

## Business Requirements for Alternate EVV Data Collection Components

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November 2019

The Ohio Department of Medicaid (ODM) uses an Electronic Visit Verification (EVV) system for many home and community-based services. In January 2018, state plan home health, private duty nursing, RN assessment and some Ohio Home Care waiver services reimbursed directly by ODM were initially subject to EVV. In August 2019, selected services provided through the waivers administered by DODD and ODA, as well as services reimbursed by Medicaid managed care plans (MCPs), became subject to EVV requirements. ODM provides the Sandata EVV System free of charge for all providers. Agency providers can choose to use either the Sandata EVV System or to implement an alternate data collection system. If an alternate data collection system is used, it must send all new and updated data to the Sandata aggregator at least daily.

Managed Care Plans (MCPs) are required to implement EVV in a manner that is consistent with the ODM fee-for-service implementation. They offer agency providers the opportunity to use either the Sandata EVV System at no cost or to implement an alternate data collection system. MCPs use EVV data in claims adjudication using units to verify claims data. Non-agency providers are required to use the Sandata EVV system.

Neither ODM nor MCPs are responsible for any costs related to implementation of an alternate data collection system. Agencies that choose to use their own system and/or the vendors providing those systems will be responsible for all costs of implementation, including those related to an interface with the Sandata Aggregator.

Agencies must initiate and participate in the certification process, including initial contact with Sandata, identification of the alternate EVV vendor, participation in a live system demo for ODM and verification of data transmitted to the aggregator during testing. An alternate EVV vendor cannot initiate the process and must complete the process for each agency with whom they contract. Because there are changes in required data elements, functionality, and interface requirements, providers who received certification with an alternate system vendor in Phase 1 are required to recertify in Phase 2.

Alternate EVV Data Collection Components (Alternate EVV System) must comply with **both** the **technical specifications** found on ODM's website **and the business requirements** below:

1. Alternate EVV Data Collection components must successfully integrate with Sandata's Aggregator by completing the Sandata certification process.
  - Agencies may begin the certification process using the technical specifications posted on the ODM EVV website.
  - Agencies are responsible for timely communication with Sandata to establish an agreed-upon date for testing and completion of the testing process. Agencies should plan to actively participate throughout the testing process. This includes participation in a live system demo for ODM and verification of data transmitted to the aggregator during testing.
  - Agencies planning to use an alternate EVV system, should contact [OHAltEVV@Sandata.com](mailto:OHAltEVV@Sandata.com) to initiate the process to link to the Sandata aggregator. It is important to allow sufficient time for development and testing.

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- ✓ Include the provider name, the provider Medicaid ID, the name of the person serving as the primary point of contact, and the phone number for the person serving as the primary point of contact in the email,
  - ✓ Please make sure the email address used is monitored frequently so that there are no unintended delays in the certification process.
- At the conclusion of successful testing, the agency must request production credentials and work with Sandata to establish the date when the provider will begin using the alternate data collection system. The provider is not able to use both Sandata EVV and an alternate data collection system at the same time.
  - It is the agency's responsibility to use eTrac to arrange for the return of Sandata EVV devices issued to the individuals to whom it provides services.
  - Providers using an alternate data collection component must complete [aggregator training](#) before requesting testing credentials. A provider using an alternate EVV system for phase 1 services who has not yet completed aggregator training must complete aggregator training prior to requesting testing credentials for the required recertification. Failure to satisfy training requirements may result in the provider being required to use the Sandata system or termination of the provider's Medicaid provider agreement.
  - Providers should email [evv@medicaid.ohio.gov](mailto:evv@medicaid.ohio.gov) after completing aggregator training to schedule a live demo of the alternate system. Both the provider and the vendor must attend the demo. Providers and vendors can continue through the certification process with Sandata after requesting the demo but will not be certified until the system is successfully demonstrated and an approval letter is received from the Department.
    - If a provider is choosing to use an alternate system and the vendor has previously completed a successful demonstration of the system, the provider can submit an affidavit in a format prescribed by the department in lieu of scheduling a demo.
      - The affidavit must assert that all required functionality was previously demonstrated and that no changes to the alternate system negatively impacting that functionality have been made.
      - The affidavit must include notarized signatures from the vendor and the provider.
      - If a previous demo did not include functionality that is required for the services offered by the provider, a demo must be scheduled.
2. A provider cannot use an alternate data collection system and the Sandata system for the same dates of service. (Note that providers must use the same data collection method for all payers included in the Ohio Medicaid EVV Initiative.)
  3. A provider choosing to use an alternate data collection system must use the same system for all services subject to EVV requirements provided and billed under that provider number.
  4. Providers must maintain compliance with both ODM's EVV business requirements and the [Sandata technical specifications](#).
    - Failure to do so may result in the provider being required to use Sandata's EVV system until the provider's system is certified. Data integrity is monitored by ODM on an ongoing basis to ensure compliance with the technical specifications and business rules.
    - ODM may require recertification of Alternate EVV Systems at its discretion. A provider who fails to complete the required recertification may be required to transition to the Sandata system until recertification is complete.
    - Providers/vendors who were certified before a demonstration was required must contact the department at [evv@medicaid.ohio.gov](mailto:evv@medicaid.ohio.gov) to schedule a demo on or before November 15, 2019.

