

# Electronic Visit Verification (EVV) Alternate Vendor Review Directions

## General

This document is intended for use with the EVV Alternate Vendor Review tool. Arizona Health Care Cost Containment Systems (AHCCCS) developed the EVV Alternate Vendor Review self-assessment to assist provider agencies in evaluating their chosen or prospective alternate vendor's compliance with the AHCCCS [EVV policy](#), [Business Requirements for Alternate EVV Data Collection Components](#), and [Alternate Data Collection Systems Interface Technical Specifications](#)<sup>1</sup>. Ultimately, the provider agency is directly responsible for overseeing their chosen alternate vendor to ensure the agency's compliance with EVV because the agency has a direct contract with their vendor. The review tool may also be used by provider agencies as part of a vetting process when choosing a new EVV vendor.

To complete the EVV Alternate Vendor Review tool, the agency representative will answer the questions on the tool by selecting yes or no in the Answer column (column C). The Risk column (column D) will automatically populate based on the chosen answer noting if the response presents an EVV compliance risk to the provider agency. The sections below mirror the sections in the EVV Alternate Vendor Review tool. Additional information, including the requirements and possible risk to the provider agency, is provided in this document.

## Devices

The alternate vendor should have at least two different types of visit verification modalities (devices). Device options are an important element of EVV. Members may have device preferences based on their comfort with technology, internet/cell phone service availability, or the way their services are delivered. As the provider agency, you are responsible for helping the member make an informed decision about the device used for EVV based on the options the alternate vendor has provided.

## Requirements

[Provider Device FAQ](#)

[AHCCCS EVV Policy, page 4](#)

[Business Requirements for Alternate EVV Data Collection Components, pages 6 & 7](#)

**Question 1: Does the alternate vendor offer at least two (2) different types of visit verification devices (mobile application, fixed visit device, telephony, etc.)?**

**Question 2: Does the alternate vendor offer at least one (1) device to use in areas with limited, intermittent or no landline, cell, or internet service?**

The alternate vendors must have the ability to collect EVV visit information while offering member choice. There is also a concern about backup options to collect EVV data if the alternate vendor's primary device or system is not working. Finally, suppose the alternate vendor's primary device doesn't work without the internet. In that

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<sup>1</sup> The EVV Alternate Vendor Review Directions was published June 2023. Changes made to referenced documents after June 2023 may have varying page numbers.

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case, there is a concern that EVV data would not be able to be collected for members living in areas with limited connectivity.

## Paper Timesheets

AHCCCS understands that EVV may only work well in most situations and could become burdensome for a select few. To allow some flexibility, AHCCCS has allowed paper timesheets to be used in specific circumstances outlined in the EVV policy. While the allowance of paper timesheets affords some flexibility, the requirement includes using the paper timesheet **in conjunction with a device that can independently verify the start and end time of the service provision to comply with EVV**. A paper timesheet attestation must also be completed and kept on file to document the allowable use of a paper timesheet.

## Requirements

[AHCCCS EVV Policy - AMPM 540, pages 3 & 4](#)

[AHCCCS EVV Policy - AMPM Policy 540 – Attachment B – Paper Timesheet Attestation](#)

[Business Requirements for Alternate EVV Data Collection Components, pages 7, 8, 9 & 10](#)

### Question 3: Does the EVV system allow you to enter paper timesheet information when the use of paper timesheets is allowable?

While AHCCCS allows the flexibility of using a paper timesheet, the EVV system must have a way to enter the information on the timesheet into the EVV system, including the data gathered from the device that independently verified the actual date, start and end time of service. For many EVV systems, but not all, this is called a manual visit.

### Question 4: Does the alternate vendor offer a device with a paper timesheet that can independently verify the actual date, start and end time of the service?

Paper timesheets must be used with a device that will independently verify the date, start and end time of service. Most EVV systems call this device a Fob, but the alternate vendor may have another device option that meets this requirement.

