

# PRF Period 2 Reporting Deadline Approaches

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May 11, 2022

## **Recipients still have time to report Provider Relief Fund payments if they can prove extenuating circumstances.**

The deadline for requesting late Provider Relief Fund (PRF) reporting for Period 1 has passed. But you still have a chance for Period 2. If you're one of the thousands of providers who missed the Provider Relief Fund (PRF) reporting deadline for Period 2, you have until May 13 by 11:59 p.m. ET to submit a request to report late for Period 2 due to extenuating circumstances.

### **Get Caught Up**

Providers that received \$10,000 or more in aggregated General and Targeted Distribution PRF payments must report on the use of funds in accordance with HRSA PRF reporting requirements. Providers that fail to satisfy reporting requirements may be excluded from receiving or retaining future PRF payments, including applicable Phase 4 payments.

HRSA sent notifications to providers informing them of the "clawbacks" starting in early March. That's when the American Medical Association (AMA), the Medical Group Management Association, and 30 other physician-focused trade groups got involved, sending a March 31 letter to **HRSA Administrator Carole Johnson**.

"Small and rural physician practices appear to be particularly impacted by the reporting deadline and the potential recoupment of funds," the letter said. "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." challenges and turnover resulted in the practice's point of contact no longer being affiliated with the practice," the letter stressed.

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“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,” the AMA and other trade groups said in the letter.

Providers who experienced one or more extenuating circumstances that prevented them from submitting a completed PRF Report in Reporting Periods 1 and/or 2 by the deadline could submit a request to report late via the Request to Report Late Due to Extenuating Circumstances Form by April 22 at 11:59 pm ET. “The deadline for providers to submit a Request to Report Late Due to Extenuating Circumstances for Reporting Period 1 has now passed,” HRSA says on its [website](#). Providers will be notified about the status of their submitted request starting the week of May 9, the agency adds. But it’s not too late to report for Period 2.

## **HRSA Explains Further**

“Providers now have an opportunity to submit a [Request to Report Late Due to Extenuating Circumstances Form](#) for Reporting Period 2 before May 13, 2022 at 11:59 p.m.,” HRSA explains.

“Submission of a Request to Report Late Due to Extenuating Circumstances does not guarantee the request will be approved or that a provider will be allowed to enter the PRF Reporting Portal to complete and submit a report,” HRSA cautions.

To qualify for the late reporting option, providers must have experienced one of six specified extenuating circumstances.

## **Which PRF Reporting Exception Do You Qualify For?**

When requesting late reporting for Period 2 of PRF payments, it won’t be enough to just say you missed the deadline — you’ll need a valid reason why.

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Extenuating circumstances, as listed by the federal HRSA, are:

- 1. Severe illness or death:** a severe medical condition or death of a provider or key staff member responsible for reporting hindered the organization's ability to complete the report during the Reporting Period.
- 2. Impacted by natural disaster:** a natural disaster occurred during or in close proximity of the end of the Reporting Period damaging the organization's records or information technology.
- 3. Lack of receipt of reporting communications:** an incorrect email or mailing address on file with HRSA prevented the organization from receiving instructions prior to the Reporting Period deadline.
- 4. Failure to click "Submit":** the organization registered and prepared a report in the PRF Reporting Portal but failed to take the final step to click "Submit" prior to deadline.
- 5. Internal miscommunication or error:** internal miscommunication or error regarding the individual who was authorized and expected to submit the report on behalf of the organization and/or the registered point of contact in the PRF Reporting Portal.
- 6. Incomplete Targeted Distribution payments:** the organization's parent entity completed all General Distribution payments, but a Targeted Distribution(s) was not reported on by the subsidiary.

The HRSA [Provider Relief Fund Reporting Requirements and Auditing](#) webpage provides full details and steps for reporting.

The deadline to use funds for payment received in Period 3 is June 30, HRSA says on its website. Reporting for Period 3 begins July 1. The PRF Reporting Portal will open July 1 and close Sept. 30 at 11:59 p.m. ET.

**References-HRSA website, AAPC**