

Electronic Visit Verification (EVV) Policy Training for CDS Employers



Parkland
Community Health Plan



Introduction to EVV

A program provider, FMSA or CDS employer must use an EVV vendor system or an HHSC-approved EVV proprietary system to electronically document the delivery of an EVV service.

EVV is a computer-based system that electronically documents and verifies service delivery information, such as date, time, service type and location for certain Medicaid service visits.

An EVV system must capture the following data elements:

- The type of service provided
- The name of the recipient to whom the service is provided
- The date and times the provider began and ended the service delivery visit
- The location, including the address and geolocation, at which the service was provided
- The name of the service provider who provided the service
- Other information the commission determines is necessary to ensure the accurate adjudication of Medicaid claims

Texas HHSC determines when a program provider, FMSA or CDS employer must use EVV based on the services delivered. EVV is required for all programs and services listed in the [Programs and Services Required to Use EVV](#) document.

Introduction to EVV, Cont.

State Laws and Texas Administrative Code

Texas law requires HHSC to implement an EVV program.

Program providers or FMSAs contracted with HHSC or an MCO must follow state law, TAC and associated policies established by HHSC when delivering Medicaid services.

Texas EVV statute and TAC include:

- [Texas Government Code Section 531.024172](#)
- [Texas Administrative Code, Title, 1 Part 15, Chapter 354, Subchapter O](#)

Live-in caregivers are not exempt from EVV requirements in Texas.

Federal Law

The [21st Century Cures Act \(the Cures Act\)](#), enacted by the U.S. Congress in Dec. 2016, added Section 1903(l) to the Social Security Act to require all states to use EVV.

The Cures Act requires the use of EVV for personal care services (PCS) provided under a State plan of the Social Security Act or under a waiver of the plan including sections 1905(a)(24), 1915(c), 1915(i), 1915(j), 1915(k) and Section 1115; and home health care services (HHCS) provided under 1905(a)(7) provided under a State plan of the Social Security Act or a waiver of the plan. This includes services delivered under the CDS option.

States must implement EVV by the following deadlines or risk a loss of federal Medicaid matching dollars:

- PCS by Jan. 1, 2020.
 - Texas received approval for a one-year delay of the deadline to Jan. 1, 2021.
- HHCS by Jan. 1, 2023.
 - Texas may apply for a one-year delay of the deadline to Jan. 1, 2024

Failure to implement EVV in accordance with the Cures Act will result in a reduction of federal Medicaid funding for Texas.

Introduction to EVV, Cont.

What is Form 1722, Employer's Selection for Electronic Visit Verification Responsibilities?

This form is used to provide information to the CDS employer on requirements for using an EVV system to electronically verify that the CDS employee delivers the required Medicaid services and documents the date and time service delivery begins and ends. EVV replaces paper timesheets for required personal care services.

- The FMSA and CDS employer must complete this form at the time of EVV implementation for a program or service delivered through the CDS option, upon enrollment in the CDS option and any time the CDS employer request a change in designation of EVV responsibilities.
- The FMSA explains the responsibilities of the CDS employer and FMSA for using the EVV system. The CDS employer will choose the appropriate option:
 - Who completes visit maintenance: the CDS employer or the FMSA.
 - Who approves the time worked by the employee:
 - the CDS employer approves time worked in the EVV system; or
 - the CDS employer elects to have the FMSA confirm the time worked in the EVV system based on approval by the CDS employer.
- The FMSA must process and select the appropriate option(s) in the EVV system within five business days of receiving a completed form, unless otherwise directed by HHSC.

EVV Resources and Communications

All program providers, FMSAs and CDS employers must sign up for GovDelivery to receive the most current news and alerts related to EVV.

Program providers, FMSAs and CDS employers can visit the HHSC EVV webpage to access the most up to date information such as:

- EVV News and Alerts
- Programs and services which require the use of EVV
- Statutes and rules governing EVV
- Service bill codes for EVV
- EVV contact information guide
- EVV training requirements and resources

CDS Employer EVV Contact Guide:

<https://www.hhs.texas.gov/sites/default/files/documents/doing-business-with-hhs/providers/long-term-care/evv/cds-evv-contact-information-guide.pdf>

PCHP's EVV website: <https://parklandhealthplan.com/providers/electronic-visit-verification/>

HHSC EVV website: <https://www.hhs.texas.gov/doing-business-hhs/provider-portals/long-term-care/providers/resources/electronic-visit-verification>

HHSC EVV Policy Handbook: <https://www.hhs.texas.gov/handbooks/electronic-visit-verification-policy-handbook>

Programs, Services and Service Delivery Options Required to use EVV:

<https://www.hhs.texas.gov/sites/default/files/documents/doing-business-with-hhs/providers/long-term-care/evv/programs-services-required-evv.pdf>

HHSC EVV Reason Codes:

<https://www.hhs.texas.gov/sites/default/files/documents/doing-business-with-hhs/providers/long-term-care/evv/evv-reason-codes-jan-1-2021.pdf>

For questions related to EVV, please email PCHP at: PCHP.EVV@PHHS.ORG

EVV Definitions and Key Terms

Key Terms are words regularly used throughout the EVV Policy Handbook. If a term is already defined in the handbook, the reference is provided below.

