



Applied
Self-Direction

FMS Providers' Perspectives on EVV Best Practices for Self-Direction

April 6, 2023

Today's Presentation

- Background on how we developed a new report on electronic visit verification (EVV) best practices for self-direction with recommendations from the Financial Management Services (FMS) industry for states and managed care organizations (MCOs)
- An in-depth overview of the findings from the new report
- Questions and comments



Quick Primer on Electronic Visit Verification (1/3)

- The 21st Century Cures Act requires states to use EVV for any Medicaid-funded personal care services
 - Failure to comply with this requirement results in a reduction of the state's FMAP (Federal Medicaid Assistance Percentage)
 - Any future changes to this requirement would require Congressional action



Quick Primer on Electronic Visit Verification (2/3)

- EVV systems are required to electronically verify the following:
 - ❑ Type of service performed
 - ❑ Who received the service
 - ❑ Who provided the service
 - ❑ Date the service was provided
 - ❑ When the service begins and ends
 - ❑ Location of service delivery



Quick Primer on Electronic Visit Verification (3/3)

- FMS providers typically play a lead role in implementing EVV in self-direction
 - They have an on-the-ground perspective on the unique operational challenges presented by EVV



**How was this new
EVV report developed?**



Developed by the National Self-Direction Policy Workgroup

- What is the National Self-Direction Policy Workgroup?
 - Comprised of FMS entities committed to advancing self-direction through collective action
 - Convened by Applied Self-Direction as part of the national FMS membership offering
- The concept and approach for the new EVV report were developed under the leadership of this workgroup
 - Specifically seeks to provide guidance to states and MCOs seeking guidance on how to improve EVV implementation for self-direction



Capturing FMS Perspectives on EVV

- Distributed a survey to all FMS members in November 2022
 - Approach to EVV
 - The status of EVV implementation
 - Positive and harmful outcomes of EVV for self-direction
- Conducted a two-part focus group series with FMS on challenges and best practices for EVV implementation in December 2022 and January 2023
 - Session 1 covered EVV implementation status, EVV workload for FMS providers, improved efficiencies, data aggregators, EVV models and systems
 - Session 2 covered participant dissatisfaction, access to technology, live-in caregivers, workforce crisis, quality of self-direction, and fraud prevention



FMS Contributors to the EVV Report

- Accra
- ACES\$
- Acumen Fiscal Agent
- ARIS Solutions
- AssuranceSD
- Attendant Services
Maine
- Best Care
- CDS in Texas
- Coalition of Texans with
Disabilities
- Consumer Direct
- Consumer Directions
- Easterseals DE & MD's
- Eastern Shore
- Fiscal Assistance
- The Fogarty Center
- Gateways
- Granite State
Independent Living
- GT Independence
- iLIFE
- JEVS Human Services
- Lifeworks
- Lori Knapp
- Mains'I Services Inc.
- Metro Solutions
- MRCI WorkSource
- Palco
- Partners In Community
Supports (PICS)
- Pathways
- Personal Accounting
Services (PAS)
- Premier
- Public Partnerships
- Veridian



Top Challenges & Benefits of EVV Implementation for Self-Direction



Top Challenges of EVV Implementation in Self-Direction (1/4)

- EVV implementation has been challenging for most FMS providers, especially in states where they must use an external vendor, submit data to an aggregator, or follow unclear or unrealistic policies and timelines from states or MCOs

How is EVV implementation going in the state(s) you serve?	Percentage
It's going well	18%
It's challenging	82%



Top Challenges of EVV Implementation in Self-Direction (2/4)

- EVV has increased the administrative burden and cost for FMS providers, who must provide technical support, training, and communication to participants and workers, as well as deal with system glitches, data errors, and compliance issues

Do you work with any states or MCOs that have successfully helped address the increased EVV workload for FMS providers?	Percentage
Yes	0%
No	100%



Top Challenges of EVV Implementation in Self-Direction (3/4)

- EVV has caused participant dissatisfaction, anxiety, and confusion, especially among live-in caregivers, family members, older adults, and those with limited access to technology, internet, or language options, as well as direct care staff attrition

From your perspective, has participant dissatisfaction with EVV improved in the last year?	Percentage
Yes	31%
No	69%



Top Challenges of EVV Implementation in Self-Direction (4/4)

