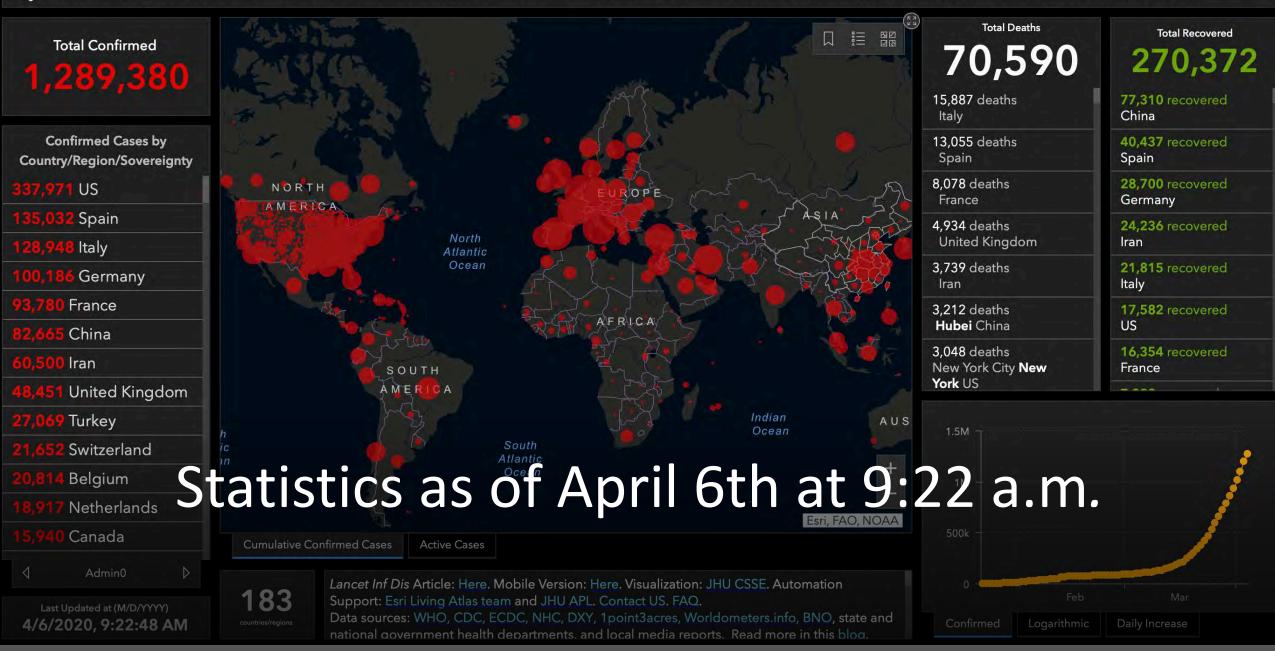
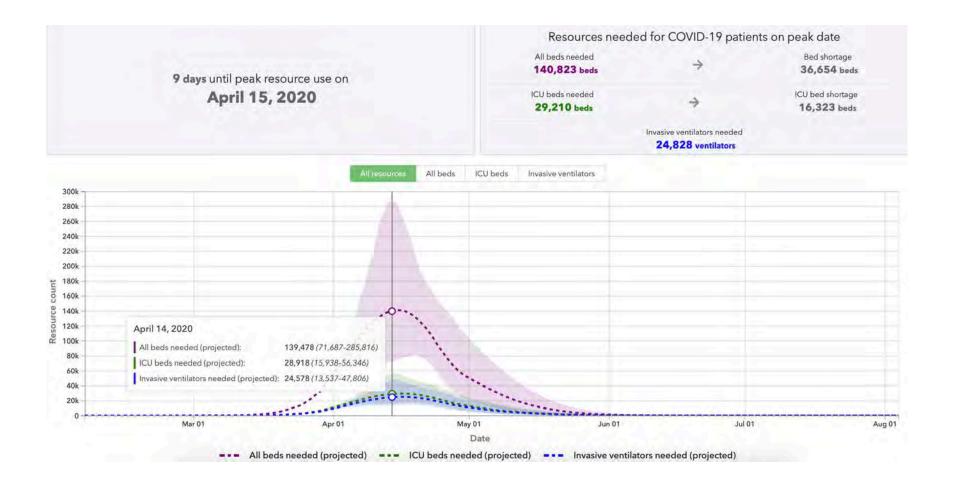
COPING WITH COVID-19: APRIL 6TH, 2020 WEBINAR HOSTED BY CINDY PEZZA, PMAC OF PINNACLE PRACTICE ACHIEVEMENT

