Electronic Visit Verification (EVV) Stakeholder Workgroup

September 28, 2026

Department of Medicaid

Today's Agenda

1. Welcome and Housekeeping
2. Senate Bill 315 Changes
3. No Immediate Change in EVV Policy
4. Planning and Staying Informed

Access, Inclusion, and Reasonable Accommodation

The Ohio Department of Medicaid (ODM) is committed to providing access, inclusion, and reasonable accommodation in its services, activities, programs, and employment opportunities in accordance with the Americans with Disabilities Act (ADA), Title VI of the Civil Rights Act, and other applicable laws. To request an interpreter, written information in a language other than English or in other formats (large print, audio, accessible electronic formats, other formats), or a reasonable accommodation due to a disability, please contact ODM's Civil Rights/ADA Coordinator at 614-446-1948/TTY 711, fax 614-644-1434, or email: **ODM_EEO_EmployeeRelations@medicaid.ohio.gov**. Requests should be made at least three business days prior to the scheduled event.

If you believe ODM has failed to provide these services or discriminated in another way, you can file a grievance with ODM's Civil Rights Coordinator and/or file a civil rights complaint with the U.S. Department of Health and Human Services (HHS) Office for Civil Rights. Further information on these processes and ODM's compliance with civil rights and other applicable laws can be found in our **Notice of Nondiscrimination**.

Unless ODM's Civil Rights/ADA Coordinator approves in advance, individuals may not record the meeting using the recording function in Teams, GoToMeeting, Zoom, or any virtual meeting platform used by the department, nor may individuals utilize artificial intelligence (AI) technologies to transcribe meetings.

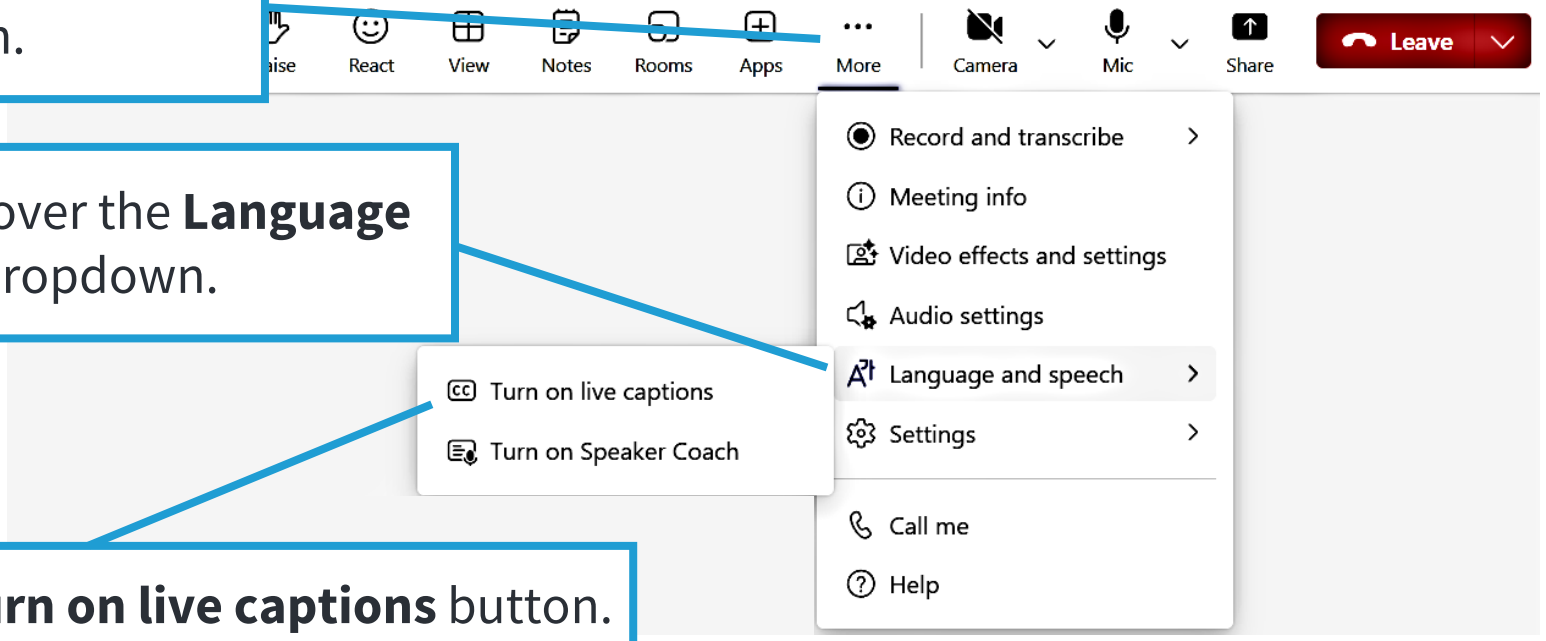
Accessibility (1 of 3)

