

---

# Physician Practices Survival Tactics

---

April 6, 2020

Disclaimer: To the best of our knowledge, these answers were correct at the time of publication. Given the fluid situation, and with rapidly changing new guidance issued daily, be aware that these answers may no longer apply. Please visit our COVID-19 hub frequently for the latest information, as we are working diligently to put forth the most relevant helpful guidance as it becomes available.

© PYA, P.C. All rights reserved.



# Introductions

---



[pyapc.com](http://pyapc.com)

800.270.9629



Lori Foley, CMA, CDI, PHR, SHRM-CP  
Managing Principal – Compliance  
[lfoley@pyapc.com](mailto:lfoley@pyapc.com)



Jeff Bushong  
Principal – Consulting  
[jbushong@pyapc.com](mailto:jbushong@pyapc.com)



Katie Ray, MSHA, CPhT  
Senior Consultant  
[kray@pyapc.com](mailto:kray@pyapc.com)

**COVID #1 (March 6) Coronavirus Preparedness and Response Supplemental Appropriations Act**

\$8.3 billion in emergency funding for federal agencies to respond to COVID-19 pandemic

**COVID #2 (March 18) Families First Coronavirus Response Act**

Paid sick leave; free coronavirus testing; expanded food assistance and unemployment benefits; protections for health care workers

**COVID #3 (March 27) CARES Act (Coronavirus Aid, Relief and Economic Security Act)**

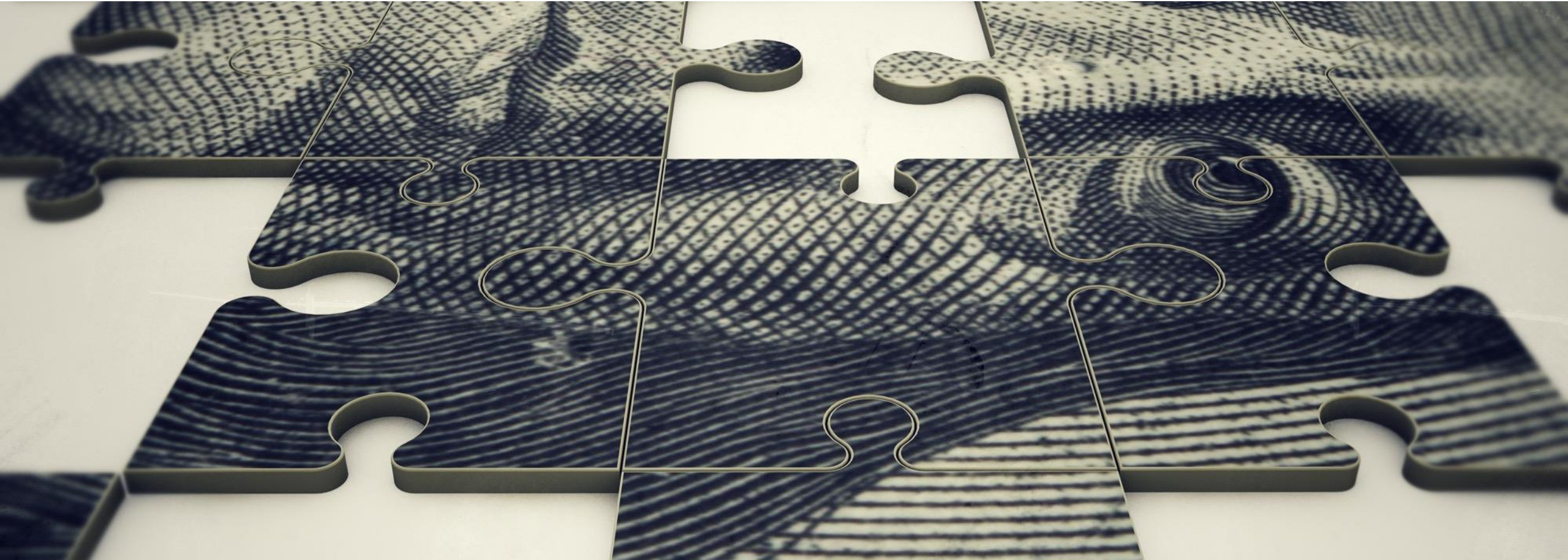
- \$2 Trillion relief package for state & local governments; big, medium, & small businesses; healthcare providers; and individuals
- 20% increase in overall federal spending in FY20

1. Paycheck Protection Program
2. Medicare Advance Payments
3. FFCRA and Staffing Considerations
4. Operations and Revenue Cycle Recommendations





