

DDD SHOUT

PROVIDER NEWSLETTER

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Pandemic Performance Plan Adjustments

DDD has implemented many temporary measures to ensure that qualified vendors receive the support needed in order to continue service delivery to DDD members. The majority of the flexibilities and alternative service delivery options are still in place. It is critical that all Qualified Vendors update their Pandemic Performance Plans to align with Centers for Disease Control and Prevention (CDC), Arizona Department of Health Service (ADHS) and DDD guidance related to health, safety and risk mitigation.

Qualified Vendors need to ensure they are continuing to monitor updated guidance issued by the CDC, ADHS or DDD and adjusting their Pandemic Performance Plans as necessary. Vendors should send notification of proposed service delivery changes including opening settings for in-person services via email to DDDQMUdocs@azdes.gov with the following information:

- Vendor name
- Name and number for the primary person coordinating the change
- What is the specific proposed service delivery change?
- Why does the vendor feel this change is required?
- Has the local health department been contacted for potential exposure?
- If yes, what direction was given?
- What is the location/address where the services occur?
- How many members will be affected by the proposed change?
- What will the vendor do to mitigate the effects of the service change, for example provide alternative services (coordinate with the assigned Support Coordinator)?
- Provide draft of the proposed member notification with link to the ADHS website.

The DDD Quality Management Unit will work with the Qualified Vendor to ensure the health and safety of all members as these situations are reviewed.

Qualified Vendors Financial Statements and Insurance Contractual Requirements

Per the [RFQVA DDD 71000 Contract](#), each Qualified Vendor must prepare financial reports in accordance with Generally Accepted Accounting Principles (“GAAP”). The completed Financial Statement Report package must be submitted to the Division via email at DDDFinancialStmtns@azdes.gov.

A Qualified Vendor **receiving five million dollars (\$5,000,000) or more in payments** from the Department for Qualified Vendor services in any state fiscal year shall provide annual audited financial statements within thirty (30) days after completion of the audit unless a different time is requested and approved by the Division. Annual financial audit reports must be conducted in accordance with Generally Accepted Auditing Standards (“GAAS”) and be audited by an independent Certified Public Accountant.

A Qualified Vendor **receiving at least two million dollars (\$2,000,000) but less than five-million dollars (\$5,000,000) in payments** from the Department for Qualified Vendor services in any state fiscal year shall provide annual financial statements that have been reviewed by an independent Certified Public Accountant. Review report must consist of at least a Balance Sheet, Income Statement and Statement of Cash Flows. Annual financial statements shall be submitted to the Division no later than thirty (30) days after the completion of the review unless a different time has been requested and approved by the Division.

A Qualified Vendor **receiving at least one million dollars (\$1,000,000) but less than two-million dollars (\$2,000,000) in payments** from the Department for Qualified Vendor services in any state fiscal year shall provide an annual financial compilation that has been compiled by an independent Certified Public Accountant. A compilation must consist of at least a Balance Sheet, Income Statement and Statement of Cash Flows. Annual financial statements shall be submitted to the Division no later than thirty (30) days after the completion of the compilation unless a different time has been requested and approved by the Division.

A Qualified Vendor **receiving less than one million dollars (\$1,000,000) in payments** from the Department for Qualified Vendor services in any state fiscal year shall provide the Department an annual financial statement that consists of a Balance Sheet, Income Statement, and Statement of Cash Flows within one hundred twenty (120) days after fiscal year end.

Qualified Vendors and subcontractors are also contractually required to procure and maintain until all of their obligations have been discharged, including any warranty periods under this Agreement are satisfied, insurance against claims for injury to persons or damage to property which may arise from or in connection with the performance of the work hereunder by the Qualified Vendor, his agents, representatives, employees or subcontractors. Required insurance documentation should be submitted to the vendor’s assigned Contract Management Specialist or via email at DDDContractsManager@azdes.gov. DDD Business Operations will ensure vendors are compliant with these requirements; non-compliance may result in contract action.

