

# COVID-19 Telehealth Program Newsletter

*Tips and Reminders for Funding Recipients*

April 8, 2021

## **TIP OF THE MONTH:**

*Get Ready!* On December 27, 2020, the Consolidated Appropriations Act, 2021, provided the Commission additional funding for the COVID-19 Telehealth Program (Program). On March 30, 2021, the Commission released a Report and Order and Order on Reconsideration establishing requirements, processes, and procedures for Program funding appropriated under the Consolidated Appropriations Act (Round 2). For additional information on Round 2, visit the Universal Service Administrative Company's COVID-19 Telehealth Program webpage at <https://www.usac.org/about/covid-19-telehealth-program/>.

**REMINDERS:** You are ultimately responsible for ensuring your compliance with program rules, procedures, and requirements, including only seeking reimbursement for eligible items. Please read the Report and Order, FAQs, and Public Notices related to the COVID-19 Telehealth Program to ensure compliance. These documents are available here: <https://www.fcc.gov/covid-19-telehealth-program>. Additionally, please carefully review all correspondence from the COVID-19 Telehealth Program Team, which contains important tips and reminders to assist you during the invoicing process.

Funding awardees may not seek reimbursement under the COVID-19 Telehealth Program for eligible items/services for which they received or expect to receive other federal, state, or local funding. Moreover, we caution funding awardees that they may not seek duplicative reimbursements, i.e., may not seek payment for the same services and/or connected devices for which the COVID-19 Telehealth Program has already reimbursed.

## **TIPS FOR THE INVOICING PROCESS**

***We encourage you to submit your invoice submissions as soon as possible so that we can more efficiently administer the invoicing process.***

**Invoicing Deadline.** The invoicing deadline to submit your requests for reimbursement is **July 31, 2021**. You must file your requests for reimbursement on or before this date to receive reimbursement for eligible expenses provided to eligible health care providers under the COVID-19 Telehealth Program. The FCC will not accept original requests for reimbursement filed after the invoicing deadline. You may, however, resubmit requests for reimbursement in instances where your original request for reimbursement was submitted on or before July 31, 2021, but rejected on or after that date.

**You Must Purchase/Implement Eligible Items BEFORE Seeking Reimbursement.** You must certify that you have received services/equipment on your Request for Reimbursement Form, so you cannot seek reimbursement for items until they are received. A purchase order, vendor quote, or other similar documentation does not demonstrate payment for the services and/or connected devices; items in

“shipping” status that have not been received or backordered items are not considered as being “received.” If you purchased eligible devices that could not be delivered by December 31, 2020, these items must have been received before you seek reimbursement from the FCC. All eligible items must be purchased and/or implemented by December 31, 2020.

**Please Verify SAM Registration before Submitting your Request for Reimbursement.** If you have not yet received any COVID-19 Telehealth Program funds, please make sure that you have registered with the federal System for Award Management (SAM) and verified that your banking information is correct prior to submitting a request for reimbursement.

**Rejection Notifications without Explanatory Comments.** Funding recipients that have received a rejection notification *with no explanatory comments* should reach out to the FCC via the Telehealth Inbox ([TelehealthInvoicSupp@fcc.gov](mailto:TelehealthInvoicSupp@fcc.gov)) **before** resubmitting their requests for reimbursement. By reaching out to the FCC first, funding recipients can get more information about how to resubmit with the correct information and potentially avoid a further rejection notification.

## TIPS FOR PREPARING REQUEST(S) FOR REIMBURSEMENT

**Avoid Duplicate Payments.** As a reminder, funding awardees may not seek reimbursement under the COVID-19 Telehealth Program for eligible items/services for which they received or expect to receive other federal, state, or local funding. Moreover, funding awardees may not seek duplicative reimbursements, i.e., may not seek payment for the same services and/or connected devices for which the COVID-19 Telehealth Program has already reimbursed. The Request for Reimbursement Form currently requires funding awardees to certify as follows: "I certify under penalty of perjury that the health care provider(s) listed in this form, to the best of my knowledge, is not already receiving or expecting to receive other funding (from any source, private, state, or federal) for the exact same services or devices eligible for support under the COVID-19 Telehealth Program."

