



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, provider agencies and 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, must be sure that participant-hired workers are using EVV. Failure to meet EVV requirements will result in participant disenrollment from the IRIS program. Participant-hired workers will continue to receive payments for hours worked up to the disenrollment date.

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

EVV is required for the following services:

- IRIS self-directed personal care per 15 minutes (T1019)
- IRIS self-directed personal care per 15 minutes (EVV grace period) (T1019 U8)
- Routine supportive home care per 15 minutes (S5125)
- Routine supportive home care per 15 minutes (EVV grace period) (S5125 U8)
- Routine supportive home care per day (S5126)

EVV system

The Wisconsin Department of Health Services (DHS) offers an EVV system at no cost called Sandata. Alternatively, fiscal employer agencies and provider agencies may choose to use an alternate EVV system. Participant-hired workers (who are not live-ins) will use the fiscal employer agency's EVV system of choice to check in and check out at the start and end of each visit. The way to capture this information is dependent on each fiscal employer agency's EVV system. The data collected from the EVV system will be used to make sure participants get their personal care or routine supportive home care services.

The Sandata system allows EVV to be captured through a free app on a cell phone or tablet, a landline, or fixed visit verification device (a digital device in the participant's home). Fiscal employer agencies and provider agencies that use the DHS-provided Sandata EVV system can find training resources online at dhs.wi.gov/evv/training.htm.

Fiscal employer agencies and provider agencies who choose to use an alternate EVV system, must have the system certified by the DHS. The alternate EVV certification process is detailed online at

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.

dhs.wi.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.

Exceptions to EVV requirements

Newly enrolled IRIS participants EVV grace period

DHS recognizes that newly enrolled IRIS participants need time to adjust to the responsibilities of a self-directed program. Therefore, DHS will grant a 60-day grace period to newly enrolled participants before their participant-hired workers' rates of accurate EVV system use will be counted toward the participant's compliance with program requirements (described in the EVV compliance section of this policy).

New participants are defined as: 1) someone who is enrolling in IRIS for the first time, or 2) someone who has been disenrolled (voluntarily or involuntarily) from IRIS and re-enrolls at a future date. The grace period applies when the new participant receives services from a non-live-in participant-hired worker—**not a provider agency**. Participants are not responsible for provider agency compliance with EVV. Provider agency claims without required EVV detail will be denied.

When establishing a newly enrolled participant's individual support and services plan (ISSP) the IRIS consultant will create applicable time-limited (60-day) service authorizations for services that require EVV using the following service code/modifier combinations:

- Routine supportive home care (EVV grace period) (S5125 U8)
- IRIS self-directed personal care (EVV grace period) (T1019 U8)

Grace period authorizations must be end dated the last day of the pay period following 60 days post enrollment.

Example: A participant enrolled on 3/12/23, the grace period authorization would be 3/12/2023 to 5/20/23. The second authorization starting 5/21/23, would be coded for and subjected to EVV compliance expectations.

The intent of the grace period is to allow time for the participant to become familiar with their responsibilities in the IRIS self-directed program, learn about electronic visit verification (EVV), and train their workers on EVV as applicable. During the grace period, participant-hired workers are required to:

- Access and review EVV training materials.
- Check in and check out for each shift using the participant's fiscal employer agency EVV system.
- Communicate with the fiscal employer agency and participant when the participant-hired worker needs to correct check in or check out times.

Visits completed during the grace period will not count towards the participant's compliance with program requirements. Workers are expected to use the grace period to practice using EVV and to troubleshoot any issues they are encountering.

Live-in workers

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 scenarios:

- 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.

- Participant resides at regularly scheduled intervals at the separate homes of both parents or guardian. Both parents or guardian are considered live-in workers for purposes of EVV compliance.

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 \(F-01201A\)](#). This form must be completed any time a live-in worker is added to the participant’s plan. Workers must notify the participant’s fiscal employer agency within seven (7) days of a change in living situation. The participant must attest to no changes in live-in worker status during the annual plan renewal process to maintain the live-in exception status. 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. As the employer, the participant is required to communicate payroll and worker updates to their fiscal employer agency.

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 use EVV.

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

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

Provider agency live-in workers

Provider agencies may choose to:

- Require live-in workers to use EVV; or
- Not require live-in workers to use EVV

Agencies that decide not to require live-in workers to use EVV, must maintain worker documentation (and provide upon request) that shows the worker’s name and current residential address. The address must satisfy the requirements for a live-in worker as described above. The worker may use one document from Column A or two types of documents from Column B to prove permanent residency.