Referring, Ordering, Prescribing, Attending (ROPA) Providers Required to Register with AHCCCS

The [Patient Protection and Affordable Care Act \(ACA\)](#) and the [21st Century Cures Act \(Cures\)](#) require that all health care providers who provide services to, order (refer), prescribe, or certify health care services for AHCCCS members must be enrolled as an AHCCCS provider.

Until these Acts passed, referring, ordering, prescribing and attending providers were required to obtain a National Provider Identifier (NPI), but were not required to be enrolled as an AHCCCS provider.

After January 1, 2021, claims which include referring, ordering, prescribing or attending providers who are not enrolled with AHCCCS will not be reimbursed. AHCCCS encourages all providers who are not currently registered with AHCCCS, but who are [referring, ordering, prescribing or attending providers](#), to register as an AHCCCS provider as soon as possible. Service providers whose claims include referring, ordering, prescribing or attending providers who are not registered with AHCCCS should work with these providers to complete their registration.

See the frequently asked questions on the [AHCCCS website](#) for more information.

Revised Guidance For Visitation At Congregate Settings

The Division published communications on both September 1, 2020, and September 9, 2020, with information about the Arizona Department of Health Services (ADHS) Guidance for Visitation at Congregate Settings for Vulnerable Adults and Children. Governor Ducey's Task Force On Long-Term Care received feedback from the vendor and stakeholder communities following the release of the initial ADHS recommendations, and as a result, reconvened to review the concerns voiced by these groups. The Task Force released [revised guidelines on September 23, 2020](#). The revisions identify the types of visitation and the criteria by which they should be permitted including required testing. The visitor types are:

- Compassionate Care Visits
- Health Care Workers
- Regulatory and Investigative Personnel
- Designated Essential Visitors

The complete, updated guidance is available on the [Arizona Department of Health Services' \(ADHS\) website](#). The Division will require the following DDD congregate setting types to adhere to the ADHS Guidance:

- Intermediate Care Facilities
- Nursing Supported Group Homes

Previously DDD indicated that DDD Group Home vendors would be required to adhere to the ADHS guidelines and attest they had implemented the requirements as outlined in the ADHS guidelines. DDD will not require DDD Group Home vendors to adhere to the ADHS standards, however it is strongly recommended. Should Vendors choose not to adopt these specific standards, they must have a visitation policy documented in their pandemic performance plan that clearly specifies criteria for visitation of family members and friends – and the appropriate safety precautions that will be put into place during visits. The vendor must maintain documentation that the visitation policy has been shared with all members and legally responsible persons, upon adoption and for any revisions to the policy. All DDD Group Homes must allow for entry of essential personnel as described on [page 9 of the guidance](#). Vendors may screen these personnel and require masks, before allowing entry to the home.

DDD continues to encourage group home vendors and planning teams to follow the guidance in DDD's [Assessing Risk](#) document in instances where specific member circumstances may impact the vendor's ability to implement visitation policies. The planning team should work together to identify a solution and document it in the member's plan if deviations need to be made from the criteria established in the vendor's visitation policy.

How Arizonans with I/DD Can Cast Their Vote in the 2020 General Election

DDD, in coordination with the Arizona Developmental Disabilities Planning Council, is providing this information so DDD Qualified Vendors and Providers can assist DDD members who may have questions about voting in the November General Election.

- The deadline for registering to vote in Arizona has been extended until October 23, 2020, and can be done [online](#).
- The deadline to request a ballot-by-mail is October 23, 2020, and can be done [online](#).
- The last day to return mail-in ballots is October 25, 2020. After October 25, 2020, voters must use a drop-off box or [polling location](#).

- Qualifications to be eligible to vote in the 2020 Arizona General Election are as follows:
 - You must be a United States citizen
 - You must be a resident of Arizona and the county listed on your registration
 - You must be 18 years of age or older on or before the day of the next regular General Election (November 3, 2020)
 - Additional Information applicable to DDD members:
 - If they are under limited guardianship, they ARE eligible to vote.
 - If they are under full guardianship, they CANNOT vote.

