

# DDD SHOUT

## PROVIDER NEWSLETTER

Volume XX - December 2020

### Clarification On DDD's Off-Site Visitation Guidance

On November 13, 2020, DDD issued [guidance for off-site visitation at congregate settings](#) during periods of moderate or substantial community spread/transmission of COVID-19 in Arizona counties. This guidance is for DDD Group Homes and DDD Developmental Homes to supplement the already existing [ADHS guidelines](#) which specifically relates to DDD ICFs, DDD Nursing Supported Group Homes and Nursing Facilities. The Division has received numerous questions since the guidance was released from the community, specifically about the recommendation for a 14-day quarantine after an off-site visit for members living in a group home or developmental home.

If a member, family member or vendor has concerns about the recommended quarantine upon return from the visit, they should convene a planning meeting with the member's Support Coordinator in advance of the potential off-site visit. The Support Coordinator and planning team will use the [Assessing Risk guidance document](#) that was linked in the November 13 communication during the planning meeting. If a specific risk mitigation plan is identified and the members of the planning team, particularly the vendor and member/family, feel comfortable with the strategies that will be used when the member is visiting off-site, the 14-day quarantine may be waived. These mitigation strategies may include the following examples:

- The member and all those with whom he or she comes into contact will wear a mask and socially distance during the entire visit.
- No one outside their normal 'pod' of family and friends will be present during the visit.
- The entire visit will take place outdoors.

However, if the vendor does not agree (i.e. there are other high risk members in the home, the member is not able to wear a mask at this time), DDD will support the vendor in implementing the 14-day quarantine or other identified mitigation strategies to protect other members in the congregate care setting. As outlined in the [Assessing Risk guidance document](#), this is not considered a rights restriction.

We recognize that some individuals believe this guidance is too stringent. However, the Division is taking the position of mitigating the spread of COVID-19 to the largest extent possible. Recent data shows that individuals with I/DD enrolled with DDD have a COVID-19 mortality rate that is two times higher than the general population in Arizona. National statistics show the number as three times more likely. To date, our risk mitigation strategies have contributed to the percentage of the DDD population who have tested positive (2.7%) to be substantially lower than the general population in Arizona (4.6%). All individuals supporting DDD members must continue to implement measures to contribute to lower transmission rates among the DDD population, especially when cases are on the rise. Positive member [cases are starting to significantly rise](#) and

with the holiday season approaching, mitigating risk to the greatest extent possible remains more important than ever.

Finally, DDD is aware that the Centers for Disease Control and Prevention (CDC) has recently updated its guidance to include additional options for quarantine length. Under these options, quarantine can end after ten days without a COVID-19 test if the person has reported no symptoms or after seven days with a negative test result if the person has reported no symptoms. The updated CDC guidance also states the following, “CDC continues to endorse quarantine for 14 days and recognizes that any quarantine shorter than 14 days balances reduced burden against a small possibility of spreading the virus. Local public health authorities make the final decisions about how long quarantine should last in the communities they serve, based on local conditions and needs. Follow the recommendations of your local public health department if you need to quarantine.” As such, DDD will continue to follow the lead of ADHS when it comes to recommended quarantine guidelines and will use the ADHS guidance to inform our recommendation for suggested quarantine length. DDD will immediately update vendors should any changes be implemented in the recommended quarantine length.

## Vendor Development Project Update

Building a strong network of high-quality providers for our members is critical to providing them with timely services. This project is building an improved system to identify providers that meet member needs and AHCCCS requirements. We are standardizing our vendor call processes to make it easier and more efficient to connect members and providers, track data and outcomes, and provide additional oversight and accountability for the program. The Division is improving its Focus system that manages the vendor call and is developing staff and vendor training that will be available in the first quarter of 2021.

Questions about the vendor call process changes can be submitted using this link:  
<https://forms.gle/mDDMTXXFRgr3jhqs7>.

