Health Resources and Services Administration

## PUBLIC COMMENTS REMEDIATIONS COVID-19 Provider Relief Fund (PRF) Reporting Activities OMB No. 0906-0068-Revision

The Health Resources and Services Administration (HRSA) is submitting an explanation of remediations to issues raised previously in the 2022 package that has been fixed with the latest revisions in the 2023 package. Details on the remediation enhancements are provided in the "PRF Reporting Activities 6 PRF Portal Enhancements" document and included in the tables listed below.

## PRF Reporting Activities - 6 PRF Port



## PRF Reporting

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Date From Received	Organization	Inquiry/ Comment	Response	Remediation			
07/26/2021 Claire Ernst, Director Government Affairs	Medical Group Management Association	I'm writing to inquire further about the COVID-19 Provider Relief Fund Reporting Activities ICR. Specifically, I would like clarification on whether the "total estimated annualized burden hours" table represents total burden hours for PRF recipients or for HRSA staff? The notice states that HRSA is seeking comments from the public regarding the burden estimate, but it is unclear who these questions are geared towards. Any input is appreciated. You can also call me at (410) 7075524. Thanks!	Thank you for your inquiry regarding the COVID–19 Provider Relief Fund Reporting Activities Federal Register Notice. The "total estimated annualized burden hours" table represents total average burden hours for Provider Relief Fund (PRF) recipients (providers).	Addressed in previous response, in addition updated, data, portal e			
08/12/2021 Taylor Salmon, Manager Assurance Services	Ernst & Young LLP	<ul> <li>Pursuant to Public Comment Request and Information Collection Request "COVID-19</li> <li>Provider Relief Fund Reporting Activities, OMB No. 0906- XXXX New", 1</li> <li>New", 1</li> <li>Nore information on the proposed project</li> <li>A copy of the data collection plans</li> <li>A copy of the draft instruments</li> <li>Comments and Questions</li> <li>What type of documentation is being requested? Is data outside of the PRF Reporting portal being requested?</li> <li>How will the information collected assist with conducting audits?</li> <li>3. Does the average burden per response (in hours) represent the amount of time HRSA will review each respondent's PRF Report? Does this include potentials audits?</li> <li>4. Will the information collected impact future PRF distributions for respondents?</li> <li>5. Will the information collected in the first PRF Reporting Portal period?</li> </ul>	<ul> <li>More information on the proposed project .</li> <li>The Provider Relief Fund supports American families, workers, and the heroic healthcare providers in the battle against the COVID-19 outbreak.</li> <li>HHS is distributing \$178 billion to hospitals and healthcare providers on the front lines of the coronavirus response.</li> <li>All recipients of Provider Relief Fund payments are required to comply with the reporting requirements described in the Terms and Conditions and specified in future directions issued by the HHS Secretary. The report mechanism, as written in the Federal Register Notice, is the mechanism for which HRSA will collect this information.</li> <li>A copy of the data collection plans Data collection plans are</li> <li>outlined in the June 11 Notice of Post-Payment Reporting Requirements at ht</li> </ul>	Addressed in previous response, in addition updated, data, portal e			