Column A (one required)	Column B (two required)
1. Current and valid State of Wisconsin driver’s license or state ID card	1. Household bill from the last three months (for example: gas, electric, phone service, cable, internet, water, trash, or other similar bill)
2. Other current official ID card or license issued by a Wisconsin governmental body or unit	2. Current or past month’s bank statement
3. Real estate tax bill or receipt for the current year	3. Current or past month’s paycheck or paystub
4. Residential lease for current year	
5. Check or other document issued by a unit of government within the last three months	

Agencies must communicate live-in worker status to the participant’s IRIS consultant agency so the IRIS consultant can create an EVV agency live-in worker service authorization. This authorization will allow claims for agency services provided by the live-in worker to bypass EVV requirements.

EVV system or power outages

When an EVV system or power outage impacts a significant portion of the service area or business (not one or two workers), lasts longer than 24 hours, and directly affects a worker’s ability to check in or out using a mobile app, landline, or fixed visit verification device, DHS will allow an exception to EVV requirements. This exception applies to the state provided EVV system (Sandata) as well as certified alternate EVV systems.

IRIS provider agencies must notify the fiscal employer agency when they are utilizing the system or power outage by submitting the [IRIS EVV System or Power Outage Exception Notification form \(F-03117\)](#) with the applicable claim(s). Participant-hired workers should communicate directly with their FEA if they experience an outage for longer than 24 hours preventing them from collecting EVV visits.

This exception is not dependent on IRIS service authorizations and does not require pre-approval.

Providers must be able to document proof of system failure or power outage upon request by DHS. Documentation should capture the date and time the outage began and ended, as well as the reason for the outage. Fiscal employer agencies are not expected to maintain documentation on behalf of provider agencies.

Use of this exception is at a provider agency’s discretion. Providers may choose to manually enter missing EVV information once the system or power outage has been resolved. There is not a systematic solution that would cause all visits for specific dates of service to bypass EVV claims editing.

DHS has and will communicate to payers and providers when there is a known Sandata outage lasting longer than 24 hours by email and the DHS website. There may be local issues that impact the use of Sandata’s technologies such as a local power outage that DHS would not communicate. To receive outage updates, [join our email list](#).

Participant’s role in EVV

The responsibilities listed below apply to participants who have non-live-in 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"> • Make sure participant-hired workers receive EVV training. • Make sure participant-hired workers have the information needed to check in using an EVV system. • 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]²) numbers to the fiscal employer agency, if using a telephone based EVV system.

² A fixed VOIP is a phone that is plugged into a wall outlet or modem and can be used in place of a landline.

	<ul style="list-style-type: none"> • Gather live-in worker validation information and provide it to the IRIS consultant agency or the fiscal employer agency.
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The EVV-related responsibilities above do not apply to participants who receive services from a provider agency. When a participant uses a provider agency, the agency is responsible for implementing EVV.

Non-live-in 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 payroll requirements. 	<ul style="list-style-type: none"> • Access and review EVV training materials. • Check in and check out with the participant’s fiscal employer agency’s EVV system 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 or to report a power outage that lasts longer than 24 hours.

Provider agency’s role in EVV

What responsibilities are the same with EVV?	What responsibilities change with EVV?
<ul style="list-style-type: none"> • Provide services in accordance with service authorizations. • Follow the fiscal employer agency’s claim requirements. 	<ul style="list-style-type: none"> • Set up your EVV system (refer to the New to EVV flyer for many of these steps). • Request an EVV provider ID, if applicable • Upload workers required to use EVV to ForwardHealth. • If using the DHS-provided EVV system, complete the Sandata training. • If using an alternate EVV system, get system certified by Sandata. • Train workers on the EVV system your agency is using. • Monitor worker visits and clear exceptions or manually enter visits as necessary to be sure all EVV related claims have a verified visit. • If exempting live-in workers from using EVV, maintain live-in worker documentation and communicate live-in worker status to the ICA. • Complete and submit form F-03117 to the fiscal employer agency when utilizing the system and power exception.

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"> • When building the ISSP for a newly enrolled participant that includes EVV required services, the IRIS consultant will create a time-limited grace period service authorization. The IRIS consultants should end the grace period authorization at the end of the pay period following 60 days. • Ensure the participant understands the following: <ul style="list-style-type: none"> ○ The EVV requirements and EVV's impact on their enrollment in the IRIS program. ○ Where to find EVV information and resources. • Answer the participant's questions about EVV or direct them to the appropriate resource. • Follow up with the participant during monthly contacts to ensure EVV compliance and document conversations in case notes, create EVV risk agreement if needed, and initiate participant disenrollment for EVV non-compliance as outlined in the 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. This option is only available when using the DHS-provided Sandata EVV system and there is no other EVV collection method available.³ • Communicate with the fiscal employer agency when a participant needs a fixed visit verification device.

