

November 6, 2019

CALIFORNIA DEPARTMENT OF SOCIAL
SERVICES

EXECUTIVE SUMMARY

ALL COUNTY LETTER NO. 19-XX

This All-County Letter (ACL) provides counties with information regarding the statewide implementation of Electronic Visit Verification (EVV).



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November 6, 2019

ALL COUNTY LETTER (ACL) NO.: 19-XX

TO: ALL COUNTY WELFARE DIRECTORS
ALL COUNTY IN-HOME SUPPORTIVE SERVICES PROGRAM
MANAGERS

SUBJECT: ELECTRONIC VISIT VERIFICATION FOR THE IN-HOME
SUPPORTIVE SERVICES AND WAIVER PERSONAL CARE
SERVICES PROGRAMS OPERATIONAL STANDARDS

REFERENCE: [H.R 34 - 21ST CENTURY CURES ACT](#)
[ALL COUNTY LETTER 15-60 \(July 22, 2015\)](#); [ALL COUNTY LETTER 17-76 \(July 14, 2017\)](#); [ALL COUNTY LETTER 18-103 \(September 5, 2018\)](#)

The California Department of Social Services (CDSS) has begun implementation activities for the statewide implementation of Electronic Visit Verification (EVV). This All County Letter (ACL) provides information for counties on the upcoming statewide implementation of EVV.

Background

The federal [21st Century Cures Act](#), passed in 2016, requires States to implement EVV for Medicaid-funded personal care services and home health care services by January 1, 2020. The statute also allows states to apply for a good faith effort exception that extends the required implementation date by one year. California submitted and has received approval for the good faith effort exception. Therefore, California's In-Home Supportive Services (IHSS) and Waiver Personal Care Services (WPCS) programs must fully comply with this federal mandate by January 1, 2021.

To meet the federal requirements and best serve the interests of recipients and providers, CDSS modified the existing Electronic Services Portal (ESP) and Telephone

Timesheet System (TTS) to allow providers to submit and recipients to verify and approve the required EVV information electronically. Since IHSS and WPCS services are often performed on and off throughout the day, providers will continue to be paid based upon the hours worked, not the time between their start time and end time.

EVV will not change the amount of service hours, nor how or where IHSS or WPCS services are provided. After EVV is completely implemented, it will fully replace the current paper timesheets, and providers and recipients will be required to utilize the EVV system either online or telephonic.

ESP and TTS System Enhancements for EVV

After extensive stakeholder feedback, CDSS decided to leverage and enhance the existing Electronic Services Portal (ESP) and Telephone Timesheet System (TTS) to comply with the federal requirement. CDSS has made the following modifications to the ESP and TTS:

1. Added three new fields to ESP that providers are required to complete every day they provide IHSS or WPCS services, which includes:
 - Start Time: The time of day the provider performed the first IHSS/WPCS service
 - End Time: The time of day the provider completed the last IHSS/WPCS service
 - Location: Where the provider performed the IHSS/WPCS services. The options to select from are: Home, Community or Both
 - Home: Services were provided only in the recipient's home
 - Community: Services were provided outside the recipient's home
 - Both: Services were provided inside and outside of the recipient's home
2. Ensure that providers and recipients have the flexibility to use both the ESP and TTS interchangeably, as long as they are registered for both methods.
3. Added functionality to the TTS that:
 - Allows providers to submit EVV information through the telephone.
 - Enables users to self-register in the TTS and manage their own passcode.
 - Expands the usage of the "press or say" functionality for recipients, who are either blind or visually impaired, or cannot press the buttons on a phone and need to be able to use their voice to navigate through the call tree.
 - Implemented a new phone line for EVV providers and recipients that do not need the "press or say" functionality that enables them to navigate through the call tree.
 - Provided the ability for providers and recipients to request a copy of a timesheet that is submitted and/or approved through the TTS.

4. Modified CMIPS to allow counties to:
 - View and modify a provider's or recipient's timesheet preferences on one screen, including which system they are using to submit and approve their timesheets, set and reset passcodes, etc.
 - Change a provider's or recipient's communication preference.

Providers and recipients actively enrolled in the electronic timesheet option in ESP, will automatically become an EVV user when their county implements EVV.

Details about the high-level system changes described above will be provided in a forthcoming ACL.