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				burden per response (in hours) represent the amount of time HRSA will review each respondent's PRF Report? Does this include potentials audits The average burden per response represents the amount of time Provider Relief Fund recipients will need to complete and submit the report as required by the Terms and Conditions. These numbers take into account the amount of PRF funding received, hours required by size of funding and number of providers estimated to report by reporting period. 4. Will the information collected impact future PRF distributions for respondents? At this time, we do not have information to share regarding any future PRF distributions. 5. Will the information collected in the first PRF Reporting Portal period be used or saved for the respondents' second PRF Reporting period? HRSA is currently assessing and developing the report portal for the second PRF reporting period. Where possible, we will consider your suggestion to save previously entered provider data in the portal.	
08/18/2021		Physicians	Attached please find comments from the American Academy of Family Physicians in response to the information collection on COVID-19 Provider Relief Fund Reporting Activities (OMB No. 0906-XXXX New). We appreciate the opportunity to provide feedback on family physicians' experience with PRF reporting requirements. Please don't hesitate to contact me if you have any questions or would like to discuss this letter further. AAFP Letter to HRSA on PRF Reporting Bur AFP Letter to HRSA on PRF Reporting Bur On PRF Reporting Bun	<ul> <li>Thank you for your feedback regarding the COVID-19 Provider Relief Fund Reporting Activities as published in the Federal Register on July 26, 2021. HRSA seeks to be as helpful as possible in supporting providers as they complete their reporting obligations. We will continue to share resources and additional guidance as they become available.</li> <li>You raise a number of important considerations and suggestions related to the reporting requirements, burden, resources, and customer support. At this time we are actively reviewing these considerations as we refine our reporting strategy and plans for additional guidance and resources.</li> <li>Specifically, you asked for clarity on the term "due to COVID". The PRF, has disbursed funds to eligible health care providers to support health care- related expenses or lost revenues attributable to the COVID-19 pandemic. Included below is an updated Frequently Asked Question (FAQs) that may be helpful to reference.</li> <li>How does a Reporting Entity determine whether an expense is eligible for reimbursement through the Provider relief Fund? (Modified 7/1/2021)</li> <li>To be considered an allowable expense under the PRF, the expense must be u</li> </ul>	

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09/03/2021 Dawn Ksepka, Vice President of Finance and System Controller	Fairview Health Services	In response to the HRSA request for comment https://public- inspection.federa lregister.gov/202 1-15885.pdf regarding the estimated burden for submitting information through the PRF Reporting Portal, please find our response. HRSA specifically requests comments on: 1. The necessity and utility of the proposed information collection; 2. The accuracy of the estimated burden; 3. Ways to enhance quality, utility, and clarity of the information collected; and 4. The use of automated collection techniques or other forms of information technology to minimize the information collection burden. Fairview Health Services has prepared the following	Thank you for your comments on the COVID-19 Provider Relief Fund (PRF) reporting activities as requested in the Federal Register on July 26, 2021. As we continue navigating this pandemic, the Health Resources and Services Administration (HRSA) appreciates opportunities for greater transparency and proactive communication about the PRF. You raise a number of important considerations and suggestions related to the reporting requirements, data collection, and system functionality. At this time we are actively reviewing these considerations as we refine our reporting strategy and plans for additional guidance and resources. Regarding your concern on the estimated burden hours, the average burden per response represents the amount of time Provider Relief Fund recipients will need to complete and submit the report as required by the Terms and Conditions. These calculations take into account averages in the amounts of PRF funding received, hours required by size of funding, and the number of providers estimated to report by reporting period. We appreciate	
		information in response to your request for comment on COVID-19 Provider Relief Fund Reporting Activities, OMB No. 0906-XXXX New. 1.) The data request would be significantly simplified by the following: a.) Information could be presented for the health system instead of entities receiving target funds being required to report, even if those funds are transferred to the Parent entity. Under the current requirements, Fairview Health Services was required to submit 7 registrations and will submit 13 reports over the three required reporting periods. b.) Expenses were not required to be reported before lost revenue when lost revenue alone would be sufficient to		
		support utilization of the grant award. c.) Lost revenue reporting would be significantly simplified if it did not require reporting by payor category. This information is not available out of our accounting system and requires data to be extracted and combined from a variety of revenue cycle billing systems. 2.) Fairview Health Services was required to submit 7 registrations and will submit 13 reports over the three required reporting periods. We estimate that the average response per report will be 40 hours for a total reporting burden to our Health System of 520 hours. 3.) Ways to enhance the quality, utility and clarity of the information collected a. Personnel information should not		
		require inclusion of contractor resources which are not included in our human resources subsystem and cannot be easily combined with employee data b. Interest rate calculation should occur at the end of the process after the utilization of funds are reported c. Calculation within the portal included funds that were transferred from other registrations 4.) The registration process and portal are easy to utilize but could be enhanced by the following a.) Ability to move forward, backward, and save information entered without submitted all required information		
09/15/2021 Jenna Stern, Sr Regulatory Affairs & Public Policy Director	Vizient	40064). I am	Thank you for contacting the Provider Relief Fund. In response to your email, data collection plans are outlined in the June 11 Notice of Post- Payment Reporting Requirements. There are various resources available online that summarizes and thoroughly describes the report instrument. They can be found at prfreporting.hrsa.gov under the resources section.	Addressed in previous response, in addition updated, data, portal é