FFR

🐨 Coronavirus COVID-19 Global Cases by the Center for Systems Science and Engineering (CSSE) at Johns Hopk...



Predicted "Peak" Average in the U.S.



	Но	spital resource use 🛈				
		Resou	irces need	ded for COVID-19 patie	ents on pe	eak date
	2 days until peak resource use on	All beds needed 25,486 beds	÷	All beds available 13,010 beds	÷	Bed shortage 12,476 beds
	April 8, 2020	ICU beds needed 6,664 beds	÷	ICU beds available 718 beds	÷	ICU bed shortage 5,946 beds
				Invasive ventilators needed 5,664 ventilators		
	All resources	All beds ICU beds Invasive ventile	ators			
50k -				-		
15k						
l0k			<u>.</u>			
5k			- • • • • • • •			
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5k -						
0k -	April 10, 2020					
5k -	All beds needed (projected): 24,786 (13,187-47,806) All beds available: 13,010	·				
0k	ICU beds needed (projected): 6,636 (3,770-12,423)		- 6			
5k –	Investive ventilators needed (prejected): E 641 (2 211 10 597)		Ĩ	9		

			Hospital re	esource use 🛈)					
				Resources needed for COVID-19 patients on peak date						
13 days	13 days until peak resource use on April 19, 2020			All beds needed 562 beds	ed	<i>></i>	All beds available 7,933 beds	÷	Bed shortage 0 beds	
				ICU beds neede 112 beds		<i>></i>	ICU beds available 558 beds	÷	ICU bed shortage 0 beds	
				Invasive ventilators needed 95 ventilators						
		All resour	rces All beds	ICU beds Invasive v	ventilators]				
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With each passing week, life as we know/knew it continues to change





The top priority is to stay safe and healthy and avoid unnecessary exposure.



Practices (in "hot spot" areas) are closing their doors and providing updates to patients on possible reopen dates



More telehealth services are being provided with frequent changes to the rules



Urgent or emergent visits in the office are being handled with extreme caution and anxiety



Information is changing rapidly so we all must stay informed (i.e. Don't shoot the messenger!)

Keep Track of Every Patient on the Schedule

- 1. Many patients are canceling on their own
- 2. We must make sure NOT to lose contact with them
- 3. Review your current schedule (marking cancelations but keeping them on the calendar) up to a week at a time.
- 4. Review each patient's history, determine who needs to be treated in the office (wounds, infections, post-ops, etc.) and try to set up as many Telehealth Visits as possible for the rest*

Let's discuss how to educate your patients about their Telehealth options while staying compliant** (especially for Option 3; Telephone Services)

Telehealth (non face-to-face) service options/rules changed as of 3/31 Any of these services can be provided to NEW OR ESTABLISHED PATIENTS!

Option 1:Utilize office E/M coding (99201-99215)

- Must use a communication tool that has interactive audio and video; real-time communication such as (FaceTime, Skype, Doxy.me)
- Use modifier 95** (different than what was previously recommended from 3/17 until it changed last wk)
- Use the Place of Service that would have been used had the service been rendered in person (e.g., POS 11 for CPT 99213)
- These services will be paid at the regular (non-facility)rate
- This waiver is in place as long as the public health emergency lasts
- Postoperative global periods still apply
- Document a progress note just like one would do when this service is provided face-to-face. This
 interaction is an E/M service and the same documentation requirements apply. The level is selected
 based on the 1995 or 1997 CMS guidelines for evaluation and management services, except when
 using CPT 99202-99215. When using CPT 99202–99215 for telehealth, the level may be selected based
 on "Medical Decision Making alone or total time alone."

