

Electronic Visit Verification (EVV) Good Faith Effort Extension Reasons by State

In accordance with the Cures Act, states have until November 30, 2019 to submit EVV good faith effort extension requests to the Centers for Medicare & Medicaid Services (CMS). The following chart summarizes [the EVV good faith effort extension approval letters published by CMS](#), including good faith actions taken by states and their reasons for an unavoidable delay in EVV implementation. We will continue to update this chart as additional approvals are released.

State	Extension Approval Date	Good Faith Effort Actions	Reasons for Unavoidable Delay in Implementing EVV ¹	Implementation Model ²	State EVV Website
Alabama	8/23/2019	<ul style="list-style-type: none"> • Conducting environmental scanning • Selecting EVV model • Updating current EVV system to meet the needs of participants self-directing their services • Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> • Conducting EVV informational sessions for case managers, recipients, and families • Notifying personal care provider agencies of pending EVV system implementation • Disseminating FAQs • Maintaining an EVV website 	<ul style="list-style-type: none"> • System informational technology issues experienced during the initial roll-out of EVV. This resulted in additional time needed to tailor the EVV software for each program and prompted the state to engage in more extensive training and testing prior to implementing EVV for self-directed personal care services. 	State Designated Single Vendor	https://medicaid.alabama.gov/content/6.0_LTC_Waivers/6.1_HCBS_Waivers/6.1.10_LTC_Training.aspx

¹ The 'Good Faith Effort Actions' and 'Reasons for Unavoidable Delay in Implementing EVV' are quoted directly from the [good faith extension approval letters](#) published by CMS.

² The implementation models are current as of 10/23/19.

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Alaska	9/18/2019	<ul style="list-style-type: none"> • Surveying personal care service providers • Scanning other states' EVV systems • Securing budgetary funding needed to develop a Request for Proposals (RFP) • Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> • Conducting community forums throughout the state • Holding monthly provider network meetings • Maintaining a dedicated EVV website 	<ul style="list-style-type: none"> • The budget including funding to develop the RFP was not passed during the scheduled legislative session, which has led to delays in selecting an EVV vendor and updating state regulations. 	Provider Choice Model	http://dhss.alaska.gov/dsds/Pages/evv/evv.aspx
Colorado	9/18/2019	<ul style="list-style-type: none"> • Completing an environmental scan • Modifying an existing contract to include EVV • Implementing work plans • Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> • Conducting four monthly stakeholder meetings • Maintaining an EVV website and inbox 	<ul style="list-style-type: none"> • The need to update its system to operationalize an exemption for live-in caregivers 	Hybrid	https://www.colorado.gov/pacific/hcpf/electronic-visit-verification-stakeholder-workgroup

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Connecticut	9/18/2019	<ul style="list-style-type: none"> • Conducting environmental scanning • Modifying an existing contract to include EVV • Implementing work plans • Piloting the EVV system • Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> • Conducting workgroups with providers • Meeting with union representatives and consumers • Maintaining a dedicated EVV webpage and email 	<ul style="list-style-type: none"> • Negotiations with union representatives • The need to identify funds and assess current providers' EVV systems to develop interfaces that are compatible with the state's vendor 	State Designated Single Vendor	https://portal.ct.gov/DSS/Health-And-Home-Care/Electronic-Visit-Verification/Electronic-Visit-Verification
District of Columbia	9/26/2019	<ul style="list-style-type: none"> • Conducting an environmental scan • Issuing a RFP to select an EVV vendor • Conducted stakeholder activities, including³: <ul style="list-style-type: none"> • Convening multiple sessions with providers that included individuals, family caregivers, and MCOs. 	<ul style="list-style-type: none"> • A six month delay during the RFP procurement process due to a protest filed by one of the proposal submitters 	State Designated Single Vendor	

³ In the District of Columbia, “the selected EVV vendor will be required to develop a communications plan, which will include a regularly updated EVV website.”

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Iowa	8/23/2019	<ul style="list-style-type: none"> • Conducting a provider survey • Selecting an EVV model • Preparing to issue a RFP for an EVV vendor • Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> • Convening stakeholder meetings • Inviting member advocacy and provider associations to participate in stakeholder activities • Maintaining an EVV website • Fielding stakeholder questions via email and Medicaid call centers 	<ul style="list-style-type: none"> • The funds will not be available in state fiscal year 2020 (July 2019 – June 2020) for EVV due to multiple existing technology investments for projects currently being implemented (e.g., modernization of the Medicaid Management Information System [MMIS], changes to how the self-direction program is paid, etc.) • The transition of one Managed Care Organization (MCO) leaving and another entering the Medicaid market 		https://dhs.iowa.gov/ime/providers/EVV
Kentucky ⁴	9/11/2019	<ul style="list-style-type: none"> • Conducting environmental scanning to identify state needs • Conducting a provider survey on EVV preferences • Networking with other states 	<ul style="list-style-type: none"> • Delay in approving the RFP due to the level of interagency coordination required to ensure the needs of reviewing agencies were met. This led to delays in selecting an EVV vendor and 		

⁴ Kentucky’s good faith effort request was approved, but CMS does not have the authority to delay the FMAP reductions after January 1, 2021. Kentucky “indicated that their current timeline will not allow them to meet the January 1, 2021 implementation date, and that they request CMS’ approval to proceed under the auspices of the good faith effort exemption request.” CMS reiterated in their good faith extension approval letter that “FMAP reductions will be applied beginning in the first quarter of 2021 and every quarter thereafter until the state achieves compliance.”