Auto-Verification (auto-verify) – An automatic process the EVV system performs to confirm an EVV visit transaction matches existing critical data elements and schedule data, if applicable, in the EVV system with no exceptions.

Business Day – Monday through Friday, except national or state holidays.

Consumer Directed Service (CDS) employer – Refer to 2800 CDS Employer and 16010 CDS Option Stakeholders.

Consumer Directed Services (CDS) option – A service delivery option in which a CDS employer employs and retains a service provider and directs the delivery of services.

Electronic Visit Verification (EVV) – Refer to 1100 EVV Overview.

EVV Aggregator – Refer to 6200 EVV Aggregator.

EVV Compliance Reviews – Refer to 10000 EVV Compliance Reviews.

EVV Claim – Documentation submitted to HHSC or an MCO for reimbursement of services required to use EVV.

EVV Portal – An online system established by HHSC that allows users to perform searches and view reports associated with visit data and EVV claim match results in the EVV Aggregator.

EVV proprietary system – Refer to 5000 EVV Proprietary System.

EVV system – An EVV vendor system or an EVV proprietary system used to electronically document and verify critical data elements related to the delivery of EVV services.

EVV System Administrator – A person appointed by a program provider or an FMSA to serve as the primary contact for administering access to an EVV system. Refer to 4130 Select an EVV System for more information.

EVV vendor system – Refer to 4110 EVV Vendor System.

EVV visit maintenance – Refer to 8000 Visit Maintenance.

EVV Definitions and Key Terms, Cont.

EVV visit transaction – Refer to 6000 EVV Visit Transaction.

Exception – Refer to 8010 Required Visit Maintenance.

Financial management services agency (FMSA) – Refer to 2600 Financial Management Services Agency and 16010 CDS Option Stakeholders.

Member – Refer to 2700 Member and 16010 CDS Option Stakeholders.

Payer – Refer to 2100 Payers.

Program provider – Refer to 2500 Program Provider.

Reason Code Description and Reason Code Number – Refer to 9000 EVV Reason Code.

Service Delivery Documentation – Information written on paper or another format by the service provider when the EVV system is unavailable to document the delivery of service. Refer to 1400 Failure to use an EVV System for more information.

Service provider (or CDS employee) – A person who provides an EVV service to a member and is employed by or contracted with either a program provider or CDS employer. Note: Service providers who are contracted directly with HHSC or an MCO as a program provider must meet applicable EVV requirements for service providers and program providers.

Service Responsibility Option (SRO) – A service delivery option where a member or LAR selects, trains, and provides daily management of a service provider, while the fiscal, personnel and service back-up plan responsibilities remain with the program provider.

Signature Authority – A person who has legal authority to sign contracts and make transactional decisions.

EVV Required Services

What programs and services are required to use EVV?

Texas HHSC determines when a CDS employer or FMSA must use EVV based on the type of services delivered. EVV is required for all programs, services, and service delivery options listed in the Programs and Services Required to Use EVV document, regardless of who is delivering the service. Texas EVV requirements do not exempt live-in caregivers.

What are Non-EVV services?

A non-EVV services is an authorized services not required to use EVV. An example of a non-EVV service is supported employment. CDS employers must continue to follow their program requirements for documenting non-EVV services. Using the EVV system does not replace paper documentation for non-EVV services. The CDS employer will determine how the CDS employee will clock in and clock out of the EVV system when switching between EVV services and non-EVV services throughout the day. You will see some examples later in this course, on the page titled “Recording Non-EVV Time Examples”, in the Electronic Verification Methods Policy section.

A photograph of a woman with long dark hair, wearing a pink top, smiling warmly while holding a young child. The child is laughing joyfully with their mouth wide open. The entire image is overlaid with a semi-transparent purple filter. The text 'EVV & CDS' is centered in white, bold, sans-serif font.

EVV & CDS

Form 22, Employer's Selection for EVV Responsibilities

With assistance from the FMSA, CDS employers must complete this form by choosing the appropriate option for using the EVV system.

CDS employers may choose to have the DR assist with EVV responsibilities described on Form 1722, Employer's Selection for EVV Responsibilities, if the CDS employer appoints a DR. The CDS employer is responsible for any actions taken by the DR and must ensure that the DR follows all privacy and security protocols, including when the DR accesses EVV data.

CDS employers who selected Option 1 (Option 1 CDS employer) on Form 1722, Employer's Selection for Electronic Visit Verification Responsibilities must:

- Ensure they have access to the EVV system and can perform EVV responsibilities.
- Ensure CDS employees use the EVV system to clock in when EVV services begin and clock out when EVV services end.
- Complete visit maintenance in the EVV system within the visit maintenance time frame.
- Approve CDS employee time worked in the EVV system in a timely manner.

CDS employers who selected Option 2 (Option 2 CDS employer) on Form 1722, Employer's Selection for Electronic Visit Verification Responsibilities must:

- Ensure CDS employees use the EVV system to clock in when EVV services begin and clock out when EVV services end.
- Approve CDS employee time worked in the EVV system in a timely manner.