Additional changes to Telehealth Option One: Now they can be used for services that would have been provided in any facility



What will happen to the claims that were submitted with the previous POS and no modifier?

- These are being paid at the facility rate (so no need to resubmit)
- The difference in using the updated POS and 95 modifier is that you get paid the non-facility rate

I will keep you posted if that changes*

Private Payers have been most likely to pay Option One (and it's the easiest)

Otherwise you must check with the individual payer about the preferred coding and modifiers for the other Telehealth options.

Option 2: "Virtual Check-in"

- G2012: Brief communication technology-based service (e.g., virtual check-in) by a physician or other qualified health-care professional who can report evaluation and management services, provided to a new or established patient, not originating from a related E/M service provided within the previous seven days nor leading to an E/M service or procedure within the next 24 hours or soonest available appointment; 5–10 minutes of medical discussion
- Can be any type of telecommunication tool, including telephone
- CANNOT relate to any service in the last seven days
- CANNOT result in patient coming in within the next 24 hours or soonest available appointment
- No modifiers needed

Option 3: Telephone E/M Services

- This interaction is an E/M service and documentation must support an E/M just like any
 other E/M type. Must have history, as much of an evaluation as possible, and some form of
 medical management.
- Must be initiated by patient or the patient's guardian
- Provider may educate patients about this option
- Not reimbursed by some payers*
- CANNOT report if call results in decision to see patient within 24 hours or next available urgent appointment
- CANNOT report if call refers to E/M service performed by same provider within previous seven days
- CANNOT report if call refers to a problem for which a patient is in a global period
- CANNOT report if provider performed a telephone E/M or online digital E/M for the same patient for the same problem in the last seven days
- CANNOT report if the call is part of Home Care Oversight Services, Care Plan Oversight Services, Home/Outpatient INR Monitoring, Complex Care Management Services, or Transitional Care Management Services

Telephone E/M Coding

- CPT 99441 Telephone evaluation and management service by a physician or other qualified health-care professional who may report evaluation and management services provided to an established patient, parent, or guardian not originating from a related E/M service provided within the previous seven days nor leading to an E/M service or procedure within the next 24 hours or soonest available appointment; 5–10 minutes of medical discussion
- CPT 99442- ; 11-20 minutes of medical discussion
- CPT 99443-; 21-30 minutes of medical discussion

Reimbursement is unknown as of today on www.CMS.gov

« Back to Search Criteria

Year: 2020 Image: Pricing Information Image: Pricing Information	elected Criteria:				
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Option 4: E-Visits

- This interaction is an E/M service and documentation must support an E/M just like any other E/M type. Must have history, as much of an evaluation as possible, and some form of medical management.
- Examples of digital platforms:
 - Electronic health record (through the patient portal)
 - Email
 - Text message
 - Other two-way digital communication
- Must be initiated by patient via a digital platform
- Provider may educate patients about this option
- Not reimbursed by some payers

E-Visits Continued

- CANNOT report if service refers to a problem for which a patient is in a global period
- CANNOT report if service is initiated within seven days of any E/M for same problem
- CANNOT report if performed on same day as in-person E/M service
- CANNOT report if service is part of Home Care Oversight Services, Care Plan Oversight Services, Home/Outpatient INR Monitoring, Complex Care Management Services, or Transitional Care Management Services
- Time spent is cumulative time over seven days starting with review of the request
- Can only report once per seven-day period
- Time includes:
 - Review of inquiry
 - Review of patient records
 - Interaction with other staff
 - Development of management plan
 - Rx
 - Ordering tests
 - Communication with patient

E-Visits Continued

- Add time if multiple providers in same practice perform this service for the same patient over the same seven-day period
- If within seven days of the initiation of an online digital E/M service, a separately reported E/M visit occurs, then the provider work devoted to the online digital E/M service is incorporated into the separately reported E/M visit
- CPT 99421: Online digital evaluation and management service, for an established patient, for up to seven days, cumulative time during the seven days; 5–10 minutes
- CPT 99422 ; 11–20 minutes
- CPT 99423 ; 21 or more minutes

