

SOURCES OF FINANCIAL SUPPORT FOR HEALTH CARE PROVIDERS DURING THE COVID-19 PANDEMIC AUGUST 18, 2020

	ELIGIBILITY	AVAILABLE FINANCIAL SUPPORT	ACTION
PROVISIONS RELATING TO CMS	FUNDING (INCLUDING FEMA FUNDING AND MEDICARE REIMBURSEMENT)		
PUBLIC HEALTH AND SOCIAL SERVICES FUND ("PROVIDER RELIEF FUND")	 Facilities and providers that received Medicare FFS reimbursements in 2019. Includes hospitals and physician practice groups. Payments made to providers according to TIN. 	 Total fund is \$175 billion (\$100 billion under CARES Act + \$75 billion under Paycheck Protection Program and Health Care Enhancement Act). <u>Phase 1</u> – General Distribution: Initial \$30 billion distributed to providers based on proportionate share of total Medicare FFS reimbursements in 2019; additional \$20 billion distributed to providers based on providers based on providers' share of 2018 net patient revenue for a total \$50 billion distribution, net of what they received in the initial distribution. <u>Phase 2</u> – General Distribution: \$15 billion to: (1) eligible providers that participate in Medicaid/CHIP programs or Medicare managed care plans; (2) dental providers; and (3) certain Medicare providers, including those who had a change in ownership in 2019 or 2020 or missed Phase 1 General Distribution payment equal to 2% of their total patient care revenue. <u>Certain Targeted Distributions</u> – \$22 billion to hospitals with high COVID-19 admissions through June 10; unspecified amount for treatment of the uninsured and \$1 billion for testing of uninsured; approximately \$11.3 billion to rural providers, specialty rural hospitals, urban hospitals with certain rural Medicare designations, and hospitals in small metropolitan areas; \$4.9 billion to SNFs; \$5 billion to nursing homes; \$500 million to the Indian Health Service; and approximately \$14.7 billion to safety net hospitals, acute care facilities, and children's hospitals. 	Attestation; Request Additional Payments
FEMA	 State, Territorial, Tribal, and local government entities and certain private nonprofit organizations. Includes private, nonprofit hospitals and related facilities, clinics, long-term care facilities, and outpatient facilities. 	• Determined pursuant to grant request coordinated at the state level. Costs must be directly tied to the performance of eligible work, documented, and reasonable in nature and amount (e.g., overtime labor for budgeted employees and straight-time and overtime labor for unbudgeted employees; backfill employee labor, call-back pay, night-time pay, weekend differential pay, and stand-by time; necessary equipment; and necessary supplies and materials).	Grant
ADVANCED AND ACCELERATED MEDICARE PAYMENTS	 Providers/suppliers that billed Medicare within 180 days prior to the request, are not in bankruptcy, are not under program integrity investigation, and do not have delinquent Medicare overpayments. UPDATE 4/26/20: Advance Payment Program suspended (Part B Suppliers); accelerated payments to hospitals under reevaluation. 	 100% of Medicare payment amount for 3-month period (6-month period for subsection (d) hospitals, children's hospitals, and certain cancer hospitals). 125% of Medicare payment amount for 6-month period for critical access hospitals (CAHs). Currently, payments must be repaid. Recoupment begins 120 days after payment. Repayment schedules vary based on provider type: subsection (d) hospitals, children's hospitals, certain cancer hospitals, and CAHs have 12-month repayment period, other providers have 210-day repayment period. [Legislation currently pending that would extend these timelines.] 	Submit Request
MEDICARE IPPS ADD-ON	Inpatient facilities with COVID-19 inpatients.	• For discharges of COVID-19 inpatients occurring during the period of the COVID-19 emergency, the weighting factor that applies to the DRG to which the discharge is assigned will automatically be increased by 20%.	Appropriate Coding
CLINICAL LAB TESTING	Providers enrolled in the Medicare program seeking reimbursement for diagnostic laboratory tests.	No reduction in Medicare reimbursement for clinical diagnostic laboratory tests for 2021, as compared to 2020 reimbursement.	None
SEQUESTRATION SUSPENSION	Providers enrolled in the Medicare program.	Elimination of the Medicare sequester, which otherwise would impose a 2% cut on all Medicare payments, from May 1 through Dec. 31, 2020.	None
EXPANDED TELEHEALTH REIMBURSEMENT	Providers enrolled in the Medicare program.	 Medicare reimbursement for telehealth services regardless of where the patient is located; regardless of where the provider is located; and across a variety of telecommunications devices that have audio and video capabilities, including smart phones. 	Appropriate Coding
FCC TELEHEALTH FUND	 Nonprofit and public eligible health care providers that fall within certain categories. Requires an eligibility determination from the Universal Service Administrative Company (USAC). UPDATE 6/25/20: FCC is no longer accepting applications, as demand for funds exceeds program funds. 	 Assists eligible health care providers in fully funding their telecommunications services, information services, and devices necessary to provide critical connected care services. FCC does not anticipate awarding more than \$1 million to any single applicant. 	Application
TREASURY LENDING FACILITIES			