CDS employers who selected Option 3 (Option 3 CDS employer) on Form 1722, Employer's Selection for Electronic Visit Verification Responsibilities must:

- Ensure CDS employees use the EVV system to clock in when EVV services begin and clock out when EVV services end.
- Approve CDS employee time worked using the method the FMSA and CDS employer have agreed to in a timely manner.
 - Refer to program policy, CDS policy or the FMSA for more information.

If time worked is not captured in the EVV system, Medicaid cannot reimburse the FMSA for payroll. CDS employees may experience a delay in payment.

CDS employers must provide Form 1722, Employer's Selection for EVV Responsibilities, to the FMSA.

If the CDS employer does not complete and provide Form 1722, Employer's Selection for EVV Responsibilities to the FMSA before the member starts receiving EVV services, the FMSA will select Option 3 when creating the CDS employer's account in the EVV system. CDS employers can request a change by completing a form and providing it to the FMSA.

Refer to [Form 1722](#), Employer's Selection for Electronic Visit Verification Responsibilities for more information.

CDS Training

Required Training for CDS Employers

EVV Policy Handbook [4200 EVV Training](#) requires CDS employers, or the appointed DR, to complete all required EVV training prior to using an EVV system for the first time and yearly.

Refer to [4230 EVV Training Requirements for CDS Employers](#) for more information.

CDS employers can access HHSC *EVV Training Requirements Checklist* to track training requirements and completion of requirements. The checklist is available on the [EVV Training Resources webpage](#).

CDS Employer Training Responsibilities

CDS employers are responsible for providing Clock In and Clock Out Methods training to CDS employees.

CDS employers must use [Form 1732](#), Management and Training of Service Provider to keep up-to-date training records of CDS employee training completions. CDS employers must provide Form 1732 to the FMSA.

Refer to [4240 Training Requirements for Service Providers and CDS Employees](#) for more information.

EVV Steps for CDS Employers

CDS employers must complete the following steps before using an EVV system:

1. Step 1: Complete Form 1722, Employer's Selection for EVV Responsibilities with FMSA assistance.
2. Step 2: Complete all required EVV trainings (Refer to [4230 EVV Training Requirements for CDS Employers](#)):
 - EVV System & EVV Policy
3. Step 3: Train CDS employees on the clock in and clock out methods. (Refer to [4240 Training Requirements for Service Providers and CDS Employees](#))

Once CDS employers have completed Steps 1 -3 in 16020 CDS Employer Steps Prior to Using an EVV System, they can use the EVV system. The following steps explain when to use the EVV system and required actions for CDS employers.

4. Step 4: The CDS employer must ensure the CDS employee uses an approved clock in and clock out method to:
 - Clock in at the beginning of service delivery & Clock out at the end of service delivery.
5. Step 5: Option 1 CDS employers, or an FMSA on behalf of Option 2 and Option 3 CDS employers, must complete visit maintenance to:
 - Correct any exceptions or critical errors.
 - Adjust bill hours, if needed.
 - Add Reason Codes as required.
 - Enter manual EVV visits, if necessary.
6. Step 6: CDS employers must review and approve time worked after visit maintenance is complete.
 - Option 1 and Option 2 CDS employers will approve time worked using the EVV system.
 - Option 3 CDS employers will approve time worked using the method the FMSA and CDS employer have agreed to in a timely manner.

A photograph of a woman and a young girl laughing together outdoors. The woman is in the foreground, smiling broadly, wearing a pink top. The girl is in the foreground, laughing with her mouth open, wearing a white patterned shirt. The background shows a wooden fence and trees. The entire image is overlaid with a purple tint.

EVV Responsibilities

FMSA Responsibilities

Some of the responsibilities of the FMSA include, but are not limited to:

- Selecting and onboarding with an EVV system
 - Sharing Form 1722 Employer's Selection for EVV Responsibilities with CDS employers
 - Providing EVV policy training to CDS employers, if needed
 - Completing visit maintenance, depending on the CDS employer's Form 1722 selection
 - Submitting EVV claims
- The FMSA must have the most current information and other information required to pay the CDS employee available when setting up the information in an EVV system. **For example**, the:
- Member's phone number
 - Member's address
 - Name of the designated representative (DR), if applicable
 - CDS employee's name
 - Name of the MCO the member selected (if applicable)

CDS Employer Responsibilities

Complete Form 1722, Employer's Selection for EVV Responsibilities and submit it to your FMSA.

- Complete EVV system and policy training.
- Determine the best clock in and clock out methods for your CDS employees and train them on the methods (you may receive assistance from the EVV vendor or your FMSA).
- Keep up-to-date training records of your employee's training using Form 1732, Management and Training of Service Provider, and send Form 1732 to your FMSA.
- Continue to approve time worked by the CDS employee.
- Follow all EVV requirements.
- Use the EVV system selected by your FMSA.
- Complete visit maintenance, depending on your Form 1722 selection.
- **Important:** Make sure your employee is clocking in and clocking out.
- The CDS employer is to review and approve time worked by the CDS employee:
 - If the CDS employer selected **Option 1 and Option 2** on Form 1722, they will:
 - Review and approve time in the EVV system and submit the approval to the FMSA so the FMSA can compare time worked to the budget.
 - If the CDS employer selected **Option 3** on Form 1722, they will:
 - Review and approve time outside the EVV system. Please work with the FMSA to discuss this process.
 - Submit the approval to the FMSA so the FMSA can compare time worked to the budget.

