

Questions to Ask Electronic Visit Verification Vendors

As states continue to plan for the January 2020 implementation of electronic visit verification (EVV), one common implementation approach is the “open vendor” or “hybrid” model. This approach offers the option to use a state-designated system at minimal direct expense to the provider, or for the provider to purchase and maintain their own EVV system that would meet state criteria.

Selecting an EVV vendor is a critical business decision with significant impact on Financial Management Services (FMS) operations. In addition, the “wrong” system could threaten the continued success of self-direction programs, as well negatively impact participants and their workers. The following questions are offered as a starting point for your research into an EVV system that will meet the unique needs of self-direction programs.

Experience with Self-Direction

1. In which states do you currently serve self-direction programs?

3+ States

2. What self-direction programs currently use your EVV system?

- State 1 - Services include companion, personal care, respite and non-specialized respite, community living supports, and homemaker.
- State 2 - Self-directed is included under PAS, or personal assistant services, for both agency and independent providers. Agency providers contract under Therapy and the Vendor has individual providers using the Vendor EVV solution set.
- State 3 - There are multiple waivers that include self-directed care. Services include personal support and community living services.

3. How long have you been operating in each state?

1.5-2.5 years each

Internet Access

1. How does your EVV solution address the issue of limited internet access?

Vendor EVV is designed to support communication in both online and offline modes.

When the rendering provider encounters a connectivity issue with starting or ending a visit, Vendor EVV will store visit information locally on the device in a secure manner and transmit the data once connectivity is restored.

When in the offline mode, the Vendor EVV mobile app continues to function normally but displays an “Offline Mode” banner to alert the user that the device has no internet connectivity. When the user gets internet connectivity, either during or after the visit, they can start and complete the visit without any interruptions to data being gathered for Vendor EVV.

Vendor EVV mobile app uses both Global Positioning Services (GPS) and triangulation to cell towers to locate the user. This provides higher precision and continues to provide location based only on the GPS when cell towers are not available. While in the offline mode, all visit data is automatically encrypted and stored onto the mobile device. When the user connects to the internet, the Vendor EVV mobile app automatically uploads all visit data gathered during the offline period to Vendor EVV servers.

2. Is internet access necessary for your system’s basic functionality?

To access the Payer or Provider Portals which provide access to scheduling, billing, reporting functionalities, internet is necessary to access the web-based solution. However, for collecting visits, the internet is not necessary. The provider can use the members landline phone for IVR visit collection or the offline mode in the mobile application.

3. If no internet access is available, what is the alternative?

Vendor offers the use of IVR in the event the mobile app is without internet connection at the member’s location. The billing provider can request permission from the State to use IVR to record the visit. When the State approves the use of IVR, Vendor updates the

member's profile signifying the approval. Updates will be made should the member establish connectivity.

When the Vendor is notified by the State that a provider is approved to use IVR for a member, the IVR indicator is stored for that provider at the individual member level, based on address and phone number.

For visits completed using IVR, the visits are maintained in Vendor EVV Solution the same way manual and mobile visits are maintained. If the rendering provider arrives at a home where they realize an IVR request will need to be made, the visit can still be rendered in Offline Mode or through manual entry into the Provider Portal.

4. Can data be captured electronically at the time of service delivery and transferred to the central system when access is available?

Yes. Through the use of our Offline Mode feature, the visit can be collected in the mobile application and once connectivity are restored, the visit data will automatically be sent to the EVV database.

5. Are landlines the primary means for logging in and logging out of the system?

No. The primary method for collecting visit data is through the use of the free mobile application. Landlines can be used as an alternative visit collection method.

6. If a landline is not available, do you provide an alternative device?

The Vendor does not provide nor recommend alternative devices. Vendor recommends MT DPHHS explore a solution called Lifeline. The solution would enable the member to receive a free smartphone where the mobile application can be downloaded.

7. What other ways do you address the issue of limited internet access?

Vendor has experience in other states who also experience issues of geography and the rural technology divide. That is why our platform provides the flexibility to allow for varied methods of validating visit information. The standard offering comes with both GPS and IVR capabilities, as well as a seamless offline mode for times when there is no cellular connectivity.