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09/21/2021	Jennifer Nading Director, Medicare and Medicaid Policy and Regulatory Affairs	Trinity Health	Trinity Health appreciates the support the Department of Health and Human Services and the Health Resources and Services Administration have provided to hospitals and physicians who are addressing the COVID-19 pandemic. Attached are comments on the questions posed by HRSA, please let me know if you have any questions. TRINITY Health COVID1	Thank you for your comments on the COVID-19 Provider Relief Fund (PRF) reporting activities as requested in the Federal Register on July 26, 2021. As we continue navigating this pandemic, the Health Resources and Services Administration (HRSA) appreciates opportunities for greater transparency and proactive communication about the PRF. You raise a number of important considerations and suggestions related to the reporting requirements, data collection, and system functionality. At this time we are actively reviewing these considerations as we refine our reporting strategy and plans for additional guidance and resources. As we continue to evaluate feedback from you and other stakeholders to inform our ability to administer the PRF in a manner that bolsters the health care syst	
09/22/2021	Alexandra Donnelly, MPH Health Policy Advisor Center for Health Policy & Health Services Research	Henry Ford Health System	On behalf of the Henry Ford Health System, I want to thank you for the opportunity to comment on "COVID-19 Provider Relief Fund Reporting Activities, OMB No. 0906- XXXX New." This letter is submitted on behalf of James Douglas Clark, Senior Vice President of Corporate Financial Services at Henry Ford Health System. Questions or comments for Mr. Clark can be sent to Alexandra Donnelly, at adonnel I@hfhs. org. Henry Ford Health System Comment Lett	Thank you for your comments on the COVID-19 Provider Relief Fund (PRF) reporting activities as requested in the Federal Register on July 26, 2021. As we continue navigating this pandemic, the Health Resources and Services Administration (HRSA) appreciates opportunities for greater transparency and proactive communication about the PRF. You raise a number of important considerations and suggestions related to the reporting requirements and data collection. At this time we are actively reviewing these considerations as we refine our reporting strategy and plans for additional guidance and resources. Regarding your concern on the estimated burden hours, the average burden per response represents the amount of time Provide	
09/23/2021	Chad Mulvany Vice President, Federal Policy	California Hospital Association	Please find the attached comments submitted on behalf of the California Hospital Association (CHA) in response to the request for information on the burden associated with (COVID-19 Provider Relief Fund (PRF) reporting. CHA appreciates the opportunity to offer comments on necessary clarifications to the PRF reporting instructions. If you have any questions, please do not hesitate to contact me at (202) 270-2143 or cmulvany@calh ospital.org. CHA HRSA Reporting Requirements RFI Co	Thank you for your comments on the COVID-19 Provider Relief Fund (PRF) reporting activities as requested in the Federal Register on July 26, 2021. As we continue navigating this pandemic, the Health Resources and Services Administration (HRSA) appreciates opportunities for greater transparency and proactive communication about the PRF. You raise a number of important considerations and suggestions related to the reporting requirements, data collection, provider burden, and system functionality. At this time we are actively reviewing these considerations as we refine our reporting strategy and plans for additional guidance and resources. Regarding your concern on the estimated burden hours, the average burden per response represents the amount of time Provider Relief Fund recipients will need to complete and submit the report as required by the Terms and Conditions.	