Designated Representative (DR) Responsibilities:

If a CDS employer (member or LAR) needs support or assistance to meet employer responsibilities, they may choose to appoint a DR.

•A CDS employer can appoint a DR to assist or to perform EVV responsibilities in the CDS Option. A DR must:

- Be 18 years of age or older.
- Be a volunteer.
- Pass a criminal history background check if a non-relative; and
- Be or become actively involved in the individual's life and be able to complete the self-assessment.

•The CDS employer will specify which EVV tasks the DR will assist with or assume. The CDS employer maintains responsibility for actions taken by the DR. Tasks might include approving time sheets or training CDS employees.

CDS Employee Responsibilities

Take the EVV clock in/clock out methods training.

- Clock in and clock out using one of the three approved EVV clock in and clock out methods:
 - Mobile method
 - Home phone landline
 - Alternative device
- Notify the CDS employer if the preferred clock in or clock out methods are not working.

Failure to Use an EVV System in the CDS Option

CDS employers:

- Must ensure an approved EVV system is used to document the delivery of EVV-required services.
- Are responsible for ensuring CDS employees use the EVV system to clock in when services begin and clock out when services end.

If the CDS employee does not use the EVV system to clock in or clock out, for any reason, they must document service delivery information and submit the documentation to the FMSA or CDS employer.

Option 1 CDS employers must manually enter the visit into the EVV system and keep all service delivery documentation.

Option 2 and Option 3 CDS employers must provide service delivery documentation to the FMSA to ensure visits are manually entered into the EVV system by the FMSA. The FMSA or CDS employer must keep service delivery documentation.

Refer to [1400 Failure to use an EVV System](#), [7000 Clock In and Clock Out Methods](#) and [11000 Usage](#) for more information.

A photograph of a woman and a young girl laughing together outdoors. The woman is in the foreground, smiling broadly, wearing a pink top. The girl is in the foreground, laughing with her mouth open, wearing a patterned shirt. The background is slightly blurred, showing a wooden fence and trees. The entire image has a purple overlay. The text "EVV Policies" is centered in white.

EVV Policies

EVV Policies

EVV Training Policy

Required Training for CDS Employers

EVV Policy Handbook [4200 EVV Training](#) requires CDS employers, or the appointed DR, to complete all required EVV training prior to using an EVV system for the first time and yearly.

Refer to [4230 EVV Training Requirements for CDS Employers](#) for more information.

CDS employers can access HHSC *EVV Training Requirements Checklist* to track training requirements and completion of requirements. The checklist is available on the [EVV Training Resources webpage](#).

CDS Employer Training Responsibilities

CDS employers are responsible for providing Clock In and Clock Out Methods training to CDS employees.

CDS employers must use [Form 1732](#), Management and Training of Service Provider to keep up-to-date training records of CDS employee training completions. CDS employers must provide Form 1732 to the FMSA.

Refer to [4240 Training Requirements for Service Providers and CDS Employees](#) for more information.

EVV Policies

EVV Training Policy, Cont.

CDS employers complete applicable required EVV training. If the CDS employer has a designated representative (DR), the DR completes the required EVV training based on the option selected by the CDS employer. This information is shown in the table below.

CDS employers must train their CDS employees on the clock in and clock out methods with assistance from the EVV vendor or the EVV PSO.

See details in table below for:

- CDS employer training based on delegation of visit maintenance on Form 1722, CDS Employer's Selection for Electronic Visit Verification Responsibilities.

- If a CDS employer switches their option by completing a new Form 1722, CDS Employer's Selection for Electronic Visit Verification Responsibilities, they must take the proper training for that option, before being granted greater access to the EVV system by an EVV vendor, their FMSA or an EVV PSO.

Form 1722 Options	EVV Training Requirement	Provided By
Option 1: The CDS employer agrees to complete all visit maintenance and approve their employee's time worked in the EVV system.	•Full EVV system training •Includes clock in and clock out methods	EVV vendor or EVV PSO (FMSA)
	•EVV policy training	Payer (HHSC or MCO) or FMSA
Option 2: The CDS employer elects to have their FMSA complete all visit maintenance on their behalf. However, the CDS employer will approve their employee's time worked in the EVV system.	•Full EVV system training •Includes clock in and clock out methods	EVV vendor or EVV PSO (FMSA)
	•EVV policy training	Payer (HHSC or MCO) or FMSA
Option 3: The CDS employer elects to have their FMSA complete all visit maintenance on their behalf. The FMSA will confirm the employee's time worked in the EVV system based on approval documentation from the CDS employer.	•Overview of EVV system training. Covers key elements of the EVV system training. •Includes clock in and clock out methods	EVV vendor or EVV PSO (FMSA)
	•EVV policy training	Payer (HHSC or MCO) or FMSA

EVV Policies

EVV Training Policy, Cont.

Service providers and CDS employees must complete the required EVV training shown in the table below. The EVV vendor or EVV PSO will provide materials and resources.

Service Providers and CDS Employees:

EVV Training Requirement	Provided By
Clock In and Clock Out Methods	Program Provider or CDS Employer

The CDS employer must keep up-to-date training records of service provider and CDS employee training completions by using Form 1732, Management and Training of Service Provider. Form 1732 should be provided to the FMSA.