**Provide Invoices that Support the Eligible Expenses Listed on the Request for Reimbursement Form.** You must submit invoice documentation from your vendor or service provider to support each line item on the Request for Reimbursement Form. A Request for Reimbursement Form will not be approved if your invoices do not support the eligible expenses listed on the Request for Reimbursement Form.

**Make Sure Total Amounts Match.** Ensure that the total amount for reimbursement entered in the U.S. Department of the Treasury’s Bureau of the Fiscal Service Invoice Processing Platform (IPP) matches the total amount on the Request for Reimbursement Form.

**Clearly Label Invoice Submissions.** To help the invoice review team more easily identify specific submissions, especially the instances where there are numerous submissions and/or some submissions have been resubmitted, please label each invoice with your Funding Commitment Number (located on your Funding Commitment Letter) followed by a sequential 4-digit number. For example, for your first invoice submission, name it “CAO-[insert Funding Commitment Number]-001,” for your second invoice submission, name it ‘CAO-[insert Funding Commitment Number]-002, etc. If you need to resubmit an invoice submission, please append “-R1”, “-R2,” etc., to the document name.

**Only Expense for Eligible Items.** If your invoices list both eligible and ineligible items, you should only request reimbursement for the costs of the eligible items (including any taxes and shipping costs attributed to eligible items). The FCC cannot adjust the amounts you request in IPP or on your Request for

Reimbursement Form, so be sure to review your invoices before filing out the requested amount. If you have put the incorrect amount in either IPP or on the Request for Reimbursement, you will need to cancel and resubmit that invoice submission.

**Letter of Authorization.** If your Funding Commitment Letter includes multiple health care provider sites (this includes multiple sites operated by the same health care provider or umbrella organization), you must attach a Letter of Authorization in IPP with your Request for Reimbursement Form and other supporting documentation. A sample Letter of Authorization is available on the FCC's website at: <https://us-fcc.app.box.com/v/LetterOfAuthorization>. The Letter of Authorization is required even if the sites listed in your Funding Commitment Letter are part of the same health system or organization. Once submitted for all health care provider sites for a given funding commitment, you do not need to submit the Letter of Authorization again. If you have received more than one funding commitment, a Letter of Authorization must be filed for each funding commitment.

**Sign and Complete all Certifications on Request for Reimbursement Form.** You must sign and complete all certifications in order for us to process your invoice submission. The current form is available here: <https://www.fcc.gov/sites/default/files/covid-19-telehealth-request-for-reimbursement-form.pdf>.

## **GUIDANCE ON ELIGIBLE SERVICES**

For additional information on eligible services, please review the FCC's FAQs, available here: <https://www.fcc.gov/covid-19-telehealth-program-frequently-asked-questions-faqs>.

### **Examples of Items Ineligible For COVID-19 Telehealth Program Support:**

- Services or devices purchased or implemented prior to March 13, 2020 or after December 31, 2020 (**NOTE:** items purchased on or before December 31, 2020 are eligible for reimbursement even if they have not been delivered by December 31, 2020; but, as noted above, you may not seek reimbursement for services or connected devices until after they have been implemented or received).
- Administrative costs, e.g., personnel expenses, consultant fees, payroll, training, customer service, project management, records management, and doctor's costs, etc.
- Back-up power equipment, e.g., back-up batteries, redundant power cords, Uninterruptible Power Supply (UPS), and surge protectors, etc.
- Separate costs for non-connected items, e.g., cases, mouse pads, cable clips, laptop bags, tablet stands, and charging stations, etc.
- Non-connected medical devices or supplies, e.g., non-connected digital thermometers, testing strips, lancets, disposable covers, and personal protective equipment, etc.
- Smart watches and fitness trackers.
- Non-telehealth items, e.g., office furniture and supplies, security systems, incidental expenses, etc.
- Construction costs, e.g., fiber, ethernet, cable network build out, facility alterations, and temporary site location structures, etc.
- Technical support, maintenance costs, warranties, support services, and protection plans. If the description on the invoice documentation uses this terminology and the expense is for more than just these costs, please provide a detailed description on the Request for Reimbursement Form or attach a separate statement with your invoice submission in IPP so that we can better determine eligibility of items sought for reimbursement.
- Carts or stands that will only be used as a workstation or desk on wheels are not eligible for support. These costs should not be included on the Request for Reimbursement Form or the request will be rejected and will need to be resubmitted excluding these costs to receive reimbursement.