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				period. We appreciate your feedback and will continue to assess the burden o	
09/24/2021	Candice Dailey American Hospital Association, Policy Dept.		Please see attached letter from the American Hospital Association Re: Agency Information Collection Activities: Proposed Collection: Public Comment Request; Information Collection Request Title: COVID-19 Provider Relief Fund Reporting Activities, OMB No. 0906– XXXX New (Vol. 86, No. 140), July 26, 2021. 2021-09-24-LTR-HRS APRFPRA.pdf	Thank you for your comments on the COVID-19 Provider Relief Fund (PRF) A	ddressed in previous response, in addition updated, data, portal e
09/24/2021	Anthony Curry, Director, Federal Government Affairs		Attached please find Advocate Aurora Health's comments in response to the Health Resources and Services and Administration's request for comments on the COVID-10 Provider Relief Fund Reporting Activities. We appreciate the agency's consideration of our comments. AAH HRSA 86 FR 40064.pdf	and information on opportunities for future funding. Thank you for your comments on the COVID-19 Provider Relief Fund (PRF) Areporting activities as requested in the Federal Register on July 26, 2021. As we continue navigating this pandemic, the Health Resources and Services Administration (HRSA) appreciates opportunities for greater transparency and proactive communication about the PRF. You raise a number of important considerations and suggestions related to the	ddressed in previous response, in addition updated, data, portal e
	Jenna Stem Sr Regulatory Affairs & Public Policy Director		Please accept the following comments regarding HRSA's notice, "Agency Information Collection Activities: Proposed Collection: Public Comment Request;	Thank you for your comments on the COVID-19 Provider Relief Fund (PRF) Ar reporting activities as requested in the Federal Register on July 26, 2021. As we continue navigating this pandemic, the Health Resources and Services Administration (HRSA) appreciates opportunities for greater	ddressed in previous response, in addition updated, data, portal e

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			Information Collection Request Title: COVID-19 Provider Relief Fund Reporting Activities, OMB No. 0906- XXXX New". HRSA PRF Comments 9 17 FINAL.pdf HRSA PRF Comments 9 17 FINAL.pdf	transparency and proactive communication about the PRF. You raise a number of important considerations related to the reporting requirements and data collection. At this time we are actively reviewing these considerations as we refine our reporting strategy and plans for additional guidance and resources. Regarding your concern on the estimated burden hours, the average burden per response represents the amount of time Provider Relief Fund recipients will need to complete and submit the report as required by the Terms and Conditions. These calculations take into account averages in the amounts of PRF funding received, hours required by size of funding, and the number of providers estimated to report by reporting period. We appreciate your feedback and will continue to assess the burden on providers, including with any future distributions, and where possible, streamline the reporting portal and eliminate any unnecessary burden. As we continue to evaluate our processes and resources, feedback from you and other stakeholders informs our ability to administer the	
				PRF in a manner that bolsters the health care system and helps providers expe	
09/24/2021 Erin O'Malley	r, Senior Director of Policy	America's Essential Hospitals	on the Health Resources and Services Administration's proposed information collection request on Provider Relief Fund reporting activities. Thank you for your consideration of these comments. Please do not hesitate to contact me with any questions.	Thank you for your comments on the COVID-19 Provider Relief Fund (PRF) reporting activities as requested in the Federal Register on July 26, 2021. As we continue navigating this pandemic, the Health Resources and Services Administration (HRSA) appreciates opportunities for greater transparency and proactive communication about the PRF. You raise a number of important considerations and suggestions related to the reporting requirements, data collection, and system functionality. At this time we are actively reviewing these considerations as we refine our reporting strategy and plans for additional guidance and resources. Regarding your concern on the estimated burden hours, the average burden per	
11/08/2021 Kara Webb, C	hief Strategy Officer	American Optometric Association	Attached are comments on the HRSA submission to OMB for Review and Approval: COVID-19 Provider Relief Fund (PRF) Reporting Activities. Thank you for the opportunity to provide comment. HRSA PRF Burden Estimate.pd	Thank you for your comments on the COVID-19 Provider Relief Fund (PRF) reporting activities as requested in the Federal Register on July 26, 2021. As we continue navigating this pandemic, the Health Resources and Services Administration (HRSA) appreciates opportunities for greater transparency and proactive fcommunication about the PRF. Regarding your feedback on the estimated burden hours, the average burden per response represents the amount of time Provider Relief Fund recipients will need to complete and submit the report as required by the Terms and Conditions. These calculations take into account averages in the amounts of PRF funding received, hours required by size of funding, and the number of providers estimated to report by reporting period. We appreciate your feedback and will continue to assess the	Addressed in previous response, in addition updated, data, portal e

