

## **ELECTRONIC VISIT VERIFICATION (EVV) POLICY**

### **OVERVIEW**

On December 13, 2016, the U.S. Congress passed a bill called the “Cures Act”. This Act specifically requires states to collect identifiable information for Home and Community-Based Services (HCBS) Waiver and state plan services which are provided to a participant. To comply with these federal requirements, Louisiana Department of Health (LDH) will collect the following information through electronic means, also known as “Electronic Visit Verification (EVV)”:

- The type of service performed;
- The individual receiving the service;
- The date of the service;
- The location of service delivery;
- The individual providing the service; and
- The time the service begins and ends.

The state sponsored EVV system, Statistical Resources, Inc. (SRI)’s Louisiana Service Reporting Systems (LaSRS), does not “track” participants or workers. It ONLY collects the “location of service delivery” at the time of clock in and clock out. This EVV system utilizes a database that can be accessed by a computer, smart phone, or tablet that has an internet connection. When a worker “clocks in” or “clocks out”, the system collects the location of the device being used at that time, as well as the time, date, individual providing the service, and the individual receiving the service. The intent of this EVV system is to ensure that participants receive services authorized in their Plans of Care (POCs), reduce inappropriate billing/payment, safeguard against fraud, replace paper timesheets and improve program oversight.

The following Office of Aging and Adult Services (OAAS) and Office for Citizens with Developmental Disabilities (OCDD) providers must utilize an EVV system:

- OCDD Supported Employment;
- OCDD Center-Based (Day Habilitation, Prevocational Services, Center Based Respite);
- OAAS and OCDD Adult Day Health Care (ADHC); and

- OAAS and OCDD In-Home Personal Care Attendants (PCAs), including those participating in the Self-Direction option.

These providers must either use the state sponsored EVV system or have an EVV system that integrates with LaSRS. If using another EVV system, it must pass the LaSRS data integration process. The provider and their EVV vendor will also be required to sign an attestation form indicating that the EVV system meets LDH standards.

**NOTE: For data integration process/documents, email [EVVHelp@la.gov](mailto:EVVHelp@la.gov).**

## **POLICY REQUIREMENTS**

Providers must develop and maintain the following internal policies regarding proper use of the EVV system:

- Requirements for workers to electronically clock in/clock out for services rendered.
- Guidelines for editing electronically captured services.
- Prohibition of sharing passwords and/or log in information.
- Recognition that logging in under another user's credentials is fraudulent.  
**NOTE: Logging into the system represents the user's signature.**
- Proper clock in/clock out processes (e.g. clock in when participant is present; clock in/clock out upon arrival/departure, etc.).
- Processes for reporting time if a worker is unable or forgets to clock in/clock out.
- Process for obtaining signed documents from every user, ensuring acknowledgement and understanding.
- Guidelines for monitoring EVV compliance.

If services are provided in an area where there is limited or no internet connectivity to record the electronic clock in/clock out, the provider's supervisor/designee **MUST** go to the service location (e.g. home, etc.) to complete the LaSRS Connectivity Test. The results will be documented on the LaSRS Connectivity Test form and uploaded into LaSRS as soon as possible. Workers **CANNOT** complete the connectivity document.

**NOTE:** A LaSRS Connectivity Test form is good for a period of one year from date of entry and will automatically expire at the end of one year. After one year, the supervisor/designee (not

DSW) must go to the home to determine if there is still a connectivity issue due to signal strength/availability. If the supervisor determines that there is still limited or no internet connectivity, then a new LaSRS Connectivity Test form must be entered into LaSRS. If a new connectivity form is not entered into LaSRS prior to the year, then the services manually entered will be counted against the EVV threshold.

In the cases where a user:

- Is unable to electronically clock in/out, including extraordinary circumstances (e.g. natural disasters, etc.), or
- Forgets to electronically clock in/out,

The provider must manually enter the following required information in the system:

- Participant's name;
- Date and exact arrival and/or departure times by the worker; and
- Specific reason for the manual entry.

Providers must keep supporting documentation of the manual entry which includes the following:

- Printed name of recipient;
- Worker's printed name, signature, and date; and
- Supervisor/timekeeper's signature and date.
- Worker's statement attesting the reported time is true and accurate.

These records will be retained in accordance with the required record retention policy.

## **UTILIZATION THRESHOLDS**

Providers must meet the 80% utilization threshold for EVV electronic clock in/clock out. The post authorization process will block units for services that are manually entered over the 20% allowance threshold. Once EVV reported services meet the 80% compliance standard, previously blocked services will be released for payment to the provider.

The following circumstances for manually entered services will **NOT** be counted as part of the 20% allowance threshold:

- Services provided in an area without cellular or internet connectivity. The provider must follow the EVV Connectivity form process (Refer to Policy Requirements above.)

**NOTE: Instructions are also available within LaSRS.**

- Services provided by a worker during the first 30 calendar days of employment with the provider.
- Services provided to a consumer before the prior authorization is available in LaSRS.

**NOTE: Services cannot be electronically captured in LaSRS unless there is a current prior authorization in the system. Providers are responsible for ensuring they have authorization to provide services.**

## **REQUIREMENTS FOR OTHER EVV SYSTEMS**

Providers using an EVV system other than LaSRS must ensure that the system electronically captures the bulleted information listed in the Overview section above.

The provider and EVV vendor must ensure that:

- All iterations of electronic clock in/clock outs collected by the External EVV since the last file are sent every business day to LaSRS.

All files must be uploaded to the LaSRS/SRI sFTP site by 9 PM central time in order to be processed for the following business day.

- The original geolocation(s) of an electronically captured record is uploaded to LaSRS.
- Any altered electronic clock in/clock outs are identified as manually edited, and must capture the following:
  - Date and time of the edit;
  - Person editing the record; and
  - Geolocation of where the record was edited.
- The system does NOT allow changes to data through a back-end process, prohibiting the manual manipulation of data.

All changes to data are made through a front-end process, which automatically captures required edit information.

- EVV systems, records, and reports are made available to LDH and any other state or federal agency, as requested.
- An attestation form, for the use of an EVV system other than LaSRS, is completed.

If LDH determines that the third party EVV system does not meet these requirements either through design or proper use, the provider will not be allowed to use the system for the electronic capture of services.

**LDH will monitor providers to ensure appropriate use of EVV and will make referrals to Program Integrity and/or the Attorney General's office as necessary.**