



June 2, 2020

The Honorable Alex Azar  
Secretary  
U.S. Department of Health and Human Services  
200 Independence Avenue, SW  
Washington, DC 20201

**Subject: Provider Relief Funds**

Dear Secretary Azar,

On behalf of our member physician group practices, the Medical Group Management Association (MGMA) urges you to establish a mechanism to expeditiously disburse unallocated stimulus relief funds provided by Congress to the Department of Health and Human Services' (HHS) Provider Relief Fund to help group practices fight the COVID-19 pandemic.

The Coronavirus Aid, Relief, and Economic Security (CARES) Act appropriated \$100 billion in relief for providers and the Paycheck Protection Program and Health Care Enhancement Act appropriated an additional \$75 billion for the CARES Act Provider Relief Fund.

**\$50 Billion General Distribution**

MGMA sincerely appreciates the Administration's quick efforts to automatically distribute the initial \$30 billion in grants and continued work to deliver the \$20 billion remaining in the \$50 billion General Distribution. To receive funds from the \$20 billion distribution, eligible group practices must submit certain revenue information to HHS via an application portal between April 24 and June 3.

We understand that HHS endeavored to deliver funds from the second (\$20 billion) tranche within 10 business days but encountered difficulties in meeting this self-imposed timeline. Group practices across the country, including those that applied on or around April 24 when the application portal first opened, report that are still awaiting disbursements and have not received clear guidance as to when, or if, they can expect to receive additional financial support. We appreciate that technical and other problems may arise when facilitating these payment disbursements but encourage HHS to allocate funds owed to providers that applied for the \$20 billion as quickly as possible.

**Additional Distributions**

In addition to the \$50 billion General Distribution, HHS has made targeted relief payments to high impact areas, rural providers, skilled nursing facilities (SNFs), and Indian Health Service facilities. HHS also states it has distributed over \$2 billion for claims submitted for COVID-19 testing and treatment for uninsured individuals. After these allocations, there is still around \$95 billion in unallocated funds.

HHS has not made clear how, or when, future Provider Relief Fund disbursements will be made. Our members continue to face financial hardships due to COVID-19 and confront difficult financial decisions. Economic relief efforts in support of physician practices remain essential to these practices' continued

operations and to the long-term health of our country. **Therefore, we urge HHS to quickly disburse unallocated funds and to consider the following recommendations when doing so.**

**MGMA strongly encourages HHS to provide additional Provider Relief funding to group practices, including disbursements that are not contingent upon Medicare enrollment.** While we appreciate HHS' work to distribute funds from a General Distribution to certain group practices, General Distributions have only supported Medicare-enrolled physicians, as billing Medicare in 2019 is a *sin qua non* of eligibility. The lack of financial relief funding for non-Medicare enrolled providers is challenging their ability to stay open and provide services to vulnerable patient populations. These practices face uncertainty as to when, if ever, they will receive financial relief.

**HHS should distribute a forthcoming wave of funds to group practices and include those that are not Medicare enrolled.** The Department could use a calculation that considers historical Medicaid, Medicare Advantage, and commercial payer revenue during a fixed, historical time period.

Lastly, MGMA appreciates that the initial distribution of \$30 billion did not entail a lengthy or complicated applications process and supports a process that deposits funds directly into providers' accounts. We believe HHS could make a similar rapid distribution while at the same time offering support to group practices that have been underrepresented in General Distribution and targeted relief distributions.

### **Conclusion**

There is a critical and immediate need to make relief available to all physician practices impacted by the pandemic, including practices who are not enrolled in Medicare. We appreciate HHS' hard work to date and thank you for your consideration of our recommendations. We look forward to continuing to work with you and the Administration to ensure that patients have continued access to care. Should you have any questions, please contact Mollie Gelburd at [mgelburd@mgma.org](mailto:mgelburd@mgma.org) or 202-293-3450.

Sincerely,

/s/

Anders Gilberg, MGA  
Senior Vice President, Government Affairs