- EVV has not improved the quality of self-directed services or prevented fraud significantly and may have eroded the flexibility and autonomy of self-direction

What has been the impact of EVV overall on the quality of self-directed services?	Percentage
Positive Impact	11%
Negative Impact	89%
No Impact	0%

Do you believe EVV has improved fraud prevention efforts?	Percentage
Yes	14%
No	57%
Unsure	29%



Potential Benefits of EVV for Self-Direction (1/3)

- Providing a convenient and secure way for workers to record their time and tasks electronically, reducing paperwork and errors.
- Enhancing the transparency and accountability of service delivery and allowing employers and FMS to monitor and verify the quality and quantity of services.
- Improving the efficiency and accuracy of payroll and billing processes, reducing administrative burden and payment delays.

“We have a lot of people that enjoy using the EVV software system and like not being tied down to a piece of paper. Budget details at fingertips. No overlapping shift issues between staff.”



Potential Benefits of EVV for Self-Direction (2/3)

- Offering data and insights to inform program evaluation and improvement, such as identifying service gaps, trends, and best practices.
- Enabling workers to use their own devices or other available options to log in and out of their shifts, making it easier and faster to submit their time.
- Giving employers more control and visibility over their workers' schedules and activities, allowing them to approve or reject shifts and track their budget.

“When an employee is able to successfully log in and create their time entries in EVV, it eliminates issues such as over budget & overlapping times.”



Potential Benefits of EVV for Self-Direction (3/3)

- Streamlining the communication and coordination between workers, employers, and FMS, facilitating timely and accurate information exchange and feedback.
- Protecting workers and employers from potential fraud and abuse, ensuring that services are delivered as authorized and agreed upon.
- Providing valuable information to measure and improve the outcomes and satisfaction of self-directed services, such as worker retention, quality of life, and cost-effectiveness.

“It has minimized fraud and allows for real time data”



Recommendations for States & MCOs



Best Practices for Stakeholder Engagement (1/3)

- Involve FMS entities, self-direction participants, and workers early and often in the planning, implementation, and evaluation of EVV, and ensure their representation and input is included in policy and decision-making processes.
- Establish clear and consistent communication, training, and support for EVV users on EVV requirements, expectations, and options.

“Self-direction is often not considered at the start of the state implementation. Once these decisions are made by the state and the state elected aggregator, it's often too difficult, based on the timeline for them to reconsider a different approach.”



Best Practices for Stakeholder Engagement (2/3)

- Provide accessible and user-friendly materials and tools in multiple languages and formats.
- Ensure that EVV systems and vendors are reliable, user-friendly, secure, and compliant with privacy and accessibility standards and that they do not limit or restrict the location or type of services provided in self-direction.

“Accessibility of the EVV option should be a top factor in vendor choice. Most options we've viewed are not intuitive and do not have accessibility features or different language choices. We need to keep in mind the populations we serve and make decisions with their wellbeing at the forefront.”



Best Practices for Stakeholder Engagement (3/3)

- Offer flexibility and choice to participants and workers on how to use EVV, such as allowing them to use different devices, methods, or vendors, or granting exceptions or exemptions for certain situations or populations.
- Monitor and evaluate the impact of EVV on the quality, satisfaction, and outcomes of self-directed services, and address any issues or challenges that arise promptly and collaboratively.

“Have seen significant success with combination of use of federal programs to provide cell phone when needed but also the state/FMS allow for the use of mobile app on smart phone or tablet, and landline.”



Best Practices for EVV Policies (1/5)

- Exempt live-in caregivers from EVV requirements, or at least simplify and streamline the process for them to submit and verify their time worked.

Which of the following approaches do you prefer?	Percentage
Exempt live-in caregivers from EVV	83%
Require EVV for live-in caregivers	0%
No preference	17%

“We hear the most push back from people with live-clocking in and out and using the GPS. We feel that live-in caregivers need to put their shifts through an electronic system but they can create a shift after it has happened and not have to have the GPS on.”



Best Practices for EVV Policies (2/5)

- Offer multiple options and methods for EVV participation, such as mobile app, web portal, landline, fixed device, or manual entry, and ensure they are accessible, user-friendly, and available in multiple languages and formats.

“In our state telephony is an option but is only for the employee to clock in and out hours but not for the support manager to approve the hours, so does not address the technology barrier for them.”



