

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.

State	Extension Approval Date	Good Faith Effort Actions	Reasons for Unavoidable Delay in Implementing EVV ¹	Implementation Model ²	State EVV Website
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
Arizona	12/5/2019	<ul style="list-style-type: none"> • Issuing an RFI • Selecting an EVV vendor • Initiating work plans • Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> ○ Establishing an EVV webpage ○ Hosting a series of public forums throughout the state ○ Disseminating a provider RFI ○ Convening a multi-stakeholder steering committee that included members, families, providers, 	<ul style="list-style-type: none"> • The RFP approval process • The need to stagger EVV implementation with a simultaneous project • Implement custom configuration requirements • Delay the business rules process in order to solicit adequate input from providers and health plans 	State Designated Single Vendor	https://www.azahcccs.gov/AHCCCS/Initiatives/EVV/

State	Extension Approval Date	Good Faith Effort Actions	Reasons for Unavoidable Delay in Implementing EVV ¹	Implementation Model ²	State EVV Website
		and managed care organizations			
Arkansas	10/22/2019	<ul style="list-style-type: none"> • Conducting a review of other states’ EVV implementation activities • Selecting an EVV vendor • Developing a technical approach • Piloting the EVV system • Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> ○ Consulting industry groups representing personal care providers ○ Launching an EVV website ○ Stakeholders will have the opportunity to provide public input during the state’s rulemaking process for EVV 	<ul style="list-style-type: none"> • Two protests received prior to awarding its EVV contract • The need for staged, regional implementation to allow sufficient time for provider engagement and training (as requested by stakeholders) • Issues identified during the pilot phase that need to be resolved 	State Designated Single Vendor	https://www.arkansas-evv.com/
California	10/22/2019	<ul style="list-style-type: none"> • Conducting a provider survey • Reviewing existing state systems and other state approaches • Releasing Requests for Information • Preparing to issue an RFP • Conducted stakeholder engagement activities, including: 	<ul style="list-style-type: none"> • The state’s project approval lifecycle process for procurement • The time needed to coordinate adequate stakeholder involvement and training • Reassessing its approach based on new CMS guidance 		https://www.cdss.ca.gov/inforesources/ihss/evv

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		<ul style="list-style-type: none"> ○ Public meetings and small stakeholder group meetings 	<ul style="list-style-type: none"> ● Interoperability issues 		
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
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 ● 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

State	Extension Approval Date	Good Faith Effort Actions	Reasons for Unavoidable Delay in Implementing EVV ¹	Implementation Model ²	State EVV Website
Delaware	11/25/2019	<ul style="list-style-type: none"> • Conducting an environmental scan • Issuing an RFP for an EVV vendor • Evaluating vendor proposals • Recommending an EVV vendor to state leadership • Contracting staff • Conducted stakeholder activities, including: <ul style="list-style-type: none"> ○ Convening multiple stakeholder meetings ○ Developing an EVV section on the state’s website ○ Establishing an EVV mailbox ○ Attending provider association meetings 	<ul style="list-style-type: none"> • A lengthened RFP process due to the volume of questions received from prospective vendors • Staffing changes • Delays in procurement and contracting have led to delays in carrying out work plans for the design, development, and implementation of the system 	Open Vendor Model	https://dhss.delaware.gov/dmma/info_stats.html
District of Columbia	9/26/2019	<ul style="list-style-type: none"> • Conducting an environmental scan • Issuing an 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.”