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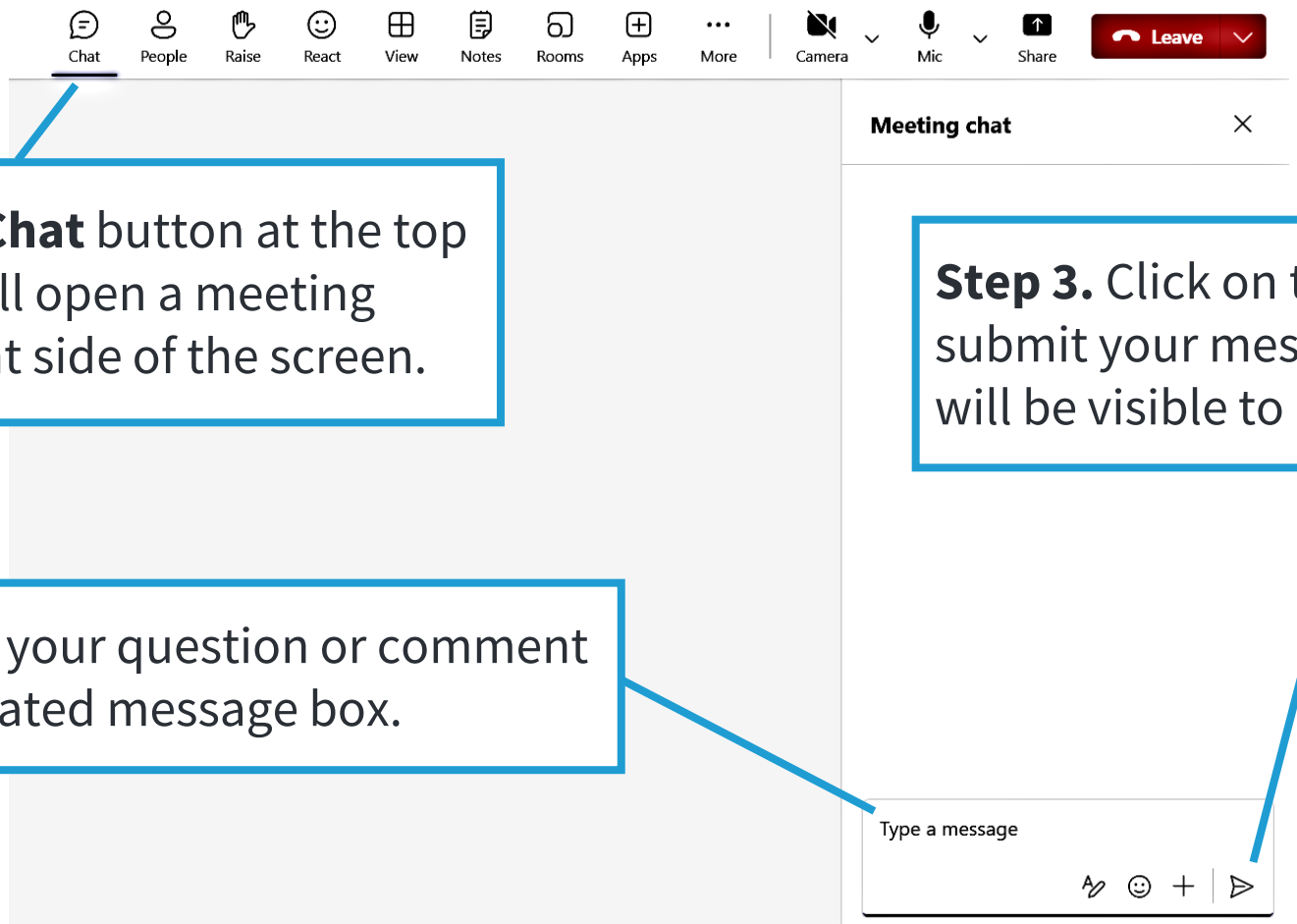
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Accessibility (2 of 3)