## Scheduling

Scheduling is simply a plan for service delivery that is informed by the members and their families' needs and preferences. With a schedule, we are able to see if a planned visit was late or missed altogether. Ultimately, the scheduling component provides the story to AHCCCS on why visits did not happen according to plan. AHCCCS does **not** require scheduling for members who employ their DCWs under the Self-Directed Attendant Care model. Additionally, AHCCCS does **not** require scheduling for members with live-in or on-site caregivers that often provide services on demand.

Schedules are not meant to be inflexible nor do they dictate the member/family's day-to-day living choices. AHCCCS has provided many flexibilities, including the allowance of unscheduled visits (to account for everyday life events) as long as there is an explanation and resolution when a caregiver does not show up as planned.

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Scheduling does not require the caregiver to wait to log in in order to provide services. It is important to be aware that visits are not considered late until an hour after the scheduled start time.

## Requirements

[Scheduling FAQ](#)

[AHCCCS EVV Policy, page 6](#)

[Business Requirements for Alternate EVV Data Collection Components, pages 3, 4, 10, 14, 15, 17 & 18](#)

[Alternate Data Collection Systems Interface Technical Specifications, pages 20 & 21](#)

### **Question 5: Does the EVV system have the ability to enter a schedule for each service?**

The EVV vendor's system must be able to record a schedule for each service provided to the member.

### **Question 6: Does the EVV system allow you to reschedule visits?**

Anytime a visit is late or missed, it should be rescheduled based on the member's contingency plan preference. The EVV system must allow rescheduling to show how the member was accommodated when the visit did not occur as scheduled.

### **Question 7: Does the EVV system track which visits are rescheduled?**

The EVV system must be able to identify which scheduled visits have been rescheduled.

### **Question 8: Does the EVV system stop schedules from being canceled/changed after the scheduled start time?**

Changes to schedules can be made until the visit is scheduled to start to allow for member preferences and unexpected changes, but after a visit is scheduled to start, the EVV system should not allow a change to the schedule.

### **Question 9: Does the EVV system allow live-in caregivers to provide services without a schedule if your agency allows it?**

AHCCCS does not require scheduling for live-in caregivers, so the EVV system must be able to allow the service to occur without a schedule. These visits may trigger an "unscheduled visit" exception, and you must apply the appropriate reason code to document why the visit was unscheduled. It is possible that the EVV system may have automated the exception documentation process for these unscheduled visits. You would need to check with the alternate EVV vendor for more information on how they address this circumstance in their system.

### **Question 10: If the EVV system allows caregivers to change schedules directly, is the agency able to approve schedules prior to the visit OR conduct post reviews on a sampling of schedules for all caregivers?**

This question only applies if the EVV system allows a caregiver to **directly** create/change a schedule for a member. If the EVV system allows caregivers to change schedules, agency administrators must either pre-approve the schedules prior to the visit or conduct post-reviews on a sampling of schedules for all caregivers no less than weekly. If the EVV system allows this, the general requirement is that there should be oversight of this change by an agency administrator.

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## Member Verification

The EVV system should offer several options to capture and document member verification. The member/Health Care Decision Maker may verify service delivery. To allow for flexibility, a designee can also be assigned to verify service delivery for the member if that is the member/Healthcare Decision Maker's preference. An EVV Designee Attestation must also be completed and kept on file to document the member's decision to assign a designee to verify their service delivery.

## Requirements

[Designee FAQ](#)

[AHCCCS EVV Policy - AMPM 540 - EVV Designee Attestation](#)

[AHCCCS EVV Policy - AMPM 540, page 3](#)

[Business Requirements for Alternate EVV Data Collection Components, pages 18, 19, 20, 21](#)

[Arizona Department of Administration and State Statute \(ARS 18-106\)](#)

### **Question 11: Does the EVV system have a way to capture member verification at the point of care?**

The EVV system must offer a way for members/Health Care Decision Makers to verify service delivery when the caregiver is done providing care.

### **Question 12: Does the EVV system have a way to capture member verification after the point of care?**

The EVV system must offer a way for members/Health Care Decision Makers to verify service delivery after the caregiver has left. AHCCCS policy requires the verification to happen within 14 days of the visit.