## AHCCCS Electronic Visit Verification

### EVV Policy – Open for Public Comment

The AHCCCS Medical Policy Manual (AMPM) Electronic Visit Verification policy (540) is now available for public comment. The comment deadline is **January 4, 2021**. You must follow the instructions on the public comment web page when submitting your comments. Please do not send them to the [EVV@azahcccs.gov](mailto:EVV@azahcccs.gov) email address. It is important to follow the standard process when submitting your comments to ensure they are all in one central location to be considered for possible revisions to the policy. In addition to your comments, we welcome your suggestions or proposals for policy revisions. **It is important to note that AHCCCS does not respond to the public comments, but rather uses them to inform a final version of the policy.** The public comments will also be used to help inform additional guidance from AHCCCS on EVV.

You can find the link to the policy [here](#) along with the instructions for how to submit public comments.

If you have questions about the policy you need answered in order to support your plans to operationalize and onboard EVV, please submit them directly to [EVV@azahcccs.gov](mailto:EVV@azahcccs.gov) for policy clarification and guidance.

### Sandata EVV System Users – Preparation For The Welcome Kit Release

AHCCCS is preparing to release Sandata EVV System Welcome Kit and credentials. In order for your agency to gain access to the Sandata EVV system, your primary Point of Contact/Agency Administrator must complete the required prerequisite training. **If the EVV Point of Contact/Agency Administrator has not completed the required prerequisite training, your agency will not be granted access to the Sandata EVV system.** A notice has been sent directly to them to encourage completion as soon as possible to ensure your agency is

positioned to receive the Welcome Kit and system credentials.

If you **do not know** who has been designated as your agency's EVV Point of Contact/Agency Administrator, please email all of your agency AHCCCS provider IDs to [evv@azahcccs.gov](mailto:evv@azahcccs.gov) to confirm.

If you need to **change** your agency's designated EVV Point of Contact/Agency Administrator, please call Sandata Customer Care at 855-928-1140 for assistance.

## General Compliance Timeline and Reminders for ALL EVV Providers

January 01, 2021

- All providers are required to begin using EVV.

January 01, 2021 – March 31, 2021 (Grace Period)

- Payment for EVV Services - AHCCCS is allowing a soft-claim edit period for claims with dates of service beginning January 01, 2021 through March 31, 2021. This means that providers can still receive reimbursement for services if there is no EVV visit to match to a claim or the EVV visit data is incomplete. Providers will be given information on issues with claims for EVV services in an effort to provide technical assistance and insight into EVV program implementation challenges. AHCCCS will be monitoring these issues to identify trends to help inform additional provider engagement and outreach.
- EVV Policy Compliance – AHCCCS is allowing providers to use the grace period to comply with the new AHCCCS EVV policy, which includes time for conversations with members as well as completing forms required (as listed in the bullet points below) as allowable/required under the policy. The draft forms available on the EVV webpage may be used for reference and training purposes only. They should not be used by providers until AHCCCS has sent notification that the final versions of the forms are available for use following the policy public comment period which ends January 4, 2021. It is incumbent upon providers to maintain documentation standards that validate the provision of services as they transition to EVV and comply with EVV policy standards for documentation.
- Designee Attestation
- Contingency Plan
- Paper Timesheet Attestation

Beginning April 1, 2021

- Payment for EVV Services – The hard claims edits will begin for EVV service claims for dates of service beginning April 1, 2021. Providers will not receive payment unless all the required EVV visit data is present.
- EVV Policy Compliance – The new EVV compliance standards will begin to be incorporated into the quality monitoring audits performed by the MCOs.

## Providers Who Will Use Their Own Alternate EVV System

If the Alternate EVV Vendor's system has not passed the required testing, AHCCCS and Sandata are monitoring Alternate EVV vendor progress and conducting provider specific outreach to ensure providers are ready to comply with EVV on January 1, 2021. If the vendor's EVV system was not approved prior to November 30, 2020, AHCCCS will notify the provider so they can complete the required training offered by Sandata to prepare them to use the Sandata EVV system until such time the alternate system is in compliance.

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](mailto:AZAltEVV@sandata.com).

## EVV Exemption for Live-In Caregivers

In August 2019, the Centers for Medicare and Medicaid Services released guidance that gives states the option to require EVV for members with live-in caregivers. AHCCCS will continue to require EVV for members in these situations to provide assurance that members get the care they need when they need it, while also providing flexibility in the EVV program for members and their live-in caregivers.

AHCCCS has an FAQ on its website that addresses the following flexibilities offered to members with live-in caregivers and their families. The FAQ can be found [here](#).

