EVV Tool Check List

21st Century CURES Act Requirements

12/23/2019

1. **How does your EVV system document and verify the participant's identity?**
   - By the participant's personal telephone?
   - By a unique number assigned to the participant.
   - 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?**
   - By the assignment of a personal identification number unique to the attendant/aide?
   - 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 utilize one or more of the following to verify the location where services begin and end?**
   - Participant's personal landline
   - Participant's cellular phone
     - (per CMS) **will** require additional location identification device such as GPS or validator.
   - Location Technologies
     - Near Field Communications (NFC)
     - Global Positions System (GPS)
     - Blue Tooth Low Energy (BTLE)
   - Affixed Electronic Device in the participant's location
   - Biometric Verification System (BVE)

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- Alternative location verification technology

EVV Functionality Requirements

1. **At a minimum, your EVV system must be capable of retrieving data reports of services delivered, tasks performed, (if required by the authorizing agency), participant identity, aide identity, beginning/ending time of service, location of service start/stop, and date of service in summary fashion that constitute adequate documentation of services. Reports shall include the vendor/provider's identity by either name or NPI.**

   Check to see if your EVV system meets functionality requirements by pulling a current report and assessing the following information:
   - **Does your report display in an easily readable format the following?**
     - ➤ Service(s) delivered?
     - ➤ Task(s) performed? (If required by the authorizing agency.)
     - ➤ Participant identity?
     - ➤ Aide identity?
     - ➤ Begin time, end time and date?
     - ➤ Location of service delivery at start of visit and end of visit?
     - ➤ Vendors/provider's identity?
   - **How would you obtain your EVV documentation?**
     - ➤ By printing out your EVV reports?
     - ➤ Saving the electronic EVV reports on a flash drive?
     - ➤ Call your EVV vendor to pull these reports?
     - ➤ How would you confirm it is the right report, with the right data, meeting the above reporting requirements?
     - ➤ How would your EVV modifications and or adjustments be tied into your EVV reports?
     - ➤ Where would documentation reasons for manual adjustments and modifications be obtained?

2. **Does your EVV system accommodate more than one participant and/or attendant/aide in the same home or at the same phone number?**
   - Do you use a paper timesheet process?
     - ➤ **This will no longer be an acceptable practice.**

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- If your EVV system utilizes the same telephone number for more than one participant is it capable of distinguishing each participant individually?
- Does your EVV system allow attendant/aide to work a split shift?

  ➢ Do you use a paper timesheet process? **Following full implementation of EVV this will no longer be an acceptable practice.**

3. **How does your EVV system document services and tasks if required by the authorizing agency?**
   - Upon implementation of the aggregator solution, providers will be required to document the tasks that appear on the Cyber Access Web Tool authorization.

5. **In Personal Care Assistance -Consumer Directed Services how does your EVV system set-up document activities/ tasks delivered to the participant?**
   - Upon implementation of the aggregator solution, providers will be required to document the tasks that appear on the Cyber Access Web Tool authorization. A full list of the 25 CDS tasks is in the CDS Worksheet, Policy 4.0 Appendix 4.

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?**
   - Following implementation of the aggregator solution, any manual entries or modifications must be identifiable to the EVV system and transmitted to the aggregator solution. Changes will require date, time, person making the entry and the reason for the manual entry.

EVV Implementation and Responsibilities

1. **Who is responsible for ensuring your EVV system and EVV set-up is compliant with the EVV rules?**

2. **If asked by MMAC or another state department to pull an EVV report whom in your agency will be able to provide assistance?**
   - If your agency has many EVV reports, how will you ensure the correct EVV

report is pulled?

3. **If your EVV system is not fully implemented, you may be questioned regarding the status of your EVV implementation efforts. Who in your agency can articulate your full implementation process?**
   - When was your EVV system process started?
   - If partially implemented can you distinguish which participants were included and or excluded in your EVV process?
   - Were only certain counties initially implemented on EVV?
   - Or were certain attendant/aides trained to initially used EVV?
   - How many participants are using your EVV system?
   - 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 office support staff?**

Best Practices

1. **What is your documentation process when the participant refuses to allow the attendant/aide to use EVV? How are you moving toward EVV CURES Act compliance?** Participants who refuse to utilize EVV are at risk of losing their personal care services.

2. **If you use an FOB or Validator do you have a process to assess if these products are secure in the participant's home?**
   a. Do you document that an FOB or Validator has been assigned to the participant?

3. **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?

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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 or adjustment sheet?

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 the data from the original vendor?
   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?

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?

6. 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 an FOB or validator in the participant's home?
   b. Is it in collaboration with your EVV GPS system on the attendant/aide's phone?