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- This presentation is for educational purposes only. It should not be construed or relied on as legal advice or to create any client, advisory, fiduciary, or professional relationship between you and CLA. You should consult with your legal counsel if you have questions or concerns regarding your eligibility to participate in the Paycheck Protection Program (PPP) or other PPP-related issues.
- This presentation considers guidance provided by the SBA and US Department of the Treasury through September 14, 2021. Additional guidance is being provided on a regular basis, please refer to the US Department of the Treasury website (<a href="https://home.treasury.gov/policy-issues/cares/assistance-for-small-businesses">https://home.treasury.gov/policy-issues/cares/assistance-for-small-businesses</a>) for recent updates.





## Learning Objectives

- Understand the DHS instructions for completing the form
- Determine the timing of expenses and lost revenues for completing the form
- Determine the strategies to minimize the potential negative impact to future SNF rates
- Prepare for completing the federal reporting portal requirement consistent with DHS COVID-19 supplement reporting





CARES Act
Distributions
– Phase I

April 2020 Phase I distribution \$50 billion

Must have billed Medicare A or B in 2019 and based on 2018 gross receipts

Distributed amount based on 2018 revenues X 2%

To be used for COVID expenses and lost revenues





CARES Act Distributions - Targeted Distribution – Skilled Nursing Facilities

- May 2020 \$4.9 billion
- \$50,000 per facility plus \$2,500 X number of beds
- To be used for COVID expenses and lost revenues





### **CARES Act Distributions – Infection Control**

- Total \$5 billion with \$2.5 billion distributed in August 2020
- \$10,000 per facility plus \$1,450 X number of beds
- To be used for increased testing of both staff and residents, reporting test results to governments, changes to physical facilities, additional services to residents (example: technology that lets them connect with families), staffing and PPE





### CARES Act Distributions – Infection Control

- \$2 billion distributed in August, September, October and December 2020 (called "Performance Periods")
- To be used for infection control expenses (see previous slide), hiring staff or independent contractors, provide patient care, provide administrative support





### PPP Loans – First Round

- Amount of loan based on 2.5 months of payroll expenses
- Most loans received in April and May 2020
- 8 week or 24 week "covered period" to use proceeds and be eligible for forgiveness
- Uses salaries, mortgage interest (not principal), rent or lease for real or personal property, utilities electric, gas, and water, telephone, internet, software or cloud computing services. Also worker protection PPE but most of these are being reported as CARES Act use.



## Tab - Instructions

ursing facility received	any of the following funding? If yes, the nursing facility is required to provide a reconciliation of the amount received and the uses of that funding.
(Indicate Y for Ye	s and N for No in the blue box)
	CARES Act Funding (Provider Relief Funds or PRF)
Yes	-Was this funding for NF, Assisted Living, Senior Housing, or all facility service lines?
Yes	-Did the NF, Assisted Living, Senior Housing, or all facility service lines receiving funding for the coronavirus general distributions? If so, the facility will need to complete Section II(a) tab.
Yes	-Did the NF, Assisted Living, Senior Housing, or all facility service lines receiving funding for coronavirus infection control? If so, the facility will need to complete Section II(b) tab.
Yes	-Did the NF, Assisted Living, Senior Housing, or all facility service lines receiving funding for <b>coronavirus testing</b> ? If so, the facility will need to complete Section II(b) tab.
	Treasury or Small Business Administration (SBA) Assistance (Other than PPP loans)
No	-Was this funding for NF, Assisted Living, Senior Housing, or all facility service lines? Please complete Section II(c) tab.
	Paycheck Protection Program (PPP Loan)
Yes	-Has the facility applied for PPP forgiveness? If yes, please provide the loan forgiveness application, approval letter, and supporting documentation. If so, the facility will need to complete Section
Yes	-Was this funding for NF, Assisted Living, Senior Housing, or all facility service lines? If so, the facility will need to complete Section II(d) tab.
	Economic Injury Disaster Loan (EIDL)
No	-Has the facility applied for EIDL forgiveness? If yes, please provide the loan forgiveness application and supporting documentation. If so, the facility will need to complete Section III(b) tab.
No	-Was this funding for NF, Assisted Living, Senior Housing, or all facility service lines? If so, the facility will need to complete Section II(e) tab.
	Federal Emergency Management (FEMA) Assistance
No	-Was this funding for NF, Assisted Living, Senior Housing, or all facility service lines? If so, the facility will need to complete Section II(f) tab.
	Local, State, and Tribal Government Assistance
No	-Was this funding for NF, Assisted Living, Senior Housing, or all facility service lines? If so, the facility will need to complete Section II(g) tab.
	Business Insurance
No	-Was this funding for NF, Assisted Living, Senior Housing, or all facility service lines? If so, the facility will need to complete Section II(h) tab.
	MN Dept. of Health COVID-19 Grants
Yes	-Was this funding for NF, Assisted Living, Senior Housing, or all facility service lines? If so, the facility will need to complete Section II(i) tab.
No	COVID-19 MN DHS 12A Funding? If so, the facility will need to complete Section II(j) tab.
No	Other Funding Not Listed Above? If so, the facility will need to complete Section II(k) tab.
No	Did you send in a reconciliation schedule for RYE 9/30/2020 costs for any of the above funding mechanisms?
	Has the nursing facility offset the costs on the Cost Report for all funds received? If so, please provide detailed supporting documentation including which line
No	number the costs were offset to.