- The service planning team has the flexibility to determine if the caregiver needs to follow a day to day schedule. EVV is only required for those hours that the live-in caregiver is getting paid to provide services.
- Members with live-in caregivers can choose a device that works best for them and their situation. There are few device options that might work best for caregivers that are providing care on and off throughout the day. One option is the continued use of a paper timesheet along with a small device that (when clicked) generates a code that goes on the paper timesheet.

Members, their families and live-in caregivers should talk with their provider agency to clarify the hours that need to be recorded with EVV and to discuss device options that might be the most flexible to support their lifestyle and the way in which services are provided.

## Fingerprint Clearance Card Reimbursement For Licensed Developmental Home Providers

The Arizona Department of Public Safety (DPS) recently updated its website with a portal to submit applications for any individual seeking a Level 1 Fingerprint Clearance card. In the past, DDD had an agreement with DPS, in which DDD was able to directly pay for processing applications for licensed developmental home providers as part of the DDD licensing process. DPS and its digital fingerprint vendor, Thales/Gemalto, made a change to their process for obtaining a fingerprint clearance card, which resulted in the website not accepting the DDD fingerprint billing code. DES/DDD worked with DPS to resolve this issue.

The DPS website will now accept the DDD fingerprint billing code, allowing DDD to directly pay for the application. The applicant must submit their application in the DPS portal, <https://psp.azdps.gov>, and they will receive a 10-character reference number from DPS. The applicant will use the 10-character reference number to register for their fingerprints to be taken on the Thales/Gemalto website [https://www.aps.gemalto.com/az\\_efas](https://www.aps.gemalto.com/az_efas). See the [DPS Guidance Document - Fingerprinting Application](#) document for more information.

Note: While the DPS application only asks for the DDD fingerprint billing code, the Thales/Gemalto application asks for the DDD fingerprint billing code and its associated password. The billing code and password have not changed since Thales/Gemalto took over the contract for this service in May 2020.

## Fraud, Waste & Abuse Considerations with Service Plans

Through the assessment process, Support Coordinators determine and implement home and community based services (HCBS) based on identified member needs. If a member's service needs change, the Support Coordinator must be notified before service changes can be made. It is the Support Coordinator's responsibility to discuss potential service changes with the member/guardian/designated representative to determine medical necessity and ensure the service level is appropriate.

The Support Coordinator completes a written planning document during the initial visit, when there are any

changes in services and at each review visit (every 90 or 180 days). The member or representative has the opportunity to review the planning document and must indicate whether he/she agrees or disagrees with each service authorization, signing the service plan each time. Services are then authorized and implemented based on the signed planning document.

The Division is responsible for reimbursing vendors and coordinating care for services provided to members pursuant to state and federal regulations. Vendors and providers must adhere to the services authorized on the member's planning document. Per [Section 5, Service Requirements/Scope of Work](#), in the Division's QVA specifications, "Prior to making any changes in the number of units or days of service provided (including an increase or decrease in the number of units or days of service) and/or a change in the setting, the Qualified Vendor shall ensure that it has received the appropriate new authorization from the Division. The Qualified Vendor shall not bill for services in excess of either the daily or aggregate amounts authorized by the Division." Any deviation from what is written in the planning document may be considered potential fraud, waste and abuse (FWA). Medical necessity for any change in services must be determined before the change in services can be provided or billed including additional service hours. Suspicions of non-compliance with contractual requirements and state and/or federal laws and regulations must be reported.

How to report Fraud, Waste, and Abuse?

- FWA Hotline: 877-822-5799
- Email: [DDDFWA@azdes.gov](mailto:DDDFWA@azdes.gov)
- Online: <https://des.az.gov/how-do-i/report-suspected-fraud/developmental-disabilities-fraud>
- AHCCCS: <https://www.azahcccs.gov/Fraud/ReportFraud/>
- Mail to: DES/DDD, Attention: Corporate Compliance Unit, 1789 W. Jefferson St. 4th Floor, Phoenix, AZ 85007

Please provide any supplementary documents, information, and/or emails etc. to substantiate allegations of Medicaid / Medicare Fraud, Waste, or Abuse.

## **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, January 7, 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 at [bit.ly/dddtownhall](http://bit.ly/dddtownhall).

## **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>.