
SOUTHWEST MICHIGAN BEHAVIORAL HEALTH

TO: REGIONAL COMPLIANCE COORDINATING COMMITTEE; REGIONAL PROVIDER NETWORK COMMITTEE
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Electronic Visit Verification (EVV) & Medicaid Service Documentation Requirements

Background: As part of the 21st Century Act, the Centers for Medicare and Medicaid Services (CMS) requires states to implement Electronic Visit Verification (EVV) systems. EVV is a validation of the date, time, location, type of personal care or home health services provided, and individual(s) providing and receiving services. This information helps to ensure that beneficiaries, clients, or participants receive the expected care.

EVV Requirements:

Per the Michigan Department of Health and Human Services (MDHHS), all providers of Personal Care Services (PCS) including community living support and respite services in a person's home, in an unlicensed setting, will be required to implement use of an EVV system in tandem with the MDHHS implementation schedule. Providers may choose to utilize the MDHHS EVV system or may use other systems that meet the requirements below.

The EVV system must electronically capture:

- The type of service performed;
- Beneficiary, client, or participant receiving the service;
- Date of the service;
- Location of service delivery;
- Individual providing the service; and
- Time the service begins and ends.

Medicaid Service Documentation Requirements: The EVV requirement is ***in addition*** to the long-established Medicaid Service Documentation Requirements.

Per the Michigan Medicaid Provider Manual and Southwest Michigan Behavioral Health (SWMBH) policy, service documentation must be sufficiently detailed to allow reconstruction of what transpired for each service billed and must include:

- Customer legal name;
- Date of service;
- Start and end time of the service;
- Type of service provided;
- Location of the service/method of service delivery (i.e., telehealth);
- Clinician/staff providing the service;
- Goal(s) and/or objectives of the IPOS addressed during the encounter;
- Interventions offered by the clinician/staff;
- Be signed and dated by the rendering clinician/staff

Meeting all EVV & Service Documentation Requirements: The MDHHS EVV requirement addresses the electronic validation of services; however, it does not address all Medicaid service documentation requirements previously outlined. In implementing an EVV system, providers must also ensure that Medicaid service documentation requirements are met. This may mean that there are two separate service recording processes to meet both the EVV and service documentation requirements.

SWMBH will continue to audit applicable services via quarterly Medicaid Services Verification reviews to ensure providers are meeting service documentation and billing requirements. Upon implementation of the EVV, we will be auditing to ensure that both the MDHHS EVV and Medicaid service documentation requirements are met. Services that fail to meet the EVV and/or Medicaid service documentation requirements may result in a recoupment of the claim(s).

For more information on EVV in Michigan, please visit <https://www.michigan.gov/mdhhs/assistance-programs/medicaid/portalhome/electronic-visit-verification>

If you have additional questions or concerns, feel free to reach out to the SWMBH Program Integrity & Compliance department.