

Health and Human Services Commission
Electronic Visit Verification
Electronic Verification Methods Policy (Revised)

Policy

Effective November 1, 2020, the Health and Human Services Commission (HHSC) updated the Electronic Visit Verification (EVV) Electronic Verification Methods Policy to:

- Incorporate the Mobile Application Policy dated April 1, 2019 and the Allowable Phone Identification Policy dated September 1, 2019.
- Allow a service attendant or CDS employee to use multiple clock in and clock out methods for a member.
- Provide information on how to document non-EVV relevant time associated with a visit.
- Include consumer directed services (CDS) employer and financial management services agency (FMSA) functions.

The EVV Electronic Verification Methods Policy requires the service attendant or CDS employee to use one of three approved electronic verification methods to clock in at the beginning of service delivery and clock out at the end of service delivery when providing services to a member in the home or the community.

The EVV vendors offer the following three approved clock in and clock out methods:

- Mobile method (Smart phone or tablet)
- Home phone landline
- Alternative device

A program provider or FMSA operating their own EVV proprietary system, known as the EVV proprietary system operator (PSO), may choose to offer one or more of the three approved clock in and clock out methods listed above.

When the service attendant or CDS employee clocks in and clocks out using an approved method, the EVV system captures the following visit data:

- The type of service provided (Service Authorization Data)
- The name of the recipient to whom the service is provided (Member Data)
- The date and times the provider began and ended the service delivery visit
- The location, including the address, where the service is provided
- The name of the individual who provided the service (Service Attendant Data)

Failure to Clock in or Clock out of the EVV system

If the service attendant or CDS employee fails to, or is unable to, clock in or clock out using one of the approved methods, the program provider, CDS employer or FMSA (if the CDS employer has designated the FMSA) must manually enter visit data in the EVV system through visit maintenance. See the *EVV Visit Maintenance* policy.

Health and Human Services Commission
Electronic Visit Verification
Electronic Verification Methods Policy (Revised)

Failure to complete all required visit maintenance prior to the program provider or FMSA submitting an EVV claim will result in the denial or recoupment of the EVV claim.

Mobile Method Policy

The service attendant or CDS employee may use a mobile method for clocking in and clocking out of the EVV system. Each EVV vendor and EVV PSO, if applicable, will supply a downloadable application for use on a smart phone or device with Internet connectivity. The service attendant or CDS employee may use the mobile method to clock in and clock out in the home or in the community.

If an internet connection or a cellular network is not available, the service attendant or CDS employee can still use the mobile method to log in and clock in or clock out.

The service attendant:

- May use their own personal smart phone or tablet, or
- May use a smart phone or tablet issued by the program provider.
- Must **not** use a member's mobile device to clock in and clock out.

The CDS employee:

- May use their own personal smart phone or tablet, or
- May use a smart phone or tablet owned by the CDS employer, if the CDS employer has authorized the CDS employee to use their smart phone or tablet.

A mobile method is the only electronic clock in and clock out method the service attendant or CDS employee may use when delivering services in the community.

The mobile method:

- Utilizes a secure login function for each user.
- Records the specific location at the exact time of clocking in and clocking out.
- Does not track location before clocking in, during the visit or after clocking out.
- Does not use mobile device plan minutes.
- Does not store Protected Health Information (PHI) on the mobile device.

Clock in and Clock Out Requirements:

- The program provider, FMSA or CDS employer must setup the mobile method in the member's profile and notify the EVV vendor or PSO, if applicable, to allow service attendants or CDS employees to use a mobile device.
- The mobile device must be operational (working phone, charged battery, etc.) to use the mobile method.

Health and Human Services Commission
Electronic Visit Verification
Electronic Verification Methods Policy (Revised)

Service Attendant and CDS Employee Requirements:

- Must follow instructions from their program provider, CDS employer or FMSA to download and activate the mobile application and obtain their own unique login credentials from the EVV vendor or PSO.
- Must only access the EVV mobile application method using their own login credentials
- Must **not** share login credentials to access the EVV mobile application method

A program provider or CDS employer may contact their EVV vendor or EVV PSO, if applicable, for a full list of mobile application method specifications, including supported mobile devices.

User Liability if Using the Mobile Method:

- HHSC, the Texas Medicaid & Healthcare Partnership (TMHP), EVV vendors and managed care organizations (MCO) are not liable for:
 - Any cost incurred while using the mobile method.
 - Any viruses on the mobile device.
 - A hacked, broken, damaged, lost or stolen mobile device.
 - A non-working mobile device.

Home Phone Landline Policy

The service attendant or CDS employee may use the member's home phone landline, if the member agrees, for clocking in and clocking out of the EVV system by calling the EVV vendor's or EVV proprietary system operator's (PSO) toll-free number.

If a member does not agree to allow the service attendant or CDS employee to use their home phone landline or if the member's home phone landline is frequently not available for the service attendant or CDS employee to use, the service attendant or CDS employee will need to use another approved clock in and clock out method.