Voting by mail:

- To reduce the spread of COVID-19, members can vote by mail: <https://azsos.gov/votebymail>.
- Members can also contact their County Recorder's Office for information, eligibility and availability on voting from home through a Special Elections Board. Individuals from two different political parties will visit them and assist in casting their ballot.

Voting at the polls:

- If a member is voting in person they must bring:
 - List 1 - Photo ID with a name and address (only 1 required):
 - Options include Arizona driver's license, non-operating ID card, tribal enrollment card or other tribal identification or valid U.S. federal, state, or local government-issued identification.
 - List 2 - Sufficient ID without a photograph that bears the voter's name and address (2 required):
 - See examples of acceptable documentation on the [AZ Secretary of State's website](#).
 - Mix and Match
 - Any valid photo identification from List 1 in which the address does not reasonably match the precinct register accompanied by a non-photo identification from List 2 in which the address does reasonably match the precinct register
 - U.S. Passport without address and one valid item from List 2
 - U.S. Military identification without address and one valid item from List 2
- Group home, nursing-supported group home, and developmental home staff are responsible for the transporting DDD members to the polling location.
- Early ballots must be returned by the voter, a family member, household member or designated caregiver (A.R.S. § 16-1005). This includes group or developmental home staff.
- Information for [voters with a disability](#):
 - Polling locations offer accessible parking and are accessible to individuals who use a wheelchair, as well as those with visual or hearing difficulties.
 - Polling locations will have accessible voting equipment.
 - Assistance at the polling location can come from the poll workers or someone the DDD member chooses.
- Members with election concerns can call the Arizona Center for Disability Law (ACDL) at 602-274-6287 from 6:00 a.m. to 7:00 p.m. on Election Day.

Vendor Call Process

DDD would like to thank the 238 individuals who responded to the Division's September 2020 survey regarding the Vendor Call Process. DDD continues to work to work to improve the vendor call process so that members can be matched to vendors that can meet their needs, in a timely manner. The responses to the Vendor Call Process survey will be instrumental in helping DDD make improvements that will increase system usability. DDD continues to work on improvements to the process across all users with target completion and implementation in March 2021.

AHCCCS Electronic Visit Verification (EVV) Update

In the coming weeks and months, AHCCCS will be posting to the EVV webpage FAQ documents on specific topics of interest based on questions and concerns that have been shared by stakeholders. AHCCCS has recently created and posted two **new** FAQ documents to help stakeholders prepare to comply with EVV.

Live-In Caregiver

This FAQ explains why [EVV is required for members with live-in caregivers](#) and the flexibilities being offered to accommodate the ways that members receive services.

Required Use of Direct Care Worker's Social Security Number

This FAQ explains why the [Direct Care Worker's Social Security Number \(SSN\)](#) is required and how the data is protected.

Providers who plan to use the Sandata EVV System

AHCCCS sent an email on October 7, 2020, to the vendor agency's EVV primary point of contact (agency administrator) regarding the details of the training including how to register for the pre-requisite training and requirements for agency administrators. The agency's EVV primary point of contact was identified by the agency on the Differential Adjusted Payment attestation submitted earlier in the year or subsequently was confirmed by DDD.

If you feel that you should have received this email for your agency but did not, please contact Sandata Customer Care at 855-928-1140 for assistance. More information for training is provided on the AHCCCS EVV Webpage (www.azahcccs.gov/EVV) under the "Sandata EVV System Training" tab.

Providers who plan to use an alternate EVV System

- **If you plan to use an alternate EVV system, please contact 844-289- 4246 or AZAltEVV@sandata.com as soon as possible** to initiate the process to send information to the Sandata aggregator in order to comply with EVV.
- Alternate EVV users will be required to complete some basic online training. This training is specific to viewing your data sent to the EVV aggregator. You should have already received a link to this training from Sandata.
- If the Alternate EVV Vendor's system is not making timely progress with testing for system compliance, the vendor agency will be expected to complete all required training offered by Sandata in preparation to use the Sandata EVV system should the alternate system not be ready on January 1, 2021. AHCCCS and Sandata will be monitoring Alternate EVV vendor progress to conduct provider specific outreach to ensure providers are ready to comply with EVV on January 1, 2021.
- In the coming weeks, AHCCCS will be releasing updated technical specifications that include both the removal and addition of requirements. Many of the changes are in response to stakeholder feedback

generated during the past few months. AHCCCS is permitting Alternate EVV Vendors additional time to comply with the updated technical specifications. This means that Alternate EVV Vendors can complete phase one testing without verification of the updated specifications and the vendors will be required to undergo a phase two testing period to verify the updated specifications are met prior to the January 1, 2021, mandatory use date.

