



# **Electronic Visit Verification Project Stakeholder Update**

**April 27, 2020**

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Bureau Chief, Bureau of Long Term Care



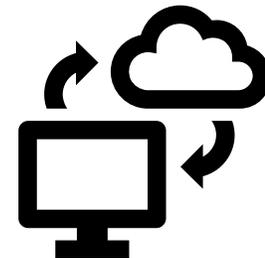
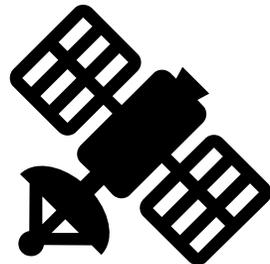
IDAHO DEPARTMENT OF  
**HEALTH & WELFARE**



- **EVV Refresher**
- **Service Analysis Refresher**
- **Implementation Update**
- **Stakeholder Workgroup Updates**
- **Negotiated Rulemaking**
- **Next Steps**



- A system that captures information about a visit to a participant's home
- There are many types of EVV systems available:
  - Telephony (Interactive voice response)
  - GPS-enabled
  - Smart phone-based applications





- **The Electronic Visit Verification (EVV) mandate is in the 21<sup>st</sup> Century CURES Act**
- **Section 12006 requires states to implement an EVV system:**
  - **For Personal Care Services (PCS) by January 1, 2020**
  - **For Home Health Services by January 1, 2023**
- **Fiscal penalties will be imposed on the state for non-compliance\***

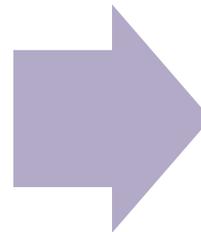
*\*States have an opportunity to request a waiver of the penalty for the first year of implementation. Our Good Faith Effort (waiver) was approved on November 5, 2019, delaying implementation for PCS to January 1, 2021.*



- **EVV is required at the service level, not a program level. What does that mean?**

**Program** refers to the entity that oversees service delivery.

- **Bureau of Long Term Care (BLTC)** oversees the Aged & Disabled Waiver, Katie Beckett, etc.
- **Bureau of Developmental Disability Services (BDDS)** oversees the Adult DD Waiver, children's DD services, Targeted Service Coordination, etc.
- **Bureau of Clinical and Quality Management** oversees home health, hospice, etc.

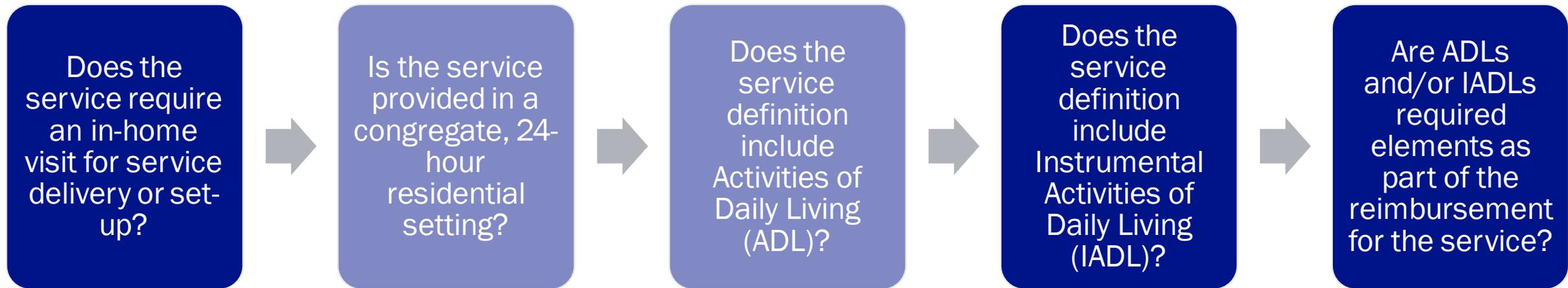


**Service** refers to the type of care that is provided.

- **BLTC** services in-scope of EVV are: Attendant Care, Homemaker Services, Respite (if rendered by PAA), and Personal Care Services.
- **BDDS** services in-scope of EVV are: None at this time.
- **Bureau of Clinical and Quality Management** services in-scope of EVV are: Nursing Services, PT, OT, Speech-language Pathology, Aide Services, and Audiology Services