Landline Requirements

- Program providers and FMSAs must follow the instructions from the vendor or PSO to set up the landline
- The landline must be the member's current primary home phone landline
 - The systems must allow the use of alternate home phone landline numbers if the member frequently receives services in a secondary location.
- The phone must be a landline phone and must not be an unallowable type

The program provider or FMSA must enter the member's primary home phone landline number in the EVV system under the member's profile before the service

Health and Human Services Commission
Electronic Visit Verification
Electronic Verification Methods Policy (Revised)

attendant or CDS employee can use the home phone landline to clock in and clock out.

The program provider or FMSA may also enter one or more alternate landline phone numbers if the member frequently receives services in a secondary location.

The program provider or FMSA must **not** enter an unallowable landline phone type into the EVV system as the member's home phone landline. An unallowable landline phone type is a mobile phone number or cellular enabled phone number. See the EVV Unallowable Landline Phone Type section below.

The program provider or FMSA must ensure the landline phone number listed in the member's profile is current. The program provider, CDS employer or FMSA must perform visit maintenance in the EVV system if the landline phone number used for clocking in and clocking out does not match the member's profile.

Unallowable Landline Phone Type

Home phones used to clock in/out through the landline method must be a landline telephone, and *not* a cellular phone or device.

Visits are subject to recoupment by the payer (HHSC or an MCO) if the service attendant or CDS employee uses an unallowable landline phone type to clock in or clock out.

Unallowable landline phone types include:

- Cellular phones
- Cellular enabled devices such as tablets and smart watches

NOTE: If the attendant or CDS employee wants to use a cell phone or tablet, they must use the mobile method.

Program providers, FSMAs and CDS employers must use The *EVV Landline Phone Verification Report* in the EVV system to identify an unallowable landline phone type as "mobile".

Alternative Device Policy

An alternative device is an HHSC-approved electronic device provided at no cost by an EVV vendor or Proprietary System Operator (PSO), if applicable, that allows the service attendant or CDS employee to clock in and clock out of the EVV system from the member's home.

Health and Human Services Commission
Electronic Visit Verification
Electronic Verification Methods Policy (Revised)

A program provider representative or the CDS employer must place the alternative device in the member's home, if the member agrees. An example of the program provider representative may be the service attendant or supervisor.

The program provider representative or CDS employer must explain to the member the purpose of the alternative device and how the alternative device works.

The alternative device must always remain in the member's home. If the alternative device does not remain in the home, visits may be subject to recoupment and the payer may make a Medicaid fraud referral to the HHS Office of the Inspector General.

The alternative device produces codes or information that display the precise date and time service delivery begins and ends. Codes from alternative devices expire seven days from the date of the visit. To record the visit in the EVV system within the seven-day timeframe, please contact your EVV vendor or EVV PSO for instructions.

The service attendant or CDS employee must follow the instructions provided by the program provider or CDS employer to use the alternative device to record a visit.

The service attendant or CDS employee may use any phone to call the toll-free number and enter the alternative device codes. However, the service attendant or CDS employee should never use or request to use the member's mobile phone unless the member is a CDS employer and the CDS employer has given the service attendant or CDS employee authorization to use the CDS employer's mobile phone.

The program provider or CDS employer must train the service attendant or CDS employee in the use of the alternative device to clock in and clock out of the EVV system.

If a member does not want an alternative device in their home, the program provider must document the issue in the member's case file and use the member's preferred method.

NOTE: A PSO may offer different types of alternative devices. All alternative devices must support the collection of the critical data elements. HHSC must approve any alternative device used by the EVV PSO before use. Refer to the *Proprietary System Policy* and *Data Collection Policy*.

Health and Human Services Commission
Electronic Visit Verification
Electronic Verification Methods Policy (Revised)

Ordering an Alternative Device from an EVV vendor

Once the program provider, FMSA or CDS employer has determined a member needs an alternative device, they have 14 days to order an alternative device from the EVV vendor.

Program providers, CDS employers, or FMSAs on behalf of a CDS employer, can order an alternative device through an EVV vendor. The EVV vendor will provide instructions on how to order a device.

The EVV vendor has 10 business days to process and ship the alternative device to the requestor upon receipt of a complete order. Depending on the shipping method, it may take additional days to deliver the order.

If an electronic verification method is not available for the service attendant or CDS employee to use prior to the delivery of an alternative device, the service attendant or CDS employee must manually document the visit as described in the *EVV Visit Maintenance Policy*.

Using the EVV vendor electronic ordering method, program providers, CDS employers, or FMSAs on behalf of CDS employers can:

- Order a new or replacement alternative device
- Track orders for the alternative device
- Manage, assign and un-assign alternative devices
- Manage shipping addresses

Installing an Alternative Device

The program provider, the program provider's representative or a CDS employer must install the alternative device by placing the device in the member's home for use by the service attendant or CDS employee.

Program providers and CDS employers must ask the member where to place the device in the member's home. The device should be in a location where it is always accessible to the service attendant or CDS employee.

The program provider representative or the CDS employer may attach the device using a zip tie, however, the device must **not** be mounted in a location that may be dangerous to a member or cause damage to the member's home.