If you would like to submit a question or comment through the chat, please feel free to do so by following the steps below.



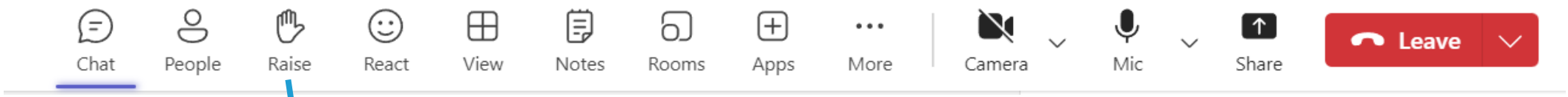
Step 1. Click on the **Chat** button at the top of the screen. This will open a meeting chat pane on the right side of the screen.

Step 2. Type your question or comment in the designated message box.

Step 3. Click on the send icon to submit your message. Your message will be visible to all attendees.

Accessibility (3 of 3)

If you would like to verbally comment or ask a question, please raise your hand by following the steps below.



Step 1. Click on the **Raise** button at the top of the screen. This will notify the presenter that you have a comment or question.

Step 2. Please wait for the presenter to acknowledge your raised hand before you begin speaking.



Step 3. If you are still muted, your mic will look like this. Please click on the mic icon to unmute.

Senate Bill (SB) 315 EVV Changes

Electronic Visit Verification Overview

- EVV records key details of Medicaid in-home services—including who received care, who provided it, and when and where the visit occurred.
- Since 2016, Federal law - the 21st Century Cures Act - has required states to use EVV to reduce billing errors and verify that services were delivered.
- Ohio follows this requirement through Ohio Administrative Code (OAC) Chapter 5160-32, which explains how Ohio Medicaid programs must use EVV and how visit information is captured and verified.

Ohio Senate Bill 315: New Ohio Revised Code Section 5164.42

Electronic Visit Verification Requirements

- Ohio Senate Bill 315 (SB 315) created Ohio Revised Code (ORC) Section 5164.42.
- Additional requirements have been added to the state's EVV program and need to be incorporated into the current OAC EVV Rules in Chapter 5160-32.
- Ohio must continue meeting all federal EVV requirements while updating the Ohio Administrative Code to include SB 315.
- Current EVV rules remain in place until the OAC is officially revised.

Live in Caregiver Exemption

Proposed updates will be made to align with federal guidance and incorporate changes in SB 315.

Updated criteria for the **live-in caregiver exemption**, which allows caregivers or direct care workers who live in the same residence as the individual receiving services to be exempt from EVV.

Current

- Any caregiver who lives in the same residence may apply to be exempt from EVV data collection.

Under SB 315

- Only individuals with a developmental disability, residing with their direct care worker will be eligible for a live in caregiver exemption.

Global Positioning System (1 of 3)

The updates include new requirements for **Global Positioning System (GPS) location capture**, which records the direct care worker's location once at the start of service and once at the end.

Current

- Providers must obtain written consent from the individual to collect GPS data.

Under SB 315

- GPS capture at the start and end of each visit will be required for all workers providing home- and community-based services (HCBS) **unless the individual is eligible for GPS location capture waiver.**

Global Positioning System (2 of 3)

A **GPS** capture waiver will be available for individuals who meet any of the following criteria:

- Enrolled in the Address Confidentiality (Safe at Home) Program.
- Live with a family member who is also the direct care worker. ODM will work to align the definition of “family member” across SB 315, federal rules, and fraud-waste-abuse standards.
- Meet the criteria for developmental disability identified in ORC 5164.42. Enrollment in a DODD waiver program meets this criteria.