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			burden on providers and where possible, streamline the reporting portal and el	
11/19/2021 Daniel Samson, Director of Government Relations	Argentum	<ol> <li>Extend the Period 2 reportin g deadline: :HRSA underest imates the time burden of complyi ng with PRF reportin g requirem ents. Further, many assisted living commun ities are still very much engaged in the same COVID- 19 safety protocol. Given this ongoing burden, the organiza tion is asking for an extension to the reportin g deadline for Period 2, to allow     </li> </ol>	Thank you for your comments on the COVID-19 Provider Relief Fund (PRF) reporting activities as requested in the Federal Register on July 26, 2021. As we continue navigating this pandemic, the Health Resources and Services Administration (HRSA) appreciates opportunities for greater transparency and proactive communication about the PRF. Regarding your feedback on the estimated burden hours, the average burden per response represents the amount of time Provider Relief Fund recipients will need to complete and submit the report as required by the Terms and Conditions. These calculations take into account averages in the amounts of PRF funding received, hours required by size of funding, and the number of providers estimated to report by reporting period. We appreciate your feedback and will continue to assess the burden on providers and where possible, streamline the reporting portal and eliminate any unnecessary burden. You raise a number of important considerations and suggestions related to the Provider Relief Fund program, reporting requirements, data collection, and ongoing	
		Argentum_HRSA_86 FR58079_Nov2021_Cr	funding strategies. At this time we are actively reviewing these considerations	
11/19/2021 Laura Spadaro, Vice President of Primary Care and Public Health Policy	Center for Graduate Medical Education	<ol> <li>Confirm s the necessit y and utility of the propose d informat ion collection for proper perform ance of the agency's function s.</li> <li>Confirm s the accuracy of the estimate d burden.</li> <li>Provides a suggestion to enhance the quality, utility, and clarity of the informat ion collection.</li> <li>Appreci ation for HRSA's commit ment and interest in explorin g</li> </ol>	Thank you for your comments on the COVID-19 Provider Relief Fund (PRF)	Addressed in previous response, in addition updated, data, portal e

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			methods to automat e the informat ion collectio n.	reporting requirements, frequently asked questions, and opportunities for future funding. Thank you, Provider Relief Fund	

	Public Comments to FRN (2022 Package)							
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04/28/2022	Carrie Cochran - McClain	National Rural Health Association	I'm writing regarding the following FR notice about the PRF information collection request, https://www.federalre gister.gov/documents /2022/04/07/2022- 07408/agency- information- collection-activities- proposed-collection- public-comment-request-covid-19 I'd like to received a copy of the proposed information collection document revisions to review. Please let me know if you need any additional information. Appreciate the consideration.	Thank you for your email. Please see the information provided below.All reci	Addressed in previous response, in addition updated, data, portal e			
				Various resources are available online that outline and thoroughly describe the reporting instrument. Resources are located under the resources section of the PRF Website at https://www.hrsa.gov/provi der-relief/reporting- auditing/reporting- resources. Please visit HHS's PRF webpage at https://www.hrsa.gov/provi der-relief/ for frequently updated information, including reporting requirements, frequently asked questions, and opportunities for future funding. If you have any further questions, please reach out to Sharon Loper, Director of the Customer Support Division, at SLoper@hrsa.gov.				