### **Question 13: Does the EVV system allow a designee to verify service delivery for a member?**

When a member/Health Care Decision Maker is unable or not in a position to verify service delivery on an ongoing basis, they can assign a Designee to have the verification responsibility. The EVV system must offer a way for designees to verify service delivery.

### **Question 14: Does the EVV system have a way for you to authenticate the member verification (i.e. view the signature, listen to a voice recording)?**

The EVV system should have a way to identify and document the person verifying service delivery. For example, some EVV systems use a Personal Identification Number (PIN), a written signature or a voice signature. You should also be able to authenticate the verification through the EVV system (i.e. view the signature, listen to a recording, etc.).

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## Location

Capturing the location of service delivery at the start and end of a visit is a required element of EVV. Alternate EVV systems can vary in how they capture the locations of visits in the home or community.

## Requirements

[EVV FAQ](#)

[AHCCCS EVV Policy - AMPM 540, page 4](#)

[Business Requirements for Alternate EVV Data Collection Components, pages 4 & 5](#)

### **Question 15: Does the EVV system capture and record the location of the visit (at the start and end of the visit)?**

The EVV system may have various ways of capturing the location.

### **Question 16: Does the EVV system enable GPS tracking while the DCW is on the clock? If so, does the system either allow that to be disabled per member preference or allow for the use of an alternate device that doesn't track?**

Some agencies may choose to enable GPS location tracking the entire time the DCW is on the clock. If your agency chooses to track DCWs, you must disclose to members how and why the DCW is being tracked. The disclosure should be documented and kept on file for audit purposes. If the member does not consent, the GPS tracking must have an option to be disabled **OR** the member should be offered another device/method for EVV compliance. While a yes answer would not mean the EVV system is not compliant, your agency would be at risk of non-compliance if member disclosures are not documented and kept on file **and** the EVV system does not offer a way to disable tracking or provide device options.

## Contingency Plan

The Contingency/Back-Up Plan should be used to discuss the members' options and preferences when scheduled visits are late or missed. The plan documents the members' preference on what the agency should do when visits are late or missed. Adherence to a member's contingency plan is recorded in the EVV system as a Resolution Code for when a visit is missed or late.

## Requirements

[Contingency Plan FAQ](#)

[AHCCCS EVV Policy - AMPM 540, page 5](#)

[AMPM Policy 540 – Attachment D – EVV Member Contingency Back Up Plan](#)

[Business Requirements for Alternate EVV Data Collection Components, pages 11, 12, 13 & 15](#)

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## **Question 17: Are you able to enter the member's contingency plan preferences by service in the EVV system?**

You should be able to record the member's contingency plan preferences by each service the member is eligible/authorized to receive in the EVV system. You should also review the member's chosen contingency plan preferences at least annually and make any updates at that time.

## **Question 18: Are you able to make changes to the member's contingency plan for a specific visit in the EVV system based on the member's preference?**

The EVV system must be flexible enough to accommodate the members' changing preferences. Members can change their contingency plan preference at any time, including when the visit was late or missed.

## **Question 19: Does the EVV system *only* use the contingency plan defaults when the member has chosen not to provide a preference?**

The EVV system should only use contingency plan defaults if the member chooses not to make any decisions about their contingency plan preference. The EVV system should not automatically use contingency plan defaults. You, as an agency, are responsible for actively engaging with your members to determine their contingency plan preferences and those conversations should take place at least annually.

## **Visit Maintenance**

This section contains several questions based on specific scenarios outlined in the [Visit Maintenance and Documentation FAQ](#). If possible, complete this section on the review tool as you perform visit maintenance in the EVV system (or have the functionality demonstrated if you are in search of a new vendor) for these common scenarios to ensure you can complete all the required functions of visit maintenance requirements outlined below.