# Paycheck Protection Program



# \$349 Billion in Small Business Loans



- SBA Act section 7(a) guaranteed loan program
- Loans of up to \$10 million
- Loans must be received before June 30, 2020
- No SBA fees
- No collateral or personal guarantees required
- No SBA recourse against any individual shareholder, member, or partner if the proceeds are used as allowed



# Who Qualifies?

---



- Business concerns, including:
  - Business entities
  - Nonprofit organizations
  - Sole Proprietorships or other eligible Self-Employed Individuals
  - Independent Contractors
  - Veterans organizations and Tribal concerns
  - Companies defined as small businesses in SBA Act
- With 500 or fewer employees
- Operating on February 15, 2020 with
  - Compensated employees (salaries and payroll taxes) and/or
  - Compensated independent contractors (payments reported on IRS Form 1099-MISC)

# Who Makes the Loans?

---



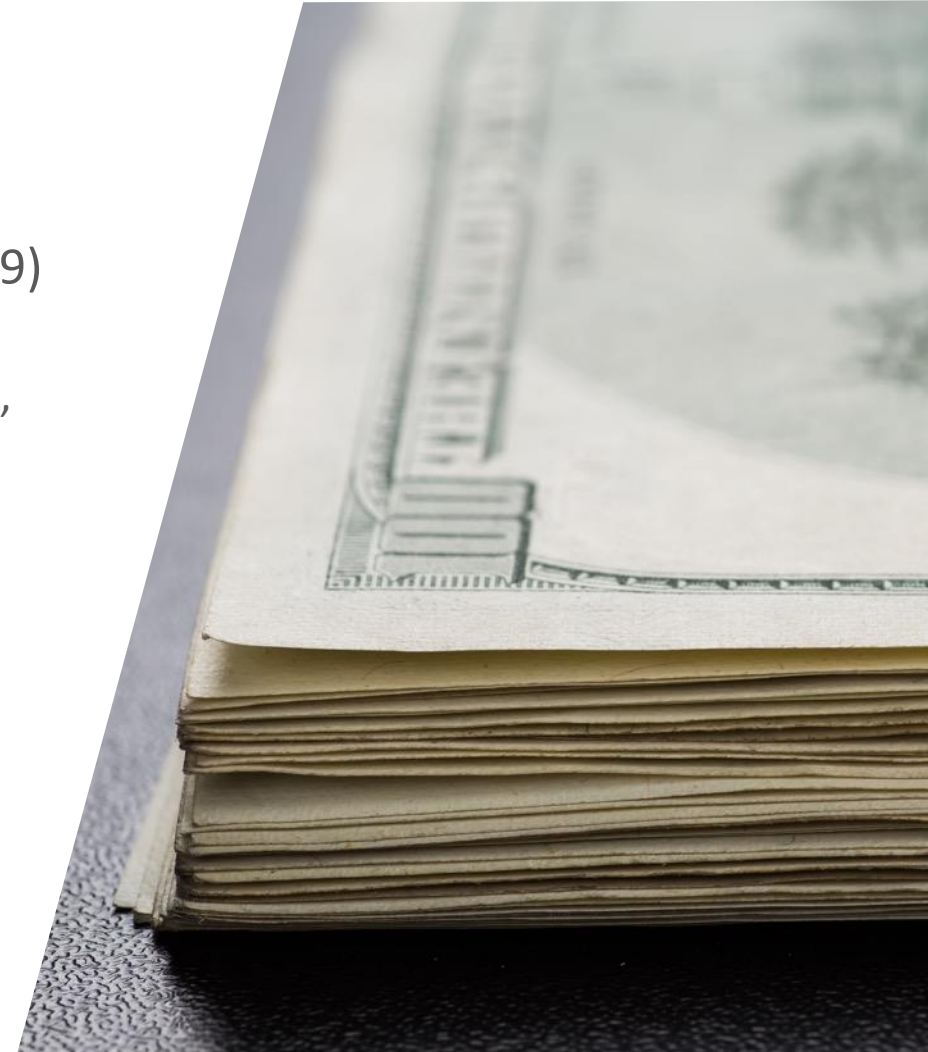
- Currently authorized SBA Act Section 7(a) lenders that opt to participate
  - Reimbursement from SBA for processing based on percentage of loan amounts
  - Other financial institutions may be qualified
- Borrower must make good faith certifications that proceeds will be “used to retain workers and maintain payroll” or make other allowed payments



# How Much Can Be Borrowed?



- Maximum amount = lesser of:
  - \$10 million; or
  - 2.5 times the borrower's average total monthly payments for payroll costs (most applicants will use payroll costs for CY 2019)
  - Eligible payroll costs
    - Salaries, wages, and commissions, “or similar compensation”
    - Cash tips or equivalent
    - Payment for vacation, parental, family, medical, or sick leave
    - Separation payments
    - Group health care benefits / insurance premiums
    - Payment of any retirement benefit
    - Payment of state or local employment compensation taxes



