

MO HealthNet Division and Division of Developmental Disabilities present

ELECTRONIC VISIT VERIFICATION

21ST CENTURY CURES ACT PROVISIONS UNDER SECTION 12006

- ❖ Requires states to implement EVV systems by January 1, 2020 for personal care services and by January 1, 2023 for home health care services
 - Advanced Personal Care
 - Chore Services
 - Consumer Directed Personal Care
 - Homemaker Services
 - In-Home Respite
 - Personal Care
 - Any of the services above reimbursed by a managed care organization

- ❖ States that fail to comply are subject to FMAP reductions

WHAT DATA ELEMENTS MUST BE COLLECTED?

- Type of service performed (including tasks if required by the authorizing agency)
- Individual receiving the service
- Individual providing the service
- Date the service was provided
- Location where service delivery begins & ends
- Time the service begins & ends

TECHNOLOGICAL CAPABILITIES

- ❖ Telephony: acceptable only if consistently available and utilizes a land line from the place of service.
- ❖ Mobile applications: appropriate to access through mobile phones, tablets, etc.
- ❖ GPS technology: system should verify location of delivery through location technology
- ❖ Fixed devices: can be used as long as the EVV system alerts if moved outside residence
- ❖ Biometric recognition: for verification of caregiver or participant

CURRENT STATUS OF EVV IN MISSOURI

- ❖ Provider Choice Model – providers select and fund the EVV system of their choice
- ❖ State will acquire an aggregator solution to collect and consolidate data from all EVV systems

THE AGGREGATOR SOLUTION

- ❖ Request for proposal is in the review process with an anticipated release date of January 2020.
- ❖ Aggregator vendor will work individually with each EVV vendor to ensure successful interface.
- ❖ Will provide ongoing training and support.
- ❖ Will have dashboards for state staff, EVV vendors and providers based on roles.

WHAT WILL EVV SYSTEMS NEED FOR APPROVAL ?

- ❖ Collect all data elements
- ❖ Use location technologies to record service delivery
- ❖ Have ability to work in offline mode
- ❖ Allow for documentation of all manual entries
- ❖ Successfully form a data exchange with the aggregator solution at the cost of the EVV vendor
- ❖ Train all provider agency staff and provide support for the EVV system

REQUESTS FOR GOOD FAITH EFFORT EXEMPTIONS

- ❖ In September 2019, CMS approved Missouri's electronic visit verification (EVV) good faith effort exemption request.
- ❖ The Cures Act provision on good faith effort exemptions do not provide CMS with authority to delay the FMAP reductions for more than one year. Therefore, if the state is not fully compliant by January 1, 2021, FMAP reductions will be applied beginning in the first quarter of 2021 and every quarter thereafter until the state achieves compliance.
- ❖ Please note this does not change Missouri's plan to push for EVV implementation by January, 2020.

EVV FACTS:

Missouri Personal Care providers have been using EVV for several years and have over 60 EVV vendors providing service in Missouri.

EVV vendors are required to ensure provider agency staff have the training necessary to utilize the system to its fullest potential and to provide support.

If the participant does not have a phone, the provider will need to explore other methods of EVV, such as mobile applications for phones or tablets.

In the event of system failure or natural disaster, manual entry may be used as a last option.

EVV requirements do not apply when assisting individuals with their necessary daily needs during delivery of other DMH HCBS waiver services. For example, Community Integration (CI) includes PA components but EVV requirements do not apply to the CI waiver service.

Documentation

- HCBS waiver service documentation requirements will not change. However, there may be some EVV vendors that capture the necessary documentation.
- **For DD providers**, Task list or case notes are not an EVV requirement; they are still required for auditing purposes, but do not have to be a part of the EVV solution.
- Participants still utilizing paper timesheets on January 1, 2020, are at risk of losing PA waiver services until they begin using an EVV system.
- HCBS waiver service providers need to ensure the vendor of choice collects all required information.

Fiscal Integrity

There will be no requirement for the aggregator to submit claims to the MMIS system at this time. The information will go to the aggregator via EVV vendor, and then to personal care service providers and state staff for review.

DD Providers may continue to bill directly to CIMOR or they may work with their EVV provider to bill directly from the EVV vendor to CIMOR and the new case management system.

Initially, Missouri is ensuring all providers are using EVV. Claims should match EVV data and will eventually have to match, since MMAC will be completing audits. However, Missouri has not indicated payment will be withheld if claims do not match EVV transactions. There will be no immediate withhold for claims that do not match, but providers who consistently submit information that doesn't match are likely to be contacted for additional information.

Looking into the future with compliance:

Effective January, 2020, the state will begin to identify providers who are not yet compliant with EVV, the providers will be educated and given an opportunity to remedy the situation.

Providers who exhibit a true effort to comply will not be at risk of adverse action at that time, but will be allowed the opportunity to resolve any issues they are having in reaching compliance. If not successful, they may face termination.

If a participant has been identified as non-complaint without a state approved justification, they may be at risk of losing services.

The next EVV Stakeholder meeting will be held:
December 5th, 2019 10am-12pm
MO Coalition for Community Behavioral
Healthcare
Jefferson City, MO

MHD and DD will share EVV information and post a Frequently Asked Questions (FAQs) document to the MHD and DD websites from this webinar.

“EVV is a process, more than a system –changing the system to improve the process”

Information regarding changes to EVV requirements may be found on the Department of Social Services (DSS), MO HealthNet Division (MHD) website at the following link:

<https://dss.mo.gov/mhd/providers/electronic-visit-verification.htm> and;
21st Century CURES Act
(<https://www.congress.gov/114/plaws/publ255/PLAW-114publ255.pdf>).

Additional Information

<https://dss.mo.gov/mhd/providers/electronic-visit-verification.htm>

Contact Information

Ask.EVV@dss.mo.gov



Improving lives THROUGH
supports and services
THAT FOSTER self-determination.

Thank you!