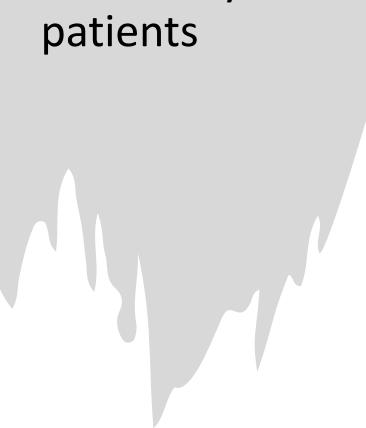
These codes are listed on www.cms.gov in the physician look up tool

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age 1 of 12		Go to p	bage	Prev	v ┥ 1 2 3 -	456 🕨	Next
MODIFIER	PROC STAT	MAC LOCALITY	NON- FACILITY PRICE	FACILITY PRICE	NON- FACILITY LIMITING CHARGE	FACILITY LIMITING CHARGE	CONV
	А	0000000	\$15.52	\$13.35	\$16.95	\$14.59	36.0896
	A	0111205	\$17.69	\$14.81	\$19.32	\$16.19	36.0896
	А	0111206	\$17.69	\$14.81	\$19.32	\$16.19	36.0896
	А	0111207	\$17.69	\$14.81	\$19.32	\$16.19	36.0896
	А	0111209	\$18.02	\$15.06	\$19.69	\$16.45	36.0896
	А	0111251	\$16.97	\$14.29	\$18.54	\$15.61	36.0896
	А	0111252	\$17.48	\$14.67	\$19.10	\$16.03	36.0896
	А	0111253	\$16.97	\$14.29	\$18.54	\$15.61	36.0896
	A	0111254	\$15.98	\$13.66	\$17.46	\$14.93	36.0896
				Seven Seven Seven			

How many patients are you seeing per day/week right now?

- APMA strongly recommends that, per the CDC's guidance below, you delay all elective ambulatory provider visits:
- Health-care facilities and clinicians should prioritize urgent and emergency visits and procedures now and for the coming several weeks. The following actions can preserve staff, personal protective equipment, and patient care supplies; ensure staff and patient safety; and expand available hospital capacity during the COVID-19 pandemic:
- Delay all elective ambulatory provider visits
- Reschedule elective and non-urgent
 admissions
- Delay inpatient and outpatient elective surgical and procedural cases

Protect yourself, your staff and your patients



Wear gloves and a mask in the office and screen, screen!

Make sure someone from your staff actually speaks to the patient prior to arrival to make sure they are not coughing, have a fever or feel "off"

Do not leave messages without a return call

If you have closed your office establish a protocol for instructing patients in need of urgent care.

Have protocols in place for if you, one of your staff members or patients finds out they are exposed

Accelerated and Advanced Medicare Payments Due to COVID-19

- According to a CMS release on 3/28, providers or suppliers must: Have billed Medicare for claims within 180 days immediately prior to the date of signature on the provider's/ supplier's request form,
- Not be in bankruptcy,
- Not be under active medical review or program integrity investigation, and
- Not have any outstanding delinquent Medicare overpayments.
- The agency will start accepting and processing requests immediately and said payments could go out within seven days.

Amount of Payment:

 Qualified providers/suppliers will be asked to request a specific amount using an Accelerated or Advance Payment Request form provided on each MAC's website. Most providers and suppliers will be able to request up to 100% of the Medicare payment amount for a threemonth period.

Repayment

- CMS has extended the repayment of these accelerated/advance payments to begin 120 days after the date of issuance of the payment. The repayment timeline is broken out by provider type below:
 - Inpatient acute care hospitals, children's hospitals, certain cancer hospitals, and Critical Access Hospitals (CAH) have up to one year from the date the accelerated payment was made to repay the balance.
 - All other Part A providers and Part B suppliers will have 210 days from the date of the accelerated or advance payment was made to repay the balance

Step-by-Step Guide on How to Request Accelerated or Advance Payment

- Complete and submit a request form: Accelerated/Advance Payment Request forms vary by contractor and can be found on each individual MAC's website. Complete an Accelerated/Advance Payment Request form and submit it to your servicing MAC via mail or email. CMS has established COVID-19 hotlines at each MAC that are operational Monday – Friday to assist you with accelerated payment requests.
- To locate your designated MAC, refer to <u>https://www.cms.gov/Medicare/Medicare-</u> <u>Contracting/Medicare-Administrative-</u> <u>Contractors/Downloads/MACs-by-State-June-2019.pdf.</u>

No matter what, keep your patients up to date!



