

Volume XXXVIII - November 2022

COVID-19 Public Health Emergency Flexibility Unwinding

The Secretary of Health and Human Services extended the COVID-19 federal public health emergency (PHE) in October 2022 until January 2023. It is unlikely the PHE will be extended again. AHCCCS has created a <u>page</u> <u>on its website</u> with details about the impact of the end of the PHE including resuming enrollment and renewal processes and the end of flexibilities granted during the PHE.

DDD is currently evaluating the PHE flexibilities to determine their termination dates based on this expectation. All PHE flexibilities will be terminated by the end of the quarter in which the PHE ends. Specific flexibilities, including parents as paid caregivers for their minor children, will continue (with some changes) as part of the State's American Rescue Plan Act proposal that was previously submitted by AHCCCS to and approved by the Centers for Medicare and Medicaid Services (CMS) or as part of changes to DDD policy. DDD will provide communication and end dates for each of the PHE flexibilities in future vendor announcements.

AHCCCS EVV Updates

AHCCCS continues to track various provider readiness milestones representing a continuum of compliance. MCOs are using that data to inform provider engagement and outreach plans to ensure providers have the support they need to fully implement EVV. If you are contacted by a DDD staff member, your agency is strongly encouraged to promptly respond to ensure your readiness for the hard claim edits.

It is incumbent upon providers to maintain thorough and reliable documentation standards that validate the provision of services as they transition to EVV and the standard requirements outlined in their Provider Participation Agreement.

REMINDER: Payment for EVV Services

During the soft claim edit period (through 12/31/22), providers can still receive reimbursement for services even if there is no EVV visit to match to a claim or the EVV visit data is incomplete. Providers should use this period to incorporate EVV into day-to-day business practices, including developing operational procedures, training administrative personnel, onboarding members and caregivers, and logging visits. More importantly, this is an opportunity for providers to self-monitor agency compliance in order to avoid billing challenges when the hard claim edit period begins on January 1, 2023. **Once the hard claim edits begin, providers will not receive payment unless all the required EVV visit data is present.** Providers should ensure they have reserves available in case they experience any issues passing claims after the hard edit date. DDD may have to transition members from Qualified Vendors out of compliance with EVV to Qualified Vendors who are compliant.

It is critical that Providers familiarize themselves and practice the steps outlined in the <u>Visit Maintenance</u> and <u>Audit Documentation</u> and <u>EVV Billing Checklist</u> to ensure readiness for the claims enforcement period

beginning January 1, 2023.

EVV Compliance

As the claims enforcement day approaches, AHCCCS is again reiterating that EVV compliance impacts every layer of the system, which means each of the following stakeholders (in addition to AHCCCS) must participate in and comply with the EVV program.

- Health Plans
- Provider agencies
- Individuals getting paid to provide a service (i.e., provider agency staff, caregivers, family members, etc.)
- Individuals receiving the service

EVV compliance is a condition of continued participation in the AHCCCS program for all of the stakeholders listed above. However, AHCCCS has created some flexibilities with EVV compliance to support members with live-in caregivers. Therefore, we encourage members, their families, and live-in caregivers to 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.

Resource Highlights

The Visit Maintenance and Audit Documentation FAQ has been posted to the EVV web page (under General Resources and Frequently Asked Questions). This FAQ will address questions related to how to document missing/incomplete information for billing and documentation purposes.

The following FAQs and updates are forthcoming and in response to common and recurring questions from providers as they operationalize EVV.

- New Contingency Plan FAQ
- New Designee FAQ
- New Case Management FAQ
- Service Confirmation Portal FAQ (updates)
- Scheduling FAQ (updates)

Information for Alternate EVV System Users

AHCCCS and Sandata have updated technical specifications/business requirements that both remove and add requirements. These changes are in response to stakeholder feedback, (including clarification to existing specifications), and in response to Sandata system changes to ensure alignment across all EVV systems. Updates to both documents are notated within each document. It is important that both Alternate EVV System users and their Alternate EVV Vendors ("vendor") read and understand both documents linked below.

Business Requirements for Alternate EVV System Data Collection Components

Alternate EVV System Data Collection Systems Interface Technical Specifications

It is incumbent upon each provider using an Alternate EVV System to ensure the vendor's compliance with AHCCCS business requirements and technical specifications. A practical way for providers to understand and monitor what information Sandata is receiving from the vendor, is to access the Sandata Aggregator. The Aggregator contains detailed information about the visit data Sandata, AHCCCS, and the Health Plans are receiving. More information on how to access the Aggregator using the <u>Sandata Aggregator Information</u> document is located on the EVV web page (<u>www.azahcccs.gov/EVV</u>) (under Alternate EVV System Requirements and Technical Specifications).

