal Endoscopy American Society for Radiation Oncology American Society of Anesthesiologists American Society of Cataract and Refractive Surgery American Society of Retina Specialists American Urological Association Association for Clinical Oncology **College of American Pathologists** Congress of Neurological Surgeons **Endocrine Society** Heart Rhythm Society Medical Group Management Association **Renal Physicians Association** Society for Cardiovascular Angiography and Interventions Society of Interventional Radiology Spine Intervention Society