Scheduling

1. Are set schedules required for your system to function?

Vendor's solution includes a scheduling platform. This tool allows providers to manage productivity and efficiency. It allows caregivers to manage their workload, while allowing the flexibility to add ad-hoc visits from the mobile device.

2. Are schedules required to be entered by a system administrator?

Admins are not able to be guardians or members. The administrator role is someone at the agency/fiscal intermediary that has authority to link caregiver, schedule and bill.

Should an agency administrator choose to set up reoccurring schedules, this would have to be done at the administrative level. If a caregiver has previously been connected to a member by the provider administrator, the caregiver can "schedule" a visit onsite when care begins. A schedule is required to be created, however Vendor offers flexible options within our Provider Portal to allow for reoccurring schedules and scheduling extemporary visits as needed. The requirement of schedules is needed in order to compare the scheduled visit data with the actual visit date within the EVV system.

3. Can the participant or representative enter weekly set schedules?

Self-directed participants or representatives that are registered as an individual provider will have the ability to schedule visits at whatever frequency they desire, including weekly. If the participant works with a Fiscal Intermediary(FI) the FI will have access to the Provider Portal and will have the ability to schedule visits at whatever frequency meets the needs of the participant.

4. Can the participant or representative easily make changes to the schedule when needed? If so, is another level of review required for approval?

Self-directed participants or representatives that are registered as an individual provider will have the ability to make changes to the schedule using the Provider Portal or mobile application. If the participant works with a Fiscal Intermediary (FI) the FI will have access to the Provider Portal and will have the ability to make changes to the schedule as needed.

Schedule changes do not require approval.

“Provider” means the entity that invoices the payer for medical care rendered by a healthcare professional (including Caregivers) to a Member.

The provider will have access to the Provider Portal where they may take on the role of the biller, administrator, or scheduler. The provider may also have access to the mobile application if they are an independent provider rendering care to a member.

5. Can worker or participants adjust shift start or end times to correct errors? If no, how are errors corrected so that the worker is paid on time?

The Vendor solution allows a visit to happen outside the pre-scheduled time. Should a member require services at a different time than that which was scheduled, the caregiver would simply start and stop the visit at the agreed upon times. The Provider Administrator would then clear any visit exceptions based on the configured business rules configured with the state. This is part of the regular visit maintenance the Provider Administrator would normally do when visits fall outside the State’s business rules. If a visit was not pre-scheduled, the caregiver would “schedule” the visit onsite when service begins.

6. What happens when a login or logout time does not fall within the set schedule?

The Provider Portal would indicate a visit is late, or missed, based on the perimeters established for the State's business rules. The administrator then has the option to include a reason code explaining why a visit may have been flagged as a late or missed visit.

Location of Service Provision

1. How does your EVV solution capture the location where services are delivered when they are not provided at the participant's home?

The Vendor EVV solution allow multiple addresses to be entered into the members profile to verify location. For example, if the member requires services while at work, the work address can be included as one of the members' addresses. Once the visit starts, GPS data is collected and verifies an address in the members profile is a match.

Should the services begin or end at an unexpected location, the Provider Administrator can clear the GPS exception and indicate a reason the visit occurred outside the expected geofences.

2. If GPS is used, how often is the location recorded?

Location is only recorded at the beginning and end of the visit when the caregiver elects to begin or end service.

3. Does the GPS device continuously track the location of the worker and participant?

No.

4. What are the "geofencing" capabilities of your system?

Geofence parameters are configurable based on the State's requirements and discussed during the implementation. The Vendor EVV Solution allows business rules logic to have hard vs. soft edits on accepting/denying visit details based on those business rules.

5. What is the alternative to a GPS device if the participant has concerns about their personal safety if their location is tracked?

The State can authorize use of the participants landline for IVR visit collection for a limited time.