EVV Implementation Strategy

The pilot phase of EVV began on July 1, 2019 in Los Angeles County with the Lancaster District Office. EVV was rolled out, by district office, over a 5-month period with district offices going live at the beginning of each month. The statewide implementation of EVV will begin in January 2020, with the state being divided into 5 multi-county waves. All implementation activities are expected to be completed by December 31, 2020 in order to meet the federal deadline.

The EVV implementation will be modeled after the one used for electronic timesheets. CDSS plans to roll-out EVV over an 18-month period which includes a pilot starting in July 2019 that ends in December 2019. Each wave will consist of a two-month roll-out, with providers and recipients currently using electronic timesheets going live in EVV Month 1, and the remaining population going live in Month 2. Month 2 would include any providers/recipients selecting the EVV telephonic option.

Two months prior to each wave, CDSS will send outreach notices to all providers and recipients in the affected counties. The notices will advise providers and recipients of the EVV requirement, provide implementation dates and encourage them to enroll in ESP or TTS, if they have not done so already.

Recipients and providers will receive a subsequent notice one month prior to their implementation date. The version of the notice they receive will be dependent on how they are currently submitting their timesheets. The individuals who are already using ESP and TTS to submit or approve timesheets will be informed that, as of their implementation date, they will be required to enter information into the three new EVV fields. Providers and recipients not using ESP or TTS will receive a notice that they are required to enroll in ESP or TTS and will be provided instructions on how to do so.

Due to the timeframes for implementation, it is suggested that counties begin outreach activities and encourage providers and recipients to use the ESP or TTS to submit or approve timesheets prior to their EVV implementation date. Based on information gained through the EVV pilot, the most effective methods of communication were flyers,

outbound text messages, and most importantly having county staff talk about using ESP at every contact with providers and recipients. Having more providers and recipients using the ESP and TTS will make the implementation of EVV much easier in each county. Counties can promote ESP usage by explaining the benefits of ESP that include:

- Faster timesheet processing. Providers no longer must wait for mail time.
- Faster payments. Providers who are using ESP and direct deposit are receiving their payment in 3-4 business days on average.
- Sick leave claiming is much easier through ESP.
- Direct deposit enrollment and changes can be done electronically.
- Providers no longer need to call their county or the help desk for their payment status, this information is available to them 24 hours a day.
- Providers will receive warnings of potential overtime violations before they submit their timesheet.

It was found during pilot that the transition to EVV was much easier for providers and recipients already using the ESP or TTS. Additionally, both counties and providers benefit when an electronic method is used. Counties with high adoption rates of individuals using electronic timesheets have experienced workload reductions in call volumes, provider violations, and timesheet errors.

County Implementation Resources

The CDSS has created various materials to assist counties with the implementation of EVV. All recipient and provider materials, including the webcasts, referenced below are translated into the statewide threshold languages (English, Spanish, Armenian, and Chinese). The webcasts are translated into these languages and closed captioning. All materials will be made available on the CDSS SAFE server prior to each wave of counties going live. In addition to the State threshold languages, Los Angeles County has also shared EVV materials in Cambodian, Farsi, Korean, Russian, Tagalog, and Vietnamese. All documents for providers and recipients will be made accessible to counties in a format that allows them to translate in any additional county threshold languages not provided by CDSS or Los Angeles County. The materials available to counties include:

- County Implementation Guide – a tool to assist counties with their implementation planning that includes readiness checklists, activities, tasks and best practices.
- EVV Job Aid – provides county staff with information regarding changes to CMIPS and general information about ESP and TTS.
- Frequently Asked Questions and Scripts – scripts developed to assist county staff with EVV calls and questions.

- Executive Staff/Board of Supervisors EVV Briefing Letter – a draft letter that counties can use to inform their boards and executive management of upcoming EVV activities.
- Outreach Letters– letters to providers and recipients that will be printed and mailed by CDSS at the beginning of each implementation wave.
- Recipient/Provider Training Materials –a step-by-step guide for recipients and providers on how to register, submit time and approve time in both ESP and TTS. All materials are available on the CDSS website.
- Webcast Videos - information and step-by-step instructions on how to use the system in the following areas:
 - Overview of EVV
 - Registering on ESP for Providers & Recipients
 - Time Entry on ESP
 - Approving Time on ESP
 - Registering on TTS for Providers and Recipients
 - Time Entry on TTS
 - Approving Time on TTS

