

# interChange Provider Important Message

## Important EVV Compliance Clarifications

Provider Bulletin 2017-66 issued by the Department of Social Services (DSS) establishes standards by which agencies must adhere to in order to be considered compliant in their use of visit validation within Sandata Technologies' Santrax® system. DSS considers a provider to be compliant if 90% of the visits performed are validated by both a check-in and a check-out documented by the caregiver via telephony, Mobile Visit Verification (MVV) or a Fixed Visit Verification (FVV) device. This compliance mandate is effective with visits on or after December 1, 2017.

Recent questions from providers have revealed a misunderstanding of this compliance requirement. **At this time, compliance is solely based upon the presence of a check-in and a check-out.** Compliance requirements do not include the manual visit maintenance that occurs if the check-in or check-out is early or late or if it needs to be merged with the visit.

Here are questions received by providers and the answers which intend to clarify this mandate.

**Q:** What if the caregiver calls in and calls out but they are early or late, and I need to manually verify the visit? Will I be out of compliance with that visit?

**A:** **No, this is a compliant visit.** As long as each visit has a check-in and a check-out, regardless if the documented times are early/late according to the schedule, the visit will be considered compliant. Manually verifying visits are not part of the compliance requirement at this time.

**Q:** How do I check-in or check-out when the client is not yet in the system?

**A:** When the client is not yet in Santrax, the caregiver can still check-in and check-out by using the client's telephone or any other phone that is available. Santrax will capture the visit check-in and check-out times and set the exception of 'unknown client' and 'unscheduled event'. When the client becomes present in Santrax, and the schedule is retroactively created, you can attach these calls to the visit. **This will not count against your compliance rate.** DSS plans to implement the ability for your agency to add new clients to your Santrax system while waiting for the client's eligibility to be updated and the client to become available in the Santrax system.



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Q: Does it mean that a compliant visit is one where call in/call out are perfect and there are no exceptions?

A: No, a compliant visit can have exceptions. As long as there is both a check-in and a check-out, regardless of how many exceptions may have been posted to the visit, the visit is considered compliant.

Q: Many of my visits were not merged properly before I exported them. Will DSS evaluate my compliance rate for visits prior to December 1, 2017?

A: No. DSS will begin reviewing compliance rates beginning with visits on or after December 1, 2017.

Q: I often have to edit a visit when the telephone number that is entered is not on the client's record, or if the visit starts in the community, but ends at the home. Will these visits be considered non-compliant if I have to edit the visit?

A: No. As long as the check-in and check-out occurs, the visit will be compliant even when an edit is necessary to manually verify the visit.

Q: We are finding that the authorization for visits from the Access Agency is not in the portal timely for us to assign staff. Is there an expectation that these agencies will be able to be more timely so authorization can be obtained and staff sent as we are not able to enter "Pending Auth"—this continues to be a problem.

A: Agencies were granted permission to create schedules in the absence of an authorization long ago. A check-in/check-out can occur in the absence of the authorization. A delayed authorization does restrict the agency from billing the claim, however, but it won't impact their compliance rate.

Q: In the event the phone is not available—such as family is on the phone at the time of arrival or departure, phone is not available at the end of the visit, or the phone is not able to be found—we assume this impacts the compliance rate. It happens more than DSS may realize. Many agencies use paper back-up but, again, it's a burdensome tracking process.

A: There is no evidence that exceptions such as these will represent more than 10% of overall visits. We have agencies who have been exceeding the 90% compliance rate since June who rely on telephony for their visit validation.

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DSS is closely monitoring EVV system performance in order to identify any issues that may impact a provider's compliance rate. Any identified issue will be communicated to providers and will be considered during the auditing period. DSS is pleased with the number of providers who have demonstrated compliance as early as June of 2017. Many of these providers have shared that the key to their success is a strong mandate that their caregivers use the system.