

April 15, 2022: Advocacy Update spotlight on PRF requests for late reporting

Reminder: Provider Relief Fund requests for late reporting due by April 22

In response to AMA and specialty society advocacy (PDF), the Health Resources and Services Administration (HRSA) has decided to reopen the reporting time for recipients of Period 1 Provider Relief Funds. HRSA informed the AMA that 16,000 recipients have not completed the Period 1 reporting.

Physicians who received more than \$10,000 in provider relief funds and failed to submit their Period 1 report should act immediately. Between Monday, April 11 and Friday, April 22, 2022, at 11:59 p.m. Eastern, providers who have not submitted their Period 1 report may submit a Request to Report Late form. Physician practices should receive information about how to submit a request directly from HRSA via email. If a provider did not submit a Period 1 report and does not hear from HRSA, the provider may initiate communication by calling (866) 569-3522.

During this reopening period, a provider must choose an extenuating circumstance(s) that prevented compliance with the original reporting deadline. HRSA has released the following as allowable extenuating circumstances:

- 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.
- 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.
- 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.
- 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.

- 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.
- 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.

While attesting to an extenuating circumstance is required, no supporting document or proof is required. If HRSA approves the Request to Report Late form, the provider will receive a notification to proceed with completing the Reporting Period 1 report shortly thereafter. Providers will have 10 days from the notification receipt date to submit the late Period 1 report in the PRF reporting portal. Learn more. The AMA will continue to advocate for greater flexibility and more information to ensure physician practices have an adequate opportunity to come into compliance.

The AMA has developed a resource (PDF) on the late reporting workflow to guide physicians through this process. Additionally, visit the AMA website for more information.

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