



We are writing today to make you aware of a number of developments in reporting for **340B covered entities**, **Provider Relief Fund recipients**, and some **SBA Paycheck Protection Program (PPP) recipients**. Additionally, the OHA's deadline for the public to comment on CCO incentive benchmarks for 2021 is Wednesday, October 14.

Please take a few moments to review the content below to learn more.

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### 340B Action

Just over two months ago, the White House and drug makers began a quiet yet tactical assault on the 340B Program and community health centers. Over the last week, there have been two developments that health centers should be aware of.

First, your **CHC should report to HRSA that they are not receiving 340B pricing on Eli Lilly, AstraZeneca, and Sanofi products**. You do not have to show that you purchased a drug at the WAC price (non 340B) but instead should state the 340B price is not available. You can [download HRSA's 340B Price Reporting Form here](#). Please copy Marty (mcarty@orpca.org) at OPCA in your submission.

Second, last week four Oregon CHCs submitted legal declarations in support of NACHC's legal action against HRSA. They were able to clearly show the harm drug manufacturers' actions have caused their organization and the patients they serve. We at OPCA want to extend a huge THANK YOU to each of you who prioritized this action last week. If your health center is interested in learning how you can support national legal action against drug manufacturers, please contact [Marty](#)

## Provider Relief Fund

On October 1, 2020 [a press release](#) announced that HHS, through HRSA, would be providing an additional \$20 billion in PRF funding to assist frontline workers addressing the COVID-19 pandemic. Providers who previously received PRF payments, previously ineligible providers, and an expanded group of behavior health providers are all invited to apply starting Monday, October 5, 2020 through November 6, 2020. For updates, check [here](#).

On September 19, 2020, HHS released reporting requirements for PRF funding. Buried in the instructions was an important change in the definition of how providers can calculate “lost revenues,” which PRF funds can be used to cover. [NACHC has released a memo](#) with important information for health centers as they determine how to navigate these reporting requirements

1. NACHC is discouraging health centers from sending back any unused funds since they can use it for 17 months

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## CCO Incentive Benchmarks for 2021 - Opportunity to Submit Testimony

The Metrics and Scoring Committee meets Friday, October 16 to finalize CCO incentive benchmarks for 2021. The Committee has completed three rounds of a Delphi survey and discussed decisions over the past few meetings. Three options for the 2021 benchmarks are currently under consideration:

1. Use 2019 as baseline for 2021 improvement targets and roll forward initial benchmarks chosen for 2020 into 2021. Discussed possibly revisiting the benchmarks in June 2021 if pre-determined criteria are met (e.g., if most schools remain virtual for the remainder of the year, immunization metrics will likely be negatively affected).
2. Use 2019 as baseline for 2021 improvement targets; roll forward initial benchmarks chosen for 2020 into 2021; and eliminate improvement target floors. As with Option 1, discussed possibility of revisiting benchmarks for individual measures if pre-determined criteria are met. CCOs would still have to improve over 2019 performance, but to a lesser extent than Option 1, which includes floors.
3. Include benchmark, but replace improvement target such that a CCO achieves a measure if it meets or exceeds its performance from 2019 (replaces current ‘improvement target’ method which requires a 10% reduction between baseline and benchmark to meet a measure, subject to a floor [though Option 2 would eliminate the floor]).

OPCA has [submitted public comment](#) and encouraged CHCs to submit their own. We’ve provided a [downloadable template here](#) should that be helpful.

Written comment may be submitted to [metrics.questions@dhsosha.state.or.us](mailto:metrics.questions@dhsosha.state.or.us) for distribution to all Committee members by Wednesday 10/14 midday. Oral public testimony may be given during the meeting as well – email to request [invite information here](#). Please reach out to [Carly](#) with questions.

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## SBA and Treasury Announce Simpler PPP Forgiveness for Loan of \$50,000 or Less

The U.S. Small Business Administration, in consultation with the Treasury Department, today released a simpler loan forgiveness application for Paycheck Protection Program (PPP) loans of \$50,000 or less. This action streamlines the PPP forgiveness process to provide financial and administrative relief to America's smallest businesses while also ensuring sound stewardship of taxpayer dollars.

SBA began approving PPP forgiveness applications and remitting forgiveness payments to PPP lenders for PPP borrowers on October 2, 2020. SBA will continue to process all PPP forgiveness applications in an expeditious manner.

Click [here](#) to view the simpler loan forgiveness application.

Click [here](#) to view the instructions for completing the simpler loan forgiveness application.

Click [here](#) to view the Interim Final Rule on the simpler forgiveness process for loans of \$50,000 or less.

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### Sign up for OPCA's COVID-19 Member Update



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