- The project team examined all services offered by BLTC, BDDS and the Bureau of Clinical and Quality Management using the following criteria:



- Though many services offered by BDDS include some of the components above, the IDAPA service definitions did not fit within the scope of EVV



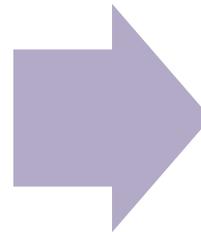
- The EVV Project Team determined Residential Habilitation was out of scope based on the service definition in Idaho and requested confirmation from the Centers for Medicare and Medicaid Services (CMS)
- The team had a technical assistance call with CMS on December 18, 2019
  - CMS indicated that if less than 20% of a service unit is spent providing assistance with Activities of Daily Living (ADLs), then the service is not subject to EVV
  - We are completing a more in-depth analysis of hourly Residential Habilitation services to confirm the 20% threshold is not met (on average, across the population receiving this service)
  - The Project Team will make this analysis available once complete and approved by Medicaid Administration. *CMS has indicated they will not be making formal determinations on the accuracy of the state's determination of in or out-of-scope services.*



## Project Phase II – Determine and Implement Idaho’s EVV Model

### Spring 2020

- ~~Continue work with stakeholders to plan implementation of chosen EVV model.~~
- ~~Begin working on changes to Idaho Administrative Code (IDAPA).~~
- **Initiate requirements gathering for state aggregator.**



### Summer/Fall 2020

- Initiate EVV launch – state aggregator and provider adoption of EVV compliant systems.
- Complete training for relevant stakeholder groups.
- Temporary rules go live January 1, 2021 (\*pending decisions associated with rule promulgation process changes).



- **Idaho has selected a Provider Choice model**

## Provider Choice

- Providers can use any EVV software they choose that meets the minimum requirements and is compatible with the state's aggregator.
- The state must identify how to aggregate and use data from those systems.

- **The terms “Open Model” and “Provider Choice Model” are interchangeable**
- **The selected model has been approved by Medicaid Administration with controls in place to ensure compatibility with the state's aggregator**
  - **Example: Provision requiring successful data transmission to aggregator to be considered compliant**



- The EVV budget requests were funded by the Legislature! What's next?
  1. Build and implement the state's aggregator solution
    - Primarily internal work and coordination between the EVV Project Team, Medicaid Systems Team and DXC Technology
  2. Implement rate increase for Personal Assistance Agencies

FY 2021 Program Maintenance	General Funds	Federal Funds	Total
Electronic Visit Verification	\$545,700	\$1,828,700	\$2,374,400

A copy of the Medicaid FY 2021 budget and corresponding documents is located on the Idaho Legislature [webpage](#) by searching for Senate Bill 1418



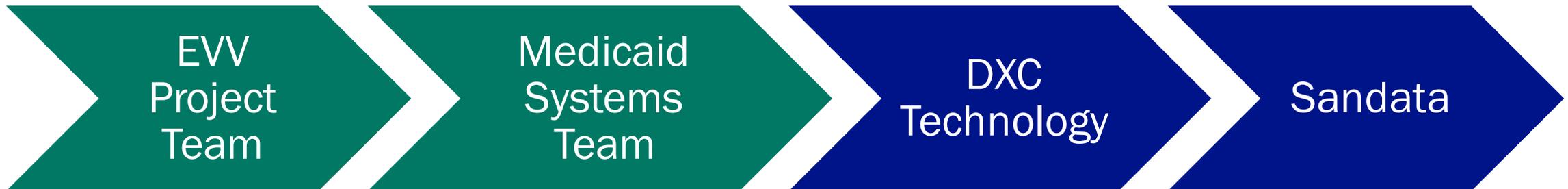
- Reimbursement rates will be increased for Personal Assistance Agencies for the following procedure codes effective July 1, 2020, applicable to dates of service on or after July 1:

Procedure Code	Service Description	Unit	Current Rates	Rates Effective 7/1/20
T1019	Personal Care Services	15-Min	\$ 4.49	\$ 4.74
S5125	Attendant Care Services	15-Min	\$ 4.49	\$ 4.74
S5130	Homemaker Services	15-Min	\$ 4.16	\$ 4.41
T1005	Respite	15-Min	\$ 4.16	\$ 4.41

- These rates are applicable regardless of the provider's EVV status
- This will be formally announced via a Medicaid Information Release in June