AHCCCS is not requiring development and testing to be completed prior to January 1, 2023. AHCCCS is preparing to host an Operational Review (OR) with each vendor to ensure compliance with business requirements on how the data is being collected and sent to Sandata, and documentation required for audit purposes. That timeline for development and testing will coincide with the ORs that will occur in early 2023. More details on the scope, how to prepare for the ORRs, and deadline for development/testing is forthcoming.

Generally, the updates to the specifications do not impact claims enforcement with one exception. The specifications will add some new service codes and modifier combinations for a few services with very low utilization (i.e., Companion Care Per Diem and Home Health Aide services provided by a Licensed Health Aide). However, it is possible that the updated specifications may include some clarification (to the original specifications) requiring the Alternate EVV Vendors to make changes prior to the claims enforcement date.

Technical Support

For Sandata users, please contact the Sandata Customer Care at 855-928-1140 for any technical support for the system including, but not limited to:

- Accessing training,
- Finding your welcome kit,
- Changing your EVV Contact,
- Importing your employees, and
- All other technical issues experienced by users on devices or the EVV portal.

For technical issues related to the current alternate system technical specifications, please contact the Sandata Customer Support at <u>AZAltEVV@sandata.com</u> or 844-289-4246.

Fingerprint Clearance Services

In August, the Division shared information from the Arizona Department of Public Safety (DPS), that they would be transitioning contractors from Gemalto/Thales to Fieldprint Inc. to perform Arizona electronic fingerprinting services in October 2022. On November 19, 2022, the Department of Public Safety (DPS) and the State of Arizona will make this transition from Gemalto/Thales to Fieldprint, Inc. To provide the best customer service and to ensure a seamless transition, DPS has developed the following transition plan:

- 1. All Gemalto/Thales registrations will be honored up to November 18, 2022, provided the applicant completes the registration and fingerprinting before November 19, 2022.
- 2. All fingerprint registrations for Fieldprint, Inc. will begin on November 19, 2022.
- 3. If the applicant registers with Gemalto/Thales prior to November 19, 2022, but does not complete the fingerprinting process, the applicant will be given a refund and directed to register with Fieldprint, Inc.
- 4. If the applicant registers with Gemalto/Thales prior to November 19, 2022, and completes the fingerprint process, however, their prints are rejected, they will be given a refund and directed to register with Fieldprint, Inc.

Qualified Vendors can register with Fieldprint, Inc. online at <u>https://arizona.fieldprint.com</u>. Agencies who wish to submit fingerprints electronically may contact the DPS Applicant Processing Team at 602-223-2223 for further information. The existing process will continue through November 18, 2022

For developmental home applicants and providers, DDD will continue to directly pay for processing applications as part of the DDD licensing process. The applicant/provider must submit their application in the DPS portal, <u>https://psp.azdps.gov</u>, 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 <u>https://www.aps.gemalto.com/az_efas</u>. See the DPS Guidance Document -Fingerprinting Application document for more information. 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. For assistance with the procedure or for billing code and password please email <u>dddolcr@azdes.gov</u>.

Any changes made to the Developmental Home applicant's fingerprinting process with the transition to Fieldprint, will be outlined in future communications.

WellSky Update

On September 1, 2022, the Division implemented the WellSky claims system that utilizes the Healthcare Common Procedure Coding System (HCPCS) and standard Centers for Medicare & Medicaid Services (CMS) claims forms when reimbursing Qualified Vendors for submitted claims. This includes the use of standardized Health Insurance Portability and Accountability Act (HIPAA) Transactions and Code Sets (TCS).

DDD and WellSky have noticed a number of provider agencies submitting claims by uploading an 837 file without using the agency's legal name of record in WellSky. Providers are reminded that they must bill using the name of record in AHCCCS/FOCUS/WellSky. Recent system changes more strictly enforce that billing and rendering provider names match the name in WellSky. Use of the incorrect name may result in claim denials or, in cases where no reasonable match can be made, claims not being visible.

The Division has published a <u>Claim Denial Tips document</u> which Qualified Vendors can reference to help reduce claim denials.

Providers can now find a <u>document with the latest WellSky information</u> on the Division's website. This document includes topics in the following areas:

- UPCOMING Resolutions/New Release Information
- RECENT Resolutions/Updates Completed
- PENDING Resolutions to Known Issues

The goal of this document is to share, in real-time, system issues that are occurring and what the Division/ WellSky is doing to address them. The PENDING Resolutions to Known Issues section lists known issues for which a solution has not been identified but that the Division is aware of and is working to address.

Question and answer sessions are being held through November 29, 2022. The schedule for these sessions is available on the <u>C2F - HIPAA TCS Compliance WellSky Claims Processing System web page</u>.