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		<ul style="list-style-type: none"> • Preparing to issue a RFP for an EVV vendor • Stakeholder education and communication will be delegated to the EVV vendor and the state's RFP includes requirements that align with promising practices for training, communication, and education 	implementing the state's stakeholder engagement plan.		
Maine	9/26/2019	<ul style="list-style-type: none"> • Modifying an existing EVV contract to include EVV • Implementing work plans • Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> • Convening multiple provider forums • Sending a letter to all beneficiaries notifying them of EVV • Establishing an EVV webpage and dedicated mailbox 	<ul style="list-style-type: none"> • The need to address technical and operational concerns raised by providers • Delays in providers implementing system requirements • System interoperability issues for providers interfacing with the state vendor 	Hybrid	https://www.maine.gov/dhhs/oms/provider/electronic-visit-verification.shtml
Missouri	9/18/2019	<ul style="list-style-type: none"> • Conducting environmental scanning • Working to procure an aggregator solution via a RFP process • Conducted stakeholder engagement activities, including: 	<ul style="list-style-type: none"> • The state's lengthy procurement process • Budget restrictions that delayed the hiring of an EVV implementation manager 	Provider Choice Model	https://mmac.mo.gov/telephonyevv-update-for-in-home-and-consumer-directed-services/providers/

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		<ul style="list-style-type: none"> • Conducting meetings with advocates and providers • Discussing EVV requirements with beneficiaries during home visits • Operating a dedicated EVV webpage and email address 	<ul style="list-style-type: none"> • Reprioritization of resources due to natural disasters 		
Rhode Island	8/23/2019	<ul style="list-style-type: none"> • Conducting environmental scanning • Selecting an EVV model • Updating an existing EVV vendor contract to include an aggregator for providers choosing their own EVV vendors and to include all service codes necessary to comply with EVV requirements • Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> • Maintaining an EVV website • Convening meetings with providers, MCOs, fiscal intermediaries, and beneficiaries 	<ul style="list-style-type: none"> • Some providers have not selected which EVV system or third-party vendor they will be utilizing. This has led to delays in provider integration with the state aggregator, piloting the EVV system, stakeholder meetings, and implementing work plans. • Logistical issues for self-directed services • Technical issues identified by MCOs 	State Designated Single Vendor	http://www.eohhs.ri.gov/ProvidersPartners/ElectronicVisitVerification(EVV).aspx
Texas	9/5/2019	<ul style="list-style-type: none"> • Conducting a review of existing EVV capabilities • Modifying its existing MMIS contract to enhance EVV operations 	<ul style="list-style-type: none"> • Legislation requiring the state to develop an open model • The need to address stakeholder concerns regarding onboarding, training, and policy 	Open Vendor Model	https://hhs.texas.gov/doing-business-hhs/provider-portals/long-term-care-

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		<ul style="list-style-type: none"> • Selecting EVV vendors • Piloting the EVV system • Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> • Maintaining an EVV-dedicated website • Convening ongoing meetings with MCOs, providers, Medicaid members, and Consumer Directed Services (CDS) participants 	<ul style="list-style-type: none"> • Complexities in allocating CDS funding for EVV devices • Changes made to EVV business requirements as a result of stakeholder feedback during pilot evaluation sessions, which has led to delays in EVV system onboarding and training for the state’s expanded EVV vendor pool. 		providers/resources/electronic-visit-verification
West Virginia	8/19/2019	<ul style="list-style-type: none"> • Conducting environmental scanning • Soliciting information from providers and other states • Assessing EVV systems currently in use • Evaluating the state’s vendor relationships • Preparing to issue an RFP • Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> • Issuing a survey to key stakeholders such as providers and beneficiaries • Regularly convening stakeholder meetings 	<ul style="list-style-type: none"> • When preparing for RFP issuance, additional time was required to develop EVV requirements that ensured the needs of the state and stakeholders were taken into consideration. This has led to delays in other key implementation activities, such as selecting a vendor and developing work plans. 	Hybrid	https://dhhr.wv.gov/bms/Programs/Waiver/Programs/EVV/Pages/default.aspx

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		<ul style="list-style-type: none"> • Maintaining a website and dedicated EVV mailbox 			
Wisconsin	8/19/2019	<ul style="list-style-type: none"> • Conducting industry and environmental scanning • Selecting an EVV model based on a comprehensive review of existing vendor relationships • Modifying an existing contract to include EVV requirements • Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> • Monthly provider agency stakeholder meetings • Provider surveys • Maintaining an EVV mailbox and website • Regularly convening provider, member, participant, and advocate forums 	<ul style="list-style-type: none"> • Changes in scope based on stakeholder feedback • Existing MMIS modernization projects affecting EVV system interoperability and project timelines • Changes in scope due to CMS and industry feedback 	Open Vendor Model	https://www.dhs.wisconsin.gov/evv/index.htm