- The Project Team meets bi-weekly with the Bureau of Medicaid Enterprise Systems to discuss business requirements for the aggregator
  - The aggregator will transmit the provider's EVV data to the Medicaid Management Information System (MMIS), the state's claims processing system
- The Medicaid Systems Team is working with DXC Technology (Idaho's MMIS vendor) to identify functional requirements for the aggregator
- DXC Technology is working with Sandata (sub-contractor of DXC Technology) to complete the aggregator work



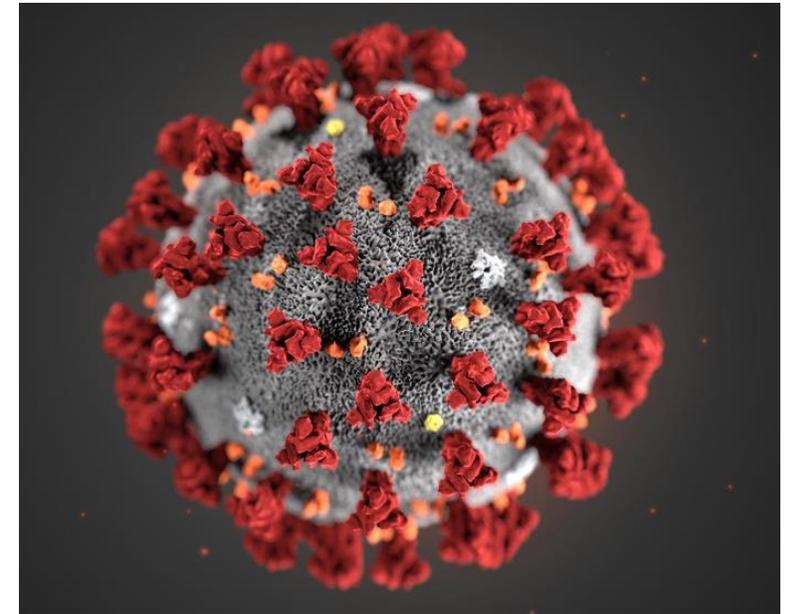


- **The Bureau of Medicaid Enterprise Systems will submit a request to our federal partner for enhanced funding to implement the aggregator**
- **They will also execute an amendment to the existing contract with DXC Technology to authorize our work with Sandata to implement the aggregator**
- **The formal effective date for beginning our work with Sandata is July 1, when funds that were appropriated by the legislature can be spent**





- **At this time, COVID-19 does not modify the implementation timeline for EVV**
- **Section 12006 of the 21<sup>st</sup> Century Cures Act specifies the dates EVV must be implemented for PCS and HHS**
- **Idaho's Good Faith Effort was approved by CMS; however, CMS does not have the authority to extend our exemption**
- **The implementation deadline is defined in federal statute. It can only be changed by Congress**





- All EVV stakeholder focus groups have been launched!



- Updated workgroup charters are available on our project webpage, including the Policy & Operation Workgroup and Implementation Workgroup close-out charters



## Completed Items

- First versions of the Frequently Asked Questions and the Provider Best Practice Guidance Document are on the webpage, located under the Resources header!

## Pending Items

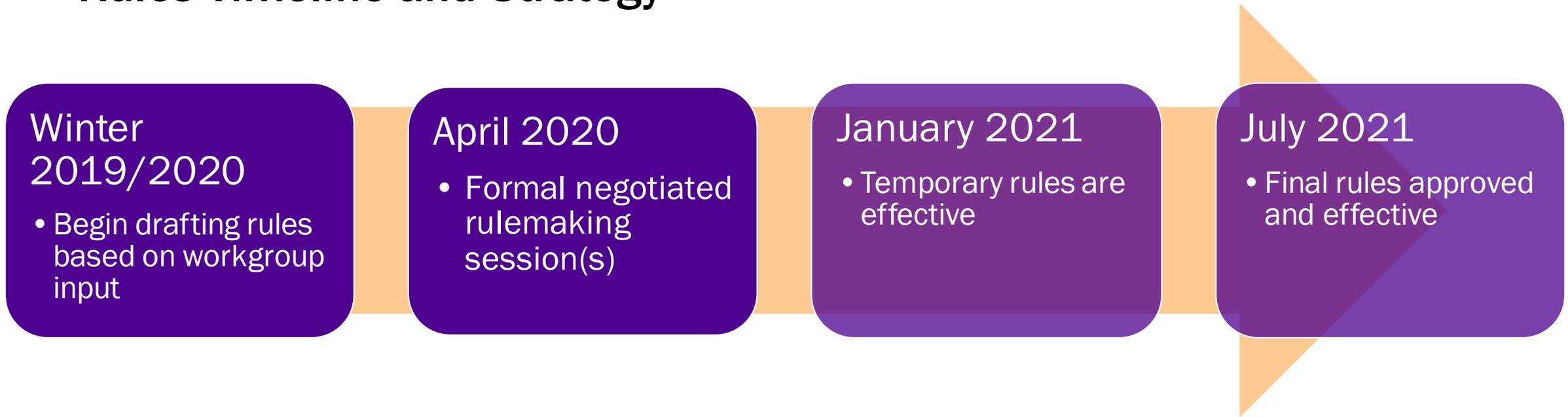
- Informed Consent draft – This will be available for public comment soon!

