Department of HUMAN SERVICES

INFORMATIONAL LETTER NO. 2239-MC

DATE: June 18, 2021

TO: Assisted Living Facilities (ALF) and Residential Care Facility (RCF) Providers

APPLIES TO: Managed Care (MC)

FROM: Iowa Department of Human Services (DHS), Iowa Medicaid Enterprise (IME)

RE: Electronic Visit Verification (EVV) June Update

EFFECTIVE: Immediately

In April 2021, the Centers for Medicare and Medicaid Services (CMS) provided a training on EVV reporting that indicated congregate settings billing on a per diem basis were allowed an exemption from the EVV requirements. The IME delayed implementation for personal care services billed in 15-minute increments in congregate settings such as ALFs and RCFs, which prompted the IME to request clarification on allowable exemptions.

CMS provided the following clarification: "For community-based providers who are not regularly scheduled shift staff of the ALF/RCF, the delivery of the service would require an in-home visit. Therefore, the state should track personal care service provisions according to EVV requirements as listed in the Cures Act. With regard to staff employed as shift workers by the ALF/RCF, it is the state's decision whether to require EVV for these employees. The 15-minute units in which Home- and Community-Based Services (HCBS) are billed would appear to speak to state efforts to track service provisions. If this is the case, it may be in the state's best interest to require the use of EVV in these instances for fiscal integrity purposes".

Given this clarification, EVV will be **optional** for all personal care services provided by ALF and RCF shift workers. **ALF and RCF providers must complete an attestation[1] identifying their exemption status with the IME by July 31, 2021, and annually via**

[1] https://www.tfaforms.com/4912558

the provider self-assessment thereafter. Failure to comply with the attestation requirement may result in disenrollment, sanction, termination, recoupment of funds, and/or liability under Iowa Code chapter 685 or other federal and state law and regulations.

EVV implementation for ALF and RCF providers who use non-shift workers for personal care services are required to use EVV beginning August 1, 2021.

If you have questions, please contact the IME Provider Services at 1-800-338-7909, Monday – Friday from 7:30 a.m. to 4:30 p.m., or by email at imeproviderservices@dhs.state.ia.us.

As a reminder, CareBridge offers on-demand training materials on their website, www.carebridgehealth.com/trainingiaevv. Additional information on EVV can be found on the Department's dedicated EVV webpage[2]. For questions related to the EVV solution, contact CareBridge at 1-844-343-3653 or iaevv@carebridgehealth.com.

[2] https://dhs.iowa.gov/ime/providers/EVV