

Ohio Department of Medicaid
Attn: Director Maureen Corcoran
50 W. Town St #400
Columbus, Ohio 43215

May 27, 2020

Dear Director Corcoran,

We are writing today on behalf of the providers who utilize Electronic Visit Verification (EVV). We ask for you to extend the deadline for alternate vendor certification, which was supposed to be completed by June 30, 2020, due to an unforeseen delay associated with COVID-19.

Provider agencies have been working diligently to ensure that they are meeting implementation deadlines and are compliant with the EVV system requirements set by the state. However, the COVID-19 pandemic has compounded the challenges that our providers face on a daily basis.

These challenges—including challenges faced by alternative EVV vendors—have undoubtedly impacted the original project implementation timelines these companies had in place to meet the June 30th deadline. We believe that COVID-19 has significantly impacted this timeline by the restrictions placed on travel, social distancing (cannot adequately train staff), staff shortages due to illness or quarantine, and staff being directed to focus on patient care. As such, a delay is warranted.

We appreciate the Department's efforts to ease some of the EVV requirements during the emergency crisis period to reduce provider burden, including: suspension of the EVV training requirement for new providers, suspending capturing client verification, and the suspension of the Sandata requirement for client signature exception.

Unfortunately, as of today, the COVID-19 crisis is not over. Providers are still focused on providing care to those impacted by the pandemic, restarting services for those who can no longer rely on a family caregiver to provide services, and serving other patients with enhanced conditions.

The implications for providers missing the June 30th deadline are substantial. Those providers could be forced into using the Sandata system regardless of the technical difficulties they have experienced, productive staff time spent resolving systemic issues, and the money they have spent coming into compliance. There could also be implications for the state for not delaying the certification deadline. The state would have the appearance of moving forward with this major deadline despite the COVID-19 reality. Providers could potentially cease to provide services if they are forced to use the Sandata system—even after all the work they have done to come into compliance.

Given that these timelines have shifted outside of providers' control, and given the extra measures that have been taken to keep themselves and the vulnerable Ohioans they serve safe in their home environment, we believe it is necessary to delay the June 30th deadline for alt-system certification. *For these reasons, we ask you to delay this requirement three-months to September 30, 2020.* This extension will give providers and alternative vendors some time they need to finish this work.

On behalf of the providers administering these services, and the vulnerable Ohioans receiving these services, we ask that you extend the deadline for certification of alternate EVV Systems. If you have any questions, please do not hesitate to reach out to any of the associations. Thank you for your consideration.

Sincerely,



Joe Russell
Executive Director
Ohio Council for Home
Care and Hospice



Kathryn Brod
President/ CEO
Leading Age Ohio



Peter Van Runkle
Executive Director
Ohio Health Care
Association



Pete Moore
President/ CEO
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