

# Health Care Provider Stabilization Grant Program: Post-Award Guidance

Document purpose and target audience: This guidance was developed to answer questions from grantee's accountants and auditors.

## General Questions

- 1. Are grantees to the Health Care Provider Stabilization Grant Program (HCS) beneficiaries or sub-recipients?**

The Vermont COVID-19 Financial Office (CFO) has classified HCS grantees as sub-recipients.

- 2. The expenditure period noted in the contracts is it March 1, 2020 to December 30, 2020 or through December 31, 2021 (per the US Treasury link on page 2). Which date is correct?**

The expenditure period for the HCS grants is March 1, 2020 through December 30, 2020.

*Additional Context:* The original end date for the federal CARES ACT funds was December 30, 2020. The federal CARES ACT was extended through the December 31, 2021 in late December of 2020. The federal extension was made after the State of Vermont had issued the grant awards; therefore, the State of Vermont's HCS grants still maintain the original end date. Currently, the State of Vermont is not considering amending the HCS grants to change the end dates.

- 3. What is the fund source for the various COVID-19 grants issued by the Agency of Human Services?**

The fund source for all AHS COVID-19 grants is the federal Coronavirus Relief Fund (CRF) CFDA #21.019. This includes the Health Care Provider Stabilization Grant Program and all earlier issued relief including, but not limited to:

- April Retainer Payment
- Sustained Monthly Payment (May, June, and/or July)
- Designated Agency and Specialized Service Agency Financial Relief
- Children's Integrated Services Financial Relief
- Nursing Home Extraordinary Financial Relief
- Private Non-Medicaid Institution (PNMI) Extraordinary Financial Relief

- 4. How can grantees meet the conditions of receipt for lost revenue?**

The lost revenue for all AHS COVID-19 Grants is earned and expended when the award was issued. The lost revenue was substantiated during the application process.

## 5. How should grantees prioritize funds?

Grantees must ensure there is no duplication of funds and that all conditions of receipt have been met. Grantees may choose to prioritize using AHS grants to cover all-payer revenue losses.

*Request:* If grantees believe that, through the combination of state and federal and other relief grants, they will have more funds than needed and will be returning funds, AHS requests that grantees return funds to AHS if possible. Funds returned to AHS may be repurposed to help other Vermont providers and keep the funds in Vermont.

### Questions Specific to the Sustained Monthly Payment Grants (SM)

#### 1. Were any Medicaid funds (General Funds and/or Federal Matching Funds) used in the awards?

No. All funds are from the federal Coronavirus Relief Fund (CRF) CFDA #21.019.

#### 2. Can the SM grants only be used for Medicaid revenue losses?

The SM grants may be used toward all payer revenue losses (such as commercial insurance, Medicare, etc.) if other sources do not cover those revenue losses.

#### 3. Can the SM grant funds be used for COVID-19-specific expenses?

Yes, the SM grants funds can be used for COVID-19-specific expenses if those expenses were incurred during the covered period (3/1/2020 – 12/30/2020) and were not covered by other sources. Grantees must retain records of SM funds directed to expenses and may be asked to report on the expenses in the future.

#### 4. The SM program guidance and Frequently Asked Questions noted that up to 10% could be subject to recoupment. What would trigger recoupment?

The AHS has waived the 10% recoupment for all providers that have signed the grant agreements.

#### 5. What if I did not sign the grant agreement in December, am I still able to sign?

Yes.