

This is a follow up to the notice sent on behalf of AHCCCS in August regarding the *hard edit date now effective January 1, 2023*



*****This notice is intended for providers subject to the Electronic Visit Verification requirements****

Providers, please read this entire communication for the most up-to-date information on Electronic Visit Verification (EVV) requirements and guidance.

1. **AHCCCS re-evaluated codes applicable to Electronic Visit Verification (EVV) and is removing the Skills Training and Development H2014 service code from the EVV requirements.** You do not need to use EVV for H2014. AHCCCS reserves the right to reinstate an EVV requirement for H2014 in the future. Personal Care T1019 and Respite S5150/S5151 remain subject to EVV requirements; claims for those services will not be reimbursed on or after January 1, 2023 unless all the required EVV data is present. AHCCCS remains committed to monitoring access to care for members receiving Skills Training and Development services and will be exploring other options (outside of EVV) that are minimally burdensome.

2. **Timeline for the Hard Claim Edits (starting January 1, 2023)**

The hard claim edits will be in effect for dates of service starting January 1, 2023. AHCCCS undertook a number of activities in partnership with CMS, Sandata, and Managed Care Organizations (MCOs) to inform the plans and timeline to make the transition from the soft claim edits to the hard claim edits period.

- The timeline decision was largely informed by Arizona's EVV system certification by CMS and DDD's implementation of the WellSky claims system.
- To maintain compliance with CMS, AHCCCS was required to implement the EVV claims enforcement plan AHCCCS presented to CMS during the EVV system certification review process
- The date of the enforcement also considered the timeline for the completed roll out of DDD's new claims system to mitigate service payment disruptions for providers who are contracted with DDD and also subject to EVV.
- AHCCCS has been tracking various provider readiness milestones representing a continuum of compliance. MCOs are using that data to inform provider engagement and outreach plans to ensure that providers have the support they need to fully implement EVV. If you are contacted by contracted MCO(s), we strongly encourage you to respond and connect to ensure readiness for hard claim edits.

3. **It is incumbent upon you to maintain documentation standards** that validate the provision of services as you transition to EVV, as well as the standard requirements outlined in your Provider Participation Agreement.

- If you are unsure as to whether or not the EVV mandate is required for your organization, please visit the AHCCCS EVV webpage (www.azahcccs.gov/EVV) and read information provided within the "Providers and Services Subject to EVV" section, including general information about services requiring EVV and resources to support providers to initiate the compliance process.

4. **Agency EVV Contact**

You must have an EVV contact on file to set up a Sandata account or, access the Sandata Aggregator if you use alternate EVV vendors.

- The Aggregator contains detailed information about visit data Sandata, AHCCCS, and the MCOs are receiving
- Please use the directions found on the AHCCCS EVV webpage (www.azahcccs.gov/EVV) in the

document [EVV Contact and Update](#) within both the “Sandata EVV System Resources and Technical Assistance” and “Alternate EVV System Requirements and Technical Specifications” sections. You may also use this process if you need to update your EVV Contact.

5. Payment for EVV Services

During the soft claim edit period through 12/31/22, you will receive reimbursement for services even if there is no EVV visit to match to a claim or the EVV visit data is incomplete.

- Please use this period to incorporate EVV into day-to-day business practices, including developing operational procedures, training administrative personnel, onboarding members and caregivers, and logging visits
- More importantly this is an opportunity to self-monitor agency compliance to avoid billing challenges when the hard claim edit begins. *Once the hard claim edits begin, you will not be paid unless all the required EVV visit data is present*

6. **AHCCCS has provided new/updated resources** here that will help you self-monitor compliance and detect any issues that may be contributing to notifications of claim failures during the current soft edits period. These notices are directly indicative of the hard edits that will be received for dates of service beginning January 1, 2023 if issues are not addressed.

- **EVV Policy Compliance**
The AHCCCS Medical Policy Manual, EVV Policy 540 has been in effect since January 1, 2021. The policy and the following associated forms are linked on the [EVV web page](#).
 - Designee Attestation,
 - Contingency Plan, and
 - Paper Timesheet Attestation
- MCOs will be initiating audits to ensure your compliance with the AHCCCS policy including reviewing documentation as evidence that you had conversations with members and completed the forms (noted above) as allowable/required under the policy.
- After an initial compliance audit, the EVV compliance standards will be incorporated into ongoing credentialing/quality monitoring audits performed by MCOs to ensure ongoing compliance.

7. Information for Sandata EVV System Users

Please contact the Sandata Customer Care at 855-928-1140 for technical support for the system including:

- Accessing training,
- Finding your welcome kit,
- Changing your EVV Contact,
- Importing your employees, and
- All other technical issues experienced by users on devices or the EVV portal

8. **Commonly reported problems** are members or authorizations missing from the agency accounts.