PAYCHECK PROTECTION PROGRAM ("PPP")	 Generally for-profit business and nonprofit organizations, including religious organizations, in operation on February 15, 2020 that employ no more than 500 employees (taking into account affiliation rules). Special exception for faith-based organizations that may allow participation notwithstanding affiliation with larger system. 	 Lesser of (i) 2.5x average monthly payroll costs and (ii) \$10 million. 1% interest rate. Funds may be used for payroll costs, employee compensation and benefits, mortgage interest payments, rent, utility costs, and interest on any other debt obligations that were incurred before February 15, 2020. At least 60% of loan must be used for payroll costs to get full forgiveness. 	Application [Deadline expired 8/8/20]
MAIN STREET NEW LOAN FACILITY ("MSNLF")	 Businesses established prior to March 13, 2020 with ≤ 15,000 employees OR ≤ \$5 billion in 2019 annual revenue. Can only participate in one of MSNLF, MSELF, or MSPLF. 	 Minimum loan size of \$500,000. Maximum loan size is lesser of (i) \$25 million or (ii) an amount that, when added to Borrower's existing debt (assuming all commitments are fully drawn), does not exceed 4x Borrower's 2019 adjusted EBITDA. 	Application
MAIN STREET EXPANDED LOAN FACILITY ("MSELF")	 Requires existing secured or unsecured term loan from the Lender that was originated after 4/24/20. MSELF requires an incremental term loan from Lender to an existing credit facility (either term loan or revolver) that originated prior to 4/24/20 and has a remaining maturity of at least 18 months. Nonprofit organizations are ineligible under MSNLF, MSELF, and MSPLF, as credit risk of nonprofit 	 Minimum loan size of \$10 million. Maximum loan size is least of (i) \$200 million, (ii) 35% of Borrower's existing debt ranking at least pari passu with the Eligible Loan and having an equivalent security status (i.e., secured or not) (assuming all commitments are fully drawn), or (iii) an amount that, when added to Borrower's existing debt (assuming all commitments are fully drawn), does not exceed 6x Borrower's 2019 adjusted EBITDA. 	Application
MAIN STREET PRIORITY LOAN FACILITY ("MSPLF")	organizations is generally not evaluated on the basis of EBITDA. See NONLF and NOELF below about loan facilities available to nonprofit organizations.	 Minimum loan size of \$500,000. Maximum loan size is lesser of (i) \$25 million or (ii) an amount that, when added to Borrower's existing debt (assuming all commitments are fully drawn), does not exceed 6x Borrower's 2019 adjusted EBITDA. 	Application
NONPROFIT ORGANIZATION NEW LOAN FACILITY ("NONLF")	 Nonprofit organizations that have been in continuous operation since January 1, 2015 with ≤ 15,000 employees OR ≤ \$5 billion in 2019 annual revenue; must have a minimum of 10 employees. 	 Minimum Ioan size of \$250,000. Maximum Ioan size is lesser of (i) \$35 million, or (ii) Borrower's average 2019 quarterly revenue. 	Application
NONPROFIT ORGANIZATION EXPANDED LOAN FACILITY ("NOELF")	 Endowment of less than \$3 billion; total non-donation revenues equal to or greater than 60% of expenses for the period from 2017 through 2019. 2019 operating margin of 2% or more; current days cash on hand 60 days. Current debt repayment capacity—ratio of cash, investments and other resources to outstanding debt and certain other liabilities—of greater than 55%. 	 Minimum loan size of \$10 million. Maximum loan size is lesser of \$300 million, or (ii) Borrower's average 2019 quarterly revenue. 	Application
ECONOMIC INJURY DISASTER LOANS	 Includes: (i) small business concerns as identified under the SBA's size standards; (ii) private nonprofit organizations; (iii) any business, cooperative, Employee Stock Ownership Plan, or tribal small business concern, with not more than 500 employees; and (iv) any individual who operates under a sole proprietorship, with or without employees, or as an independent contractor. 	 Up to \$2 million with \$10,000 advance available within 3 days of application. However, SBA currently limiting EIDLs to \$150,000. 30-year loan term (deferred for first 6 months); 3.75% interest rate for small businesses and 2.75% interest rate for nonprofits. Funds may be used to maintain payroll to retain employees and provide paid leave, make rent or mortgage payments, meet increased costs to obtain materials unavailable from the applicant's original source due to interrupted supply chains, and repay obligations that cannot be met due to revenue losses. 	Application
TAX PROVISIONS			
EMPLOYEE RETENTION TAX CREDIT	• Private employers, including tax-exempt organizations, that experience a full or partial suspension of the operation of their business due to COVID-19 or a significant decline in gross receipts.	• Fully refundable credit against the employer portion of Social Security tax (6.2% of wages). The credit is equal to 50% of qualified wages, up to a maximum of \$5000 of credit per employee.	Claim through IRS process
EMPLOYER SHARE OF SOCIAL SECURITY TAX	All employers except those that receive a loan under the PPP that is forgiven.	Deferral of payment of the employer portion of Social Security tax (6.2% tax) that would be payable with respect to wages paid from March 27, 2020 through December 31, 2020.	Claim through IRS process
CHARITABLE CONTRIBUTION DEDUCTIONS	No eligibility requirements.	• Full deduction of cash charitable contributions made in 2020. Absent the change, the deduction for such contributions would be limited to 60% of AGI.	Development