Source of Funds

			CARES Act Non-										
	CARE	S Act NF	NF	CAR	ES Act NF	CARES Act Non-	Treasury-SBA	Treasury-SBA			PPP Loan Non-		MDH Grants Non-
Funds Type Received	(Unre	estricted)	(Unrestricted)	(Res	tricted)	NF (Restricted)	Loan NF	Loan Non-NF	PPP	Loan NF	NF	MDH Grants NF	NF
DATE Rec'd													
4/15/2020									\$	554,000.00			
4/17/2020	\$	61,654.25											
4/24/2020	\$	64,311.18											
5/22/2020	\$	195,000.00											
6/25/2020												\$ 118,194.00	
8/27/2020				\$	94,100.00								
9/24/2020				\$	8,373.29								
Total	\$	320,965.43	\$ -	\$	102,473.29	\$ -	\$ -	\$ -	\$	554,000.00	\$ -	\$ 118,194.00	\$ -
Total Use of Funds	\$	33,488.00	\$ -	\$	-	\$ -	\$ -	\$ -	\$	554,000.00	\$ -	\$ -	\$ -
Total Funds Remaining	\$	287,477.43	\$ -	\$	102,473.29	\$ -	\$ -	\$ -	\$	0.00	\$ -	\$ 118,194.00	\$ -



Navigating the DHS COVID-19 Supplement – Reporting PPP Proceeds Uses

Strategy – Report the least possible care-related costs for uses of PPP loan proceeds

- "Aggressive approach"? regardless of what was reported on application for forgiveness
- First, use 24-week "Covered Period" for mortgage interest (not principal), rent or lease for real or personal property, utilities electric, gas, and water, telephone, internet, software or cloud computing services.





## Navigating the DHS COVID-19 Supplement – PPP Forgiveness Application Form 3508EZ

#### **Forgiveness Amount Calculation:**

Payroll and Nonpayroll Costs  Line 1. Payroll Costs:	\$ 1,742,223.00
Line 2. Business Mortgage Interest Payments:	\$ 0.00
Line 3. Business Rent or Lease Payments:	\$ 42,000.00
Line 4. Business Utility Payments:	\$ 54,052.00
Potential Forgiveness Amounts Line 5. Add the amounts on lines 1, 2, 3, and 4:	\$ 1,838,275.00
Line 6. PPP Loan Amount:	\$ 554,000.00
Line 7. Payroll Cost 60% Requirement (divide Line 1 by 0.60):	\$ 2,903,705.00



## Navigating the DHS COVID-19 Supplement - Tab III(a)

				Cost
				Report
	PPP Loan	PPP Loan		Line
Loan Forgiveness	Forgiven NF	Forgiven Non-N	F Description	Number
Date Forgiven = 3/4/21			PPP Loan through Bremer Bank total = \$554,000	
All expenses listed belo	w are for the cov	ered period of 4/2	26 - 10/10/2020	
	\$ 9,884		Interest - care center improvements loan	7031
	\$ 11,554		Interest - care center mortgage	7031
		\$ 12,650	Interest - housing divisions	NA
	\$ 42,000		Care Center rent paid to city	7053
	\$ 50,910		Care Center utilities	6630
	\$ 3,142	!	Care Center telephone and internet	8080
		\$ 34,490	Utilities, telephone, internet - housing divisions	NA



Navigating the DHS COVID-19 Supplement – Reporting PPP Proceeds Uses (con't)

- Second, report payroll costs on a "FIFO" basis so that other costs reported plus payroll costs equal the total PPP loan amount.
- Question Do you report whole payrolls, or do you "pick and choose" and only report non-care related salaries?
- Remember PPP loan proceeds were based on total salaries for your corporation, so be sure to include non-nursing home salaries in reporting your use of PPP proceeds.