## 2019 Average Monthly Payroll

Gross Payroll:	\$38,000
Excess Salaries:	(\$9,000)
State UI Tax:	\$ 2,500
Employer Paid Health Insurance:	\$ 5,000
Employer 401k Match:	\$3,500
<b>Total:</b>	<b>\$40,000</b>

## Sample practice calculation for Dr. Feelgood Family Medicine

- 2019 average monthly payroll = \$40,000
- \$40,000 x 2.5 multiplier = \$100,000
- Calculated loan eligibility = \$100,000

**Note:** *Eligible payroll costs* include: wages, salaries; payments for vacation time, leave, sick; group health benefits; retirement; state and local unemployment compensation taxes.

# How Much Can Be Borrowed?

---



- Eligible payroll costs (continued)
  - The sum of payments of any compensation to or income of a sole proprietor or independent contractor that is a wage, commission, income, net earnings from self-employment, or similar less than \$100,000 in 1 year, as prorated for the covered period
- Payroll costs do not include
  - Compensation of an individual employee in excess of an annual salary of \$100,000, as prorated for the covered period
  - Taxes imposed or with held under chapters 21, 22, or 24 of the Internal Revenue Code of 1986 during the covered period [21 – Expenses for Household and Dependent Care Services; 22 – Credit for the elderly and permanently and totally disabled; 24- Child Tax Credit]
  - Any compensation of an employee whose principal place of residence is outside of the United States

# How Much Can Be Borrowed?

---



- Payroll costs do not include (continued)
  - Qualified sick leave wages for which a credit is allowed under section 7001 of the Families First Coronavirus Response Act (Public Law 116– 127); or
  - Qualified family leave wages for which a credit is allowed under section 7003 of the Families First Coronavirus Response Act (Public Law 116– 127)
- Note - If applicable, borrowers can elect to add the outstanding principal amount of an EIDL made between 01/31/20 and 03/27/20 thereby making the EIDL eligible for loan forgiveness



# How May Loan Proceeds Be Used?

---



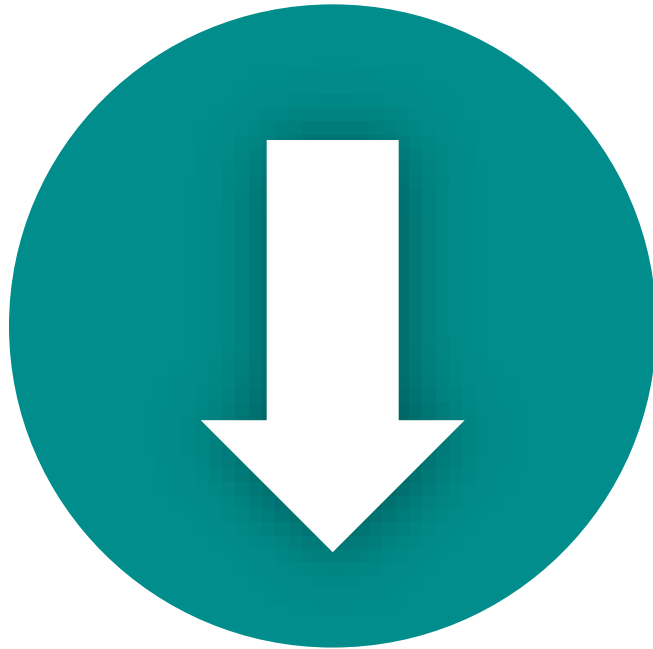
- Payroll costs (as specifically defined in the Act)
- Costs related to continuation of group health care benefits during periods of paid sick, medical or family leave, and insurance premiums
- Rent (including rent under a lease agreement)
- Utility payments (power, water, transportation, telephone, and internet access)
- Mortgage interest payments and interest on any other debt obligations incurred before 02/15/20
- Existing SBA Act Section 7(a) loan allowable uses, including working capital

# What Loan Amount May Be Forgiven?



- Specified costs incurred and payments made during the 8-week period following the loan origination date (8-week period) for the following things, as specifically defined in the Act:
  - Payroll costs
  - Payments on covered rent obligations
  - Covered utility payments
  - Payments of interest on any covered mortgage obligation
- Total forgiveness cannot exceed the loan principal amount
- Debt forgiveness  $\neq$  income for federal income tax purposes





