



## BCBSTX ELECTRONIC VISIT VERIFICATION PROVIDER COMPLIANCE PLAN

BCBSTX will track, monitor, and address provider compliance regarding Electronic Visit Verification per the requirements outlined in the HHSC Uniform Managed Care Manual (UMCM), the HHSC Provider Compliance Plan, and the BCBSTX Provider Compliance Plan.

### I. Pre 11/1/16 Implementation

#### A. EVV Provider Participation Verification Process

- i. BCBSTX will use the weekly *EVV Vendor Selection Provider File.xlsx* received from HHSC as a comparative report against the *BCBSTX Newly Added Contracted Provider List* in order to determine the STAR Kids Network LTSS Designated-Providers who have and who have not contracted with an EVV Vendor.
  1. Those designations include Personal Care Services (PCS) , Community First Choice (Personal Assistant Services/Habilitation (PAS/HAB)), Flexible Family Support Services (FFSS), In-home Respite Care and FMSAs providing PCS, CFC-PAS/HAB, FFSS, and In-home respite care. EVV is optional for the Consumer Directed Services (CDS) option.
- ii. Applicable providers who have not yet contracted with either of the EVV Vendors, DataLogic or MEDsys, will be contacted via phone to encourage provider contracting and will be given additional information or education, if needed.
- iii. BCBSTX will continue to follow up with applicable non-contracted providers on a weekly basis until it is confirmed that the provider has selected an EVV vendor. These contacts will be documented in the BCBSTX internal provider data base.

#### B. BCBSTX will post EVV-related provider compliance information on our Provider Website including the following (at a minimum):

- i. Link to HHSC EVV Website
- ii. Contact name, email, and toll-free provider customer service number
- iii. HHSC EVV FAQ Sheet
- iv. BCBSTX EVV Provider Compliance Plan

#### C. Provider Training

- i. General education will be provided during STAR Kids Provider group training sessions and on a one-to-one basis as needed.
- ii. EVV Vendors will be informed via email of any applicable newly contracted provider who is new to EVV so that the vendors may reach out to these providers to schedule in depth training as needed.

### II. Post 11/1/16 Implementation

#### A. Provider Compliance Score Monitoring Process

- i. BCBSTX will download and review the applicable EVV Vendor System Reports on a monthly basis or as needed, including the EVV Compliance Plan Summary Snapshot Report and the EVV Compliance Plan Daily Snapshot Report, for all provider agencies, and note those that have not achieved EVV compliance score equal to or greater than 90%.
- ii. BCBSTX will conduct provider outreach to provider agencies who have been identified as non-compliant during the monthly monitoring process.
- iii. On a quarterly basis, BCBSTX will submit an EVV Quarterly Summary Report to HHSC per requirements outlined in the UMCM.



iv. Compliance data will be submitted to BCBSTX Quality for quality oversight and monitoring.

**B. BCBSTX Actions for Non-Compliant Providers**

i. Letter of Non-Compliance

1. For those provider agencies achieving less than 90% at the end of the first quarter (October, November, December, 2016), BCBSTX will notify the provider agency in writing of their score, and in one week of sending the letter, will follow-up with a phone call to the provider to:
  - a. Discuss what is outlined in the letter,
  - b. Review contractual requirements for EVV compliance, as outlined in the UMCM and the BCBSTX Provider Compliance Plan and
  - c. Explain that they must implement acceptable EVV mechanisms as soon as possible.
2. BCBSTX will continue to monitor non-compliant provider compliance via the monthly monitoring process and will provide status updates to the appropriate internal teams.

ii. Provider Education and Training

1. If by the next quarterly reporting period, the EVV vendor reporting metrics do not show that the provider is improving towards or has achieved the 90% compliance score, BCBSTX will prepare and send a second letter and contact the provider to schedule an EVV session to review and educate the provider agency on EVV contractual requirements.
2. BCBSTX will continue to follow-up on a weekly basis until the provider agency can confirm they are meeting the EVV requirements when delivering attendant services.

iii. Network Termination

1. If the non-compliant LTSS network provider agency has not achieved an aggregated quarterly compliance score of 90% at the end of the third consecutive reporting quarter:
  - a. The BCBSTX Provider Network Management LTSS staff will recommend, based on a detailed time line of events and correspondence to the provider agency regarding the provider agency's EVV Compliance Score, that the provider be terminated from network participation due to noncompliance with EVV requirements.
  - b. A recommendation for termination will be presented to the appropriate BCBSTX staff through a review committee. If the committee agrees that the provider agency's noncompliance justifies termination, BCBSTX will send a termination letter that also advises the provider agency of their right to request a review of the decision.

**C. Initial Third Quarter Period**

- i. Between the STAR Kids Go Live Date of November 1, 2016 and March 30, 2017, providers will be granted a "transitional period" where their compliance score expectation will be determined as 75% and above.
- ii. Providers that fall below the 75% score will receive further education, as applicable, and will receive follow-up on a weekly basis until their compliance score rises to 75% or above.