



Applied
Self-Direction

A Closer Look at EVV Implementation in Self- Direction

2021 HCBS Conference

Agenda

- Introduction
- Perspectives on Electronic Visit Verification Implementation in Self-Direction:
 - Synopsis of feedback from state agencies & Financial Management Services (FMS) entities
 - Viewpoint from a longtime participant in self-direction
- Conclusion



Who We Are

- Applied Self-Direction is a mission-driven organization with one goal: to advance self-direction.
 - We believe everyone who needs long-term services and supports should have the option to self-direct- that is, to decide when, where, how, and from whom their services are delivered.
- We currently serve over 150 different organizations through membership including Financial Management Services (FMS) entities, state program agencies, and other stakeholders
- Today's speakers
 - Molly Morris, Director of Engagement
 - Erica Andres, Training & Technical Assistance Consultant



Perspectives on EVV Implementation in Self- Direction: Feedback from States & FMS Entities



5 Common EVV Implementation Challenges

1. Supporting participant employers
2. Challenges related to live-in caregiver requirements
3. Coordinating with aggregators
4. Meeting expectations for EVV manual entry thresholds & errors
5. High cost of implementation



Supporting Participant Employers

- FMS representatives were more likely to report that most participants strongly object to EVV usage
 - In most states, FMS entities provide significant support to onboard and train participants on EVV (in addition to their myriad of other duties)

(States) What percentage of participants would you estimate object to EVV usage?	
Answer	Percentage
0-20%	42%
20-40%	25%
40-60%	25%
60% plus	8%

(FMS) What percentage of participants would you estimate strongly object to EVV usage?	
Answer	Percentage
0-20%	20%
20-40%	20%
40-60%	17%
60% plus	43%



Supporting Participant Employers

- Certain populations tend to require more extensive training and hands-on support to successfully implement EVV – which often requires more time and resources
 - Rural/frontier settings
 - Individuals without access to technology
 - Individuals with low technology literacy
 - Older adults
- Ongoing concern regarding the impact of EVV on direct care staff attrition in self-direction from some state and FMS representatives



Live-In Caregiver Requirements

- It is at the discretion of states whether to require EVV for live-in caregivers. Either approach has trade-offs.
- When requiring EVV for live-in caregivers:
 - Live-in caregivers typically do not have clearly defined start and end times
 - Additional support and guidance may be needed regarding allowable methods for time tracking
 - EVV systems that require a set schedule are especially problematic (for any self-direction program)
- When exempting live-in caregivers from EVV requirements:
 - States must develop a system to verify live-in status, sometimes these tracking requirements are highly cumbersome and costly for FMS entities to track
 - May reduce potential efficiencies in billing introduced by EVV



Coordinating with Aggregators

- In states that allow for more than one EVV vendor, it is necessary to contract with a third-party aggregator to synthesize EVV data
- FMS representatives tended to experience challenges partnering with aggregators

(FMS) How is it going partnering with aggregators in your programs?	
Answer	Percentage
It's going well	13%
It's challenging	60%
Unsure	13%
N/A	17%



Coordinating with Aggregators

- In some states, FMS reimbursement is contingent upon the timely submission of EVV records to the state.
 - In this scenario, the state may withhold payment to the FMS entity if the EVV records are being held up at the aggregator level
 - When FMS entities are given the choice of an EVV vendor, but have not elected to use the aggregator's EVV solution, there is a disincentive for the aggregator to quickly and efficiently manage claims from other EVV systems

(FMS) Does your organization have its own agreement or contract with the aggregator(s)?	
Answer	Percentage
Yes, we have a formal agreement with the aggregator	14%
No, the aggregator contracts with the state only	69%
Unsure	7%
N/A	14%



Meetings Expectations for EVV Manual Entry Thresholds

- States set a target threshold for manually entered and edited EVV. Typically, the threshold is defined as a maximum acceptable percentage of total EVV records that cannot be auto-adjudicated and require manual intervention to be processed.
- To achieve EVV compliance, states will need to implement an EVV system that is "minimally burdensome." If many participants are unable to stay under the manual threshold limit, it may indicate a system issue that should be addressed before holding participants individually accountable.



Meetings Expectations for EVV Manual Entry Thresholds

- State expectations for EVV manual entry thresholds may differ from what is currently feasible in the self-direction program

(States) What do you consider to be an acceptable percentage of manual/edited entries in your EVV system?

Answer	Percentage
0-20%	80%
20-40%	20%
40-60%	0%
60% plus	0%

(FMS) What do you estimate is the percentage of manual/edited entries in your EVV system?