- For any decrease during the 8-week period of employee wages in excess of 25% for employees whose pay rate was less than \$100,000 per year
- Use of more than 25% of the funds for allowed non-payroll expenses
- For any decrease during the 8-week period in full-time equivalent employees
  - Note the definition of FTEs for this purpose differs from the definition of employees for qualification, as previously discussed
  - Loan forgiveness will not be reduced for employees laid off between February 15, 2020 and April 26, 2020 and re-hired by June 30, 2020

## Forgiveness Calculation

Amount expended  
on Allowable Costs  
previously defined



Average Number of FTE's per Month Employed Over  
the 8-Week Period Following Receipt of the Loan



At the election of the Non-Seasonal Borrowers, either:

- a) Average Number of FTEs per Month Employed  
2/15/19 - 6/30/19; or
- b) Average Number of FTEs per Month Employed  
1/1/20 – 2/29/20

For Seasonal Employers only – the Average Number of  
FTEs per Month Employed 2/15/19 – 6/30/19



# Sample: Loan Forgiveness Calculation



## Feel Better Medical Center

**\$100,000**  
(Original loan amount)



**3.8 FTEs**  
(Avg. # FTEs in 8-week period)


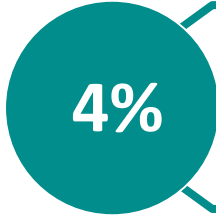




**4.0 FTEs**  
(Avg. # FTEs in either 2019 or 2020 periods defined)

**EQUALS = \$100,000 x (3.8/4.0) = \$95,000 of loan forgiveness**

# Repayment of Unforgiven Amounts



-  **2 Years**  
Unforgiven portion to be repaid over a maximum 2-year period
-  **4%**  
Maximum interest rate = 4%, currently 1%
-  **No Penalty**  
No prepayment penalty
-  **Deferral**  
Deferral of repayment is available for up to one year with a minimum deferral of six months

# Act Now

---



- Contact your bank to see if they are an SBA section 7(a) Lender; be persistent as they are likely swamped with high volume
- Gather all information requested and complete application thoroughly; work in conjunction with your banker, accountant, etc. to complete and submit expeditiously
- Determine borrower loan eligibility to compare to bank calculations
- Submit application as soon as possible
  - SBA started accepting applications Friday, April 3 for small businesses and sole proprietors
  - Application acceptance for independent contractors and self-employed individuals is slated to begin Friday, April 10

# Tax Credits for Employee Retention

---



- Employee Retention Credit under CARES Act – can cover 50% of qualified wages, up to \$10K of wages per employee (i.e., to \$5,000 per employee)
  - Available to any trade or business that either suspends operations (fully or partially) due to governmental limitations placed on commerce, travel, or group meetings, OR experiences a 50% reduction in revenue when compared to the same quarter of the prior year.
  - Credit takes the form of reduced remittance of federal employment taxes, including withheld taxes, that are required to be deposited with the IRS or by requesting an advance of the credit from the IRS.



# Economic Injury Disaster Loans (EIDL)



- Working capital loans of up to \$2 million from SBA
- Available to businesses with fewer than 500 employees, sole proprietors, and independent contractors
- Waiver of personal guarantees for loans of \$200,000 or less
- Waiver of showing inability to obtain credit elsewhere
- EIDLs may be refinanced as part of a Section 7(a) loan, *but loan proceeds may not be used for same purposes as the allowed uses of a Section 7(a) loan*



# \$10,000 EIDL Advance/Grant

---



- Available through December 31, 2020
- Requested as part of EIDL loan request process
- Advance must be used for payroll, sick leave, increased supply costs, rent/mortgage payments, and certain other items
- SBA pays applicant within 3 days of application
- Advance does not have to be repaid even if denied a loan under EIDL; will offset forgiveness under a Section 7(a) loan

# Medicare Advance Payments



# Address Providers' Cash Flow Challenges



Part A providers and Part B suppliers - up to 100% of Medicare payments for 3-month period

PUBLISHED MARCH 30, 2020

**ENSURING PROVIDER CASH FLOW DURING THE COVID-19 PANDEMIC – MEDICARE ADVANCE PAYMENTS**



Image source: Shutterstock

1

---

Billed Medicare  
for claims within  
last 180 days

2

---

Not be in  
bankruptcy

3

---

Not be under active  
medical review or  
program integrity  
investigation

4

---

Not have any  
outstanding  
delinquent Medicare  
overpayments

# Application Process

---



1. Use advance payment request form posted on each Medicare Administrative Contractor's website
  - Each MAC maintains COVID-19 Hotline to assist with requests
2. Required information:
  - Provider/supplier identification information
  - Amount requested
  - Reason for request
    - Check Box 2 and state request is for advance payment due to COVID-19 pandemic
3. Signed by authorized representative
4. Submit by e-mail



**Jurisdiction L - Medicare Part A and B  
Accelerated and Advance Payment Request Form**

**NOVITAS SOLUTIONS**

The Centers for Medicare & Medicaid Services (CMS) has expanded the Accelerated and Advance Payment Program to provide financial relief to Medicare providers/suppliers working to provide treatment to patients and combat the 2019-Novak Coronavirus (COVID-19) pandemic. The expansion of this program is only for the duration of the public health emergency.