State	Extension Approval Date	Good Faith Effort Actions	Reasons for Unavoidable Delay in Implementing EVV ¹	Implementation Model ²	State EVV Website
Florida ⁴	12/12/2019	<ul style="list-style-type: none"> • Selecting an EVV vendor • Implementing the majority of tasks on its work plan • Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> ○ Publishing FAQ on its website ○ Maintaining an EVV mailbox ○ Disseminating EVV newsletters ○ Convening multiple stakeholder meetings 	<ul style="list-style-type: none"> • System interoperability issues due to privacy and security concerns • The need for more requirement analysis and system design sessions than originally planned • Extensive configuration modifications that needed to be made to the vendor’s off-the-shelf solution 	State Designated Single Vendor (FFS only)	http://ahcaevv.4tellus.com/index.php
Georgia	12/2/2019	<ul style="list-style-type: none"> • Conducting an environmental scan • Issuing an RFP for an EVV vendor • Selecting an EVV vendor • Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> ○ Convening stakeholder workgroups with providers and member advocates ○ Facilitating statewide input sessions ○ Establishing a dedicated EVV website 	<ul style="list-style-type: none"> • Delays in the RFP process due to the need to incorporate a significant level of stakeholder input • Delays in the contracting and evaluation process due to other Medicaid initiatives 	State Designated Single Vendor	https://medicaid.georgia.gov/programs/all-programs/georgia-electronic-visit-verification

⁴ Florida did not include the 1905(a)(24) state plan personal care benefit in their good faith exemption request.

State	Extension Approval Date	Good Faith Effort Actions	Reasons for Unavoidable Delay in Implementing EVV ¹	Implementation Model ²	State EVV Website
Hawaii	12/12/2019	<ul style="list-style-type: none"> • Conducting an environmental scan • Selecting an EVV vendor via an RFP process • Initiating work plans • Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> ○ Launching an EVV webpage ○ Conducting informational sessions with stakeholders ○ Establishing weekly meetings with providers, health plans, and sister agencies 	<ul style="list-style-type: none"> • The length of time required for the procurement process and additional time needed to adequately engage stakeholders, which delayed business rules process • The need for custom configuration to their off-the-shelf system • A simultaneous project for a provider management system update 	Open Vendor Model	https://medquest.hawaii.gov/en/plans-providers/electronic-visit-verification.html
Idaho	11/5/2019	<ul style="list-style-type: none"> • Conducting an analysis of all Personal Care and Home Health Services provided by Medicaid • Recommending an EVV model to the Division Administrator • Held several stakeholder meetings with plans to continue once a model is approved • Held preliminary meetings with the state's MMIS vendor to discuss options related to implementing the proposed model 	<ul style="list-style-type: none"> • The need to identify ways to work around the Red Tape Reduction Act which caused an increase in the number of approvals needed to process requests through the Department of Financial Management • Several vacancies in critical staff positions which require the need to budget current staff time between EVV implementation, and the recently passed Medicaid Expansion including 		http://healthandwelfare.idaho.gov/Default.aspx?TabId=4404

State	Extension Approval Date	Good Faith Effort Actions	Reasons for Unavoidable Delay in Implementing EVV ¹	Implementation Model ²	State EVV Website
			five additional mandates related to this expansion		
Illinois	11/21/2019	<ul style="list-style-type: none"> • Conducting a survey of state agencies • Reviewing contracts that may need to be amended to comply with the EVV system • Preparing to issue an RFP for an EVV vendor • The state will make information about its EVV system available to the public on the state’s website and will accept public comments during the rulemaking process related to the implementation of the system⁵ 	<ul style="list-style-type: none"> • The need to coordinate drafting the RFP with the roll-out of the state’s Medicaid managed care program • A budget impasse which delayed the appropriation of funding and updates to state laws and policies • The need for negotiations with multiple state agencies to develop a model that is least disruptive to program operations 		http://www.dhs.state.il.us/page.aspx?item=66961
Indiana	11/25/2019	<ul style="list-style-type: none"> • Modifying an existing contract with its fiscal agent to include EVV • Selecting an EVV vendor • Implementing work plans • Piloting the EVV system • Conducted stakeholder engagement activities, including: 	<ul style="list-style-type: none"> • The need for further outreach to providers to ensure they are aware of and compliant with EVV requirements • The need for additional time to determine appropriate system 	Open Vendor Model	https://www.in.gov/medicaid/providers/1005.htm

⁵ “CMS acknowledges that the state (IL) has had EVV in place for several of its programs since 2014, however advises the state to follow the promising practices for training, communication, and education outlined in CMS’ May 12, 2018 Informational Bulletin for those impacted by the state’s new EVV system.”