Examples of places where the program provider or CDS employer may locate the device in the home include:

- Kitchen counter

Health and Human Services Commission
Electronic Visit Verification
Electronic Verification Methods Policy (Revised)

- Coffee table
- Lockbox located in the garage or on the patio

Malfunctioning Alternative Device

The service attendant or CDS employee must notify the program provider or CDS employer immediately if the alternative device malfunctions or fails to generate codes.

When the service attendant or CDS employee reports that the device has malfunctioned:

- The service attendant or CDS employee must manually document the visit as described in the *EVV Visit Maintenance Policy*.
- The program provider, CDS employer or FMSA must contact the EVV vendor or EVV PSO to report the malfunctioning device and order a replacement alternative device.

Using Multiple Clock in and Clock Out Methods

A service attendant or CDS employee may use one method to clock in and clock out one day and a different method to clock in and clock out the next day. A service attendant or CDS employee may also use one method to clock in and clock out for a single visit or use multiple clock in and clock out methods for a single visit.

Using **one** method to clock in and clock out happens when the service attendant or CDS employee:

- Clocks in and clocks out using the mobile method.
- Clocks in and clocks out using a home phone landline.
- Clocks in and clocks out using an alternative device.

Using **multiple** methods to clock in and clock out happens when the service attendant or CDS employee:

- Clocks in using a home phone landline and clocks out using a different clock out method (alternative device or mobile)
- Clocks in using an alternative device and clocks out using a different clock out method (home phone landline or mobile)
- Clocks in using the mobile method and clocks out using a different clock out method (home phone landline or alternative device)

Program providers and CDS employers may contact their EVV vendor or EVV proprietary system operator (PSO) if you have additional questions or need training on clock in and clock out methods.

Health and Human Services Commission
Electronic Visit Verification
Electronic Verification Methods Policy (Revised)

EVV Services Delivered Outside the Member's Home

A service attendant or CDS employee must record the visit when they begin or end an EVV service outside the member's home either by:

- Using the mobile method or
- Manually documenting the visit as described in the *EVV Visit Maintenance* policy.

The mobile method is the recommended clock in and clock out method when an EVV service begins or ends in the community. Using the mobile method for clocking in and clocking out in the community will avoid negative impacts to the EVV Usage Score.

Program providers and CDS employers may contact their EVV vendor or EVV proprietary system operator (PSO) for more information and training on available methods to document visits in the community.

Non-EVV Services Policy

A non-EVV service is an authorized service **not** required to use EVV. Examples of non-EVV services are transportation and supported employment.

Program providers and CDS employers must continue to follow program documentation requirements for non-EVV services. Using the EVV system does not replace paper documentation for non-EVV services.

The program provider or CDS employer will determine how the service attendant or the CDS employee will clock in and clock out of the EVV system when performing non-EVV services and EVV services throughout the day.

The program provider or the CDS employer may select one of the following options for their service attendant or CDS employee to document a non-EVV service that occurs during an EVV visit:

- **Option 1:** Clock in to the EVV system and clock out of the EVV system before the non-EVV service begins and clock back in to the EVV system after the non-EVV service has ended.
- **Option 2:** Remain clocked in to the EVV system while delivering the non-EVV service and document the amount of time spent on the non-EVV service.
Note: Follow the EVV vendor or EVV proprietary system operator (PSO) instructions on how to subtract the non-EVV service time at the end of the visit and use an appropriate EVV Reason Code Number and EVV Reason Code Description as necessary.

Health and Human Services Commission
Electronic Visit Verification
Electronic Verification Methods Policy (Revised)

Examples for recording non-EVV time:

The service attendant or CDS employee is working from 8:00 am to 2:00 pm. The service attendant or CDS employee spends five hours on EVV required services from 8:00 am – 12:00 pm and 1:00 pm – 2:00 pm and one hour on non-EVV services from 12:00 pm – 1:00 pm.

- **Option 1:** Clock out of the EVV system before the non-EVV service begins and clock back in to the EVV system after the non-EVV service has ended.
 - The service attendant or CDS employee will:
 - Clock in at 8:00 am and clock out at 12:00 pm
 - Begin the non-EVV service
 - Clock back in at 1:00 pm and clock out at 2:00 pm
 - Documents the non-EVV services in accordance with program policy
- **Option 2:** Remain clocked in to the EVV system while delivering the non-EVV service and document the amount of time spent on the non-EVV service.
 - The service attendant or CDS employee will:
 - Clock in at 8:00 am and clock out at 2:00 pm.
 - Record the service time in accordance with program policy and report the time to the program provider.
 - The program provider, CDS employer, or FMSA will use the EVV system to indicate one hour of time spent.
 - Contact your EVV vendor or EVV PSO for instruction to adjust the pay hours for a claim that is delivering a non-EVV service.

The program provider, CDS employer and FMSA can review the reported non-EVV service time by accessing the *Non-EVV Relevant Time Report* in the EVV system. The report will show the total hours worked for non-EVV services.

NOTE: The program provider or CDS employer must contact their EVV vendor or EVV PSO to determine how to document non-EVV services for members with pre-scheduled visits.

For questions related to this policy contact HHSC at electronic_visit_verification@hhsc.state.tx.us