- There can be a few different reasons why this might occur
- Please note, members will show up in the agency account when they are tied to a prior authorization from the MCO or when the agency has entered information into the AHCCCS EVV Service Confirmation Portal that links the agency to a member (in lieu of an authorization) when prior authorization is not required for a service.
- If the agency is experiencing missing members or authorizations, please use the [Missing Authorization and Member Checklist](#) available on the [EVV web page](#) to research and determine what steps should be taken before contacting Sandata (refer to the section entitled “Sandata EVV System Resources and Technical Assistance.”)

9. AHCCCS wants to make you aware that Sandata can interface with EMR/EHR systems to, specifically, import employees and schedules into the Sandata EVV system

- This may mitigate duplication of effort
- If interested in this opportunity should contact Sandata Technical Support for a copy of the technical specifications to initiate the process.
- Lastly, AHCCCS continues to pursue opportunities to streamline EVV. For example, AHCCCS is finalizing a change request with Sandata to help streamline the check in/out process for group visit service delivery scenarios. AHCCCS and Sandata sought input directly from providers to ensure the change request will be the intended outcome.

10. Information for Alternate EVV System Users

It is incumbent upon each provider, using an alternate EVV system, to ensure the vendor's compliance with AHCCCS business requirements and technical specifications

- One practical way for you to understand and monitor what information Sandata is receiving from the alternate vendor, is to access the Sandata Aggregator
- The Aggregator contains detailed information about the visit data Sandata, AHCCCS, and the Health Plans are receiving
- You can find more information on how to access the Aggregator using the [Sandata Aggregator Information](#) document located on the EVV webpage (www.azahcccs.gov/EVV) (refer to the section entitled "Alternate EVV System Requirements and Technical Specifications.")
- The current AHCCCS/Sandata priority is preparing updated technical specifications/business requirements that both remove and add requirements. The document release is planned within the next two weeks. These changes are in response to stakeholder feedback, (including clarification to existing specifications) and in response to Sandata system changes to ensure alignment across all EVV systems. The updated technical specifications will:
 - Clearly outline the changes;
 - Denote the specific elements that will be tested in the next phase. This includes elements in the current version of the technical specifications that were not tested in the initial round of testing (i.e., data elements that were noted as optional).
- AHCCCS is not requiring development and testing to be completed prior to January 1, 2023. That timeline is tentatively planned to coincide with the Operational Reviews that will occur in early 2023. Generally, the updates to the specifications do not impact claims enforcement with one exception. The specifications will add some new service codes and modifier combinations for a few services with very low utilization (i.e., Companion Care Per Diem and Home Health Aide services provided by a Licensed Health Aid). That said, it is possible that the updated specifications may include some clarification to the existing specifications requiring the alternate EVV vendors to make changes prior to the claims enforcement date.
- AHCCCS and the Sandata technical team will follow the release of the updates with a webinar to answer questions about technical specifications and the associated business requirements
- The notice will include a timeline for the development and testing process, reflective of the hard claim edits timeline
 - For example, AHCCCS/Sandata are currently outlining specifications that have a direct impact on the hard claim edit timeline
 - One consideration is to allow the vendors to complete testing for those specifications ahead of the hard claim edit to mitigate provider billing issues while affording vendors more development/testing time for the remaining specifications not directly impacting provider claims payment after January 1, 2023.

- **AHCCCS is also preparing to host an Operational Readiness Review (ORR) with each vendor** to ensure compliance with business requirements on how the data is being collected that is being sent to Sandata and documentation required for audit purposes. More details on the scope and how to prepare for the ORRs is forthcoming.
- For technical issues related to the current alternate system technical specifications, please contact the Sandata Customer Support at AZAltEVV@sandata.com or 844-289-4246.

11. Provider Resources

AHCCCS is working on resources to support compliance with EVV. The resources coinciding with this communication focus on helping providers understand the EVV process from start to finish and providing practical ways to understand and assess gaps in EVV compliance. The following resources can be found on the [EVV web page](#) (refer to the section entitled “General Resources and Frequently Asked Questions.”)

- Sandata EVV Workflow,
- Alternate Vendor EVV Workflow,
- EVV Billing Checklist, and
- Billing FAQ (updated).

12. Upcoming Updates or Releases of New FAQs

AHCCCS is also concurrently updating existing FAQs and writing new FAQs (see below), prioritizing the Documentation FAQ as a desk aide for individuals responsible for visit maintenance to reconcile missing/incomplete visit information for billing and ensure maintenance of documentation for audit purposes.

1. *New Documentation FAQ,*
2. *New Contingency Plan,*
3. *New Designee FAQ,*
4. *New Case Management FAQ, and*
5. *Service Confirmation Portal FAQ (Updates)*
6. *Scheduling FAQ (Updates).*

13. Stay Informed

Please [sign up](#) for email notices about EVV.