### **Requirements**

[Visit Maintenance and Documentation FAQ](#)

[Business Requirements for Alternate EVV Data Collection Components](#)

## **Question 20: Does the EVV system allow caregivers to perform visit maintenance?**

Members and caregivers are prohibited from performing visit maintenance with one exception; members enrolled in the ALTCS-EPD program who are using the Self Directed Attendant Care (SDAC) model may choose to perform visit maintenance in the EVV system. While a "yes" answer would not mean the EVV system is not compliant, your agency would be at the risk of non-compliance if your agency was not a fiscal intermediary supporting members under the SDAC model.

## **Question 21: Does the EVV vendor send data to the aggregator frequently enough so that it does not impede your ability to bill for services?**

Each alternate vendor sends your visit data to the Sandata aggregator. Providers cannot get paid unless all the required EVV visit data is present in the aggregator and passes claims validation. You should understand how often the alternate vendor sends the visit data and determine if that cycle aligns with your claim submission timelines.

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**Question 22: Does the EVV system maintain an appropriate audit trail of all visit transactions including:**

1. The person entering the information.
2. The names and AHCCCS Provider IDs of both the rendering service provider agency and group biller (if applicable)
3. The AHCCCS ID number of the member receiving services
4. The date and time of the visit,
5. The reason for the manual verification
6. The date and time of the manual verification and
7. The names of the member/designee and the name and system generate ID of the DCW who validated the visit. Member/designee verification is required when visit data is edited.

The EVV system should collect and store an audit trail of required visit transaction information for audit purposes. You should be able to access this information for any of your visits.

**Scenario: DCW lives with the member so a schedule is not required.**

- **Question 23: For this scenario, does the EVV system flag the visit with the “Unscheduled Visit” exception?**

You should see the “Unscheduled Visit” exception that would need to be cleared to get the visit in a verified status. If the EVV system has automated the visit exception and documentation process, the visit data should show the unscheduled visit was applied.

- **Question 24: Are you able to enter the reason code “LiveIn/Onsite Caregiver” in the EVV system?**

To clear the “Unscheduled Visit” exception, you should be able to enter the reason code of “LiveIn/Onsite Caregiver.”

**Scenario: DCW forgets to clock in.**

- **Question 25: For this scenario, does the EVV system flag the visit with the “Visits Without In Calls” exception?**

You should see the “Visits Without In Calls” exception that would need to be cleared to get the visit in a verified status.

- **Question 26: Are you able to manually edit the visit to add the clock in time?**

To clear the exception, you must manually edit the visit to add the missing clock in time.

- **Question 27: Are you able to enter the reason code “Caregiver Error” in the EVV system?**

To clear the “Visits Without In Calls” exception, you should be able to enter the reason code of “Caregiver Error.”

- **Question 28: Are you able to enter a memo stating “Entered manual date and time after confirming with the [member/designee’s name] via [Communication Method] on XX/XX and [caregiver name] via [Communication Method] on XX/XX.” (Communication method = verbal, email or portal)?**

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The EVV system should allow you to enter a memo explaining the manual edit to the visit in the required format.

**Scenario: DCW cancels and the agency can't provide a relief caregiver to meet the member's contingency plan.**

- **Question 29: For this scenario, does the EVV system flag the visit with the "No Show" exception?**  
You should see the "No Show" exception that would need to be cleared to get the visit in a verified status.
- **Question 30: Are you able to enter the reason code "Caregiver No Show" in the EVV system?**  
To clear the "No Show" exception, you should be able to enter the reason code of "Caregiver No Show."
- **Question 31: Are you able to enter the appropriate resolution code "Reschedule within 2, 24 or 48 hours; Next Scheduled Visit; or Non-Paid Caregiver" in the EVV system?**  
The EVV system should allow you to enter the appropriate resolution code to show what happened in response to the caregiver missing the visit.

**Scenario: Guardian/Designee was not home when the service ended to verify service delivery.**

- **Question 32: For this scenario, does the EVV system flag the visit with the "Client Signature Exception, or Service Verification Exception" exception?**  
You should see the "Client Signature Exception, or Service Verification Exception" exception that would need to be cleared to get the visit in a verified status. Depending on the circumstance, both exceptions might be flagged.
- **Question 33: Are you able to enter the reason code "Member/Designee Unable to Verify" in the EVV system?**  
To clear the "Client Signature Exception, or Service Verification Exception" exception, you should be able to enter the reason code of "Member/Designee Unable to Verify."
- **Question 34: Are you able to enter a memo stating "Confirmed date/time of service delivery with the [member/designee's name] via [Communication Method] on XX/XX." (Communication method = verbal, email or portal)?**  
The EVV system should allow you to enter a memo (in the required format) to document verification since it did not occur at the point of care.

