



EVV Tool for In-Home and CDS Providers

Is Your EVV System and Set-up Compliant with the Rules?

(Updated 4/26/17)

EVV Minimum System Requirements

1. How does your EVV system document and verify the participant's identity?
 - a. By the participant's personal telephone?
 - b. By a unique number assigned to the participant?
 - c. By alternative technology? If so, how is this technology verifying the participant's identity?
2. How does your EVV system document and verify the attendant/aide?
 - a. By the assignment of a personal identification number unique to the attendant/aide?
 - b. By alternative technology? If so, how is this technology verifying the attendant/aide identity?
3. Does your EVV system document the exact date of services delivered?
4. Does your EVV system document the exact time the services begin?
5. Does your EVV system document the exact time the services end?
6. Does your EVV system support changes in the care plan?
 - a. Can additional task codes be added?
 - b. Can additional services be added?
 - c. Does your system set-up limit the number of codes, services and /or tasks that can be inputted? **If so, your EVV system may not meet the EVV rule.**
7. Does your EVV system allow for addition of services if DHSS makes changes to these programs?

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References: 19 CSR 15.9.100, 19 CSR 15.9.200, 13 CSR 70-91, 19CSR 15-9.100, 19CSR 15-7, 19 CSR 15-8,660.023, 208.909

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EVV Minimum System Requirements Continued

8. At a minimum, your EVV system must be capable of retrieving current and archived data to produce reports of services delivered, tasks performed, participant identity, beginning and ending times of service, and date of service in summary fashion that constitute adequate documentation of services.
 - a. Pull an EVV report for a current period. Does your report display in an easily readable format the following?
 - i. Service(s) delivered?
 - ii. Task(s) performed?
 - iii. Participant identity?
 - iv. Begin time, end time and date?
 - b. Pull an EVV report from July 1, 2015 or the first month you started EVV and compare to the items above. Did the report include all the items above?
 - c. Do you have a legend if your report displays task and or service codes?
 - d. Does the report display your company's name or National Provider Identifier (NPI) number?
 - e. How would you obtain your EVV documentation to be given to MMAC?
 - i. By printing out your EVV reports?
 - ii. Saving the electronic EVV reports on a flash drive?
 - iii. How would you confirm it is the right report, with the right data, meeting the above reporting requirements?

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- iv. How would your EVV modifications and or adjustments be tied into your EVV reports you are giving to MMAC?
- v. Where would you obtain your documentation reasons for the manual adjustments and modifications?

EVV Minimum System Requirements Continued

- 9. Is your EVV system capable of producing reimbursements requests for participant approval that ensure accuracy and compliance with program expectations?
 - a. Is this report easy for the participant to understand?
 - b. Do you have a process to send out these reports upon participant request?
 - c. What is your practice if the participant confirms this report is not adequate?

EVV Functionality

- 1. Does your EVV system utilize one or more of the following?
 - a. Participant's personal landline
 - b. Participant's cellular phone
 - c. Location Technologies
 - i. Near Field Communications - NFC
 - ii. Global Positions System - GPS
 - iii. Blue Tooth Low Energy – BLE
 - d. Affixed Electronic Device in the participant's location
 - e. Biometric Verification System – BVV
 - f. Alternative technology – Does it meet the minimum EVV system requirements?



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2. Does your EVV system accommodate more than one participant and/ or attendant/aide in the same home or at the same phone number?
 - a. Do you use a timesheet process? **This is acceptable practice if your EVV system does not accommodate items listed above. Must document reason for timesheet.**
 - b. If your EVV system utilizes the same telephone number for more than one participant is it capable of distinguishing each participant individually?
 - c. Does your EVV system allow attendant/aide to work a split shift?
 - i. Or is this a paper time sheet process?

EVV Functionality Continued

3. How your EVV system document services and tasks delivered to each participant?
 - a. Do the attendant/aides enter service codes for services without task codes?
 - b. Your EVV system, per your choice, does not record tasks. If this is your EVV system set-up what is your process to document tasks delivered? **Per EVV rule this is acceptable practice if you have a "paper" task documentation process in place.**
 - c. Personal Care – Agency Directed. How does your EVV system document/ identify Medical Related Household tasks under Personal Care? Is there a process to differentiate homemaker tasks under the Aged and Disabled Waiver?
4. **In Personal Care Assistance -Consumer Directed Services how does your EVV system set-up document activities/ tasks delivered to the participant?**
 - a. **By documenting the tasks that appear on the Cyber Access Web Tool authorization?**
 - i. **A full list of the 25 CDS tasks is in the CDS Worksheet, Policy 4.0 Appendix 4.**
 - b. **By utilizing task "groupings", used historically in the program when it was administered by the Department of Education and Secondary Education Vocation Rehabilitation?**

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- i. Personal Care
- ii. Toileting
- iii. Health
- iv. House Keeping
- v. Transportation
- vi. Meals.