In addition to these materials, CDSS is also providing the assistance of EVV Implementation Coordinators (EICs) to assist counties in the planning and execution of the implementation tasks. The EICs will partner with the counties in the following areas:

- Establishing and maintaining a Single Point of Contact (SPOC) for EVV planning
- Collaboratively coordinating EVV readiness activities
- Tracking EVV adoption rates and other metrics
- Assisting in scheduling county staff training and EVV Informational Sessions for recipient and provider outreach

County Staff Training

The CDSS will be providing both online and in-person trainings for county IHSS staff to prepare them for their EVV implementation. The training sessions will provide background on the new EVV requirements, give an overview of both ESP and TTS and include the functionality added to CMIPS in support of EVV implementation. The EICs will contact counties to coordinate these training sessions.

Provider and Recipient Informational Sessions

Counties have the option to hold CDSS-supported informational sessions for providers and recipients. The informational sessions are meant to provide information about EVV, including registration, in addition to submitting and approving time. These sessions are also meant to provide hands-on assistance with EVV registration, where county and CDSS staff assist attendees with registering on ESP or TTS.

Counties are not required to hold informational sessions, but those who would like to and plan to utilize CDSS resources for support should work with their EIC. Early planning for the EVV informational sessions, as indicated on the County Readiness Checklist in the EVV Implementation Guide, is essential for effective scheduling of CDSS resources. It is the responsibility of the county's SPOC to arrange the location, and dates of the informational sessions.

For those counties that wish to schedule CDSS supported EVV informational sessions, the county is responsible for all logistics. This includes finding and booking the sites, ensuring they have internet access, appropriate equipment and technical resources are available if utilizing a county network, and inviting providers and recipients to the informational sessions. County staff should also be available to assist with the informational sessions, provide support in the county threshold languages and be prepared to help providers and recipients with ESP and TTS registration. EVV Informational Sessions are generally held for two hours (one-hour presentation; one-hour registration assistance). Counties should not tell providers and recipients that the informational sessions are required and should promote them as a "free" session, due to some recipients and providers being under the impression that these sessions are at a cost.

ESP & EVV Online Informational Sessions Hosted by CDSS

The CDSS has been hosting online webinars for ESP and EVV for providers and recipients to promote ESP usage and will continue to do so until EVV implementation is completed. CDSS has scheduled webinars on Mondays and Wednesdays for ESP and Tuesdays and Thursdays for EVV. The webinars provide information about registering, submitting time and approving time in ESP, as well as an overview of the new EVV requirements in the EVV focused sessions.

The CDSS has been providing the webinar schedules to providers and recipients through timesheet stuffers and the EVV outreach mailings. The schedules for ESP and EVV webinars are also available on the CDSS website at the following links:

<https://www.cdss.ca.gov/inforesources/IHSS/IHSS-Providers/Resources/ETS-Training>

<https://www.cdss.ca.gov/inforesources/IHSS/IHSS-Providers/Resources/EVV-Training>

EVV Statewide Implementation Schedule

The CDSS coordinated with the County Welfare Director's Association and the counties to develop a statewide implementation schedule that met the needs of the counties. EVV is scheduled to be implemented in 2-month waves as follows:

Wave One - January/February 2020

- Lake

- Napa
- Orange
- Placer
- Sacramento
- San Luis Obispo
- Solano

Wave Two – March/April 2020

- Fresno
- Kern
- Kings
- Riverside
- San Bernardino
- Tulare

Wave Three – May/June 2020

- Alameda
- Contra Costa
- Marin
- Mendocino
- Monterey
- San Francisco
- San Mateo
- Santa Barbara
- Santa Clara
- Santa Cruz
- Sonoma

Wave Four – July/August 2020

- Alpine
- Amador
- Calaveras
- Colusa
- Del Norte
- El Dorado
- Glenn
- Humboldt
- Inyo
- Lassen
- Mariposa
- Merced
- Modoc
- Mono
- Nevada

- Plumas
- San Benito
- San Joaquin
- Shasta
- Sierra
- Siskiyou
- Stanislaus
- Sutter
- Tehama
- Trinity
- Tuolumne
- Yolo
- Yuba

Wave Five – September/October 2020

- Butte
- Imperial
- Madera
- San Diego
- Ventura

Statewide IHSS Service Desk

The CDSS has greatly increased the number of agents available at the IHSS Service Desk for recipients and providers in anticipation of EVV implementation. The agents have been trained and have been provided materials and scripts to help recipients and providers register in either ESP or TTS. Once recipients and providers are registered, the Service Desk agents are also prepared to assist recipients and providers with questions regarding account management, password resets, entering and approving EVV information and other technical issues.