Best Practices for EVV Policies (3/5)

- Establish clear and consistent policies and guidance on EVV requirements, expectations, and timelines, and communicate them effectively and frequently to all stakeholders, using multiple channels and formats.
- Ensure all policies are established and communicated early enough to allow adequate testing time prior to implementation deadlines. Stakeholders' feedback should be requested to ensure ample time exists.

“It would be more helpful if MCO/state are more organized in the rollout and aware of the amount of time it takes to rollout. some of the timelines given are not thought through”



Best Practices for EVV Policies (4/5)

- Provide adequate funding, support, and training for EVV implementation, including covering the costs of devices, internet, and technical assistance for participants and workers who need them.
- Allow for payment to workers for their time spent on EVV training.

“[State] is not allowing participants who need to use EVV to purchase a device for their workers to use with their program funds.”



Best Practices for EVV Policies (5/5)

- Establish reasonable and realistic compliance thresholds and exception policies that recognize the diversity and variability of self-directed services and do not penalize or disenroll program participants or FMS providers for minor or unavoidable errors or difficulties with EVV.

“Yes, go in phases and hopefully allow exceptions where it makes sense. During a workforce crisis, it's so important not to add barriers for people trying to use services.”



Best Practices for Collaboration with FMS (1/4)

- Consider that the technology needs for EVV systems are different in a self-direction context versus an agency context. Common EVV system requirements such as scheduling and attestations are not aligned with the philosophy of self-direction and can cause unnecessary restrictions and burdens on the participant and their worker.

“Consumer-directed participants are very different from traditional agency workers and their differences aren't considered”



Best Practices for Collaboration with FMS (2/4)

- Allow FMS providers to have a choice of vendor, a hybrid system, or an in-house system that supports integration with their portal and payroll processes.
- Allow FMS providers to choose or develop their own EVV system that meets the federal requirements and supports integration with their existing systems and processes, rather than mandating a single state or MCO vendor that may not suit the needs of self-directed programs.

“Seems that a lot of the expectation for execution and compliance comes down on the FMS provider but not all states and MCOs allow for the FMS entities have the flexibility to select and partner with EVV vendors that may function well with their systems.”



Best Practices for Collaboration with FMS (3/4)

- Provide adequate funding and reimbursement for FMS providers to cover the costs and workload associated with EVV implementation, including staff training, technical support, data reporting, and compliance monitoring.

“Increase rates for FMS. We had ours reduced in 2022 even with EVV implementation being demonstrably burdensome.”



Best Practices for Collaboration with FMS (4/4)

- Provide FMS providers with accurate and updated technical specifications and guidance on data submission and validation, and notify them of any changes or issues promptly. Ensure technical specifications are applicable to self-direction.

“Make sure the specifications that are given to the FMS are correct. We were provided specifications that were not correct which required programming and then reprogramming for the aggregator.”



Best Practices for Partnering with Data Aggregators (1/3)

- Involve FMS providers in the selection, contracting, and oversight of aggregators, and solicit their input and feedback on the performance and functionality of aggregators.
- Establish clear and timely communication channels and protocols between FMS providers and aggregators, and designate a point of contact for each party.

“If we are sending EVV data, again it's important to start early and engage with stakeholders to educate the state and state-elected aggregator on why self-direction is different than traditional provider agencies. Tech specs to send data often change and we are not notified proactively.”



Best Practices for Partnering with Data Aggregators (2/3)

- Ensure that data aggregators have the capacity, expertise, and technology to handle and process the data from FMS providers efficiently and accurately, and to resolve any errors or discrepancies quickly.

“In my experience, the contacts at the state and/or MCOs that we work with on a daily basis are too far separated from detailed EVV knowledge. This often means that when we try to engage with them or the state aggregator we are stuck. The state aggregator defers to the state, whereas the state contacts don't understand how all the parts work together, and where there is a disconnect may be leading to aggregation problems.”



Best Practices for Partnering with Data Aggregators (3/3)

- Align the data elements and formats required by aggregators with the data collected and stored by FMS providers, and minimize any duplication or inconsistency of data entry or reporting.
- Allow FMS providers to test and verify their data transmission and aggregation before going live, and provide feedback and support to address any problems or gaps.

“A billing payment can be denied if there is not a matching line in the aggregator”



Questions & Discussion



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