User-friendly Experience

1. How do features of your EVV solution support a user-friendly experience?

Vendor has extensive experience servicing the provider markets within behavioral health, home health and personal care agencies. Many of our provider clients require a simple, personal & powerful user experience which Vendor collaborates our user experience team for feedback on a frequent basis when collaborating with agencies. The Vendor EVV solution is a comprehensive yet flexible platform that goes beyond EVV mandates to improve care and drive efficiency. The system provides user friendly functionality, including:

- The ability for users to change the language of the system within their profile
- The enablement of users to make needed corrections
- A Provider Portal where billing providers can maintain their EVV visits and claims
- An intuitive mobile application that uses GPS and cellular tower triangulation to collect the most accurate location at the start and end of the visit
- A mobile application equipped with an offline mode that allows the caregiver to continue the visit uninterrupted
 - Once the caregiver reconnects to service, the visit automatically transfers to the EVV Solution
- IVR technology built to recognize the caregiver based on a unique PIN
- The EVV system is 508 compliant

2. Do workers create their own password and username?

The Provider Administrator sets up the basic information, including a username, for the caregivers and sends an invite to access the system. Once the caregiver receives the invite, they can set up their own password.

3. Do participants create their own password and username?

Self-directed participants or representatives that are registered as an individual provider will create their own username and password. Non-self-directed participants do not have access to the Provider Portal or mobile application therefore they would not have credentials.

4. Are passwords and usernames generated by the system?

No. The Provider Administrator assigns usernames, but the password is set by the user once logged in from the initial PW creation.

5. Is the user interface based on common mobile device conventions?

The Vendor mobile application can be downloaded for iOS and Android. The mobile user interface is custom to Vendor, but also configured for ease of use. Our mobile application goes through a third-party 508 compliance review to ensure inclusivity for users.

6. Can the device(s) used to enter be easily modified for individuals with limited motor skills?

The mobile application and Provider Portal are designed to be compatible with adaptive technology.

7. Can on-screen text be customized for languages other than English? If not, how will you accommodate workers and participants with limited English skills?

The Provider Portal and mobile applications are available in both English and Spanish.

8. Can required tasks can be accomplished with a minimum number of clicks or taps?

Tasks can be required based on the service authorization. Users collecting the visits will be presented with task options that have an easy-to-use checkbox.

9. Does the interface limit text entry?

The note section in the mobile application requires a minimum of 4 and maximum of the 400 characters.

Training

1. What is your overall strategy for training participants, workers, and provider agencies to use your EVV solution?

Vendor has a robust training program which includes Electronic User Guides, On-Demand Interactive Modular Training, Live Trainer Led Webinars, Pre-Recorded Webinars, on-demand modular training videos, and Implementation Town Halls which are recorded so users can attend or watch the recording based on their schedule. Vendor hosts multiple educational webinar opportunities for all stakeholders.

- Learning Management System: An eLearning Modules through Vendor’s EVV to orient all user types to the adoption & use of mobile application.
- Electronic User Guides: Vendor provides robust user guides detailing how to use the EVV solution for each user role.
- On-Demand Interactive Modular Training: Users have access to interactive training that mimics the application to receive more “hands on” training on the solution.
- Live Trainer Led Webinars: Vendor hosts live webinars during the month for users to attend. Users can ask questions at the end of the webinar. Vendor collects survey data to gauge user satisfaction and feedback on webinars.
- Pre-Recorded Webinars: Vendor provides pre-recorded webinars for on demand training users can take at any time. Vendor collects survey data to gauge user satisfaction and feedback on webinars.
- On-Demand Modular Training Videos: Vendor offers on demand modular training videos where frequently asked questions or key topics are broken down into smaller pieces so users do not have to watch an entire webinar on key topics but can instead watch a training that is only a few minutes long.
- Implementation Townhalls: Vendor joins the State hosted townhalls to provide additional training on EVV, while the state can discuss upcoming policy changes and key dates with their stakeholders.

2. How is the initial introduction to your EVV solution accomplished?

Vendor recommends the State hold regularly scheduled stakeholder meetings as known as townhall meetings. It's important for the stakeholder community to see the State owns the process in partnership with Vendor. During the first stakeholder meeting, Vendor would be introduced as the vendor with a brief overview of the expectations for Solution functionality. Subsequent meetings would include demonstrations of select pieces of the Solution, so the stakeholders become incrementally familiar with the EVV system.