To register for EVV training:

- EVV System: Visit your EVV vendor website or contact your EVV PSO (FMSA).
- EVV Policy: Visit the HHSC or MCO EVV webpage.
 - Access the HHSC Learning Portal then create an account.
- EVV Portal Training: Visit the TMHP website
 - Access the TMHP Learning Management System (LMS) and create an account.

For questions related to training, contact:

Topic	Contact
EVV Policy	•HHSC EVV Operations at EVV@hhs.texas.gov •Your MCO (refer to EVV Contact Guides found in Resources section on HHSC EVV webpage)
EVV Portal	•TMHP at EVV@tmhp.com
EVV vendor or EVV PSO System	•Your EVV vendor or EVV PSO (FMSA)

EVV Policies

EVV Schedules Policy:

- Schedules are optional in the EVV system for members who selected the CDS option.
- The CDS employer can choose to enter a schedule in the EVV system, or not.
- Note: The EVV vendor will provide instructions on the use of the EVV system with or without schedules.

EVV Electronic Verification Methods Policy:

- The EVV Electronic Verification Methods Policy requires CDS employee to use one of three approved methods to clock in at the beginning of service delivery and clock out at the end of service delivery when providing services to a member in the home or the community.
- The EVV vendors offer the following three approved clock in and clock out methods:
 - Mobile method (smart phone or tablet)
 - Home phone landline method
 - Alternative device method
- Note: If the FMSA is using an EVV proprietary system, ask the EVV PSO (the FMSA) which clock in and clock out methods are available for your CDS employee to use.
- Note: CDS employees don't have to clock in and clock out for each different EVV-required service being provided during a single visit.

EVV Policies

EVV Electronic Verification Methods Policy (continued):

- CDS employees may:
 - Use one method to clock in and clock out one day and a different method to clock in and clock out the next day.
 - Use one method to clock in and clock out for a single visit or use multiple clock in and clock out methods for a single visit.
- Using **one method** to clock in and clock out happens when the CDS employee:
 - Only clocks in and clocks out using the mobile method.
 - Only clocks in and clocks out using a home phone landline method.
 - Only clocks in and clocks out using an alternative device method.
- Using **multiple methods** to clock in and clock out happens when the CDS employee:
 - Clocks in using a home phone landline and clocks out using a different clock out method (alternative device or mobile method).
 - Clocks in using an alternative device and clocks out using a different clock out method (home phone landline or mobile method).
 - Clocks in using the mobile method and clocks out using a different clock out method (home phone landline or alternative device).
 - Example of using **multiple methods** to clock in and clock out:
 - CDS employee Lisa Gibson clocks in using the mobile application (the mobile method) on her Android smartphone, and clocks out using the alternative device located in the member's garage.

EVV Policies

EVV Electronic Verification Methods Policy (continued):

- EVV services delivered outside the member's home:
 - A CDS employer must record the visit when they begin or end an EVV service outside the member's home either by:
 - Using the mobile method or
 - Manually documenting the visit as described in the EVV Visit Maintenance policy.
 - The mobile method is the recommended clock in and clock out method when an EVV service begins or ends in the community.
 - CDS employers may contact their EVV vendor or EVV PSO (the FMSA) for more information and training on available methods to document visits in the community.
- Documenting Non-EVV services that occurs during an EVV visit:
 - The CDS employer may select one of the following options for their CDS employee to document a non-EVV service during an EVV visit:
 - **Option 1:** Clock into the EVV system and clock out of the EVV system before the non-EVV service begins and clock back into the EVV system after the non-EVV service has ended.
 - **Option 2:** Remain clocked into the EVV system while delivering the non-EVV service and document the amount of time spent on the non-EVV services.
 - **Note:** Follow the EVV vendor or PSO (the FMSA) instructions on how to subtract the non-EVV service time at the end of the visit and use an appropriate EVV Reason Code Number and EVV Reason Code Descriptions necessary.
 - CDS employers and FMSAs can review the reported non-EVV service time by accessing the Non-EVV Relevant Time Report in the EVV system. The report will show the total hours worked for non-EVV services.

EVV Policies

EVV Electronic Verification Methods Policy (continued):

- Examples of recording non-EVV time in the EVV system:
 - CDS employee Maria Hernandez is working from 8 a.m. to 2 p.m.
 - She spends five hours on EVV required services from 8 a.m. to 12 p.m. and 1 p.m. to 2 p.m.
 - During lunchtime, she provides one hour of supported employment (non-EVV service) from 12 p.m. to 1 p.m.
 - Maria has two options for clocking in and out.
 - **Option 1:** Maria can clock out of the EVV system before the non-EVV service begins and clock back in to the EVV system after the non-EVV service has ended. Maria will:
 - Clock in at 8 a.m. and clock out at 12 p.m.
 - Begin the non-EVV service.
 - Clock back in at 1 p.m. and clock out at 2 p.m.
 - Document the non-EVV service in accordance with program policy.
 - **Option 2:** Maria can remain clocked in to the EVV system while delivering the non-EVV service and document the amount of time spent on the non-EVV service. Maria will:
 - employer or FMSA will use the EVV system to indicate one hour of time spent on non-EVV tasks.
 - **Note:** This documentation is not a substitute for the timesheet and other documentation requirements for time spent on non-EVV services.

