



3 West Road | Virks Building | Cranston, RI 02920

Dear Providers,

Please read this important notice carefully.

The RI Medicaid program is moving forward with full compliance with the Federal 21st Century Cures Act, Section 12006(a), effective January 1, 2021.

In 2016, EOHHS began implementing Electronic Visit Verification (EVV), an electronic system which verifies that personal care/home cares service visits occur by documenting six points of data:

- Type of Service
- Date of Service
- Location of Service
- Individual Receiving the Service
- Individual Providing the Service
- Time the Service Begins and Ends

EOHHS is focused on ensuring a smooth transition for providers beginning to use EVV for all Medicaid services covered by Federal law. Since 2016, EOHHS has worked with the State's EVV vendor, Sandata, to build and make available the State EVV Solution, Santrax Agency Management (SAM), for all Medicaid providers fee for service claims. Beginning in April 2020, the RI Medicaid program also allowed providers to use third-party EVV systems via an "aggregator" with the Santrax system, to submit EVV records, should they choose not to implement the full Medicaid EVV solution.

To minimize administrative burden and reduce the financial impact when Medicaid claims require EVV records on January 1, 2021, EOHHS began a 'soft launch' implementation to familiarize providers with the use of EVV before incorporating claims editing. This soft launch began in April 2020 and will continue through the end of the year.

As of September 30, 2020, during this soft launch period, EOHHS has seen low utilization of both the State EVV system (SAM) as well as the third-party aggregator system. Out of 10,811 total visits from August 1, 2020-August 31, 2020, only 36% have been submitted and verified by EVV. Further, we are concerned about agency adoption of EVV solutions overall. Currently there are 9 providers who have not completed testing and 12 providers who have not started testing.

We must remind providers that under Federal law, each provider's third-party EVV system must either be fully interfaced with the State vendor, Sandata, or providers must use the State EVV system until the interface is complete by January 1, 2021. Providers must meet this deadline to meet federal compliance and avoid interruption in payments. Providers will not be exempt from using EVV while establishing interfaces with Sandata.

Through our soft launch period, all Medicaid claims subject to EVV requirements have paid even without an EVV record on file to match to the claim. Beginning January 1, 2021, all Medicaid claims submitted to EOHHS that require EVV records will be reviewed for the corresponding EVV record at time of adjudication. Medicaid claims without corresponding EVV records will deny during claims adjudication or, if the claim is paid and does not have valid matching EVV records, it will be subject to review and recoupment.





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EVV audits will be conducted in the same manner and procedure as all Medicaid Program Integrity audits, as communicated on May 1, 2020. Results of EVV audits will be formally documented and will allow for provider review and response. Audits finding will document recommendations, may require corrective action and could result in penalties for the billing providers.

EVV audits will commence six (6) months after the federal EVV compliance deadline (January 1, 2021) and will include dates of service back to the start of the compliance period. EVV providers will be notified no later than thirty (30) business days in advance of an audit taking place. This notification will outline the purpose of the audit, the required documentation and the process that will be followed.

To ensure consistency and transparency, Rhode Island Medicaid's managed care organizations will follow the same procedures and timeframes as outlined above.

EOHHS has made available and implemented multiple resources for providers to begin complying with EVV requirements. The Rhode Island Medicaid EVV website is the primary source of information for the EVV program and stakeholders may access that information at [http://www.eohhs.ri.gov/ProvidersPartners/ElectronicVisitVerification\(EVV\).aspx](http://www.eohhs.ri.gov/ProvidersPartners/ElectronicVisitVerification(EVV).aspx) .

If you have any questions about the EVV implementation, please contact Meg Carpinelli via email at Margaret.Carpinelli@ohhs.ri.gov

EOHHS values the partnership of providers and looks forward to working with you to meet the requirements for EVV.

Sincerely,

Bruce W. McIntyre, JD
Director, Office of Program Integrity

