

COVID-19 Telehealth Program Newsletter

Tips and Reminders for Funding Recipients

October 29, 2020

TIP OF THE DAY: Funding recipients that have received a rejection notification *with no explanatory comments* should reach out to the FCC via the Telehealth Inbox (TelehthInvoicSupp@fcc.gov) before resubmitting their invoices in IPP. 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.

REMINDER: 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.

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.

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 purchase eligible devices that cannot be delivered by December 31, 2020, these items must be received before you seek reimbursement from the FCC. All eligible items must be purchased and/or implemented by December 31, 2020. For additional information, see the Wireline Competition Bureau’s recent Public Notice extending the deadline <https://www.fcc.gov/document/covid-telehealth-program-purchase-and-implementation-deadline-extended>.

Invoice Submission Documents. After you’ve received eligible services and/or connected devices, and provided payment for these services and/or connected devices, you must invoice the FCC for these costs through the U.S. Department of the Treasury’s Bureau of the Fiscal Service Invoice Processing Platform (IPP). As part of the IPP invoice submission, you must upload the following documents as “Attachments”:

- (1) Invoice(s) from your service provider or vendor showing, at a minimum, receipt of the service and/or connected devices identifying the eligible services and/or connected devices purchased and received, and price paid;
- (2) Request for Reimbursement Form, on which you should indicate whether the services and/or connected devices have been delivered/started. **Please attach this form as a separate attachment so that reviewers can more efficiently review your invoice documentation;**

- (3) If applicable, a Letter of Authorization, which you would need to submit if you received a funding commitment on behalf of other eligible health care provider sites; and
- (4) Any additional documentation (which can include email correspondence from Commission staff) supporting reimbursement for the eligible cost of the services and/or connected devices.

TIPS FOR PREPARING INVOICE SUBMISSION(S)

Clearly Label Invoice Submissions – To help the invoice review team more easily identify specific submissions, especially in 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.

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.

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). 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.

Make Sure Total Amounts Match– Ensure that the total amount for reimbursement entered in the IPP payment document matches the total amount on the Request for Reimbursement Form.

TIPS FOR PREPARING REQUEST(S) FOR REIMBURSEMENT

Include Multiple Eligible Expenses on each Request for Reimbursement Form. To the extent possible, please attempt to include a reasonable number of eligible expenses on each Request for Reimbursement Form, for example, up to six eligible expenses, to speed the invoice review process. The invoice review team can more efficiently process a single submission with six eligible expenses than six separate submissions in IPP. Similarly, the invoice review team can more efficiently process a submission with six eligible expenses than a submission with 25 eligible expenses, given the amount of additional documentation needed to verify each expense. That said, we recognize that some recipients filing on behalf of multiple health care provider sites may need to include a larger number of line items in their invoice submissions – to the extent possible, please bundle identical expenses for multiple health care provider sites as one eligible expense on your Request for Reimbursement Form.

Include your Recipient Health Care Provider (HCP) Number – Please be sure to include the “Recipient Health Care Provider Number” not the “Applicant National Provider Identifier” where requested on the Request for Reimbursement Form. If you do not include the Recipient Health Care Provider Number, your invoice submission may be rejected. The “Recipient Health Care Provider Number” is the number assigned to sites that were determined to be eligible based on your FCC Form 460. The eligible health care provider number(s) for your funding award can be found on your Funding Commitment Letter. Eligible services and

connected devices funded through the COVID-19 Telehealth Program are intended for use by the eligible health care providers indicated in your Funding Commitment Letter.

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 before December 31, 2020 are eligible for reimbursement even if they have not been delivered by December 31, 2020; as noted above, you may not seek reimbursement for services or devices until after you received them).
- 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, and 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 submit this additional information with your invoice submission.

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.

QUESTIONS?

If you have any questions, please submit your inquiries to TelelthInvoicSupp@fcc.gov.