EVV Functionality Continued

- c. By the activity categories "Routine tasks" in regulation 19 CSR 15-8. Routine tasks and instrumental activities of daily living include, but not limited to, the following:
 - i. Bowel and Bladder elimination
 - ii. Dressing and undressing
 - iii. Moving into and out of bed
 - iv. Preparation and consumption of food and drink
 - v. Bathing and grooming
 - vi. Shopping/transportation
 - vii. Maintenance and use of prostheses, aids, equipment and other similar devices
 - viii. Ambulation, housekeeping, or other functions of daily living based on an independent living philosophy as specified in state law and regulation.

All the three listed above are acceptable methods of documenting tasks in the CDS program for now.

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If using task /activity “groupings”, the vendor must clearly define which task appearing on the Cyber Assess Web Tool authorization fall under each of the “groupings”.

5. Where do you document the justification of manual modifications, adjustments or exceptions after the attendant/aide has entered or failed to enter the information as required?
 - a. In the EVV system?
 - b. On a timesheet?
 - c. In an e-mail?
 - d. On a separate agency form?
 - e. A combination of the above methods?
 - f. Do your EVV reports distinguish if the EVV documentation was a manual entry?
 - g. If you are documenting manual justifications other than in your EVV system where are you storing this information?
 - h. What is your process for modifications, adjustments or exceptions?

EVV Implementation

1. If asked by MMAC to pull an EVV report whom in your agency will be able to pull this report?
 - a. If your agency has many EVV reports, how will you ensure the correct EVV report is pulled that meets the EVV rule?
2. Was your EVV system set up prior to or by July 1, 2015 per the EVV standards?
3. If your EVV is not fully implemented you may be asked your EVV implementation efforts. Who in your agency can articulate your full implementation process?
 - a. When was your EVV system process started?

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- b. If partially implemented can you distinguish which participants were included and or excluded in your EVV process?
 - i. Were only certain counties initially implemented on EVV?
 - ii. Or were certain attendant/aides trained to initially used EVV?
 - c. How many participants are using your EVV system?
 - d. Can you anticipate a full EVV implementation date?
4. Have you developed internal policies and procedures that meet EVV standards?
 5. Have you developed EVV training materials for the attendants/aides and their office support staff?

Best Practices

1. Who is responsible to ensure your EVV system and EVV set-up is compliant with the EVV rules?
2. If a telephone or other electronic verification options are not available or accessible in the participant's home do you obtain documentation explaining the reason the attendant/aide is not using EVV?
 - a. What is your documentation process when the participant refuses to allow the attendant/aide to use EVV?
 - b. What is your process if a participant does not have a landline?

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- c. Is your process a paper time sheet? **If EVV is not available, assessable or participant refused use of EVV then reverting to paper time sheet is required. Using a blank paper etcetera is not acceptable.**
 - d. If you use a FOB or Validator do you have a process to assess if these products are secure in the participant's home?
 - e. Do you document that a FOB or Validator has been assigned to the participant?
3. What is your process when a participant refuses to use your EVV system?
 4. Do you charge a fee to offset your cost of the EVV system? **If so, not recommended by MMAC**
 - a. To your participants?
 - b. To your attendant/aides?
 5. Do you use your EVV system and set-up for other programs or service lines? For example, PDN, DMH?
 - a. If so, have you checked if your EVV system and set-up meets the program requirements for these specific programs?

Best Practices Continued

6. Do you have a process in place to accrue partial units by service line?
7. **Does your EVV system round minutes? (Some Providers still are requesting their minutes to round up to a full unit of 15 minutes.)**

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EVV Compliance Evaluation

1. What is your process to record modifications and justifications of manual time reporting adjustments or exceptions?
 - a. Do you always accept the attendant/aide's verbal reason why the EVV record is incomplete or inaccurate?
 - b. Do your teams verify accuracy of the submitted timesheet?
2. How does your EVV system maintain a reliable backup and recovery process?
 - a. Are you aware of your EVV system's backup and recovery process?
 - b. How long does your EVV system store this data? (**Providers must maintain their records for 6 years.**)
 - c. If you have changed EVV systems who can access this data?
 - d. Is there a determined length of time when you can access the EVV data from you previous EVV system?
3. Is your archived EVV data accessible in a timely matter?
4. What is your EVV system recovery process in the event of a system malfunction or disaster?

EVV Compliance Evaluation Continued

5. What is your alternative system for timekeeping due to an EVV failure or inability to use the EVV system for a start and or end of shift?

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6. EVV System set-up can document tasks delivered and bill by service type accordingly. If your EVV system set-up to document the services by tasks, how does it document services that do not have an applicable task, such as Respite Care Services?
7. Is the attendant/aide's name on your EVV timekeeping records and does your EVV system includes this information on reports?
8. Do you allow the attendant/aide to use their personal cell phone to clock in and or out? **Does not meet EVV rule if personal's cell phone not in collaboration with a. or b. listed below.**
 - a. Is it in collaboration with a FOB or validator in the participant's home?
 - b. Is it in collaboration with your EVV GPS system on the attendant/aide's phone?

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