**Instructions:**

- Please type your responses on the form. The completed form must be printed and signed by the provider's/supplier's authorized representative that is legally able to make financial commitments and assume financial obligations on the provider's/supplier's behalf. If not signed by the authorized representative, the request will be denied.
- Complete all fields to prevent delays in processing.
- If you need to request a payment for more than one Medicare Identification Number (PTAN), submit a separate form for each Medicare Identification Number (PTAN) and matching National Provider Identifier (NPI). This will ensure faster processing of your request.
- Novitas Solutions will notify you of the decision and when you'll receive payment to the email listed on the form.
- Providers will have to pay back the accelerated/advance payment.

**Request forms must be uploaded through our Provider Enrollment Gateway at:**  
[https://www.novitas-solutions.com/webcenter/portal/Enrollment\\_JL/EnrollmentGateway](https://www.novitas-solutions.com/webcenter/portal/Enrollment_JL/EnrollmentGateway)  
 Our Gateway entry page includes a help guide on accessing the tool and submitting your request form.  
 Only PDF formats are accepted on the Gateway.

Provider Name:	Phone Number:
Medicare Identification Number (PTAN):	Fax Number:
NPI:	Email Address:

**Check the reason for your request**

Select one option below

Delay in provider/supplier billing process is of an isolated temporary nature beyond the provider/supplier's normal billing cycle due to COVID-19 and not attributable to other third party payers or private patients

Other: Please explain

**Payment Amount Requested**

Select one option below

I want the maximum payment amount as calculated by CMS.

I want less than the maximum payment amount as calculated by CMS.  
 Enter payment amount requested \_\_\_\_\_

\_\_\_\_\_, certify that I'm the authorized representative that is legally able to make financial commitments and assume financial obligations on the provider's/supplier's behalf.

(Name) (Title)

Signature of authorized representative listed above: \_\_\_\_\_ Date: \_\_\_\_\_

MAC confirms form  
is complete and  
requestor meets  
eligibility  
requirements



MAC notifies  
requestor of  
approval/denial  
via email



MAC issues  
payment within  
7 calendar days  
from request



- Recoupment begins 120 days following receipt
  - MAC withholds payment on all claims up to the amount of the advance payment



- Reconciliation
  - MAC makes demand for payment of any remaining amount one year following receipt for hospitals, 210 days for all other providers
  - Opportunity for extended repayment schedule (with interest)?
  - Impact of bankruptcy?

# FFCRA and Staffing Considerations



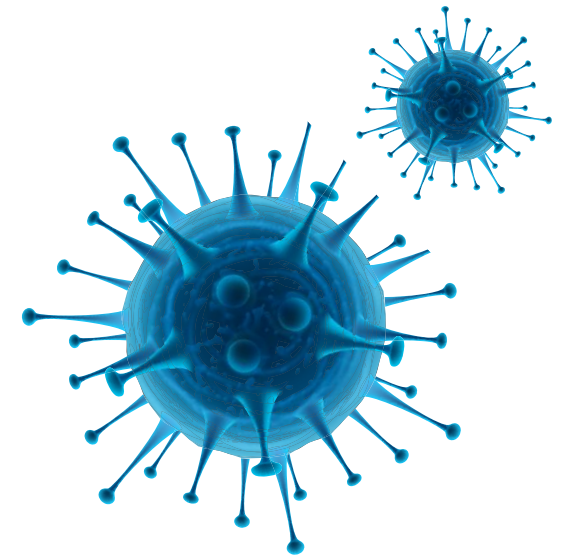


# Families First Coronavirus Response Act (FFCRA)

---



- Who qualifies?
  - Businesses with less than 500 people
  - Employers with less than 50 workers may ask the Secretary of Labor for an exemption
- What are the effective dates?
  - April 1, 2020 – December 31, 2020
- Who can be exempted?
  - Healthcare providers and emergency responders allowed to be excluded from the definition of employees who are permitted to take leave
  - Initially lacked clarity of definition of “healthcare provider”
  - Clarified in regulations released late last week