State	Extension Approval Date	Good Faith Effort Actions	Reasons for Unavoidable Delay in Implementing EVV ¹	Implementation Model ²	State EVV Website
		<ul style="list-style-type: none"> ○ Convening multiple stakeholder meetings ○ Developing a member EVV website ○ Establishing an EVV mailbox and hotline ○ Publishing a member letter 	changes in response to the CMS guidance issued in August, 2019		
Iowa	8/23/2019	<ul style="list-style-type: none"> ● Conducting a provider survey ● Selecting an EVV model ● Preparing to issue an 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/i/me/providers/EVV
Kansas	12/23/2019	<ul style="list-style-type: none"> ● Initiating work plans to update its existing EVV system to ensure all applicable personal care services are included 	<ul style="list-style-type: none"> ● The need for additional time to ensure any new stakeholders using the EVV System will have 	State Designated Single Vendor	

State	Extension Approval Date	Good Faith Effort Actions	Reasons for Unavoidable Delay in Implementing EVV ¹	Implementation Model ²	State EVV Website
		<ul style="list-style-type: none"> Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> Soliciting feedback from stakeholders on ways the current system could be improved Conducted regular trainings 	<ul style="list-style-type: none"> opportunities for training and input The length of time required for coordinating information exchange between the state’s EVV vendor, the state’s data systems, and managed care organizations 		
Kentucky ⁶	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 Preparing to issue an 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 	<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 implementing the state’s stakeholder engagement plan. 		

⁶ 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.”

State	Extension Approval Date	Good Faith Effort Actions	Reasons for Unavoidable Delay in Implementing EVV ¹	Implementation Model ²	State EVV Website
Louisiana	12/2/2019	<ul style="list-style-type: none"> • Issuing an RFI • Modifying an existing contract to include EVV • Piloting the EVV system • Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> ○ Maintaining an EVV website and mailbox ○ Convening in-person meetings and trainings with providers, self-direction employers, and case management agencies 	<ul style="list-style-type: none"> • System interoperability issues with regards to services provided through the Early and Periodic Screening, Diagnostic and Treatment benefit • The need to develop an alternate self-direction solution as a result of CMS' August 2019 guidance on web-based electronic timesheets 	Open Vendor Model	http://ldh.la.gov/index.cfm/subhome/40
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
Maryland	12/20/2019	<ul style="list-style-type: none"> • Contracting with a vendor to develop the state's EVV system 	<ul style="list-style-type: none"> • The need to develop a more robust IT system that supports 	State Mandated In-House	

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		<p>and beginning to incorporate additional functionality for personal support services provider through the state’s 1915(c) waivers</p> <ul style="list-style-type: none"> • Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> • Providing information and soliciting feedback during the state’s bimonthly advisory council • Issuing letters to beneficiaries explaining the EVV system and how to provide feedback • Sharing a monthly newsletter via an email listserv of EVV users 	<p>comprehensive billing for both EVV and non-EVV services simultaneously, which has been delayed in order to address stakeholder concerns identified during a pilot phase for the system</p>		
Massachusetts	12/17/2019	<ul style="list-style-type: none"> • Conducting an environmental scan • Modifying an existing contract to include EVV • Selecting an EVV vendor • Developing comprehensive work plans • Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> • Convening public listening sessions 	<ul style="list-style-type: none"> • Ongoing contract negotiations with its EVV vendor • The need to develop solutions to issues identified by stakeholders • Complexities around system interoperability 	Hybrid	https://www.mass.gov/info-details/electronic-visit-verification-evv

