

GRETCHEN WHITMER GOVERNOR STATE OF MICHIGAN DEPARTMENT OF HEALTH AND HUMAN SERVICES LANSING

ELIZABETH HERTEL DIRECTOR

July 7, 2025

- **TO:** Interested Party
- **RE:** Consultation Summary Project Number 2504-LTC Clarification on Electronic Visit Verification (EVV) Home Health Care Service Visits

Thank you for your comment(s) to Health Services relative to Project Number 2504-LTC. Your comment(s) has been considered in the preparation of the final publication, a copy of which is attached for your information.

Responses to specific comments are addressed below.

- **Comment:** Home Help is a service that can be provided for a person meaning the service is not always being provided face to face with the Home Help provider for services such as grocery shopping, laundry, house cleaning and such. A Home Help provider could provide those supports at the same time that a person might be working with their Community Living Supports staff, for example.
- **Response**: This policy only applies to Home Health Electronic Visit Verification (EVV) services. Home Help and Community Living Supports should continue to follow their program specific requirements.
- **Comment:** Does this policy apply to all providers including providers from different agencies supporting the same beneficiary?
- **Response**: This policy applies only to Home Health providers. Other providers, such as Mi Choice, Home Help, Centers for Independent Living, etc, should continue to follow their program requirements.
- **Comment:** Requiring two care providers to "wait" until one provider is complete with their task is inefficient, and at times, having two people attending to a patient prevents mistakes or errors.

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- **Response:** The Medicaid Provider Manual in the Billing and Reimbursement for Institutional Providers Chapter, Home Health Claim Completion states, "the timing of the visit begins at the beneficiary's home when services actively begin and ends when services are completed. The time counted must be the time spent actively treating the beneficiary." This policy clarifies how the policy applies within the EVV and is not a change in policy.
- **Comment:** If providers experience a non-payment for services due to the overlap, it will lend one to believe that they would be reluctant to serve Medicaid patients in the future.
- **Response:** Home Health Providers may do a manual correction to correct for an overlap in services. See the HHAX LMS page for more information on manual corrections.
- **Comment:** What is the implementation date for these policies?
- **Response:** The effective date of the policy is August 1, 2025. However, since this policy is clarifying existing Medicaid policy that states that time counted must only be active treatment time, the EVV system has been designed to deny overlapping visits. To make corrections to visits that may overlap complete a manual correction.
- **Comment:** Additional suggestions for improving EVV for providers and patients: ensure data standardization, set go-live date for Managed Care Organizations, reduce burden of manually entering beneficiary data, and improve geocoded data.
- **Response:** Thank you for these comments.

Thank you for your inquiry. We trust that previous responses addressed the concerns and questions noted. If you wish to comment further, send your comments to Aimee Khaled at <u>MDHHS-HomeHealthandHospice@michigan.gov</u>.

Sincerely,

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Meghan E. Groen, Chief Deputy Director Health Services