³ 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 (SMC) app for mobile visit verification data collection; the participant does not have a smart phone or tablet that would support the SMC 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 training and education to EVV users. • Provide the participant with information on incorrect punches and the process for EVV corrections. • Verify live-in participant hired worker validation information. • Provide the participant with EVV set-up information for their non-live-in participant-hired workers. • Use the chosen EVV system to verify visits. • Communicate EVV requirements to applicable provider agencies during onboarding. • Communicate EVV compliance information to IRIS consultant agencies via biweekly reports, excluding the T1019 U8, T1019 KX, S5125 U8, and S5125 KX service authorizations. • Link participant-hired worker timesheets to EVV verified visits. • Link provider agency claims to verified visits and deny provider agency claims that are missing EVV information. • Provide information to provider agencies regarding the reasons for claim denial due to EVV. • Request fixed visit verification devices from Sandata (only when using the DHS-provided EVV system and there is no other EVV collection method available). • Send DHS applicable EVV data with encounters. Include an "E" in the Support Indicator field of the detail line item when submitting encounters where the system and power outage exception is being used.

EVV compliance

Participants, as the employer, must make sure participant-hired workers who do not live with them are using an EVV system, as required. IRIS consultants will discuss EVV compliance during each monthly contact. For dates of service beginning May 1, 2023, failure to meet EVV requirements will result in disenrollment from the IRIS program as described in the [IRIS Participant EVV Flyer](#).

As described in the exceptions section above, DHS recognizes that it takes time for newly enrolled participants to become familiar with their responsibilities in a self-directed program, learn about electronic visit verification (EVV), and train workers on EVV. Compliance as described in this section will be monitored following the 60-day post-enrollment grace period.

Non-live-in participant-hired workers who refuse to meet the EVV requirement, risk being terminated. While a 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 workers fail to meet the EVV requirement, the following process will assist participants to meet their EVV-related responsibilities.

- If an FEA needs to edit a participant hired worker’s EVV visit data (for example, add or correct a check in or check out date or time), it will reduce the worker’s accuracy rate. Workers are expected to accurately use EVV at least 80% of the time. FEAs will provide IRIS consultants with reports regarding missing EVV information on a biweekly basis. The reports will list workers who have not achieved a minimum of 80 percent accuracy on EVV use.
- If workers are not meeting the EVV requirement, the IRIS consultant will follow up with the participant at the next monthly contact. The IRIS consultant will ensure the participant understands EVV requirements and knows where to find EVV resources to assist workers who are not using an EVV system 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 worker continues to not use EVV as required, the IRIS consultant will complete a risk agreement. Further, the IRIS consultant will make sure the participant understands their options, including hiring a new worker, firing a current worker, hiring a provider agency, or choosing to receive personal care from fee-for-service Medical Assistance Personal Care (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, to determine if the participant-hired worker is collecting EVV information as required. If the worker is not collecting EVV information, at the monthly contact, the IRIS consultant will confirm the participant’s final decision on whether the participant has selected to hire a different participant-hired worker, use a provider agency, or switch to receive personal care from fee-for-service Medical Assistance Personal Care (also known as MAPC) instead of IRIS.
- At the following monthly contact, if the steps listed above have not resulted in a worker using EVV as required (80% accuracy) and the participant has not switched to using a provider agency, MAPC, or hired a different participant-hired worker, then the IRIS consultant will disenroll the participant for failure to comply with program requirements. Individuals who are disenrolled can work with their local aging and disability resource center (ADRC) to find a different option for the care needed.

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: dhs.wi.gov/evv/iris-evv.htm

Fiscal employer agency contact information

Fiscal Employer Agency	EVV Website and Customer Service
GT Independence	<ul style="list-style-type: none"> • Website: https://gtindependence.com/resources-and-tools/app/ • Phone: 877-659-4500 • Email: customerservice@gtindependence.com
iLIFE	<ul style="list-style-type: none"> • Website: https://ilife.org/evv/evv-information-and-training/ • iLIFE EVV Customer Care: 855-511-6443 • Email: IRIS.EVV@iLIFE.org

Fiscal Employer Agency	EVV Website and Customer Service
Premier	<ul style="list-style-type: none">• Website: https://premier-fms.com/• Phone: 855-224-5810• Email: etimesheets@premier-fms.com