State	Extension Approval Date	Good Faith Effort Actions	Reasons for Unavoidable Delay in Implementing EVV ¹	Implementation Model ²	State EVV Website
		<ul style="list-style-type: none"> • Maintaining an EVV website and mailbox • Providing written and face-to-face education to consumers and their families 			
Michigan	12/23/2019	<ul style="list-style-type: none"> • Conducting an environmental scan • Issuing a RFI • Preparing to issue a RFP for an EVV vendor • Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> • Conducting 30 meetings targeted to various stakeholder groups • Disseminating educational materials such as presentations and FAQs 	<ul style="list-style-type: none"> • A general fund budget shortfall for IT projects in the state, which delayed the state’s timeline for issuing a RFP for an EVV vendor 	Open Vendor Model	https://www.michigan.gov/mdhhs/0,5885,7-339-71547_4860_78446_87138---,00.html
Minnesota	12/23/2019	<ul style="list-style-type: none"> • Conducting an environmental scan • Selecting an EVV model • Preparing to issue a RFP for an EVV vendor • Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> • Conducting fourteen public stakeholder meetings • Creating an EVV dedicated webpage 	<ul style="list-style-type: none"> • Delays in the development of the RFP due to complexity and resource needs associated with establishing business requirements • Lack of sufficient state funding • The need to ensure the state’s system adequately reflects stakeholder preferences 	Open Vendor Model	https://mn.gov/dhs/partners-and-providers/news-initiatives-reports-workgroups/long-term-services-and-supports/evv/

State	Extension Approval Date	Good Faith Effort Actions	Reasons for Unavoidable Delay in Implementing EVV ¹	Implementation Model ²	State EVV Website
			<ul style="list-style-type: none"> • The need for additional time to assess how EVV will be implemented for individuals who self-direct their services 		
Mississippi	12/27/2019	<ul style="list-style-type: none"> • Taking steps to update the existing EVV system in the state to comply with the Cures Act, which involves integrating waivers and services not previously included in the EVV system • Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> • Conducting meetings with stakeholders prior to its initial implementation of EVV • Sending communications regarding the EVV system to beneficiaries with opportunities to provide feedback • The state plans to conduct a series of additional stakeholder meetings with beneficiaries and their families as they move forward with implementation 	<ul style="list-style-type: none"> • Procurement issues with the existing contract which prohibited the state from issuing a contract extension and instead required the state to rebid the contract • The prioritization of other system implementations in the state • The implementation of a new 1915(i) service requiring EVV 	State Designated Single Vendor	

State	Extension Approval Date	Good Faith Effort Actions	Reasons for Unavoidable Delay in Implementing EVV ¹	Implementation Model ²	State EVV Website
		of the remaining personal care services			
Missouri	9/18/2019	<ul style="list-style-type: none"> • Conducting environmental scanning • Working to procure an aggregator solution via an RFP process • Conducted stakeholder engagement activities, including: <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"> • The state’s lengthy procurement process • Budget restrictions that delayed the hiring of an EVV implementation manager • Reprioritization of resources due to natural disasters 	Provider Choice Model	https://mmac.mo.gov/telephonyevv-update-for-in-home-and-consumer-directed-services-providers/
Montana	10/22/2019	<ul style="list-style-type: none"> • Conducting environmental scanning • Evaluating its EVV model based on member and provider feedback • Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> ○ Conducting multiple listening sessions with providers and members ○ Holding public EVV vendor demonstrations 	<ul style="list-style-type: none"> • Cancelling its initial RFP for an EVV vendor due to feedback from the member advocate community • System interoperability concerns 	State Designated Single Vendor	

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Nebraska	11/5/2019	<ul style="list-style-type: none"> • Selecting an EVV model • Engaging in the RFP process for EVV vendors • Making necessary changes to two sections of the Nebraska Administrative Code for Home and Community Based Services and Personal Care services to allow for the inclusion of basic EVV language • Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> ○ Including EVV in the LTSS LTC redesign monthly/bimonthly discussions with stakeholders since the initial EVV planning phase ○ Establishing coordination between the Project team, Organizational Change Management lead and the Deputy Director of Communications to ensure a thorough communications plan and follow through with communications updates ○ Maintaining a dedicated EVV web page and mailbox 	<ul style="list-style-type: none"> • Public comment hearings not being completed in time for EVV language to be reviewed for regulation updates • Procurement delays due to the need to coordinate between multiple departments and the creation of new procurement documents due to the fact that existing documents weren't suitable for EVV requirements 		http://dhhs.ne.gov/Pages/Fiscal-Agent-and-Electronic-Visit-Verification.aspx