Send e-blasts, post information in your reception area and outside your office, post on social media (make videos)...



Radio silence is not an option during this time.

Schedule patients so that each can be taken directly into a treatment room upon arrival (some offices are removing chairs from waiting rooms).

Scheduling and Waiting Room Precautions



If patients do have to wait prior to entering the treatment room, remind them of social distancing recommendations and arrange seats 6 feet apart.



Some practices are requiring temperatures to be taken prior to patients entering office**

Establish protocols for patients who need to purchase supplies (credit card payment by phone, minimal contact at pickup)

Other considerations



If patients rely on public transportation and need to come in, try to plan accordingly as many have extended wait times to be picked up.



Ask that patients do not bring anyone with them to their appointment. If they rely on a family member or friend to drive them to their appointment, (especially for post-op patients who need to be seen) ask that they wait in the car.

Remove and Sanitize

- Remove magazines and children's toys from your waiting room areas to help prevent the spread of the virus.
- Sanitize common office areas more frequently
 - After each patient disinfect exam chairs, counter tops, door handles, etc.
 - Ask each staff member to use the same phone throughout the day
 - Suggest that staff members in the front and back office wear gloves at all times.
 - Have face masks available for patients and staff members.
 - No sharing of food, no reps allowed in and no accepting of outside food from reps (even if store bought)
 - WASH HANDS with soap and water for at least 20 seconds frequently and avoid touching your face (that's more difficult than you think)

Federal Government Coronavirus Stimulus Package

The Coronavirus Aid, Relief, and Economic Security Act (CARES Act), the largest financial assistance bill ever, includes provisions to help small businesses. The Triple P (Paycheck Protection Program) The Paycheck Protection Program creates a type of emergency loan that can be forgiven when used to maintain payroll through June and expands the network beyond SBA so that more banks, credit unions and lenders can issue those loans.

The basic purpose is to incentivize small businesses to not lay off workers and to rehire laid-off workers that lost jobs due to COVID-19 disruptions.

The application for this program became available on 4/3/20 but caused a lot of confusion amongst lenders and small business owners who need to apply



The maximum loan amount under the Paycheck Protection Act is \$10 million (Loans can be up to 2.5 x the borrower's average monthly payroll costs, not to exceed \$10 million), with a very low interest rate (started at just under 4%, went to 0.5% and may go to 1%**)

How much can I get and what are the terms?



No personal guarantee or collateral is required for the loan. Any unforgiven funds must be paid back in 2 years*



75% of this loan must be used for payroll** Are you or is your spouse a W-2 employee of the business?

Good Question

What will lenders be looking for?

It keeps changing!

Paycheck; Protection Program Application Form

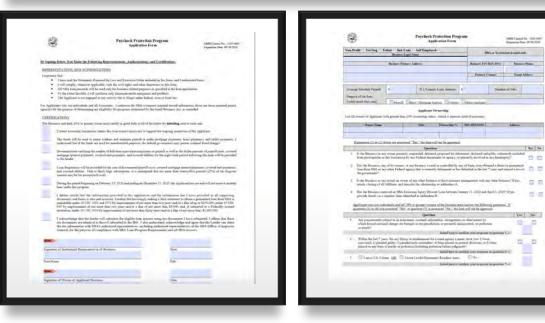
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Paycheck Protection Program Application Form

OMB Control No.: 3245-0407 Expiration Date: 09/30/2020

Purpose of this form:

This form is to be completed by the Applicant and all individuals identified below and submitted to your SBA Participating Lender. Submission of the requested information is required to make a determination regarding eligibility for financial assistance. Failure to submit the information would affect that determination.