EVV Policies

EVV Electronic Verification Methods Policy (continued):

- **Mobile Method:**

- The CDS employee may use a mobile method for clocking in and clocking out of the EVV system in the home or in the community.
- Each EVV vendor or EVV PSO (the FMSEA) will supply a downloadable application for use on a smartphone or tablet with internet connectivity.
- The mobile method is the recommended clock in and clock out method when the EVV service begins or ends in the community.
- The CDS employee may use:
 - Their own personal smartphone or tablet, or
 - A smartphone or tablet owned by the CDS employer, if the CDS employer agrees.
- The mobile method (mobile application):
 - Uses a secure login function for each user.
 - Records the specific location at the exact time of clocking in and clocking out.
 - Does not track location before clocking in, during the visit, or after clocking out.
 - Does not use mobile device plan minutes.
 - Does not store Protected Health Information (PHI) on the mobile device.
 - Requires having a mobile device that works, has a charged battery, etc.

EVV Policies

EVV Electronic Verification Methods Policy (continued):

•Home Phone Landline Method:

- If the member agrees, the CDS employee may use the member's home phone landline to call a toll-free number to clock in and out.
- A landline phone must be used. Phone types that cannot be used for this method include:
 - Cellular phones.
 - Cellular-enabled devices such as tablets and smart watches.
- The FMSA must enter the member's primary home phone landline number in the EVV system under the member's profile before the CDS employee can use this method to clock in and clock out.
 - It's important for the FMSA to have the most current phone number of the member to enter into the EVV system.
 - If the landline phone number used for clocking in and clocking out doesn't match the member's profile, visit maintenance must be performed in the EVV system.
 - FMSAs can enter one or more alternate landline phone numbers if the member frequently receives services in a secondary location.
- Note:If the CDS employee wants to use the cellphone or tablet to clock in and/or clock out, they must use the mobile method as the clock in and/or clock out method.

EVV Policies

EVV Electronic Verification Methods Policy (continued):

•Alternative Device Method:

- An alternative device is a free, HHSC-approved electronic device that allows the CDS employee to get codes that represent the date and times EVV services begin and end. The CDS employee must document the codes, then call a toll-free number within seven days to record the clock in and clock out.
- The alternative device:
 - Is provided at no cost by the EVV vendor or the EVV PSO (the FMSA).
 - Must always remain in the member's home.
- Any phone may be used; however, the CDS employee should never use or request to use the member's mobile phone unless the member is a CDS employer and the CDS employer has given the CDS employee authorization to use the CDS employer's mobile phone.
- Once the codes expire, the visit must be manually entered into the EVV system (the EVV vendor or EVV PSO can provide instructions on how to do this).
- With the member's permission, the CDS employer or employee must place the device in the member's home and should ask the member where they would like the device placed. The device should be in a location where the CDS employee can always reach it.
- The CDS employer may attach the device using a zip tie; however, the device must not:
 - Be mounted to a location that may be dangerous to a member, and cause damage to the member's home.
- Examples of where the CDS employer may place or attach the device in the home include:
 - Kitchen counter, coffee table, lockbox located in the garage or on the patio, refrigerator or cabinet door handle.

EVV Policies

EVV Electronic Verification Methods Policy (continued):

•Alternative Device Method:

- CDS employers, or FMSAs on behalf of a CDS employer, can order an alternative device through an EVV vendor.
- The EVV vendor has 10 business days to process and ship the alternative device to the requestor upon receipt of a complete order. Depending on the shipping method, it may take additional days to deliver the order.
- If an electronic verification method is not available for the CDS employee to use prior to the delivery of an alternative device, the CDS employee must manually document the visit as described in the EVV Visit Maintenance Policy.
- Note: If the FMSA is using an EVV proprietary system, ask the FMSA if they provide an alternative device and if so, ask them how to order it.

Examples of using each method:

- **Mobile Method –Example:** CDS employee Lisa Gibson uses her Android smart phone to log into the EVV mobile application and clock in when service delivery begins and clock out when service delivery ends.
- **Home Phone Landline Method –Example:** CDS employee Maria Hernandez uses the member's home phone landline (a cordless phone, in this case) to call a toll-free phone number to clock in when service delivery begins and clock out when service delivery ends at the member's home.
- **Alternative Device Method –Example:** CDS employee Jason Smith uses the alternative device, located in the garage at the member's home, to clock in when service delivery begins and clock out when service delivery ends at the member's home. Codes display on the device, and he writes them down on paper. After the visit, Jason uses his own cellphone to call a toll-freenumber to call in the codes that were displayed on the alternative device.