**Scenario: The member can't verify service delivery and the guardian is the paid caregiver. There is no one else to verify service delivery.**

- **Question 35: For this scenario, does the EVV system flag the visit with the "Client Signature Exception, or Service Verification Exception" exception?**  
You should see the "Client Signature Exception, or Service Verification Exception" exception that would need to be cleared to get the visit in a verified status. Depending on the circumstance, both exceptions might be flagged.



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- **Question 36: Are you able to enter the reason code "Member/Designee Unable to Verify" in the EVV system?**

To clear the "Client Signature Exception, or Service Verification Exception" exception, you should be able to enter the reason code of "Member/Designee Unable to Verify".

- **Question 37: Are you able to enter the appropriate resolution code "Designee Attestation on File" in the EVV system?**

For ongoing situations where the member cannot verify service delivery, the Health Care Decision Maker is the paid caregiver or no one else is able to act as a Designee, this needs to be documented under the "No Available Designee" section on the attestation with the treatment or planning team. The agency should keep the attestation on file for audit purposes. The EVV system should allow you to enter the appropriate resolution code to show why the visit is missing verification.

## Scenario: DCW and the member decide on a schedule change, but don't tell the agency.

- **Question 38: For this scenario, does the EVV system flag the visit with the "No Show" exception?**

You should see the "No Show" exception that would need to be cleared to get the visit in a verified status.

- **Question 39: Are you able to enter the reason code "Member Preference" in the EVV system?**

To clear the "No Show" exception, you should be able to enter the reason code of "Member Preference."

## Scenario: DCW forgets to clock in until after starting work.

- **Question 40: For this scenario, does the EVV system flag the visit with the "Late In Call" exception?**

You should see the "Late In Call" exception that would need to be cleared to get the visit in a verified status.

- **Question 41: Are you able to manually edit the visit to add the clock in time?**

To clear the exception, you must manually edit the visit to correct the incorrect clock in time.

- **Question 42: Are you able to enter the reason code "Caregiver Error" in the EVV system?**

To clear the "Late In Call" exception, you should be able to enter the reason code of "Caregiver Error".

- **Question 43: Are you able to enter a memo stating "Entered manual date and time after confirming with the [member/designee's name] via [Communication Method] on XX/XX and [caregiver name] via [Communication Method] on XX/XX." (Communication method = verbal, email or portal)?**

The EVV system should allow you to enter a memo (in the required format) explaining the manual edit to the visit.

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## Security

The alternate vendor will collect and store sensitive and private identifiable health information that must be protected per the Health Insurance Portability and Accountability Act of 1996 (HIPAA). As part of your Provider Participation Agreement, you have agreed to safeguard all confidential and protected health information.

## Requirements

[Provider Participation Agreement](#)

### **Question 44: Has the alternate vendor provided you with information on how the system complies with Requirement #13 outlined in the AHCCCS Provider Participation Agreement?**

The alternate vendor is required to ensure that confidential and protected health information will be safeguarded. There are several ways an alternate vendor may meet this requirement. Below are questions you can ask the alternate vendor to determine if the appropriate measures in place to protect confidential health information within their EVV system:

- Is the alternate vendor's system hosted in a FedRAMP or StateRAMP authorized environment?
- Is the alternate vendor's system FedRAMP or StateRAMP authorized?
- Does the vendor ensure all data is processed, stored and transmitted within the United States?
- Is the alternate vendor's data encrypted in transit and at rest using FIPS 140-2 or 140-3 regulations for compliant encryption technologies?

*The items listed in the questions above are optional certifications or authorizations evaluated by an independent third party to ensure compliance but are not an AHCCCS requirement.*