Instructions for completing this form:

For purposes of calculating "Average Monthly Payroll", most Applicants will use the average monthly payroll for 2019, excluding costs over \$100,000 on an annualized basis for each employee. For seasonal businesses, the Applicant may elect to instead use average monthly payroll for the time period between February 15, 2019 and June 30, 2019, excluding costs over \$100,000 on an annualized basis for each employee. For new businesses, average monthly payroll may be calculated using the time period from January 1, 2020 to February 29, 2020, excluding costs over \$100,000 on an annualized basis for each employee.

The first section and questions 1-4 request information about the Business. Questions 5-7 are to be completed, signed and dated by each applicant who is an Individual as well as 'each 20% or greater owner of an Applicant Business. All parties listed below are considered owners of the Applicant Business as defined in 13 CFR § 120.10, as well as ''principals.''

- · For a sole proprietorship, the sole proprietor;
- · For a partnership, all general partners, and all limited partners owning 20% or more of the equity of the firm;
- · For a corporation, all owners of 20% or more of the corporation;
- · For limited liability companies, all members owning 20% or more of the company; and
- Any Trustor (if the Applicant is owned by a trust).

Paperwork Reduction Act - You are not required to respond to this collection of information unless it displays a currently valid OMB Control Number. The estimated time for completing this application, including gathering data needed, is 8 minutes. Comments about this time or the information requested should be sent to : Small Business Administration, Director, Records Management Dirision, 409 3rd St., SW, Washington DC 20416., and/or SBA Desk Officer. Office of Management and Budget, New Executive Office Building. Washington DC 20503.

Privacy Act (5 U.S.C. 552a) – Under the provisions of the Privacy Act, you are not required to provide your social security number. Failure to provide your social security number may not affect any right, benefit or privilege to which you are entitled. (But see Debt Collection Notice regarding taxpayer identification number below). Disclosures of name and other personal identifiers are required to provide SBA with sufficient information to make a character determination. When evaluating character, SBA considers the person's integrity, candor, and disposition toward eriminal actions. Additionally, SBA is specifically authorized to verify your criminal history, or lack thereof, pursuant to section 7(a)(1)(B). Is USC Section 536(d)(1)(B) of the Small Business Act (the Act).

Disclosure of Information: Requests for information about another party may be denied unless SBA has the written permission of the individual to release the information to the requestor or unless the information is subject to disclosure under the Freedom of Information Act. The Privacy Act authorizes SBA to make certain "rotutine uses" of information protected by that Act. One such rotutine use is the disclosure of information maintained in SBA's system of records when this information protected by that Act. One such rotutine use is the disclosure of information maintained in SBA's system of records when this information rotected by that Act. One such rotutine use is the disclosure of foreign, charged with responsibility for, or otherwise involved in investigation, prosecution, enforcement or prevention of such violations. Another routine use is disclosure to other Federal agencies conducting background checks but only to the extent the information is relevant to the requesting agencies' function. See, 74 F.R. 14890 (2009), and as amended from time to time for additional background and other routine uses. In addition, the CARES Act, requires SBA to register every loan made under the Paycheck Protection Act using the Taxpayer Identification Number (TIN) assigned to the borrower.

Debt Collection Act of 1982, Deficit Reduction Act of 1984 (31 U.S.C. 3701 et seq. and other titles) – SBA must obtain your taxpayer identification number when you apply for a loan. If you receive a loan, and do not make payments as they come due, SBA may: (1) report the status of your loan(s) to credit bureaus, (2) hire a collection agency to collect your loan, (3) offset your income tax refund or other amounts due to you from the Federal Government, (4) suspend or debar you or your company from doing business with the Federal Government, (5) refer your loan to the Department of Justice, or (6) foreclose on collateral or take other action permitted in the loan instruments.

