The University of Illinois Chicago’s Division of Specialized Care for Children (DSCC) is the operating agency for Illinois Healthcare and Family Service’s (HFS) Medically Fragile and Technology Dependent (MFTD) waiver. As such, DSCC is required to monitor the compliance of all home health nursing agencies with federally mandated electronic visit verification (EVV) standards.

EVV is a technology-based system that efficiently verifies home healthcare visits. It collects information by capturing the time, location, and attendance of home care workers. EVV reduces the likelihood of error while promoting program integrity through a practical and simple monitoring system. It is designed to promote quality services and positive outcomes (HFS, 2023).

All nursing agencies enrolled with DSCC must use an EVV system to electronically track and document time spent with a DSCC participant providing nursing services. Agencies may use the State-selected EVV vendor, HHAeXchange, or they can use a different qualified EVV vendor. When a different vendor is selected, the EVV information must still be submitted to HHAeXchange. For this reason, nursing agencies using a vendor other than HHAeXchange, must verify that the vendor they select has compatible electronic data interchange (EDI) capability. Agencies can learn more about the EDI process by visiting HHAeXchange's information hub and clicking on the "EDI Process" tab.

### Compliance Requirements

DSCC expects nursing agencies to monitor the EVV compliance of their nurses. Any EVV entry done point-in-time and not requiring a manual entry or adjustment is considered “EVV compliant.” Any entry not done point-in-time and therefore requiring a manual entry or adjustment is considered “EVV non-compliant.”

Each nursing agency must assess EVV compliance when timesheets are submitted. This will ensure they are meeting compliance thresholds and have documentation to support audit inquiries. Compliance must minimally meet the following State thresholds:

- All nursing agencies who were enrolled with DSCC prior to the effective date of this policy must meet 50% compliance with EVV usage within 6 months of the effective date of this policy and must meet 75% compliance within 12 months.
• Nursing agencies that enroll with DSCC after this policy’s effective date must meet 50% compliance with EVV usage within 6 months of their DSCC enrollment date, and 75% compliance within 12 months.

DSCC recognizes that there will always be cases of service provision where EVV could not be utilized due to equipment failure, worker error, etc.

DSCC requires nursing agencies to have an EVV policy and procedure on file.

DSCC does not have any exemptions to this policy.

**Compliance Monitoring**

DSCC will track the EVV system that each enrolled nursing agency uses. Those who are not using the HFS-selected system will be required to submit documentation showing that their system is compliant with EDI.

DSCC will receive notification of non-compliant agencies from HFS.

DSCC will also monitor compliance during annual nursing agency reviews. *DSCC’s compliance monitoring will include verifying that nurse providers are clocking in and out correctly.*

Finally, DSCC may be informed about compliance issues through regular communication with families, DSCC team members, and nursing agencies.

**Compliance Remediation**

When DSCC receives reports of a non-compliant agency from HFS, DSCC will compare the information received from HFS to internal claims documentation. When DSCC identifies noncompliance has occurred, through the HFS reporting or otherwise, DSCC will work with the nursing agency to develop a remediation plan which will be due within 30 days of their notification. DSCC will provide the plan to HFS, as well as follow-up documentation verifying that the remediation was successfully completed.

A verbal reminder will be provided to the nursing agencies after the initial occurrence of non-compliance. After the second occurrence, DSCC will again provide counseling verbally and in writing. After three instances of non-compliance, DSCC will place the nursing agency “on hold.” Putting the agency “on hold” means the agency can continue to serve its existing DSCC participants but will not receive new referrals until the remediation plan is fully implemented.
Communication

DSCC provides information about EVV requirements, including the guidance outlined in this policy, through multiple channels including but not limited to:

- Annual nursing agency webinars
- Provider notices sent to all nursing agencies and posted on DSCC’s external website
- Verbal communication from DSCC nursing agency liaisons