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Nevada	12/5/2019	<ul style="list-style-type: none"> • Issuing an RFI • Selecting an EVV vendor • Completing its initial rollout of its EVV system • Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> ○ Maintaining an EVV webpage and email listserv ○ Presenting about EVV to advisory boards, tribal authorities, provider groups, and MCOs ○ Holding town halls ○ Disseminating letters to recipients 	<ul style="list-style-type: none"> • Unanticipated implementation issues with data aggregation and billing functionality due to insufficient vendor staffing • The inability to test the system with live user data • The need for extensive one-on-one work with each provider to appropriately configure data uploads 		http://dhcftp.nv.gov/EVV-PCA/
New Hampshire	11/21/2019	<ul style="list-style-type: none"> • Issuing an RFP for a consultant to assist with defining EVV requirements and developing an RFP for vendor selection⁷ • Launched an EVV website 	<ul style="list-style-type: none"> • A delay in procuring its consultant due to a change in department contract staff and the diversion of staff to work on opioid issues. This delayed stakeholder engagement activities and defining EVV requirements 		https://www.dhhs.nh.gov/dcbcs/beas/evv.htm

⁷ The consultant contract will include stakeholder engagement activities, including soliciting feedback from external stakeholders through public forums, surveys, and other means proposed by its contractor.

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			<ul style="list-style-type: none"> • Budget/legislative appropriation issues, indicating that although proposed, the state budget for FY 2020 did not include funding for EVV 		
New Jersey	12/19/2019	<ul style="list-style-type: none"> • Conducting an environmental scan • Issuing a RFP for an EVV vendor • Beginning the vendor selection process • Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> • Conducting quarterly and ad hoc meetings with stakeholders • Requesting stakeholder input on the state’s RFP • Presenting EVV at stakeholder meetings with families and caregivers • The state intends to use the time afforded by the extension to further engage stakeholders via focus groups with families and caregivers 	<ul style="list-style-type: none"> • The state’s extensive RFP review and approval process, which invited input from stakeholders • The need to conduct additional stakeholder engagement activities with individuals who self-direct their services 		

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New Mexico	12/9/2019	<ul style="list-style-type: none"> • Conducting an environmental scan • Modifying an existing contract to expand EVV • Selecting an EVV vendor • Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> ○ Disseminating member letters ○ Issuing a survey ○ Conducting regional presentations ○ Publishing FAQs 	<ul style="list-style-type: none"> • The state is currently in the process of replacing its existing MMIS, which has been delayed due to changes in scope and the need for additional review and approval • System interoperability issues 		
New York	12/5/2019	<ul style="list-style-type: none"> • Completing an environmental scan • Issuing an RFI • Securing funding for EVV implementation • Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> ○ Establishing an EVV webpage and email inbox ○ Conducting regional listening sessions ○ Publishing a stakeholder feedback report ○ Posting FAQs 	<ul style="list-style-type: none"> • Additional time needed to ensure the state was able to obtain input from its full range of stakeholders • The need to conduct a survey and three rounds of follow-up to adequately assess providers' EVV awareness and implementation status • The state's mandatory timeframe for seeking budget approval for EVV implementation 	Provider Choice Model	https://www.health.ny.gov/health_care/medicaid/redesign/evv/index.htm

