

Subject: Important EVV Update on Hard Claims Edit Date Extended to January 1, 2023.

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

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 appreciates the efforts providers have undertaken to evaluate current compliance with EVV and develop resolutions when issues have been detected. Furthermore, AHCCCS and Sandata are working on a few change requests that will impact claims enforcement. Therefore, upon AHCCCS' request, CMS has granted a claims enforcement extension to January 1, 2023, to afford AHCCCS, Sandata and providers a little bit more time to prepare for the hard claims edit. It is strongly encouraged for providers not to consider this extension as a delay, but rather to maintain the momentum to assess and comply with the EVV requirement and use every minute of this extension to ensure their readiness for the claims enforcement.

AHCCCS continues to track 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 providers are contacted by their contracted MCO(s), they are strongly encouraged to respond to ensure their readiness for the hard claim edits.

It is incumbent upon providers to maintain documentation standards that validate the provision of services as they transition to EVV, as well as the standard requirements outlined in their Provider Participation Agreement.

Payment for EVV Services

During the soft claim edit period (through 12/31/22), providers can still receive reimbursement for services even if there is no EVV visit to match to a claim or the EVV visit data is incomplete. Providers should 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 for providers to self-monitor agency compliance in order to avoid billing challenges when the hard claim edit period begins on January 1, 2023. **Once the hard claim edits begin, providers will not get paid unless all the required EVV visit data is present.**

AHCCCS has provided resources here that will help agencies 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 agencies will receive for dates of service beginning January 1, 2023 if these issues are not addressed.

Provider Resources



The following resources were created to help providers understand the EVV process from start to finish, and provide practical ways to understand and assess gaps in EVV compliance. They can be found on the EVV web page (under "General Resources and Frequently Asked Questions.").

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

Upcoming Updates or Releases of New FAQs

AHCCCS is also concurrently updating existing FAQs and writing new FAQs (see below). AHCCCS is prioritizing the FAQs that are in response to common and recurring questions from providers as they operationalize EVV. For example, the Documentation FAQ will serve as a desk aid for individuals responsible for visit maintenance to reconcile missing/incomplete visit information for billing and ensure maintenance of documentation for audit purposes. AHCCCS anticipates starting to release these new and updated FAQs within the next two weeks.

- New Documentation FAQ,
- New Contingency Plan,
- New Designee FAQ,
- New Case Management FAQ,
- Service Confirmation Portal FAQ (Updates), and
- Scheduling FAQ (Updates).

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 providers 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 web page (www.azahcccs.gov/EVV) (under "Alternate EVV System Requirements and Technical Specifications.")

AHCCCS and Sandata are 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:

1. Clearly outline the changes, and



2. 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 and a discussion of the forthcoming Operational Reviews.

AHCCCS is also preparing to host an Operational Review (OR) 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.

Provider Resources

AHCCCS is working on a number of resources to support provider compliance with EVV, help providers understand the EVV process from start to finish, and provide practical ways to understand and assess gaps in EVV compliance. Find these resources on the <u>EVV web page</u> (under "General Resources and Frequently Asked Questions.")

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

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.



- New Documentation FAQ,
- New Contingency Plan,
- New Designee FAQ,
- New Case Management FAQ, and
- Service Confirmation Portal FAQ (Updates).

Technical Support

For Sandata users, please contact the Sandata Customer Care at 855-928-1140 for any technical support for the system including, but not limited to:

- 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.

For technical issues related to the current alternate system technical specifications, please contact the Sandata Customer Support at <u>AZAltEVV@sandata.com</u> or 844-289-4246.

Stay Informed

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