# Navigating the DHS COVID-19 Supplement – PPP Proceeds Used for Salaries

Total PPP loan	554,000.00
Used for utilities, interest, phone	(164,630.00)
Salaries needed to cover remainder	389,370.00
Less 5/14/20	(143,516.51)
Less 5/28/20	(146,928.87)
needed from 6/11/20	98,924.62
ratio of 6/11/20 needed to total	0.627742804





## Navigating the DHS COVID-19 Supplement – PPP Proceeds Used for Salaries

					Factored	Total for PPP	MA Cost Report	:
GL Acct # D	escription	5/14/2020	5/28/2020	6/11/2020	6/11/2020	Loan Forgiveness	Line Number	
10-30-116190 Sc	ocial Services	2464.095	2499.455	2200.065	1,381.07	6,344.62	6211	
10-31-116112 RI	N	9865.87	10337.45	14381.24	9,027.72	29,231.04	6112	
10-31-116113 LF	PN	13151.28	15697.01	17513.37	10,993.89	39,842.18	6113	
10-31-116114 C	NA	40084.14	40837.88	42103.49	26,430.16	107,352.18	6114	
10-31-116115 Tr	MA	6460.29	7159.29	9692.06	6,084.12	19,703.70	6115	
10-31-116116 M	Medical Records	4523.07	4704.13	3888.94	2,441.25	11,668.45	6116	
10-31-116117 RI	N House Supervisor	3162.2	3326.17	3097.43	1,944.39	8,432.76	6112	
10-31-116118 Re	ehab Aides	1041.12	1049.02	1400.63	879.24	2,969.38	6114	
10-31-116119 St	taff Development	3386.8	2760.8	2498	1,568.10	7,715.70	6260	
10-31-116121 M	IDS Coordinator	5061.19	3756.39	5385.7	3,380.83	12,198.41	6111	
10-31-116124 Cd	ommunity Assistant	4229.66	979.48	636.13	399.33	5,608.47	6513	
10-31-116125 Ba	asic Care Aide	0	2812.01	3081.01	1,934.08	4,746.09	6114	
10-31-1161142 C	NA Training	0	0	35	21.97	21.97	6114	
10-33-116211 A	ctivity Director	1874.26	1923.26	1835.82	1,152.42	4,949.94	6212	
10-33-116212 A	ctivities Staff	3044.33	3087.06	3041.37	1,909.20	8,040.59	6212	
10-35-116311 Di	ietary Director	2259.71	2217.07	2669.44	1,675.72	6,152.50	6313	
10-35-116313 Di	ietary Staff	6322.12	5949.56	6332.83	3,975.39	16,247.07	6313	
10-35-116314 Co	ook Staff	4846.2	4776.43	4966.4	3,117.62	12,740.25	6313	
10-36-116411 Er	nvironmental Supervisor	2857.84	3413.97	2772	1,740.10	8,011.91	6513	
10-36-116412 Er	nvironmental Staff	3214.83	3326.49	3138.05	1,969.89	8,511.21	6513	
10-36-116413 La	aundry Staff	1374.05	1405.87	1412.21	886.50	3,666.42	6413	
10-37-116612 M	Naintenance Staff	1591.45	1607.73	1616.65	1,014.84	4,214.02	6613	
10-41-118011 A	dministrator	5514.48	5514.48	5514.48	3,461.68	14,490.64	8013	
10-41-118015 Fi	inancial Director	2605.6	2605.6	2605.6	1,635.65	6,846.85	8013	
10-41-118016 CI	lerical Staff	1458.37	1445.72	1403.06	880.76	3,784.85	8013	
10-41-118017 H	IR Director/Payroll	2600.5	3010.48	2843.82	1,785.19	7,396.17	8013	
30-45-336190 RI	RE Housing Manager	253.705	253.705	253.705	159.26	666.67	Non NF	
40-46-446190 Vi	illa Housing Manager	185.78	185.78	185.78	116.62	488.18	Non NF	
50-40-556190 G	arden Cottage Housing Manager	120.32	120.32	120.32	75.53	316.17	Non NF	
10-42-119011								
and 10-42-								
169011 Er	mployer FICA	9963.25	10166.26	10963.22	6,882.08	27,011.59	26,901.94	NF
							109.66	Non NF
TOTAL		143,516.51	146,928.87	157,587.82	98,924.62	389,370.00		