3. Are the provider agencies expected to train the participants and workers?

Vendor does promote the train-the-trainer approach. We believe Provider Administrators know their business model and caregivers better than anyone else. This allows them to train their staff on a workable schedule that does not impact access to care. Caregivers are more than welcome to watch pre-recorded webinars or take any of the training offer through the Learning Management System.

4. Do you provide written training materials that can be accessed online?

Vendor provides robust user guides detailing how to use the EVV solution for each user role. The user guides are accessible online.

5. Are materials available in alternative formats and languages other than English?

User guides are available in English and Spanish. The guides can be downloaded to PDF or viewed online.

6. Do you have web-based training videos?

Vendor offers on demand modular training videos where frequently asked questions or key topics are broken down into smaller pieces so users do not have to watch an entire webinar on key topics but can instead watch a training that is only a few minutes long.

7. Do you offer webinar-based training that can be archived for viewing at a later date?

Vendor provides pre-recorded webinars for on demand training users can take at any time.

Vendor collects survey data to gauge user satisfaction and feedback on webinars.

8. Is online help with chat available 24/7?

Vendor does not offer live Chat support. However, Vendor does offer 24/7 online support via the Online Help Portal. The Online Help Portal is available to document any issues and enter a support request ticket. Vendor also offers online self-help resources through Knowledgebase, accessible through the Online Help Portal.

9. What hours would customer service representatives be available to take phone calls?

Customer service representatives will be available 8:00 am to 5:00 pm central time.

Approving Hours Worked

1. How does the participant review and approve each shift in EVV solution?

At the end of the shift, the participant is shown the mobile application by the caregiver and will approve the start and end times, along with tasks (if required by the State). They then have the option to approve the visit by signing their name, or they can refuse to approve the times and services shown.

2. How does the participant approve the start time as the worker begins each shift?

At the end of the shift, the participant is shown the mobile application by the caregiver and will approve the start and end times, along with tasks (if required by the State). They then have the option to approve the visit by signing their name, or they can refuse to approve the times and services shown.

3. How does the participant approve the start time as the worker ends each shift?

At the end of the shift, the participant is shown the mobile application by the caregiver and will approve the start and end times, along with tasks (if required by the State). They then have the

option to approve the visit by signing their name, or they can refuse to approve the times and services shown.

4. How does the participant verify the total hours worked each day?

At the end of the shift, the participant is shown the mobile application by the caregiver. The signature screen does indicate the start dates and end times used to determine total hours worked.

5. Can the worker or the participant retroactively adjust the shift start of end times?

The Provider Administrator would log into the Provider Portal and adjust the start or end times as needed. This would require the Provider Administrator to provide a reason for the change. The caregiver using the mobile application cannot edit or modify their clock in / clock out times.

6. What is the process for correcting errors after the hours have been submitted for processing?

The Provider Administrator would log into the Provider Portal and adjust the start or end times as needed. This would require the Provider Administrator to provide a reason for the change.

Devices Used to Capture Time

1. Can workers or participants use their own mobile devices with your EVV solution?

Yes. The mobile application can be downloaded to either the caregiver or the participant's mobile device based on State's preference.

2. Can workers or participants use their own computers or tablets with your EVV solution?

Yes, the solution is device & browser agnostic. The mobile application is available via Android & iOS on both tablet & phone.

3. Do you provide devices that can accompany a worker or participant beyond the home with your EVV solution?

No. The devices used with the Vendor solution are those owned by the end user.

4. **Does your solution require the use of a device installed at a physical location?**

No.

5. **Does your solution offer the use of a device installed at a physical location as an option?**

No.

6. **Do you provide repair and replacement of devices?**

No. Vendor does not provide devices.

Data Privacy and HIPAA Requirements

1. **How does your EVV solution address security issues?**

Vendor EVV controls are continuously evaluated and monitored by various Vendor EVV associates, including the Infrastructure, Information Security, and GRC teams. Vendor's Infrastructure and Information Security teams monitor physical and environmental security issues daily, using monitoring and notification software. The Information Security team monitors security feeds from key security providers for potential exploits, virus outbreaks, attack patterns, and application vulnerabilities.