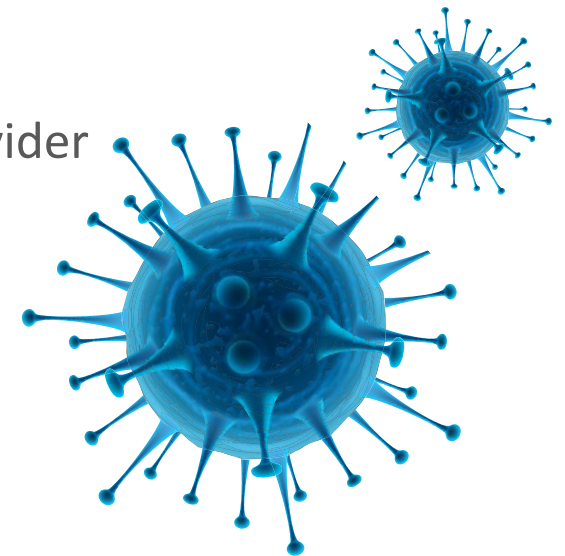


# Definition of health care provider

---



- Definition of a health care provider is *anyone* employed at
  - Any doctor's office
  - Hospital
  - Health care center or clinic
  - Post-secondary educational institution offering health care instruction
  - Medical school
  - Local health department or agency
  - Nursing facility, retirement facility, nursing home, home health care provider
  - Facility that performs laboratory or medical testing
  - Pharmacy
  - Any similar institution, Employer, or entity



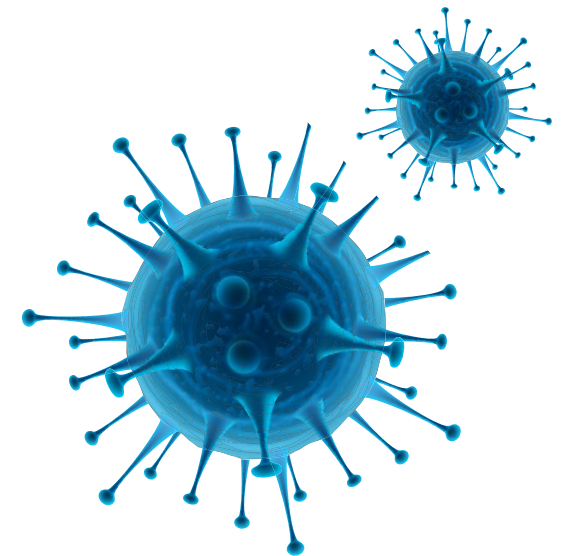


# Definition of health care provider

---



- Definition of a health care provider also includes
  - any individual employed by an entity that contracts with any of these institutions described above to provide services or to maintain the operation of the facility where that individual's services support the operation of the facility.
  - anyone employed by any entity that provides medical services, produces medical products, or is otherwise involved in the making of COVID-19 related medical equipment, tests, drugs, vaccines, diagnostic vehicles, or treatments.



# FFCRA: Out or In?



- Regardless of decision, practices must post required FFCRA poster
  - [https://www.dol.gov/sites/dolgov/files/WHD/posters/FFCRA\\_Poster\\_WH1422\\_Non-Federal.pdf](https://www.dol.gov/sites/dolgov/files/WHD/posters/FFCRA_Poster_WH1422_Non-Federal.pdf)
- If opting **out**, notify employees of opt-out decision
- If opting **in**, practices must follow the guidelines of both the Emergency Family and Medical Leave Expansion Act (EFMLE) and Emergency Paid Sick Leave (EPSL)

**EMPLOYEE RIGHTS**  
PAID SICK LEAVE AND EXPANDED FAMILY AND MEDICAL LEAVE  
UNDER THE FAMILIES FIRST CORONAVIRUS RESPONSE ACT

The Families First Coronavirus Response Act (FFCRA or Act) requires certain employers to provide their employees with paid sick leave and expanded family and medical leave for specified reasons related to COVID-19. These provisions will apply from April 1, 2020 through December 31, 2020.

► **PAID LEAVE ENTITLEMENTS**  
Generally, employers covered under the Act must provide employees:  
Up to two weeks (80 hours, or a part-time employee's two-week equivalent) of paid sick leave based on the higher of their regular rate of pay, or the applicable state or Federal minimum wage, paid at:

- 100% for qualifying reasons #1-3 below, up to \$511 daily and \$5,110 total;
- ⅔ for qualifying reasons #4 and 6 below, up to \$200 daily and \$2,000 total; and
- ⅓ for 12 weeks of paid sick leave and expanded family and medical leave paid at ⅓ for qualifying reason #5 below for up to \$200 daily and \$12,000 total.

A part-time employee is eligible for leave for the number of hours that the employee is normally scheduled to work over that period.