- **CMIPS Service Desk:** 1-877-844-5844-Monday-Friday, 8am-5pm, excluding major holidays
- **IHSS Service Desk:** 1-866-376-7066-Monday-Friday, 8am-5pm, excluding major holidays

Although the size of the IHSS Service Desk has increased, counties are still considered the first point of contact for providers and recipients. Counties are responsible for informing and educating providers and recipients on IHSS program and payroll policy and requirements. As the primary point of contact, counties should be making every effort to answer provider and recipient questions.

The IHSS Service Desk may have to refer a provider or recipient to the county for assistance as a potential fraud prevention measure, when they are unable to verify a caller's identity because the caller cannot provide the answer to their security questions in the ESP or provide any identifying information that can be matched with the data in

CMIPS. When this happens, the caller is advised to contact the county so they may validate the caller's identity. When counties receive these calls, they should use their county business processes to verify the caller's identity. Once the county can verify the caller's identity, they should open a help desk ticket with the CMIPS Service Desk, either by phone or through the CMIPS portal, and advise the help desk that they were able to verify the caller's identity. The help desk ticket should include the caller's name, provider or case number and a good phone number to reach them. Once the help desk ticket is received by the CMIPS Help Desk, it will be routed to the IHSS Service Desk for a return call to be made to the provider or recipient, where assistance will be provided.

County Responsibilities for EVV Implementation

Counties are responsible for the planning and development of their own implementation strategy. Counties must appoint at least one SPOC who will be responsible for coordinating EVV implementation activities with CDSS and their EIC. Each county's EIC will ensure that all materials and supporting documents are provided in all available translations. If a county's threshold language materials are not available, the county will be responsible to appropriately translate the materials.

EVV Deferrals and Exceptions

It is anticipated that some providers and recipients may have situations that interfere with registering for an electronic method. All providers are required to enroll in an EVV method by December 31, 2020. Providers cannot defer their enrollment because they want to stay on paper timesheets or "do not like EVV." Counties are required to work with these individuals to ensure they are enrolled by the December 31, 2020 federal deadline. CMIPS has been modified to provide flexibility for counties who must work with a myriad of different and unique situations.

Counties will be able to defer provider and recipient enrollment in an EVV option when one of the following circumstances applies:

- 1) The recipient or provider needs to complete specific activities in order to do EVV (i.e. landline installation, establishing internet connectivity, identifying a timesheet signatory, etc.)
- 2) The recipient is claiming they meet the conditions for an exception below and the county needs time to complete verifications.

Exceptions can only be granted for recipients when they meet the following criteria:

- They have no access to a landline phone or internet twice a month in order to approve timesheets, **or**
- They have a disability that prevents them from using an electronic method to approve timesheets that can be substantiated by a medical doctor, **and**

- There is no one available to act as the recipient's timesheet signatory.

County staff must explore options for access to a phone/internet or someone to act as the recipient's timesheet signatory prior to giving them an EVV exception. If a recipient qualifies for an EVV exception, counties can take the appropriate action in CMIPS to continue issuing paper timesheets to the provider. More information about the exception process will be provided in a forthcoming All County Letter.

Additionally, there may be times when a recipient and/or provider are not able to enroll in the ESP or TTS, and the provider must be paid immediately. To accommodate these types of emergencies, CMIPS has been updated to allow counties to issue a paper timesheet for an EVV pay period. Counties should follow the current process in CMIPS to issue paper timesheets. Please note, this solution is not meant for individuals who need more time to enroll in ESP and TTS, nor is it meant for recipients who qualify for an exception.

As county staff work with recipients and providers to enroll in ESP or TTS, they should also be taking the opportunity to determine whether or not a recipient needs a timesheet signatory. Counties should be using the *In-Home Supportive Services – Designation of Authorized Representative Form* (SOC 839) to designate a timesheet signatory whenever appropriate. A recipient can have only one timesheet signatory.

If you have questions or comments regarding this ACL, please contact the Adult Programs Division, System Enhancements Bureau at 916-653-1873.

Sincerely,

Original Document Signed By:

DEBBI THOMSON
Deputy Director
Adult Programs Division

c: CWDA

ATTACHMENT

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