Navigating CMS Certification for EVV Operations

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Agenda

• Ohio EVV Program Summary
• EVV Lessons Learned
• CMS Certification Process
• Benefits of CMS Certification
• CMS Certification Lessons Learned
• Questions/Contact Information
Session Summary

CMS certification has been an evolving process where CMS and States have been able to openly communicate needs. Ohio was an experimental state for most of the CMS certification. Learn how Ohio navigated from one process to another to obtain CMS certification, while relying heavily on EVV operations to measure success with the new outcome-based approach. In addition, hear how Ohio’s phased approach to EVV implementation worked, including lessons learned, helpful tips and tricks, and how to build a successful operations unit to support your new, or new to you, EVV System.
Ohio EVV Program Summary

• Program Launch **Phase 1, January 2018**
  » FFS State Plan Services
  » Ohio Homecare Waiver Services

• Program Launch **Phase 2, May 2019**
  » Department of Developmental Disabilities
  » Department of Aging
  » Managed Care

• Program Launch **Phase 3, Late 2020**
  » Home Health Therapy Services
  » Consumer Directed Care Services
Payers for EVV Phases 1 and 2

- **ODM**
  Ohio Department of Medicaid

- **DODD**
  Department of Developmental Disabilities

- **ODA**
  Ohio Department of Aging

- **MCO’s**
  aetna
  buckeye health plan
  CareSource
  MOLINA Healthcare
  Paramount
  UHC
Ohio EVV Program Summary

• Current Program Size
  » 121,800 Members
  » 12,000 Providers
  » 6 MCOs

• EVV Model
  » Mobile and Telephonic Visit Verification
  » Member Devices
  » Open Model using Aggregator
  » Claims Validation

• 1st EVV Program to obtain CMS Certification!
EVV Lessons Learned

• Phased Approach
  » Benefits
    • Phase 1 - Started with smallest group of Providers/Individuals, single billing entity with ODM
    • Phase 2 – Added more payers (Departments and MCOs), amended existing claims validation to accommodate more payers, used lessons learned in Phase 1 to improve Phase 2

• Program Lessons
  » Initial Phase 1 solution adoption (August 2018) was 62%, expectation was 30%
  » Change in course helpful in the long run
Program Adoption as of May 2019

Of 7,651 eligible Phase 1 providers: 998 Agencies / 6,653 Non-Agencies

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<tr>
<th>*As of May 5, 2019</th>
<th>Total %</th>
<th>Agency Providers <em>Including Alt. EVV</em></th>
<th>Non-Agency Providers</th>
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<tr>
<td>Providers who have Billed for EVV Services</td>
<td>2,076, or 27% of Phase 1 Eligible Providers (7,651)</td>
<td>622 (27%)</td>
<td>2,454 (73%)</td>
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<td>Providers who Billed and NOT using EVV:</td>
<td>15%</td>
<td>6%</td>
<td>19%</td>
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<td>Providers who Billed and are using EVV</td>
<td><strong>85%</strong></td>
<td><strong>94%</strong></td>
<td><strong>81%</strong></td>
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- Mandated use date for Phase 1 was July 8, 2018
- Program added 868 eligible providers in about a year
- Both Agency and Non-Agency adoption increased, individually
- Increase in overall adoption by providers from July 2018 to May 2019 of **23%**
Program Adoption for 2019

- EVV mobile verification represents the primary method used for visit verifications to date: 1,255,056 visits (56%)
- Telephony in second: 616,435 visits (28%)
- Manual entry is least used: 10,499 visits (16%)

Of the 1,863 Providers with 2019 Visits in EVV:

- **58%** have **75%-100% of Visits Auto-Verified**
- **15%** between **50-74% of Visits Auto-Verified**
- **9%** between **25-49% of Visits Auto-Verified**
- **7%** between **1-24% of Visits Auto-Verified**
- **11%** - Never Auto Verified

Providers are managing visits with minimal manual maintenance.
EVV Lessons Learned

• Open Model with an Aggregator
  » 239+ agency providers certified or going through certification process to use their preferred EVV system, representing 32 vendors
  » Open communication with provider and vendor community
  » Agency accountability is crucial
  » It’s beneficial to providers and program when the state has ownership in the certification process
EVV Lessons Learned

• Claims Validation- Go in with an open mind!
  » Important to work with stakeholders and review data to determine when to set claims denial date
  » Make adjustments to claims validation structure, if needed
  » Importance of outreach – trading partners posted messages, remittance advice messages, e-blasts, IVR outreach
  » CMS is asking for statistics (FFS and Managed Care) that were denied or would be denied for claims subject to EVV
EVV Lessons Learned