( 50 )	PPP Loan Forgiven NF	PPP Loan Forgiven Non-NF	Description	Cost Report Line Number
	\$ 6,344.62		Social Services	6211
	\$ 29,231.04		RN	6112
	\$ 39,842.18		LPN	6113
	\$ 107,352.18		CNA	6114
	\$ 19,703.70		TMA	6115
	\$ 11,668.45		Medical Records	6116
	\$ 8,432.76		RN House Supervisor	6112
	\$ 2,969.38		Rehab Aides	6114
	\$ 7,715.70		Staff Development	6260
	\$ 12,198.41		MDS Coordinator	6111
	\$ 5,608.47		Community Assistant	6513
	\$ 4,746.09		Basic Care Aide	6114
	\$ 21.97		C NA Training	6114
	\$ 4,949.94		Activity Director	6212
	\$ 8,040.59		Activities Staff	6212
	\$ 6,152.50		Dietary Director	6313
	\$ 16,247.07		Dietary Staff	6313
	\$ 12,740.25		Cook Staff	6313
	\$ 8,011.91		Environmental Supervisor	6513
	\$ 8,511.21		Environmental Staff	6513
5	\$ 3,666.42		Laundry Staff	6413
5	\$ 4,214.02		Maintenance Staff	6613
	\$ 14,490.64		Administrator	8013
5	\$ 6,846.85		Financial Director	8013
	\$ 3,784.85		Clerical Staff	8013
5	\$ 7,396.17		HR Director/Payroll	8013
		\$ 666.67	RRE Housing Manager	NA
		\$ 488.18	Villa Housing Manager	NA
		\$ 316.17	Garden Cottage Housing Manager	NA
!	\$ 26,901.94		Employer FICA	9011
		\$ 109.66	Employer FICA	NA



Navigating the DHS COVID-19 Supplement – Reporting PPP Proceeds Uses

Strategy – Remember – no double dipping – PPP Loan covered period is 24 weeks – so any hero pay, bonuses, hazard pay, etc. during the covered period should not be reported as use of PRF Phase I or Targeted distributions. (Assuming you have enough COVID expenses and lost revenues through 30 June 2021 to justify those two PRF distributions).



CARES Act Proceeds (Provider Relief Funds "PRF")

- First calculate lost revenues so you have an idea of how much COVID-related expenses are needed to avoid any payback of PRF
- the foundation for <u>any</u> expense to begin to be considered allowable is that it specifically has a nexus to COVID (prepare, prevent, respond to COVID). Then it needs to be incremental, justifiable, reasonable, documented etc.





## CARES Act Proceeds (con't)

• HRSA reiterated in a June 11, 2021 FAQ that, "The Provider Relief Fund permits reimbursement of marginal increased expenses related to coronavirus provided those expenses have not been reimbursed from other sources or that other sources are not obligated to reimburse."





# Navigating the DHS COVID-19 Supplement – Tab II(a)

	CARES	Act (PRF)	CARES Act (PRF)		
	NF		Non-NF		Cost Report Line
Use of Funds	(Unrestricted)		(Unrestricted)	Description	Number
See attached	\$	33,488		Various - see ledger history attached	8080





# Navigating the DHS COVID-19 Supplement – Reporting PRF Uses

_	9	APIR	6181007	4	1.03E+09	COVID-19	210.26	Amazon Capital Services, Inc., Invoice D
	9	APIR	6191458	3	1.03E+09	COVID-19	20.81	Tiger Ace Hardware, Bolt Eye w/ nut, Fas
	9	APIR	6261621	2	1.03E+09	COVID-19	1011	Direct Supply, Inc, 3 Ply Disposable Fac
	9	APIR	6301603	4	1.03E+09	COVID-19	519.79	Direct Supply, Inc, Isolation Station &
	9	APIR	6301603	5	1.03E+09	COVID-19	35.19	Direct Supply, Inc, Standard Glove Box D
	9	APIR	6301603	6	1.03E+09	COVID-19	928	Direct Supply, Inc, 3 Ply Disposable Fac
	9	APIR	7011456	2	1.03E+09	COVID-19	1925	Advanced Wireless Communications, Invoic
	9	APIR	7031118	2	1.03E+09	COVID-19	1011	Direct Supply, Inc, 3 Ply Disposable Fac
	9	APIR	7031118	3	1.03E+09	COVID-19	12.39	Direct Supply, Inc, Standard Glove Box D
	9	APMI	7131158	3	1.03E+09	COVID-19	400	Rick Zillgitt Consulting Fee for Boiler
	10	APIR	7131505	2	1.03E+09	COVID-19	2621.98	Cardmember Service, Acct # Ending in 744
	10	APIR	7151335	5	1.03E+09	COVID-19	928	Direct Supply, Inc, 3 Ply Disposable Fac
	10	APIR	7271534	7	1.03E+09	COVID-19	68.52	McKesson Medical-Surgical Minnesota Supp
	10	APIR	7281508	2	1.03E+09	COVID-19	877	Direct Supply, Inc, 3 Ply Disposable Fac
	11	APIR	8131102	4	1.03E+09	COVID-19	88.96	Cardmember Service, Acct # Ending in 744
	11	APIR	8191328	3	1.03E+09	COVID-19	1477.5	Citi Cards, Mobile Outfitters: Invoice D
	11	APIR	9011329	4	1.03E+09	COVID-19	775.4	Direct Supply, Inc, 3Ply Disposable Mask
	11	APIR	9021455	9	1.03E+09	COVID-19	795.4	Direct Supply, Inc, 3 Ply Disposable Fac
	12	APIR	9111613	3	1.03E+09	COVID-19	26.16	McKesson Medical-Surgical Minnesota Supp
	12	APIR	9211057	5	1.03E+09	COVID-19	724.4	Direct Supply, Inc, 3Ply Disposable Face
	12	APIR	9251632	4	1.03E+09	COVID-19	24.76	Direct Supply, Inc, Standard Glove Box D
	12	APIR	10051627	4	1.03E+09	COVID-19	506.76	Direct Supply, Inc, Isolation Station, 4
	12	APIR	10051627	5	1.03E+09	COVID-19	116.55	McKesson Medical-Surgical Minnesota Supp
							33,488.10	
							_	