Telemedicine carts are eligible for support, whether bought ready-to-use from a vendor or bought piecemeal from various vendors. If you are requesting support to build your own telemedicine cart, please let us know that you are seeking to build your own telemedicine cart(s) as part of your invoice submission.

**Recurring Services.** You may seek reimbursement for up to six months of expenses for eligible recurring services as long as those services were implemented on or before December 31, 2020. Existing services that were not purchased to respond to COVID-19 (e.g., services purchased prior to March 13, 2020) are not eligible for funding. Costs thus incurred prior to March 13, 2020 must be removed from your request for reimbursement. However, if existing services were upgraded on or after March 13, 2020 to respond to COVID-19, the costs of the upgrade may be included.

**Providing Supplemental Information and Descriptions of Eligible Services and/or Connected Devices.**

Please provide detailed descriptions of the services and equipment on which you are seeking reimbursement on your Request for Reimbursement Form. COVID-19 Telehealth Program funding can be used to purchase telecommunications services, information services, and the connected devices necessary to provide telehealth services to patients in response to the coronavirus pandemic. If you think that additional information may be needed to support your request for reimbursement, feel free to supplement your submission with an attachment providing additional description regarding the eligible item(s).

**MAKING CHANGES AFTER YOU'VE SUBMITTED YOUR INVOICE SUBMISSION(S)**

**Post-Reimbursement Request Credits or Cancellations.** If you receive a post-reimbursement credit or cancel an item for which you sought reimbursement, please notify us immediately by sending an email to [TelelthInvoicSupp@fcc.gov](mailto:TelelthInvoicSupp@fcc.gov).

**POST-PROGRAM GUIDANCE**

**Post-Program Reports.** In the originating Program Report and Order, the FCC indicated that funding recipients should provide a report to the FCC on the effectiveness of the COVID-19 Telehealth Program funding on health outcomes, patient treatment, health care facility administration, and any other relevant aspects of the COVID-19 pandemic. In a recent public notice, the Wireline Competition Bureau and the Office of the Managing Director established a **January 31, 2022** deadline for these reports. The public notice also provided a COVID-19 Telehealth Program Post-Program Report Template for funding recipients to use for reporting outcomes. The template contains a list of questions that you are asked to respond to when developing their post-program reports. The completed report(s) are to be filed in WC Docket No. 20-89 in the Commission's electronic comment filing system, available at <https://www.fcc.gov/ecfs/>. The public notice can be found here: <https://www.fcc.gov/document/invoicing-deadline-covid-19-telehealth-73121-post-program-guidance>.

**CFDA Number.** For health care providers that are subject to a Single Audit, the Catalog of Federal Domestic Assistance (CFDA) identification number is 32.006. This information is also available under the COVID-19 Telehealth Program Frequently Asked Questions, which can be found on the FCC's website here: <https://www.fcc.gov/covid-19-telehealth-program-frequently-asked-questions-faqs> (Question #47).

**QUESTIONS?**

If you have any questions, please submit your inquiries to [TelelthInvoicSupp@fcc.gov](mailto:TelelthInvoicSupp@fcc.gov).

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