

## **Electronic Visit Verification – Changes for Non-Live-In Providers**

The California Department of Social Services (CDSS) received some additional guidance from the federal Centers for Medical & Medicare Services (CMS) that will require some changes to how In-Home Supportive Services (IHSS) and Waiver Personal Care Services (WPCS) providers, that do not live with the recipient they serve, use the Electronic Visit Verification (EVV) system. The federal government has advised CDSS that IHSS/WPCS providers will be required to check in and out from their recipient's home at the start and the end of each day they work. In order to be compliant with federal law and avoid federal penalties, the EVV system will be updated to capture the location of the provider when they check in and out on each day they work.

### **What does this mean?**

This means that any IHSS/WPCS provider who does not live with their recipient will be required to check in and out, from their recipient's home, each day that they work. In order to be compliant with federal law and avoid federal penalties, the current EVV system will be updated to capture the provider's location when they check in and out. The details as to how the system will be updated are dependent upon the stakeholder process and will be as least intrusive as possible. Providers will receive further information about the EVV system updates before the changes go into effect.

Here is some important information about this change:

- Providers **who do not live with their recipient** will be required to check in at the start and check out at the end of each day they work. Provider's will still need to enter the number of hours and minutes worked for each day, as they do today.
- The system will only capture location when the provider checks in and out. The system **will not** track the provider's location or movements throughout the day.
- It will still be acceptable for a provider's start and end times for the day to overlap if they work for multiple recipients.

- The EVV system will allow a provider to fix an error if they forget to check in or out.
- The system will still issue payment based on the number of hours worked, not the check in and out times.
- Providers **who live with their recipient** will not be required to report the three fields: start time, end time, and location, but will still be required to submit their timesheets online through the Electronic Services Portal (ESP) or the Telephone Timesheet System (TTS).

## **Frequently Asked Questions**

### **Q: Why do you have to change the EVV system?**

A: Federal law requires EVV systems electronically capture the location of IHSS/WPCS providers at the start and end of each workday to ensure the recipients are receiving services in their home. California must update the current EVV system to be in compliance or financial penalties will be assessed by the federal government.

### **Q: Is the government tracking us?**

A: No, we are not tracking you. We **will not** be “tracking” your movements or location, only capturing the location when you check in at the start of each day and check out at the end of each day in order to meet the federal EVV requirements.

### **Q: Why are you doing this after we were told we would have no GPS tracking?**

A: Based on our IHSS stakeholder feedback not to utilize GPS, CDSS submitted a plan to the federal Centers on Medicare/Medicaid Services (CMS) that required providers to enter their location into an electronic system rather than utilizing GPS. However, CMS has now determined that our current process does not meet the federal requirement that the provider’s location must be electronically captured at the beginning and end of services being provided. California will be required to pay penalties beginning January 1, 2021 until the EVV system is compliant with federal law.

**Q: Does this mean that providers must check in and check out throughout the day for every service they provide for the recipient?**

A: No, providers will only have to check in and out once per day for each recipient they work for.

**Q: What if I make an error?**

A: The system will allow you to fix any errors. Providers will still be able to review and update their timesheet before they submit their timesheet to their recipient for approval, just like you can do today.

**Q: What if I work for multiple recipients?**

A: Each day you will be required to check in and out for any recipient you work for. The start times and end times can overlap. You will still need to make sure you capture the number of hours you work each day for each recipient just like you do today. You will still need to submit a timesheet for each recipient you work for.

**Q: What if I need help?**

A: CDSS will ensure that you have the resources you need to make this change. We will make sure there are lots of training materials available online and will be scheduling online training classes, just like we did for the EVV implementation. Additionally, you will be able to contact the IHSS Provider Help Desk and the counties if you need to talk with someone directly for assistance.