► **ELIGIBLE EMPLOYEES**  
In general, employees of private sector employers with fewer than 500 employees, and certain public sector employers, are eligible for up to two weeks of fully or partially paid sick leave for COVID-19 related reasons (see below). Employees who have been employed for at least 30 days prior to their leave request may be eligible for up to an additional 10 weeks of partially paid expanded family and medical leave for reason #5 below.

► **QUALIFYING REASONS FOR LEAVE RELATED TO COVID-19**  
An employee is entitled to take leave related to COVID-19 if the employee is unable to work, including unable to telework, because the employee:

1. is subject to a Federal, State, or local quarantine or isolation order related to COVID-19;	5. is caring for his or her child whose school or place of care is closed (or child care provider is unavailable) due to COVID-19 related reasons; or
2. has been advised by a health care provider to self-quarantine related to COVID-19;	6. is experiencing any other substantially-similar condition specified by the U.S. Department of Health and Human Services.
3. is experiencing COVID-19 symptoms and is seeking a medical diagnosis;	
4. is caring for an individual subject to an order described in (1) or self-quarantine as described in (2);	

► **ENFORCEMENT**  
The U.S. Department of Labor's Wage and Hour Division (WHD) has the authority to investigate and enforce compliance with the FFCRA. Employers may not discharge, discipline, or otherwise discriminate against any employee who lawfully takes paid sick leave or expanded family and medical leave under the FFCRA, files a complaint, or institutes a proceeding under or related to this Act. Employers in violation of the provisions of the FFCRA will be subject to penalties and enforcement by WHD.

For additional information or to file a complaint:  
**1-866-487-9243**  
TTY: 1-877-889-5627  
[dol.gov/agencies/whd](https://dol.gov/agencies/whd)

WAGE AND HOUR DIVISION  
UNITED STATES DEPARTMENT OF LABOR

WH1422 REV 03/20

## ■ Emergency Paid Sick Leave

- Up to 80 hours of paid sick leave benefits if unable to work for six reasons due to COVID-19; part time employees based on average number of hours worked, on average, over 2-week period
- Any employee having to care for any individual, regardless of length of employment, is eligible

## ■ Leave paid at regular rate of pay for the following up to daily cap of \$511:

1. Quarantine or isolation order
2. Advice from health care professional to self-quarantine
3. Experiencing symptoms of COVID-19 and seeking medical dx

## ■ Leave paid at 2/3 regular rate for the following up to daily cap of \$200:

4. Caring for individual subject to quarantine/isolation order or who has been advised to self-quarantine by health care professional
5. Caring for own child whose school, place of care is closed, provider of care is unavailable due to COVID-19
6. Experiencing substantially similar condition specified by Secretary of HHS



- Emergency Family and Medical Leave Expansion Act
  - 12 weeks of job-protected leave due to a son or daughter's school or childcare service being closed due to public health emergency
  - First 10 days (2 weeks) are unpaid unless employee uses other paid-leave benefit of employer
  - For the subsequent 10 weeks, workers must receive two-thirds of their regular pay, capped at \$200/day or \$10,000 total
  - For employees with variable hours, the paid family leave will be based on the average number of hours worked per day over the previous 6 months
  - Eligible employees include those that have been on payroll at least 30 calendar days immediately prior to the day leave would begin

- Eligible employers can fund
  - Qualified leave wages
  - Allocable qualified health plan expenses
  - Eligible Employer's share of Medicare tax on the qualified leave wages
- Via federal employment taxes related to wages paid between April 1 – December 31, 2020 that would otherwise be required to be deposited with the IRS.
  - In anticipation of claiming the credits on the Form 941, Eligible Employers can retain
    - federal income tax withheld from employees
    - the employees' share of Social Security and Medicare taxes
    - the Eligible Employer's share of Social Security and Medicare taxes with respect to all employees
  - If above is insufficient to cover FFCRA leave costs, can request an advance of the credit from the IRS by filing Form 7200.

# Reductions, Layoffs, & Furloughs

---



- Reduced compensation considerations include
  - Salary/rate freezes
  - Reconsidered raises
  - Held or reconsidered bonus payments
  - Pay cuts – graduated, across the board
- CAN reduce salaries unless employees are protected by an employment contract or a collective bargaining agreement
- CANNOT
  - Reduce hourly rates below minimum wage (non-exempt)
  - Reduce exempt employee compensation below \$455/week FLSA exempt employee threshold
  - Vary compensation for exempt employees based on the number of hours worked during a work week



# Layoffs, Furloughs & Reductions

---



- Layoffs
  - Separations from employment equivalent to a termination with a potential for rehire
    - Typically includes termination of benefits
- Furloughs
  - Temporary, mandatory unpaid leave
    - Often includes continuation of benefits such as health insurance
    - Challenge: portion of benefits historically paid by employee
- If practice adopts FFCRA and subsequently enacts a furlough or layoff, FFCRA obligations cease from date of such furlough/layoff