# Navigating the DHS COVID-19 Supplement – Tab II(b)

Schedule II(b)	CARES Act Restric	ted Use of Funds							
Care Center's res	tricted amounts rec	eived from the CA	RES Act were for	testing (received	n August 2020) and inf	ection cont	rol		
received in Sept	ember 2020). The Ca	are Center had not	expended any o	f these funds as of	30 September 2020.				
eport including o	detailed description	of funding and a d	letailed breakdo	wn of the uses).	g that supplies the req				
• •	d paste a picture of If and/or a PDF of th	•		., .	aste from an Adobe PD al schedule.	F into this v	workbook.	The	
The reconciliation	n schedule should ir	nclude all COVID-1	9 related expens	es in which restric	ted CARFS Act restricte	d funding s	was usad <i>i</i>	chronologicall	v.



## Example property change



Addition to building of \$23 million



Capitalized interest and financing costs of \$1.2 million





## Pre-Fair Rental Value rate

Property-related per diem		
Property-related costs to be included in the property per diem		
Recognized Moratorium Exception Process project costs	\$23,177,043	
Average Debt For Moratorium Project	\$18,147,465	
5.66% of (Value - Debt)	\$284,674	
Allowable Interest		
	<u>\$1,110,938</u>	¢1 205 (12
Moratorium costs to be included in the property per diem		\$1,395,612
Capacity days		
	<b>V</b>	
Does the facility choose to assign greater costs to single bed rooms?	Yes	
Total number of beds	248	
Days in a year	<u> 365</u>	
Capacity days	90,520	
Additional capacity for assigning greater costs	37,595.00	
Total capacity days	128,115	
95% of capacity days		121,709
Building capital allowance increase for the project		\$11.47
Non-reimbursable cost areas percentage		4.75%
Net building capital allowance increase for the project		\$10.93
Property per diem rate increase		\$10.93



## Fair Rental Value rate

Estimated appraised value after construction is completed (URC) <sup>1</sup>	\$64,135,803		
Maximum URC	<u>\$63,640,190</u>		
Limited URC	\$63,640,190		
Depreciated Replacement Cost (DRC) of existing plant	\$64,135,803		
Ratio of Limited URC to URC	99.2%		
Limited DRC	<del></del>	\$63,622,717	
Land and Land Improvements (5% of Limited URC)		\$3,182,010	
Subtotal		\$66,804,727	
Rental rate		<u>7.50%</u>	
Annual Fair Rental Value		\$5,010,355	
88% of Capacity Days		<u>79,658</u>	
Fair Rental Value property rate			\$62.90
Equipment Allowance per bed		\$10,000	
Number of licensed beds		248	
Rental rate		<u>7.50%</u>	
Subtotal		\$186,000	
88% of Capacity Days		<u>79,658</u>	
Equipment allowance			<u>\$2.33</u>
Fair Rental Value property rate			\$65.23
Sum of current PCRAs		\$0.00	
Sum of current Consolidation rates		\$0.00	
Sum of current SBIs		\$0.00	
Current Equity Incentives		\$0.00	
Estimated property rate in 2020		<u>\$16.29</u>	
Total of all current property-related rate items			<u>\$16.29</u>
Property rate change from completing a FRV project		_	\$48.94





Thank you for attending

Please reach out to us if you have questions

or need assistance

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