If you have questions about using an alternate EVV system or are waiting for testing information, please contact support at 844-289-4246 or AZAltEVV@sandata.com.

Progress Report Submission Requirements Reminder

The DES Division of Developmental Disabilities requires progress reports to be submitted using the process outlined in the [Division Provider Policy Manual Chapter 35](#) and in the August 29, 2019, vendor announcement, [Changes to Progress Report Submission Process with FTP Access Request Instructions](#). Progress Reports should no longer be provided directly to Support Coordinators. All progress reporting mailboxes have been disabled.

All qualified vendors and providers submitting progress reports to the FTP site should use Chapter 35 as a guide for how and when to submit progress reports for services. Each progress report for all services must include the following information in the header or body of the report:

- Vendor Name
- Member Full Name (on all pages in document)
- Member ID
- Member D.O.B.
- Service Delivered

Additionally, when submitting progress reports to the FTP site, a separate file MUST be submitted for each member. **Multiple members cannot be submitted in one file.** Files are processed by the FTP site and are then sent to each member's assigned Support Coordinator using the Assists ID entered in the file name. **Submitting reports with multiple members in one file will prevent the progress reports from being forwarded to the correct Support Coordinator.** Instructions for accessing the FTP and for using an FTP application to upload multiple files at once can be found on the [Current Qualified Vendors page](#) in the section labeled "Progress Reporting."

Post Payment Review (PPR) Process

The Division has a contractual obligation to submit an External Audit Plan/Schedule and Audit Report of all individual vendor audits to the AHCCCS Office of the Inspector General (OIG). DDD audits claim payments to ensure payments are being prepared correctly for claims submitted by authorized vendors for eligible AHCCCS members. This is called the Post Payment Review (PPR) process. Audits include a random sample of claims based on vendor type, billing code and other distinguishing factors. The External Audit Plan and Audit Reports are submitted to AHCCCS OIG every 6 months. The Auditor General performs an annual audit of the ALTCS program including claims processing and payment.

The steps in the completion of PPRs are:

1. DES OIG – Internal Audit Administration (IAA) completes PPRs with vendors.
2. IAA submits a report of findings to DDD.
3. DDD conducts an analysis of findings and identified trends.

4. DDD reports estimated dollars at risk.
5. DDD determines corrective measures to ensure compliance.
6. DDD notifies the vendor of corrective measures or if they have been referred to AHCCCS OIG for further review.

The Division follows these steps to implement corrective measures that address vendor non-compliance with the billing and claim submission process:

1. Enactment of a Corrective Action Plan to include:
 - a. Education and training specific to billing and claim submittal discrepancies.
 - b. Network referral to address and monitor non-compliance with Qualified Vendor Agreement.
 - c. Completion of a follow up audit, 6 months later, to ensure the vendor is compliant. If the vendor is still found to be non-compliant after the follow-up audit, Step 2 is implemented.
2. Referral to the Division’s Contract Action Unit for review and determination of contract action to include but not limited to:
 - a. Inquiry Meeting
 - b. Demand for Assurance
 - c. Corrective Action Plan
 - d. Enrollment Suspension
 - e. Contract Termination
 - f. If the vendor is still found to be non-compliant, Step 3 is implemented.
3. Referral to AHCCCS OIG for investigation determination.

A vendor is immediately referred to AHCCCS OIG under the following circumstances:

- The vendor has been referred in the last 12 months to the Division for suspected fraud, waste, and abuse (FWA).
- The vendor has been referred in the last 12 months to AHCCCS OIG for suspected FWA.
- The vendor has an open investigation with AHCCCS OIG.

