

# The Government's COVID-19 Financial Assistance: Impact on Billing



**By Elizabeth Woodcock, MBA, FACMPE, CPC**

The Provider Relief Fund (PRF) provided \$175 billion in payments made through the Coronavirus Aid, Relief and Economic Secure (CARES) Act, as well as the Paycheck Protection Program (PPP). These funds may not require repayment, however, there are terms and conditions with which recipients must comply.<sup>[1]</sup> These terms, among others, include protocols related to balance billing patients.

After accepting the federal funds, physicians must avoid balance billing out-of-network patients for COVID-19 related care. The Department of Health and Human Services reports: "...[A]n out-of-network provider delivering COVID-19-related care to an insured patient may not seek to collect from the patient out-of-pocket expenses, including deductibles, copayments, or balance billing, in an amount greater than what the patient

---

would have otherwise been required to pay if the care had been provided by an in-network provider." COVID-19 related care includes confirmed and presumptive cases, even when a positive test result is not documented in the patient's record. This does not prevent a physician from receiving payment from an insurer, however. HHS reveals: "The terms and conditions do not impose any limitations on the ability of a provider to submit a claim for payment to the patient's insurance company." It's only the next step – balance billing the patient for the out-of-network differential – that's prohibited.

Balance billing is also not allowed in the case of *uninsured* patients, should a physician have sought payments as a participant in the HRSA COVID-19 Uninsured Program.

While the receipt of the federal assistance does not have an expansive impact on your billing protocols, it is important to be aware of when balance billing is prohibited. Remember to consult with your accountant regarding the multiple tax and accounting considerations.

[1] The PPP loans may be forgiven if used as prescribed; seek your accountant's advice about the use of the funds, as well as the completion of the [now-available PPP loan forgiveness application](#).

---

*The contents of The Sentinel are intended for educational/informational purposes only and do not constitute legal advice. Policyholders are urged to consult with their personal attorney for legal advice, as specific legal requirements may vary from state to state and/or change over time.*