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North Carolina	11/21/2019	<ul style="list-style-type: none"> • Issuing an RFI to survey the marketplace for EVV vendors • Reviewing other states' EVV systems • Developing an RFP for vendor selection • Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> ○ Surveying stakeholders impacted by EVV ○ Conducting regional provider trainings ○ Maintaining an EVV website and inbox ○ Outreaching to self-directed workgroups ○ Convening an EVV stakeholder meeting to present on EVV requirements, the state's design model, and implementation timeline ○ Developed a communications plan that will engage stakeholders in each affected program and will convene a 	<ul style="list-style-type: none"> • Veto of a budget bill that included funding for EVV, which has delayed the issuing of the RFP • Transition to managed care which requires significant system reconfiguration, and the state cannot integrate EVV until this project is complete 	Open Vendor Model	https://medicaid.ncdhhs.gov/electronic-visit-verification

State	Extension Approval Date	Good Faith Effort Actions	Reasons for Unavoidable Delay in Implementing EVV ¹	Implementation Model ²	State EVV Website
		focus group for beneficiaries and their families			
North Dakota	12/12/2019	<ul style="list-style-type: none"> • Conducting an environmental scan • Procuring an EVV solution • Preparing to issue an RFP for a data aggregator • Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> ○ Posting information about EVV on the state’s website ○ Issuing a survey ○ Convening stakeholder meetings at locations across the state ○ Will also be conducting quarterly engagement opportunities for beneficiaries, caregivers, and other stakeholders 	<ul style="list-style-type: none"> • The length of time required for the procurement process which included public notice, a public comment period, and a protest period • Two major projects, MMIS certification and EVV implementation, were occurring at the same time, which contributed to a lack of available staff resources 	Open Vendor Model	https://www.nd.gov/dhs/services/adultsaging/docs/electronic-visit-verif-publi-input-meeting-2019-presentation.pdf
Ohio ⁸	12/6/2019	<ul style="list-style-type: none"> • Conducting an environmental scan • Selecting an EVV vendor • Implementing two phases of its EVV program 	<ul style="list-style-type: none"> • The need for a contract amendment, which took longer than anticipated due to the time required to fully accommodate the needs of 	State Designated Single Vendor	https://medicaid.ohio.gov/INITIATIVES/Electronic-Visit-Verification

⁸ Ohio did not include the 1905(a)(24) state plan personal care benefit in their good faith exemption request.

State	Extension Approval Date	Good Faith Effort Actions	Reasons for Unavoidable Delay in Implementing EVV ¹	Implementation Model ²	State EVV Website
		<ul style="list-style-type: none"> • Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> ○ Establishing an EVV webpage and email inbox ○ Convening multiple stakeholder meetings ○ Will also conduct targeted outreach to individuals and providers as it moves into its third phase of implementation 	<ul style="list-style-type: none"> • providers and individuals receiving participant-directed services • The need for financial management services vendors to develop EVV interfaces • Updates to the project scope • The decision to use a phased approach in order to allow sufficient time for training, outreach, and program improvement 		
Oklahoma	11/6/2019	<ul style="list-style-type: none"> • Selecting a model • Creating a dedicated EVV webpage and mailbox • Maintaining an existing EVV system with at least one state agency • Performing a SWOT analysis for each agency • Initiating additional contract agreements with the current EVV vendor for work with the other agencies • Conducted stakeholder engagement activities, including: 	<ul style="list-style-type: none"> • Being required by the Office of Management Enterprise Services (OMES) to restart the contracting process with the existing vendor which caused a delay in Joint Configuration • The state remains in the process of implementing workarounds for self-directed individuals who do not have access to cell phones and/or computers 	State Designated Single Vendor	http://okhca.org/individuals.aspx?id=22330

