



IRIS Electronic Visit Verification (EVV)

EVV

The federal 21st Century Cures Act requires states to use electronic visit verification (EVV) for Medicaid-funded personal care. EVV is an electronic system that uses technology to verify that participants receive their services. In IRIS, non-live-in participant-hired workers providing personal care services and routine supportive home care services¹ are required to use EVV. Participants, as the employer of record, must ensure that participant-hired workers are using EVV. Failure to meet EVV requirements will result in participant disenrollment from the IRIS program.

EVV collects the following information:

- Who receives the service
- Who provides the service
- What service is provided
- Where the service is provided
- Date of service
- Worker's time in and time out

Participant-hired workers providing the following services will need to use EVV:

- IRIS self-directed personal care per 15 minutes (T1019)
- Routine supportive home care per 15 minutes (S5125)
- Routine supportive home care per day (S5126)

EVV does not replace service authorizations. At this time, there are no policy changes related to service authorizations.

EVV System

The Wisconsin Department of Health Services (DHS) provides fiscal employer agencies with an EVV system at no cost. Participant-Hired Workers will use the EVV system to check in and check out at the start and end of each visit. EVV can be captured via a free mobile phone app, a landline, or a digital device in the participant's home. The mode for capturing this information is dependent on each fiscal employer agency solution. The data collected from the EVV system will be used to make sure participants get their personal care or supportive home care services.

Fiscal employer agencies and provider agencies that use the DHS-provided Sandata EVV system can [find training resources online](https://www.dhs.wisconsin.gov/evv/training.htm) at <https://www.dhs.wisconsin.gov/evv/training.htm>.

Fiscal employer agencies and provider agencies may choose to use an alternate EVV system. Alternate EVV systems must be certified. [The alternate EVV certification process is detailed online](https://www.dhs.wisconsin.gov/evv/alternateevv.htm) at <https://www.dhs.wisconsin.gov/evv/alternateevv.htm>. Fiscal employer agencies and provider agencies that use an alternate EVV system are required to provide training and education to their users.

¹ The 21st Century Cures Act EVV requirement applies to personal care services. Because DHS's definition of routine supportive home care services includes personal care services, the EVV requirement also applies to routine supportive home care services.

Exception to EVV Requirements: Participant-Hired Live-In Workers

In the IRIS program, participant-hired live-in workers are not required to use EVV. For the purposes of EVV, DHS defines a live-in worker as a worker who meets one of the following requirements:

- Permanently resides in the same residence as the participant receiving services.
- Permanently resides in a two-residence dwelling, like a duplex, where the participant receiving services lives in the other half of the dwelling, AND is a relative of the participant receiving services. A relative is defined as a person related, of any degree, by blood, adoption, or marriage.

To show permanent residency, a participant-hired worker will need to provide documentation of their current address. For further information on live-in worker documentation requirements, see the [IRIS Participant-Hired Worker Relationship Identification Form F-01201A](#). A live-in worker must verify their permanent address every year. When a live-in worker provides services to more than one participant they permanently reside with, their status as a live-in worker must be validated for each participant.

If the participant-hired worker is unwilling or unable to provide live-in documentation, they will be considered non-live-in for EVV purposes and will be required to submit EVV.

The following are examples of who is **not** considered a live-in worker:

- A worker who stays with the participant for a short period of time, like two weeks.
- A worker who works 24-hour shifts but does not reside with the participant permanently.

Please note that the participant-hired live-in worker exception does not apply to live-in workers who are hired through a provider agency. A provider agency may decide to require their live-in worker employees to use EVV.

Participant's Role in EVV

The responsibilities listed below apply to participants who have participant-hired workers.

What responsibilities are the same with EVV?	What responsibilities change with EVV?
<ul style="list-style-type: none">• Hire and train participant-hired workers• Ensure participant-hired workers have good work habits• Communicate payroll and worker updates to the fiscal employer agency• Review, sign, and submit timecards• Submit required paperwork for participant-hired workers• Ensure services are provided as listed in the Individual Support and Service Plan (ISSP)• Address worker performance issues	<ul style="list-style-type: none">• Ensure that participant-hired workers receive EVV training• Ensure that participant-hired workers have the information needed to check in• Review EVV information with participant-hired workers to reinforce the requirement to use EVV, which may include verifying participant-hired workers' check in and check out times• Communicate landline (or fixed voice over internet protocol (VoIP))* numbers to the fiscal employer agency, if using a telephone-based EVV system• Gather live-in worker validation information and provide it to the IRIS consultant agency or the fiscal employer agency

The EVV-related responsibilities above do not apply to participants who hire workers through a provider agency. When a participant uses a provider agency, the agency is responsible for implementing EVV.

* A fixed VOIP is a phone that is plugged into a wall outlet or modem and can be used in place of a landline.