- CARES Act extended eligibility, added funds to eliminate one week waiting period, added 13 weeks to each state's current benefits
- Employees cannot receive UI benefits concurrently while receiving sick leave or expanded family/medical leave
- Employees who are furloughed or laid off can apply for unemployment insurance, regardless of whether Employer seeks CARES Act financing and intends to rehire
- Partial unemployment insurance, worksharing and short-time compensation programs are available in some states for employees who experience reduced hours/wages
- Benefits vary by state but CARES Act funds an additional \$600/week/beneficiary through July 31, 2020
- Very fluid as states evaluate their programs and await guidance from Federal Department of Labor

# Operations and Revenue Cycle Recommendations



# Potential Revenue Sources

---



- Paycheck Protection Program (PPP)
  - Loans of up to \$10 million based on loan calculation as laid out in SBA application
- Economic Injury Disaster Loan (EIDL)
  - Eligible for up to \$10,000 in advance
  - Cannot be used for same purpose as PPP loan funds
- Medicare advance payments
  - Part A providers and Part B suppliers - up to 100% of Medicare payments for 3-month period
- Commercial/Medicare Advantage plans – explore advance based on receipts/VBP
- Line of credit access for cash flow
  - Reach out to lender to inquire about increasing line of credit
- Telehealth

# Practice Revenue Cycle Initiatives



- Outsourced billing and/or collections considerations:
  - Set up daily check-in calls with vendor to review key metrics and provide feedback
  - Understand any potential challenges the third-party may be facing (i.e., staffing shortages, bandwidth issues, etc.)
  - Work in tandem with third-party to monitor denials and identify opportunities to improve likelihood of receiving payment
  - Consider revising small balance write-off thresholds



- Aged accounts receivable (A/R) analysis
  - Prioritize A/R and focus efforts on collecting high dollar, aged, and/or self-pay amounts
  - Identify routine denial types or payer-specific trends such that follow-up could be streamlined
  - Follow-up on patient responsibility balances - co-insurance/deductibles
    - Consider implementing additional flexibility/options for patient payment plans to increase incremental cash flow
  - Potential benefit: increase cash, improve staff efficiency, and reduce A/R in “high-risk” populations



# Practice Revenue Cycle Initiatives



- Timely filing and timely appeals review
  - Create list of each payer's timely filing and appeal deadlines
  - Identify any unbilled accounts nearing timely filing deadline and prioritize for resolution
  - Review claims denied for timely filing to identify accounts that are nearing appeal deadlines and take the necessary steps
  - Potential benefit: increase cash, accelerate submission of unbilled claims, and reduce timely filing denials and write-offs



- Rent
  - Rent payment = allowable use for PPP loan funds
    - Mortgage interest payments also allowable use, but no prepayment of interest allowed
  - If not seeking PPP loan, may consider:
    - Reviewing leases and potential amendments for language relating to rent abatement or force majeure clause;
    - Negotiating rent reduction or deferment;
    - Applying security deposit to upcoming rent payment;
    - Utilizing insurance coverage (some states considering legislation to mandate insurers pay COVID-19 business interruption claims)



- Malpractice premiums
  - Not an allowable use of PPP loan funds
  - May want to seek deferment of these payments
    - Review state law and/or follow-up with carrier to evaluate options
      - Example: Governor Cuomo in New York allowing consumers and small businesses experiencing financial hardship due to COVID-19 to defer paying premiums for property and casualty insurance, including medical malpractice.

# Staffing Model Considerations



- Many staffing considerations as mentioned previously (i.e., layoff, furlough, reduced hours, position consolidation)
- Consider key revenue-generating functions needed during this time (patient and payer follow-up, denials management, etc.) and staffing complement needed to complete these functions
- Identify cross-trained employees who may be able to complete multiple functions



# Communication with Staff

---



- Communicate with staff early and often
- Utilize daily huddles to discuss updates to practice protocols regarding policies and operations
- Equip staff with tools to most efficiently and effectively communicate with patients regarding COVID-19 changes
- Continue to routinely monitor your practice and assess whether policies and procedures currently in place are sufficient or need to be updated
  - Includes work from home policies especially related to non-exempt employees and total hours to be worked





The background image shows a blurred hospital setting with medical equipment and staff in teal scrubs. The text 'COVID-19 HUB' is overlaid in large, white, sans-serif font.

# COVID-19 HUB

- Prior webinar recordings, slides, transcripts, follow-up Q&As
- PYA thought leadership
- Links to important resources

[www.pyapc.com/covid-19-hub/](http://www.pyapc.com/covid-19-hub/)