State	Extension Approval Date	Good Faith Effort Actions	Reasons for Unavoidable Delay in Implementing EVV ¹	Implementation Model ²	State EVV Website
		<ul style="list-style-type: none"> ○ Holding teleconferences, in-person regional meetings, user group meetings, and a weekly Q&A session via telephone during the EVV system implementation and maintenance ○ Forming a workgroup of SMA and agency partner staff 			
Oregon	12/5/2019	<ul style="list-style-type: none"> ● Completing an environmental scan ● Identifying an EVV model ● Preparing for RFP issuance ● Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> ○ Establishing an EVV webpage ○ Conducting stakeholder engagement and training taskforce sessions ○ Plans to conduct regional EVV focus group sessions 	<ul style="list-style-type: none"> ● The need to procure a new EVV vendor due to leadership challenges with the initial vendor ● Changes in scope from the vendor ● Conflicting schedules with another project that impacted resource availability 		https://www.oregon.gov/DHS/SENIORS-DISABILITIES/DD/PROVIDERS-PARTNERS/Pages/evv.aspx
Pennsylvania	12/23/2019	<ul style="list-style-type: none"> ● Conducting an environmental scan ● Modifying an existing contract to include EVV ● Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> ● Conducting bimonthly public EVV meetings 	<ul style="list-style-type: none"> ● The need for additional time to integrate providers using their own EVV system with the state's data aggregation system ● The need for an amendment to the state's contract with its FMS 	Open Vendor Model	https://www.dhs.pa.gov/providers/Billing-Info/Pages/EVV.aspx

State	Extension Approval Date	Good Faith Effort Actions	Reasons for Unavoidable Delay in Implementing EVV ¹	Implementation Model ²	State EVV Website
		<ul style="list-style-type: none"> • Quarterly meetings with a participant-directed advisory group • Monthly webinars 	<ul style="list-style-type: none"> • vendor to include a requirement for EVV • Additional time needed for EVV vendor to finalize technical specifications related to claiming 		
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
South Dakota	11/5/2019	<ul style="list-style-type: none"> • Selecting an EVV model • Updating provider contracts to include an EVV clause • Selecting the two vendors the state identified it needed to meet the requirements 	<ul style="list-style-type: none"> • The need to coordinate between two vendors • Challenges with interfacing the new case management system with the state's existing MMIS system 		

State	Extension Approval Date	Good Faith Effort Actions	Reasons for Unavoidable Delay in Implementing EVV ¹	Implementation Model ²	State EVV Website
		<ul style="list-style-type: none"> • Worked with an EVV vendor to complete a custom case management system to validate claims, assist with presenting improper payments, and streamline EVV data • Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> ○ Surveying 100% of personal care recipients under DDD ○ Holding monthly calls with Family Support Coordinators ○ Working with the IT system vendor to test the EVV platform with participants ○ Holding several EVV activities/events for provider feedback 	<ul style="list-style-type: none"> • Large staff turnover which required the training of new employees • The need for key EVV team members to split time between EVV and CMS CAP recommendations 		
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 • Selecting EVV vendors • Piloting the EVV system • Conducted stakeholder engagement activities, including: 	<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 • Complexities in allocating CDS funding for EVV devices • Changes made to EVV business requirements as a result of 	Open Vendor Model	https://hhs.texas.gov/doing-business-hhs/provider-portals/long-term-care-providers/resources/electronic-visit-verification

State	Extension Approval Date	Good Faith Effort Actions	Reasons for Unavoidable Delay in Implementing EVV ¹	Implementation Model ²	State EVV Website
		<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 	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.		
Utah	12/27/2019	<ul style="list-style-type: none"> ● Completing an environmental scan ● Selecting an EVV model ● Receiving approval for an Advance Planning Document to develop a system for analyzing EVV data ● Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> ● Convening a public meeting ● Inviting numerous stakeholders to participate in the EVV development process ● Publishing articles regarding EVV compliance in the state's Medicaid bulletin 	<ul style="list-style-type: none"> ● Budgetary constraints which limited the number of staff available for EVV activities ● Challenges engaging small providers and hard-to-reach populations (e.g., in rural or frontier areas) ● Delays in integrating financial management services agencies into the EVV system 	Provider Choice	https://medicaid.utah.gov/ew/
Vermont	10/25/2019	<ul style="list-style-type: none"> ● Conducting environmental scanning ● Selecting an EVV model ● Modifying an existing Medicaid MMIS contract to include EVV ● Selecting an EVV vendor 	<ul style="list-style-type: none"> ● The need for additional funds to provide adequate training and technical support to providers 	Hybrid	https://dvha.vermont.gov/electronic-visit-verification-1