Answer	Percentage
0-20%	23%
20-40%	23%
40-60%	35%
60% plus	19%



Meetings Expectations for EVV Errors

- To date, CMS has not issued guidance on what would be considered a reasonable error rate for a state EVV system. CMS representatives have indicated they expect states to reduce their error rates over time.
- Some payers have elected to deny reimbursement to FMS entities in the absence of a “perfect” EVV record. This is an inadvisable approach.
 - For more background, read our [issue alert](#)

(States) Does your state withhold payment from FMS providers if there are EVV errors?	
Answer	Percentage
Yes	25%
No	50%
Unsure	25%

(FMS) Do you work with any states that will withhold due to EVV errors?	
Answer	Percentage
Yes	40%
No	23%
Unsure	37%



High Cost of Implementation

- FMS entities tend to take on significant responsibilities to implement EVV in self-direction resulting in increased administration costs:

(FMS) Has EVV implementation increased your administration cost?	
Answer	Percentage
Yes, the cost has significantly increased	63%
Yes, the cost has slightly increased	17%
No, the cost is the same	7%
No, the cost has slightly decreased	3%
No, the cost has significantly decreased	0%
Unsure	10%



High Cost of Implementation

- Few states have increased their compensation rate for FMS entities to account for the increased workload:

Have the state(s) you work with increased your compensation rate to account for the increased responsibilities associated with EVV implementation?	
Answer	Percentage
Yes, our rates have permanently increased	7%
Yes, our rates have temporarily increased	7%
No, our rates have stayed the same	83%
Unsure	3%



Recommendations to States

- Reevaluate policies that limit choice and control that go beyond the necessary requirements for EVV compliance
- Avoid overly punitive policies that fail to acknowledge the time and support needed to achieve successful implementation, particularly among populations that require intensive support to achieve compliance
- Clarify the role of each stakeholder involved in EVV



Recommendations to States

- Treat FMS entities as a partner in successful EVV implementation. Support their efforts and needs both financially and practically.
- EVV implementation in self-direction is unique. Expect to adapt or reinvent EVV systems and solutions that have been developed for a traditional setting.
- Engage in ongoing dialogue with participants to understand and address challenges and harmful policies. Don't allow program requirements to override the participant's choice and access to the community on their terms.



Perspectives on EVV Implementation in Self- Direction: EVV in Real Life



Background

- 11 years self-directing in Wisconsin's IRIS program
- 8 years as an IRIS Consultant
- Began using EVV in October 2021



Truth about EVV: Positives

- Makes workers more responsible
 - Accountable to be at work on time
 - Filling out their own timecards
- In some states, don't have to do paper timecards



Truth about EVV: Challenges

- Very invasive, particularly given GPS tracking
 - People that don't need care aren't tracked
- Disruptive, must stop or delay getting care so the worker can punch
 - Live-in workers must remember to punch before doing care
- Contradicts the principles of self-direction
 - Don't have a choice over where services are delivered. Must be at home to get care.
 - Don't have control over a schedule. Must punch in/out at a certain time



Truth about EVV: Challenges

- Puts more work on people self-directing and the workers, who are already overworked
 - ❑ Must get all workers set up with little or no direction
 - ❑ Must clock in/out for different service, but in reality they are all intermixed
 - ❑ If a punch is missed or incorrect, the participant must go in to correct it
 - ❑ Must approve punches and still do timecards
 - ❑ Must train staff to use it. Most that are not tech savvy
- Rolled out with poor planning
 - ❑ Unreliable app
 - Freezes
 - Glitches
 - ❑ Didn't get start up information for caregivers
 - ❑ The customer service people don't know the answers to questions



Truth about EVV: Recommendations

- My Dream: Get rid of EVV all together
- Remove GPS portion
 - Require participants and workers' phones to be in close proximity
 - Fingerprint verification from participant
- Remove requirement for all live-in workers



Truth about EVV: Recommendations

- Have a good system for adjusting punches
- Improve Call Centers
 - Staff with people that know the system and can accurately answer questions
 - Have more staff, so people can get through when calling
 - Don't have different people that need to be called for different problems
- Have quick reference guides that are easy to understand and not all writing



Thank you for joining us!

- Please contact us if you have any questions or would like more information about EVV implementation for self-direction:
 - ❑ Molly Morris, molly@appliedselfdirection.com
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- Visit our virtual exhibit booth this week to schedule a time to chat!