The security administration team uses a variety of security utilities to identify and detect possible security threats and incidents. These utilities include, but are not limited to, firewall notifications, intrusion detection system (IDS) or intrusion prevention system (IPS) alerts, vulnerability assessment reports, and operating system event logs. These alerts and notifications are reviewed daily by the security administration team using a security incident and event monitoring (SIEM) product. A monitoring solution has been implemented to detect unauthorized access to the network. Alerts are automatically sent to members of the Information Security team based upon predefined events, and any identified risks are logged within a ticketing system and are investigated and resolved.

Vendor's Information Security team conducts vulnerability assessments on the EVV environment. They use industry technology to detect vulnerabilities associated with software within the EVV environment. Scans are scheduled weekly, and the findings are submitted to the corresponding operational group to remediate the vulnerability.

2. How does your EVV solution safeguard the privacy of workers?

Vendor maintains a robust and mature Information Security Program that is focused on safeguarding covered information (ePHI/PII) as part of the Information Security Program.

The Vendor administrative controls include, but are not limited to:

- Policies and Procedures
- An expansive Knowledge Base repository for employees
- Mandatory HIPAA Compliance Training and exam for all employees, contractors, subcontractors, and volunteers who access any part of the Vendor Infrastructure. This is regardless of direct access to the covered information.
 - New Hire
 - Yearly
- Mandatory Information Security Awareness Training and exam for all employees, contractors, sub-contractors, and volunteers, who access any part of the Vendor Infrastructure. This is regardless of direct access to the covered information.
 - New Hire
 - Yearly
- BCP/DR testing
- Strict change control procedures

Vendor technical controls are enforced programmatically as follows:

- Encryption of all covered information while at rest and in transit
- The use of encryption protocols as per NIST.SP.800-175Br1 guidance
- Forced password rotation of 90 days for all users and 60 days for all administrators/root level accounts

- Passwords include complexity checks (mandatory length and characters from all 4-character types), as well as real-time “leaked password” checking and static blacklists.
- Use of operational programs whitelists and blacklists
- Host-based and perimeter AV, Intrusion Detection System (IDS) and Intrusion Prevention System (IPS)
- Automated vulnerability scanning

3. How does your EVV solution safeguard the privacy of participants?

The Vendor maintains a robust and mature Information Security Program that is focused on safeguarding covered information (ePHI/PII) as part of the Information Security Program.

The Vendor administrative controls include, but are not limited to:

- Policies and Procedures
- An expansive Knowledge Base repository for employees
- Mandatory HIPAA Compliance Training and exam for all employees, contractors, subcontractors, and volunteers who access any part of the Vendor Infrastructure. This is regardless of direct access to the covered information.
 - New Hire
 - Yearly
- Mandatory Information Security Awareness Training and exam for all employees, contractors, sub-contractors, and volunteers, who access any part of the Vendor Infrastructure. This is regardless of direct access to the covered information.
 - New Hire
 - Yearly
- BCP/DR testing
- Strict change control procedures

Vendor technical controls are enforced programmatically as follows:

- Encryption of all covered information while at rest and in transit

- The use of encryption protocols as per NIST.SP.800-175Br1 guidance
- Forced password rotation of 90 days for all users and 60 days for all administrators/root level accounts
 - Passwords include complexity checks (mandatory length and characters from all 4-character types), as well as real-time “leaked password” checking and static blacklists.
- Use of operational programs whitelists and blacklists
- Host-based and perimeter AV, Intrusion Detection System (IDS) and Intrusion Prevention System (IPS)
- Automated vulnerability scanning

Aggregator System

1. Do you offer an aggregator system?

Yes. The Vendor is the State selected aggregator in four different states and additional payers (managed care organizations).

2. Can your EVV solution be used with an aggregator system?

Yes. The Vendor has many provider and MCO clients where the Vendor interfaces with the State’s chosen solution.