- Importance of Business Intelligence Reporting
  » 14 cases referred to Medicaid Fraud Control Unit and cases have been accepted based on evidence provided from the EVV system
  » Employee Conflict reporting – shows employees logging visits for two or more different providers at the same time
  » 124 referrals made to Provider Compliance Section
EVV Lessons Learned

• Importance of Operations Manual
  » Critical for CMS Certification – defined the EVV operational processes and provided key artifacts for Certification
  » Business processes are clearly documented
    • i.e. How providers are added, trained, terminated – full lifecycle is clearly documented
    • Supports business continuity for ODM if key staff change after implementation
    • Creates a historical record of program decisions (for example, program grace periods)
    • ODM owns and maintains document repository of key decisions, functionality, etc. and reviews collaboratively with EVV Vendor
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## ODM EVV Program Integrity

### Vision

ODM takes a broad and holistic approach to program integrity. ODM has developed partnerships that focus on fraud, waste, and abuse (FWA). These relationships work to promote cost containment and quality care for the individuals being served. EVV is another program integrity tool that ODM will utilize in conjunction with existing efforts.

### Key Stakeholders

#### EVV Team

This team is the daily operational unit for the EVV system. In real-time and a short time horizon, the EVV Team will have access to EVV time and service data from the EVV...
CMS Certification Process

• Timeline
  » R1 (214 days) 1/10/2017 – 11/3/2017
  » R2 (289 days) 10/2/2017 – 11/15/2018
  » R3 (61 days) 2/1/2019 – 4/29/2019
  » 1st EVV Certification ever!

• Certification Team
  » ODM
    • Included funding in contract for CMS Certification support.
    • Project Manager responsible and managing as a full project.
    • Cross functional collaboration required (policy, legal, etc.).
  » IV&V (Berry Dunn)
    • Worked with ODM and Sandata to clarify requirements for artifacts.
  » EVV Vendor (Sandata)
    • Full time resources dedicated to Certification.
    • Created new supporting artifacts to support process.
Benefits of CMS Certification

• CMS Certification brings enhanced Maintenance and Operations Funding!

**EVV Qualifies for Enhanced Federal Match**

*Under the Cures Act, Ohio got:*
- 90% Design, Development & Implementation
- 50% of Operational costs covered by CMS

*With certification, Ohio got:*
- 75% of Operational costs covered by CMS

• Collaboration Examples
  » CMS Regional Team actively participated with ODM, IV&V and EVV vendor on the Certification.
  » Collectively able to refine the overall requirements to reduce scope of certification process.
Benefits of CMS Certification

• Improved UAT Process
  » Extensive documentation in Phase 2
    • Including screen shots
    • Improved follow up and resolution of issues

• Realized Additional Importance of Operational Data
  » Due to the phased approach, even though Phase 2 was still in implementation, the ability to collect and report on Phase 1 data (live) was invaluable.
  » Operational data used to support CMS development of KPIs for EVV.
CMS Certification Lessons Learned

- Close communication/collaboration with regional CMS office.
- Documentation is critical!
- Think through operational processes before starting certification.
- Outreach and Education Tracker key to providing data on the number, types, and frequency of outreach activities.
- CMS extremely complimentary and stressed the importance of working with stakeholders, home care associations, etc. as a MUST for success!
# ODM EVV Outreach Tracker - Phase 1

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Outreach

• Who
  » Agency Providers
  » Non-Agency Providers
  » Case Managers
  » Individuals
  » Stakeholders

• How
  » Email
  » ODM Website
  » Newsletters
  » Webinars
  » Phone calls
  » In-Person events
Phase 2 Implementation Outreach Efforts

**ODM Sponsored Outreach**
- Provider Introduction Letter
- Provider Readiness Letter
- Provider Contact Information Notice
- Training Registration and Roadmap
- Training Registration is Open email
- Training is Open email
- Bi-weekly Training Incomplete (2 more to go)
- EVV Newsletters
- Stakeholder Meeting Demo
- 2 Individual Letters mailed to homes

**Payer Outreach Efforts**
- Links on Payer website to EVV homepage
- Memos, E-mail and fax blasts
- Provider webinars
- Provider Bulletins
- Postcards
- Newsletters
- .... And more!
Outreach Highlights and Focus

2018

- 37 communication points
- Focus on getting providers to adopt the system and regulatory updates
- Getting internal stakeholders up to speed on viewing data
- Webinars
  - 2 unique topics

2019

- 50 communication points
- Focus on provider compliance
  - Notifications of non-compliance
  - EVV account reviews offered and completed
  - Webinars to refresh key concepts
- Certified letters
- Internal Customer Care cross-training
- Communication through associations and partners to further reach
- More webinars
  - 6 unique topics (4 completed, 2 more planned)
Questions & Contact Information

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Thank you!