Additional information and resources including <u>Frequently Asked Questions</u> and a <u>form to submit questions</u> will be available on the <u>Division's web page</u> through the close of business on November 30th.

Beginning December 1, 2022, all questions regarding billing or claims should be submitted to the Customer Service Provider Mailbox, <u>DDDcustomerservice-providers@azdes.gov</u>, or by calling the Customer Service Center at 1-844-770-9500 option 1. Your inquiry will be answered by one of our team members in the order it was received.

Residential Vendor Call Update - IDLA Providers

The Division has been refining the Residential Vendor Call process over the past few years to help match members with vendors more efficiently, standardize the process for all residential services statewide, and improve the system to automate the tracking and monitoring of data. The Division implemented several changes on March 7, 2022. The next upgrade will impact Individually Designed Living Arrangement (IDLA) services.

Currently staffing matrices for IDLA are managed manually using Excel spreadsheets. For this reason, The Division is adding staffing schedules into the Focus Program Staffing Application (PSA) for Individually Designed Living Arrangements (IDLA) to improve efficiency. Qualified Vendors providing IDLA services will be required to begin using the PSA system for staffing schedules beginning December 1, 2022.

The Division will host training sessions so impacted Qualified Vendors can learn about the changes being made in FOCUS for IDLA staffing schedules.

The training sessions are scheduled as follows:

- Tuesday, November 15, 2022 from 1:00 p.m. to 2:00 p.m.
 - Join by Internet: <u>https://us05web.zoom.us/j/84467365560?pwd=M1RhNXBvdXhkaXJGR0ZwYjh6T0t</u> IQT09
 - Meeting ID: 84467365560
 - Passcode: 5SL1v0
- Thursday, November 17, 2022 from 10:30 a.m. to 11:30 a.m.
 - Join by Internet: <u>https://us05web.zoom.us/j/84467365560?pwd=M1RhNXBvdXhkaXJGR0ZwYjh6T0t</u> IQT09
 - Meeting ID: 84467365560
 - Passcode: 5SL1v0

Qualified Vendors and Providers with questions regarding the changes being made to staffing schedules for IDLA may submit them via email at dddresidentialunit@azdes.gov.

Electronic Monitoring Devices In Private Bedrooms

The Division is currently revising Provider Policy Manual Chapter 42 Electronic Monitoring/Surveillance System in Program Sites to align with Senate Bill 1542 that was signed into law by Governor Ducey on May 20, 2022, and Article 14 which was open for public comment in September and October 2022. This policy will be open for public comment in early 2023.

The Division intends to address not only the requirements for SB 1542 but to also address stakeholder feedback about the use of private electronic monitoring devices in member bedrooms. The proposed language regarding this issue will prohibit Qualified Vendors from interfering with or assisting in the use of an electronic monitoring device by a responsible person in a member's private bedroom. The language will also include prohibitions on covering, obscuring, moving or powering the device off. Responsible persons will be responsible for any repair or damage caused by the installation or removal of any such devices.

The full policy revision draft will be available for public comment on the Division's Policy Webpage in January 2023 with the intent of publishing it into the Provider Policy Manual in early Spring 2023. In the interim, Qualified Vendors should not prohibit members or their Responsible Persons from using private electronic monitoring devices in their bedrooms.

Town Hall Meetings

The Office of Individual and Family Affairs (OIFA) continues to host town hall meetings for members, families and providers. There will not be a town hall event in December 2022. The next town hall meeting will be held on Thursday, January 5, 2023, from 6:00 p.m. to 8:00 p.m. Please share this information with members

and families and encourage them to participate at the next event. The town hall schedule and instructions to join via the Internet or phone can be found <u>bit.ly/dddtownhall</u>.

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, <u>https://des.az.gov/services/disabilities/</u><u>developmental-disabilities/vendors-providers/vendor-announcements</u>.

Report Fraud, Waste, Abuse and Misconduct

Report to DDD

- Call DDD at 1-877-822-5799
- Send an email to <u>dddfwa@azdes.gov</u>
- Send a letter to DES/DDD Attn: Corporate Compliance Unit 1789 W Jefferson St. Mail Drop 2HA1 Phoenix, AZ 85007
- Complete this <u>online form</u>.

Report to AHCCCS

- Provider Fraud
 - In Arizona: 602-417-4045
 - Outside Arizona: 1-888-ITS-NOT-OK (1-888-487-6686)
- Report Member Fraud:
 - In Arizona: 602-417-4193
 - Outside Arizona: 1-888-ITS-NOT-OK (1-888-487-6686)
- If you have questions about AHCCCS fraud, abuse of the program, or abuse of a member, email the AHCCCS Office of Inspector General (OIG) at <u>AHCCCSFraud@azahcccs.gov</u>.