EVV Policies

EVV Reason Codes Policy

- This policy pertains to CDS employers that have selection **Option 1** on Form 1722.
- An EVV Reason Code is a standardized HHSC-approved code entered into an EVV system that explains the specific reason why a change was made to an EVV visit when completing visit maintenance.
- During visit maintenance, you:
 - Select the most appropriate EVV Reason Code Number(s).
 - Select the most appropriate EVV Reason Code Description option(s).
 - Enter any required free text.
- **Free text** is additional information attached to an EVV Reason Code Description. CDS employers must include an explanation in the free text field when the visit is missing a clock in time, a clock out time, or both.
- Failure to document any required free text may result in enforcement actions, including recoupment of associated claim(s).
- Access the full list of available reason codes, reason code descriptions, and free text requirements in the HHSC EVV Reason Codes document on the HHSC EVV website.
- Example of EVV Reason Code:
 - CDS employee Maria Hernandez forgot to clock in using the mobile method. Visit maintenance must be performed in the EVV system. In the EVV system, you would:
 - Select Reason Code: 900
 - Select Reason Code Description: A –Failure to call in
 - Enter free text to document the actual clock in time: “Actual clock in was 8:05 a.m.”

EVV Policies

EVV Reports Policy

- This policy pertains to CDS employers that have selection **Option 1 and Option 2** on Form 1722.
- The EVV Reports Policy describes the EVV standard reports available in the EVV system:
 - **EVV Alternative Device Order Status Report**—Used to verify and track the status of alternative device orders
 - **EVV Attendant History Report**—Verifies which CDS employees provided services to a member for a requested date range. Shows accepted EVV visits for CDS employees for a requested date range.
 - **EVV CDS Service Delivery Log**—Displays EVV visit data for CDS employers for a requested date range. Data is based only on completed and verified visits from the EVV system. Review this report in the EVV system to make sure the employee's time worked is correct. Just as the paper time sheet is reviewed to make sure it is correct, the EVV CDS Service Delivery Log is reviewed to make sure it is correct.
 - **EVV Clock In/Clock Out Usage Report**—Displays the CDS employee's: use of EVV clock in and clock out methods, number of total visits worked within a specific date range, and percentage of total visits worked for each clock in and clock out method within a specific date range.
 - **EVV Landline Phone Verification Report** – Displays the phone number used for clocking in and clocking out of the EVV system to ensure the home phone landline number is an allowable phone type (and not a pay phone number or cellphone number).
 - **EVV Reason Code Usage and Free Text Report** – Displays the EVV Reason Code Number, Reason Code Description, and any free text entered on accepted EVV visit transactions during a specified month. Shows the number of times the EVV Reason Code Number was used in the selected month. Used to conduct EVV compliance oversight reason code and required free text reviews; see the EVV Compliance Oversight Reviews Policy for more information.
 - **EVV Units of Service Summary Report** – Displays daily, weekly, and monthly total of hours of services delivered for a member. Identifies breaks in service for a member.
 - **Non-EVV Relevant Time Report** – Displays the CDS employee's time spent on non-EVV services during each visit for a requested date range (if the CDS employee didn't clock in and out for non-EVV time).
- Note: State staff, MCOs, and FMSAs can also view these reports and will use these reports for EVV compliance.

EVV Policies

EVV Visit Maintenance Policy:

- This policy pertains to CDS employers that have selection **Option 1** on Form 1722.
- Visit maintenance is a process that allows edits to certain data element(s) in an EVV visit transaction within an EVV system. During visit maintenance, errors are corrected to accurately reflect the delivery of service.
 - **For example:** Visit maintenance must be completed when the CDS employee forgets to clock in or clock out using the mobile method, home phone landline method, or alternative device method.
- It is the CDS employer's choice on who completes visit maintenance in the EVV system and it is documented on Form 1722 Employer's Selection for Electronic Visit Verification Responsibilities.
- CDS employers who will be performing visit maintenance will receive training from the EVV vendor or PSO (FMSA) on how to complete EVV visit maintenance in the EVV system. CDS employers conduct visit maintenance by:
 - Correcting visit errors from EVV system validations.
 - Adjusting Pay Hours.
 - Adding Reason Codes as required.
- Timeframe to complete visit maintenance:
 - CDS employers and FMSAs have 95 calendar days from the date of the visit to complete visit maintenance. After 95 days, the visit is locked and cannot be changed.
 - CDS employers or FMSAs must contact PCHP to request visit maintenance be unlocked in order to edit the EVV visit transaction.
 - Approval to unlock visit maintenance is at the discretion of PCHP and determined on a case-by-case basis.

EVV Policies

EVV Visit Maintenance Policy cont.

- Visit Maintenance Unlock Request:

- Program providers have 95 days from the date of the visit to perform visit maintenance (VM) in the electronic visit verification (EVV) system. If a program provider does not make the correction to visits within the standard 95 days visit maintenance timeframe, the Visit Maintenance Unlock Request Form is used to request approval to open visit maintenance from their appropriate payer for the visits the program provider wishes to correct.

Instructions for Completing the HHSC Visit Maintenance Unlock Request Form

- The VM Unlock Request Form contains the following sections that must be completed by the program provider:
 - Program Provider Information, Member Information, Correction Request Information, Additional Information
- Please answer all questions for the sections listed above. Program providers must include supporting documentation, such as EVV vendor ticket numbers, call logs, etc. for all requests being submitted. Payers may ask for additional information before approving a request.
- A program provider may request the payer unlock visit maintenance to correct data element(s) on an EVV visit transaction; however, the following data elements cannot be changed:
 - Actual time in, Actual time out, Actual visit date, Reason codes (the program provider can add a new reason code, but cannot remove or change the existing reason code)
- Approvals and denials of EVV visit maintenance unlock requests after the standard 95-day visit maintenance timeframe has passed are at the payer's discretion and are determined on a case-by-case basis.
- Submitting the HHSC Visit Maintenance Unlock Request Form
- It is required that the Visit Maintenance Unlock Request Form be sent via secure email to the appropriate payer.
- If HHSC is the payer, this form must be sent via secure email to Electronic_Visit_Verification@hhsc.state.tx.us with the subject line "Visit Maintenance Unlock Request."