The below table is a sample of PPR data completed with 6 vendors as part of the deliverable most recently submitted to AHCCCS OIG.

Deliverable Period: January 1, 2020 – June 30, 2020

PPR Findings	Value of Improper Payments
Identified Overpayments	\$419,642.04
Value of Other Unsupported or Non-Compliant Claims	\$12,596.11
Total Amount of Overpayments	\$432,238.15
Total Amount of Payments in Scope	\$1,409,756.21
Total Amount of Payments Sampled	\$1,234,101.80
Total # Claims Tested	5,536
Total # Claims in Error	2,257
Claim Error Rate	48%
Sample as % of Payments	89%
Total Payment Error Rate	23%

Identified Trends from this PPR Sample

- Billed more units than recorded on timesheets - **\$2,499.79** (0.58% of total overpayment)
- Insufficient HAB/HID hours (billed incorrect range) - **\$320,621.38** (74.17% of total overpayment)
- Billed Wrong Rate/Service Code - **\$54,400.06** (12.59% of total overpayment)
- Lack of supporting or non-compliant documentation - **\$12,597.11** (2.91% of total overpayment)
- Billed while member not present - **\$19,649.07** (4.55% of total overpayment)
- Billed while member was hospitalized - **\$7,567.08** (1.75% of total overpayment)
- Billed unauthorized modifier - **\$3,337.78** (0.77% of total overpayment)
- Billed non-compliant employee hours - **\$10,716.48** (2.48% of total overpayment)
- Other issue - **\$850.40** (0.20% of total overpayment)

Policy Public Comment

DDD is currently soliciting public comments regarding the following Division policies:

- (Revision) Division Operations Policy Manual Chapter 4004-I, Ledgers Maintained by Providers.
 - The Division will accept public comment until October 21, 2020.
- (New) Division Provider Policy Manual Chapter XX, Abuse, Neglect and Exploitation Prevention.
 - The Division will accept public comment until October 28, 2020.

More information regarding these proposed changes and instructions for submitting comments can be found on the [DDD website](#). Complete this form, <http://bit.ly/dddpolicyupdates>, to be notified directly by email about future changes to DDD policies.

QVA Directory

Qualified Vendors are responsible for updating and maintaining this site-specific. The Division updated [Provider Policy Manual Chapter 47, Managing Vendor Call Lists, Provider Directories](#) and the Scope of Services and Reporting in September 2019 to reflect this requirement and compliance with AHCCCS Contractors Operations Manual (ACOM) 406 – Member Handbook and Provider Directory, which includes requirements for identifying facilities with special accessibility features.

The Division's Qualified Vendor Application (QVA) Provider Directory Search application was enhanced in 2019 with new features including the ability for a Qualified Vendor to update and maintain the required site-specific details, including cultural/linguistic capabilities and accessibility features. This information improves the overall functionality of the Provider Directory and online Provider Search used by members and Support Coordinators. It additionally assists in matching members/families with Qualified Vendors.

Please ensure the required site-specific information for your facilities is up-to-date as inaccurate information can result in mis-matching members with your agency or your agency not being considered for a service you are able to provide.

Additional resources:

- [DDD Vendor Directory Application User Manual](#)
- [Provider Manual Chapter 47: Managing Vendor Call Lists, Provider Directories, Scope of Services and Reporting Requirements](#)

DDD Town Hall Meetings

The Office of Individual and Family Affairs (OIFA) continues to host town hall meetings for members, families and providers. **The next town hall meeting will be held on Thursday, October 22, 2020, from 6:00 p.m. to 8:00 p.m.**

Please share this information with the members and families you serve and encourage them to participate. The [town hall schedule and instructions to join](#) via the Internet or phone can be found on the main DDD webpage in the “Upcoming DDD Events” section.

Get Caught Up

Did you know the Division posts vendor announcements and editions of the Shout on the web? Get caught up and stay informed on all of the recent vendor communications, <https://des.az.gov/services/disabilities/developmental-disabilities/vendors-providers/vendor-announcements>.