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5. Providers who certified an alternate data collection component using Phase 1 specifications and business rules must recertify using Phase 2 technical specifications and business rules no later than May 5, 2019. A provider who does not complete the required recertification may be required to transition to the Sandata system until recertification is complete.
6. The alternate system must assign unique identifiers for all users. In addition, all administrative users who have access to edit and/or enter visit information in the Alternate EVV System must have unique email addresses. An email address that has been used for an employee in the past cannot be used again for a new employee.
7. No later than January 1, 2019, the alternate system must use mobile GPS technology to collection GPS coordinates in near real time at the start and end of the visit as the primary method of data collection. Telephony or prerecorded GPS coordinates are not acceptable as the primary solution after December 31, 2018.
8. Alternate methodologies must be available for those circumstances when mobile GPS coordinates cannot be captured.
  - After January 1, 2019, at least two alternate methods of visit entry must be offered. One of those methods must be manual visit entry.
  - The collection device must send visit information to the Alternate EVV System's storage component in near real time.
9. Alternate systems must send new and edited data to the Sandata Aggregator within 24 hours of entry. All required data elements must be sent in accordance with the Sandata technical specifications for Phase 2. If data is not sent in a timely manner or in accordance with the technical specifications, ODM may require the agency to use the Sandata system.
10. Alternate systems must calculate all exceptions that are calculated by Sandata for providers using the Sandata system. The exceptions must be calculated using logic that is identical to the logic used by Sandata. ODM will provide a standard list of exceptions on the ODM website.
11. Alternate systems must permit providers to make manual entries and edits.
  - Alternate systems must collect the reason code supporting the manual entry and/or edit. ODM will provide a standard list of reason codes on the ODM website.
  - Alternate systems must maintain an audit trail in accordance with State and Federal law.
  - Visit data collected using an alternate data collection system cannot be modified directly in the Sandata system.
12. Alternate systems must collect an attestation for all manual entries and/or edits confirming the presence of alternate documentation supporting the entry and/or edit in accordance with program policy rules for the service provided. The Alternate EVV System may use a resolution code as described by Sandata or an alternate method approved by ODM.
13. Alternate systems must maintain all records necessary to fully disclose the extent of services provided in accordance with program policy rules for the services provided. The provider must maintain such records for six years from the date of receipt of payment based upon those records or until any initiated audit is completed, whichever is longer.

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14. Alternate systems must have the ability to collect and maintain both voice and digital signatures collected at the end of each visit when an individual verifies the service delivered and the time of service delivery if the verification is required by program policy. (Note that any services provided through a waiver administered by the Ohio Department of Developmental Disabilities (DODD) does not require a verification from the individual.)
- If an alternate system will be used only by providers of DODD waiver services, the system does not have to collect and maintain voice and/or digital signatures.
  - Voice and digital signatures must be provided upon request to ODM or affiliates in a timeframe specified by the requesting entity when the service provided is subject to verification requirements.
  - Alternate EVV systems will send an indicator to Sandata's Aggregator indicating the voice or digital signature has been obtained for each visit.
  - GPS coordinates are not an acceptable substitute for the voice and/or digital signature.
  - Voice and digital signatures required to be collected from individuals as verification of service and time of visit must be maintained in the alternate system in accordance with the requirements for record retention outlined in item 12 in this document.