Right to Financial Privacy Act of 1978 (12 U.S.C. 3401) – The Right to Financial Privacy Act of 1978, grants SBA access rights to financial records held by financial institutions that are or have been doing business with you or your business including any financial institutions participating in a loan or loan guaranty. SBA is only required provide a certificate of its compliance with the Act to a financial institution in connection with its first request for access to your financial records. SBA's access rights continue for the term of any approved loan guaranty agreement. SBA is also anthorized to trunsfer to another Government authority any financial records concerning an approved

Paycheck Protection Program Checklist

APPLICATION Complete Paycheck Protection Program Application Form (Form 2483) 1. Entity documents: Complete set a. Articles of Incorporation/Articles of Organization **Bylaws/Operating Agreement** b. Tax ID Number c. Minutes if applicable d. e. Ownership Verification Driver license copy (all owners - 20% or more) 3. Payroll summary report/register for FY 2019 - 12 mos. (to calculate average one month payroll) - capped at \$100,000 per employee Breakdown of payroll benefits (vacation, allowance for dismissal, group healthcare benefits, retirement benefits, etc.) 5. Evidence of payroll taxes paid, insurance premiums and benefits paid to employees that matches payroll summary 6. 2019 business tax return or financial statement (if 2019 tax return not available, provide 2018 tax return) 7. 1099s (for independent contractor) 8. 8 WEEKS AFTER THE FUNDING - verification of funds used Payroll summary report with corresponding bank statement or cancelled check copies of payroll 1. Copy of mortgage statement with corresponding evidence of payment (only interest covered for the eligible use) 2. Copy of lease with corresponding evidence of payment 3. 4. Utility bills with corresponding evidence of payment Certification that the documents are true and correct and that the amount of funds requested for forgiveness were used to 5. keep employees and make eligible mortgage interest, rent, and utility payments. IF YOU DO NOT PROVIDE ABOVE DOCUMENTATION OR USED FUNDS FOR OTHER PURPOSES, REPAYMENT WILL BE REQUIRED. REPAYMENT IS ALSO REQUIRED IF YOU DO NOT MAINTAIN YOUR STAFF AND PAYROLL.

Can Loans be Forgiven?

A borrower is eligible for loan forgiveness equal to the amount the borrower spent on the following items during the 8-week period beginning on the date of the origination of the loan**:

- Payroll costs (using the same definition of payroll costs used to determine loan eligibility)
- Interest on the mortgage obligation incurred in the ordinary course of business
- Rent on a leasing agreement
- Payments on utilities (electricity, gas, water, transportation, telephone, or internet)
- The loan forgiveness cannot exceed the principal.

How could the forgiveness be reduced?

The amount of loan forgiveness calculated above is reduced if there is a reduction in the number of employees or a reduction of greater than 25% in wages paid to employees. Specifically:

Reduction based on reduction of number of employees



PAYROLL Calculated on page 2

COST

PAYROLL

Calculated

on page 2

COST



Average Number of Full-Time Equivalent **Employees (FTEs)** Per Month for the 8-Weeks Beginning on Loan Origination

Option 1:

Average number of FTEs per month from February 15, 2019 to June 30, 2019

Option 2:

Average number of FTEs per month from January 1, 2020 to February 29, 2020

For Seasonal Employers:

Average number of FTEs per month from February 15, 2019 to June 30, 2019

Reduction based on reduction in salaries



For any employee who did not earn during any pay period in 2019 wages at an annualized rate more than \$100,000, the amount of any reduction in wages that is greater than 25% compared to their most recent full guarter.

uschamper.com/co

What if I bring back employees or restore wages?

Reductions in employment or wages that occur during the period beginning on February 15, 2020, and ending 30 days after enactment of the CARES Act, (as compared to February 15, 2020) shall not reduce the amount of loan forgiveness **IF** by June 30, 2020 the borrower eliminates the reduction in employees or reduction in wages.

How do I calculate my average monthly **PAYROLL COSTS?**



sum of INCLUDED payroll costs	sum of EXCLUDED payroll costs	=	PAYROLL COSTS
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Economic Injury Disaster Loans (EIDLs)

Another important aspect of the CARES Act for small businesses is that it expands eligibility for the SBA's <u>Economic Injury Disaster</u> <u>Loans (EIDLs)</u>.

In early March, the SBA's disaster loan program was extended to all small businesses affected by COVID-19, but the CARES Act opens this program up further and makes it easier to apply.