Steps to submit an unlock request:

- Please download the unlock request located on the PCHP EVV website.
- Once completed this form must be sent via a secure email to PCHP.EVV@PHHS.ORG with the subject line: Visit Maintenance Unlock Request.
- Providers must submit the spreadsheet in Microsoft Excel format, and the layout of the spreadsheet cannot be altered.

- Last Visit Maintenance Date:

- If visit maintenance is completed, the EVV system will record the date the visit maintenance was done. Some examples of fields that if changed, will result in the last visit maintenance date being updated:
 - Pay Hours, Units, Adding an EVV Reason Code Number, Adding an EVV Reason Code Description, Entering Required Free Text
- The full list of field changes that result in the last visit maintenance date being updated are located on the HHSC EVV website in the EVV Visit Maintenance Policy.
- If the last visit maintenance date is after the date the FMSA submitted the EVV claim, then the EVV claim is subject to recoupment (the payment for that visit could be taken back by PCHP).
- **Remember:** Visit maintenance must be completed on a visit transaction before the FMSA submits the corresponding EVV claim for that visit.

EVV Policies

EVV Compliance Reviews Policy

- PCHP will conduct EVV compliance reviews to ensure CDS employers are following EVV requirements and policies. The reviews will not start until the EVV visit maintenance timeframe has expired.
- PCHP will initiate enforcement action if CDS employers do not meet any of the following EVV compliance requirements:
 - EVV Usage –CDS employers are required to meet the minimum EVV Usage Score of 80% per state fiscal year quarter, unless otherwise changed by HHSC.
 - EVV Landline Phone Verification –CDS employers are required to ensure their CDS employee is clocking in and clocking-out using a valid phone type when the *landline method* is used to clock in and clock out of the EVV system.
- Compliance Grace Periods:
 - EVV Usage –CDS employers have a grace period from January 1, 2021 thru August 31, 2022, unless changed by HHSC. PCHP will post a notice on the EVV webpage 90 days prior to the start of reviews.
 - EVV Landline Phone Verification –CDS employers have a grace period from January 1, 2021 through December 31, 2021. The compliance reviews for EVV Landline Phone Verification can begin on or after January 1, 2022.
 - During the grace period, PCHP will not initiate enforcement action unless noted by HHSC.
 - During the compliance grace periods, the CDS employer must monitor compliance reports monthly, at a minimum in the EVV system and perform the following:
 - Use the EVV system as required.
 - Complete all required visit maintenance (if Option 1 on Form 1722, Employers Selection for Electronic Visit Verification Responsibilities).
 - Establish a process to monitor compliance reports with the FMSA (if Option 3 on Form 1722, Employers Selection for Electronic Visit Verification Responsibilities) unless they have read only access in the EVV system.
 - Train or re-train CDS employees on clock in and clock out methods.
 - Ask questions.

EVV Policies

EVV Compliance Reviews Policy, Cont.

- CDS Employers Enforcement Actions:
 - EVV Usage –When a CDS employer fails to meet and maintain the minimum EVV Usage Score in a state fiscal year quarter, PCHP may send a non-compliance notice to enforce one or more of the following progressive enforcement actions based on the number of occurrences within a 24-month period:
 - First occurrence within a 24-month period –Require additional EVV policy, system, and portal trainings within a specific timeframe.
 - Two or more occurrences within a 24-month period –Require completion of a CAP within ten business days of the notice of non-compliance.
 - Three or more occurrences within a 24-month period –Recommend removal from the CDS option.
 - EVV Landline Phone Verification –When a CDS employer fails to meet required actions within 10-business days of notification by the FMSA:
 - The FMSA can remove the unallowable landline phone type from the EVV system as the member’s home phone landline, and
 - The FMSA can follow TAC 40, Part 1, Chapter 41, Subchapter B, Rule Section 41.221 relating to failure to submit complete service delivery documentation or meeting CDS employer responsibilities and place the CDS employer on a corrective action plan (CAP).
- Compliance Review Reports:
 - EVV Usage –For EVV Usage Reviews, PCHP will use the EVV CDS Employer Usage report located in the EVV system. This report is currently under development and should be available to CDS Employers in 2022.
 - EVV Landline Phone Verification –For EVV Landline Phone Verification Reviews, PCHP will use the *EVV Landline Phone Verification Report* located in the EVV system. This report is currently available to CDS Employers.
- Compliance Review Schedule:
 - PCHP will complete EVV Compliance Reviews quarterly based on the state fiscal year quarters. A complete schedule will be posted to the PCHP EVV webpage 90-days prior to the start of the reviews.
- CDS employers may refer to the *HHSC EVV Policy Handbook, section 10000, EVV Compliance Reviews* for more information.



Parkland
Community Health Plan

**For questions,
please email
PCHP.EVV@PHHS.ORG**