Participant-Hired Worker’s Role in EVV

What responsibilities are the same with EVV?	What responsibilities change with EVV?
<ul style="list-style-type: none"> • Provide services as contracted • Meet all employee responsibilities • Follow the fiscal employer agency’s payroll requirements 	<ul style="list-style-type: none"> • Access and review EVV training materials • Check in and check out for each shift • Communicate with the fiscal employer agency and participant when the participant-hired worker needs to correct check in or check out times

IRIS Consultant Agency’s Role in EVV

What responsibilities are the same with EVV?	What responsibilities change with EVV?
<ul style="list-style-type: none"> • Ensure the participant has the information and resources needed to meet responsibilities • Help the participant comply with program expectations • Communicate with fiscal employer agencies as needed • Support the participant in their role as employer • Assist with onboarding paperwork as needed 	<ul style="list-style-type: none"> • Ensure the participant understands the following: <ul style="list-style-type: none"> ○ The EVV requirements and EVV’s impact on the IRIS program ○ Where to find EVV information and resources • Answer the participant’s questions about EVV or redirect them to the appropriate resource • Follow up with the participant during monthly contacts to ensure EVV compliance, create EVV risk agreement if needed, and initiate participant disenrollment for EVV non-compliance as outlined in the Non-compliance section of this policy. • Confirm, when applicable, that the IRIS Participant-Hired Worker Relationship Identification Form (F-01201A) is completed and that the required supporting documentation is provided to the fiscal employer agency before listing a participant-hired worker as a live-in worker on an authorization • Evaluate whether the participant needs a fixed visit verification device (only when using the DHS-provided Sandata EVV system and there is no other EVV collection method available)² • Communicate with the fiscal employer agency when a participant needs a fixed visit verification device

² Fixed visit verification devices may be requested from the fiscal employer agency, as a method of last resort, if services are anticipated to be authorized for more than 60 days and all of the following criteria are met: the participant does not have a landline or fixed VoIP home phone; the participant-hired worker does not have a smart phone or tablet device that would support the Sandata Mobile Connect app for mobile visit verification data collection; the participant does not have a smart phone or tablet that would support the Sandata Mobile Connect app for mobile visit verification data collection; and the participant has a smart phone or tablet, but it is not available for EVV.

Fiscal Employer Agency's Role in EVV

What responsibilities are the same with EVV?	What responsibilities change with EVV?
<ul style="list-style-type: none"> • Process timesheets • Process payroll • Communicate with IRIS consultant agencies and participants 	<ul style="list-style-type: none"> • Enter participant-hired worker information into the ForwardHealth Portal • Provide the participant with information on the process for EVV corrections • Verify live-in worker validation information • Provide the participant with EVV set-up information for their participant-hired workers • Use the chosen EVV system to verify visits • Communicate EVV compliance information to IRIS consultant agencies via biweekly reports • Link participant-hired worker timesheets to verified visits in EVV • Link provider agency claims to verified visits and deny provider agency claims that are missing EVV information • Request fixed visit verification devices from Sandata (only when using the DHS-provided Sandata EVV system and there is no other EVV collection method available) • Send DHS applicable EVV data with encounters

Non-compliance

Participants, as the employer of record, must ensure that participant-hired workers are using EVV as required. IRIS consultants will discuss EVV compliance – or non-compliance – during each monthly contact. Failure to meet EVV requirements will result in disenrollment from the IRIS program.

Participant-hired workers who refuse to meet the EVV requirement, risk being terminated. While a participant-hired worker may lose their job for failing to meet EVV requirements, they will be paid for the shifts that they worked while employed by the participant. If participant-hired workers fail to meet the EVV requirement, the following process will assist participants to meet their EVV-related responsibilities.

- Fiscal employer agencies will provide IRIS consultants with reports regarding irregular EVV use on a bimonthly basis. The reports will list participant-hired workers who have not achieved 80 percent accuracy on EVV use. This report will also include the current accuracy rate for each of the workers not meeting the required threshold.
- If participant-hired workers are not meeting the EVV requirement, the IRIS consultant will follow up at the next monthly contact. The IRIS consultants will provide additional training to allow the participant to assist with participant-hired workers who are not using EVV as required. IRIS consultants should inform participants that if their workers have not demonstrated compliance with EVV, a risk agreement will be put in place during the next monthly contact.
- If the participant-hired worker continues to not use EVV as required, the IRIS consultant will complete a risk agreement. Further, the IRIS consultant will make sure that the participant understands their options, including hiring a new worker, firing a current worker, using a provider agency, or choosing to receive personal care from fee-for-service (also known as MAPC) instead of IRIS.

- The IRIS consultant will review EVV compliance reporting provided by the fiscal employer agency, prior to the participant’s next monthly contact. At the contact, the IRIS consultant will confirm whether the participant-hired worker is using EVV as required or whether the participant has selected to hire a different participant-hired worker or use a provider agency.
- At the following monthly contact, if the steps listed above have not resulted in a participant-hired worker using EVV as required and the participant has not switched to using a provider agency, MAPC, or some other EVV-compliant solution; then the IRIS consultant will disenroll the participant for failure to comply with program requirements. Individuals who are disenrolled will still be able to select another long-term care program option.

EVV Resources and Contact Information

Wisconsin EVV Customer Care

- Phone Number: 833-931-2035 (Monday–Friday, 7 a.m. to 6 p.m., CST)
- Email: VDXC.ContactEVV@wisconsin.gov
- Website: <https://www.dhs.wisconsin.gov/evv/iris-evv.htm>

Fiscal employer agency contact information

Fiscal Employer Agency	Phone number	Email	Website
GT Independence	877-659-4500	customerservice@gtindependence.com	www.gtindependence.com/self-directed-services/medicaid/iris/
iLIFE	888-800-5599	iris.evv@ilifefms.com	www.ilifefinancialmanagement.com/EVV.htm
Outreach	715-494-9440	wisconsin@outreachhealth.com	www.outreachhealth.com/wisconsin-cds-training/
Premier	855-224-5810	etimesheets@premier-fms.com	www.premier-fms.com