This loan is not forgivable but has longer terms to repay and is still at a low interest rate

Apply for as many programs as you can (you don't have to take the money but at least get in line for it!)**

EIDL continued

- EIDLs are also available to Tribal businesses, cooperatives, and ESOPs (employee stock ownership plans) with fewer than 500 employees. They are also available to all non-profit organizations, including 501(c)(6)s, and to individuals operating as sole proprietors or independent contractors.
- EIDLs can be approved by the SBA based solely on an applicant's credit score.
- EIDLs that are smaller than \$200,000 can be approved without a personal guarantee.
- Borrowers can receive a \$10,000 emergency grant cash advance that can be forgiven if spent on paid leave, maintaining payroll, increased costs due to supply chain disruption, mortgage or lease payments or repaying obligations that cannot be met due to revenue losses.

Has anyone (or anyone you know)received a check yet?



Be productive during the forced slow down Make and check off items on "To Do lists"

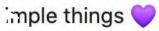
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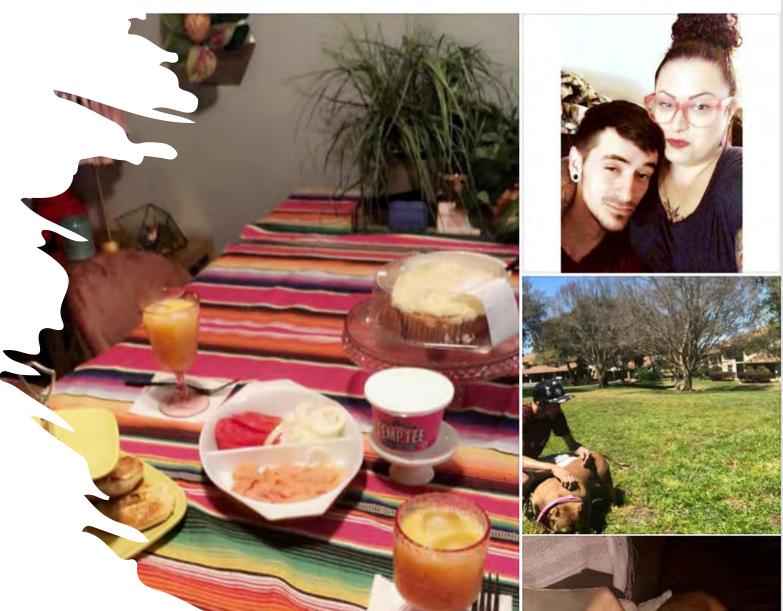
- 1. Look at emergency fund (3-6 months of living expenses)
- 2. Review spending (download credit card transaction history and last 3 months of bank statements) and understand your expenses (without having to justify)
- 3. Shop around (car insurance, call your malpractice carrier and inquire about current low volume discounts)
- 4. Set up a high-yield savings account (look into IUL, etc.)
- 5. If you don't have a financial/wealth mgt. consultant, get one
- 6. Optimize debt repayment (call creditors and ask for lower % rates)
- 7. Pull a credit report (your entitled to a free one every 12 months from the the 3 main credit bureaus; look for errors)
- 8. Think about the afterlife (organize documents, put together a will, POA and healthcare proxy, review beneficiaries on retirement accounts and make sure they are up to date)

Ask questions and pay attention

- Educate your loved ones on the severity of this pandemic
- Stuck at home is safe at home!

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What are the true silver linings in all of this?



More family time



Time to reconnect virtually with friends and family members all over the world Time to read that book you bought a year ago



Time to workout (virtual classes, walks, runs)







Time to organize, clean and prioritize

Less traffic, clear skies, cleaner air

Time to take the dog for a walk (time to rescue a dog because you are home to train him)

Time to be PRESENT

"I can't remember the last time I had dinner with my family so many nights in a row" What matters the most is keeping you and your family safe and healthy. **Open Discussion**

Thank you for joining and keep watching for emails

"Extra Extras" will be sent as frequently as possible with helpful tips and information. The rules are changing everyday so please stay tuned and stay safe. . .

Visit <u>www.pinnaclepa.com</u> for more information