## Upcoming

- Drafting a Participant Best Practice Guidance Document
- Identifying implementation phases and a timeline



## Rules Timeline and Strategy



➤ By writing in an implementation time frame, we can provide a phase-in period for providers and Medicaid to implement. Example: IDAPA 16.03.10.318.03:

**03. Quality Assurance.** The Department will begin enforcement of quality assurance compliance with Sections 311 through 314 of these rules on January 1, 2017. (7-1-16)



- **The EVV Project Team hosted a Negotiated Rulemaking session on April 22, 2020 from 10:00 AM – 12:00 PM via WebEx**
  - **Reviewed draft rule text specific to EVV in IDAPA 16.03.09, “Medicaid Basic Benefits Plan” and 16.03.10, “Medicaid Enhanced Plan Benefits”**
  - **Reviewed recommendations for Bureau of Long Term Care (BLTC) rules in IDAPA 16.03.10, “Medicaid Enhanced Plan Benefits”**
    - **BLTC hosted a rule review session for PAA providers on February 25, 2020**
    - **BLTC compiled stakeholder feedback and incorporated actionable items for review at Negotiated Rulemaking**



- Due to changes to the rule promulgation process this year, the final draft of rule text may not aesthetically look like what you have seen in the past
- Draft rule text is available on our website: if you have additional comments or input, please send your comments to the project team at [EVV@dhw.idaho.gov](mailto:EVV@dhw.idaho.gov)
- Please ensure your comments are submitted on or before May 22, 2020



- **The Project Team is soliciting participation on each of the workgroups by individuals accessing EVV-applicable services to ensure that all aspects of the user perspective are captured**
- **We may have additional opportunities for participant engagement as the project develops**
- **We have compiled data from our Participant Experience Survey. The summary will be available soon on our project webpage!**



- **Distribute workgroup deliverables for review and comment**
- **Internal work:**
  - **Engaging with our systems team**
  - **Engaging with DXC Technology**
- **Next stakeholder update: June**

A large teal speech bubble with a white outline, containing the text "WHAT'S NEXT?" in white, bold, uppercase letters. A smaller teal circle is positioned below the main bubble, connected by a thin line, suggesting a thought or a question.

**WHAT'S  
NEXT?**

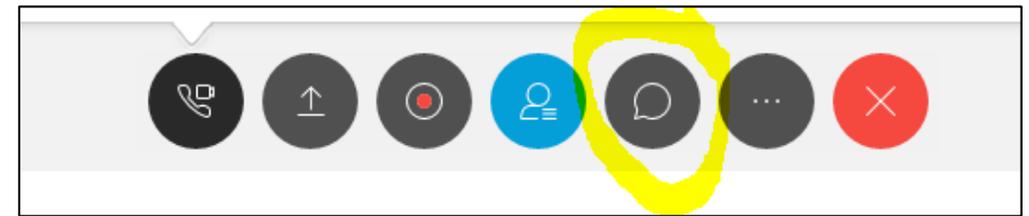


## Stay Up-To-Date!

- Visit <http://EVV.dhw.Idaho.gov> for more information about the project and upcoming activities
- Email the project team at [EVV@dhw.Idaho.gov](mailto:EVV@dhw.Idaho.gov)



Ask a question using the “chat” feature in the WebEx Application.



You can also ask your question by pressing \*6 to un-mute your phone.