State	Extension Approval Date	Good Faith Effort Actions	Reasons for Unavoidable Delay in Implementing EVV ¹	Implementation Model ²	State EVV Website
		<ul style="list-style-type: none"> • Updating existing EVV systems in the state • Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> ○ Meeting with external stakeholders ○ Disseminating letters and flyers to self-directed services employers and employees ○ Creating a website with a dedicated EVV mailbox. ○ Currently developing a comprehensive training and outreach strategy to support the needs of stakeholders 	<ul style="list-style-type: none"> • System interoperability issues with current timesheet and claims processing systems • Delays disseminating technical specifications to providers. • Delays engaging stakeholders on system design, training, and data exchange 		
Virginia	12/5/2019	<ul style="list-style-type: none"> • Identifying an EVV model • Modifying an existing contract to include EVV • Initiating work plans • Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> ○ Establishing an EVV webpage and e-mail address ○ Disseminating provider bulletins and member letters 	<ul style="list-style-type: none"> • The state’s promulgation process for regulations, which is necessary for requiring providers to submit EVV information with their claims • The need for increased outreach to providers to ensure their EVV systems are capable of transmitting EVV information to the state 	Open Vendor Model	http://www.dmas.virginia.gov/#/longtermprograms

State	Extension Approval Date	Good Faith Effort Actions	Reasons for Unavoidable Delay in Implementing EVV ¹	Implementation Model ²	State EVV Website
		<ul style="list-style-type: none"> ○ Conducting numerous webinars and stakeholder meetings 			
Washington	10/20/2019	<ul style="list-style-type: none"> ● Initiating pilot of the EVV system ● Developing EVV requirements for providers ● Developing/modifying provider contracts to include these requirements and increasing rates for providers to include EVV costs ● Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> ○ Engaging with representative client and self-advocate groups ○ Creating a strategic workgroup to advise on EVV and self-direction ○ Holding regular meetings with labor-union representatives, developmental disability advocacy groups and other stakeholder groups while conducting outreach and consultation with Tribal partners 	<ul style="list-style-type: none"> ● Ongoing work with stakeholders on how to address concerns related to live-in caregivers which has delayed finalizing contract requirements for providers ● The state needs to make alterations to its current location capturing requirements in response to CMS guidance and needs additional time to design, test, and implement any changes needed to the data aggregator 	State Designated Single Vendor	https://www.dshs.wa.gov/altsa/stakeholders/electronic-visit-verification

State	Extension Approval Date	Good Faith Effort Actions	Reasons for Unavoidable Delay in Implementing EVV ¹	Implementation Model ²	State EVV Website
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 ○ Maintaining a website and dedicated EVV mailbox 	<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/WaiverPrograms/EVV/Pages/default.aspx
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"> • 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.wisc.gov/evv/index.htm

State	Extension Approval Date	Good Faith Effort Actions	Reasons for Unavoidable Delay in Implementing EVV ¹	Implementation Model ²	State EVV Website
		<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 			
Wyoming	12/2/2019	<ul style="list-style-type: none"> ● Conducting an environmental scan ● Surveying providers ● Modifying an existing contract to include EVV ● Issuing an RFP for an EVV vendor ● Conducted stakeholder engagement activities, including: <ul style="list-style-type: none"> ○ Convening in-person meetings with stakeholders who self-direct their services ○ Surveying beneficiaries ○ Conducting provider and beneficiary interviews 	<ul style="list-style-type: none"> ● Non-responsiveness from providers during initial stakeholder engagement efforts ● The need to wait for funding to be approved by the legislature prior to initiating the procurement process ● Project staffing and internal program vacancies 		https://health.wyo.gov/healthcarefin/wyoming-integrated-next-generation-system-wings-project/electronic-visit-verification-evt/