Direct care workers providing services through self-direction under a nursing facility-based waiver will not be eligible for the GPS waiver unless the individual meets the definition of a developmental disability under ORC 5164.42.

Global Positioning System (3 of 3)

Other **GPS** changes:

- ODM may still require GPS capture or other verification methods for some providers identified as “high-risk” under certain circumstances.
- With consent obtained and on file, providers serving individuals who qualify for an exemption may still choose to use GPS for all visits.

Live-in Exemption and GPS Capture Waiver Processes

ODM commitment to efficiency:

- ODM is committed to making the family live-in caregiver exemption process easier as updates to both the exemption and GPS waiver capture processes take effect.
- When possible, ODM will use information it already has to check eligibility.

Enhanced Requirements for High-Risk Providers

SB 315 requires ODM to set enhanced oversight for high-risk in-home care providers. Additional verification methods to verify visits may be required for high-risk providers.

Examples of when a provider may be identified as high-risk:

- Repeated mismatches in EVV check-in data
- Suspicious and impossible travel durations between service locations
- Overlapping claims when a recipient is in the hospital and the service plan does not align
- Billing outliers such as unusual frequency or duration of services
- Other indicators that may suggest potential fraud

Additional Services Subject to EVV

More services may be required to use EVV

- SB 315 requires ODM to review additional Medicaid services and determine whether they should require EVV, using the updated definition of services required.
- More information will be provided by ODM throughout the review.

Provider Oversight (Fraud, Waste, and Abuse)

- ODM is committed to transparency in efforts to identify potential fraud, waste, and abuse within the provider community.
- Oversight and enhanced verification will examine:
  - EVV patterns that differ significantly from peer providers
  - Patterns or a high frequency of manual updates
  - Care needs outlined in the person-centered service plan compared with the type and amount of care delivered

No Immediate Change in EVV Policy

Individual Privacy and Choice



- Protecting the privacy of all individuals remains a priority for the Ohio Department of Medicaid, the Department of Aging, and the Ohio Department of Developmental Disabilities.
- Proposed changes will continue to be reviewed for potential impacts on individuals, especially children and minors.
- Individuals receiving home- and community-based services will continue to have flexibility in where services are delivered.
- There are no changes to where individuals may receive services. Services will continue to be able to begin and end in the community, if appropriate for an individuals' needs.

EVV Manual Entry



- Manual entry will remain permitted when a caregiver cannot safely stop providing care — such as during hands-on tasks, emergencies, or other urgent situations.
- Patterns of repeated manual corrections may lead to targeted provider education, oversight, or remediation.

EVV Adjustments and Error Corrections



- Edits will still be allowed when a caregiver cannot immediately clock in or out.
- Providers may continue correcting, or “curing,” EVV records to fix missed clock-ins or clock-outs, incorrect times, or other errors.
- Based on stakeholder feedback, the department will explore options to update systems so that minor manual adjustments are not inadvertently categorized as non-compliant. Operational approaches to support this change are currently being developed.

EVV as a Condition of Payment



- There are no immediate changes to the EVV requirements tied to payment at this time.
- Each claim line must match validated EVV information.
- Providers will continue to ensure all EVV information is complete and accurate, even when issues occur - such as technology failure, poor connectivity, GPS inaccuracies and emergencies.



What questions or comments do you have about the required changes to EVV?

Type your question in the chat or raise your hand using the features in Teams.

Additional EVV policy questions may also be sent to
HCBSPolicy@medicaid.ohio.gov

Planning and Staying Informed

EVV Stakeholder Engagement and Feedback



- AGE, DODD, and ODM will continue using existing stakeholder groups for feedback.
- Feedback will also be collected through the public rulemaking process.
- All feedback is reviewed alongside:
  - Federal and state requirements
  - Legislative direction
  - Agency priorities
  - The responsibility to prevent fraud, waste, and abuse

Ensuring Access to HCBS



- AGE, DODD, and ODM will jointly evaluate the impact of SB 315 across programs, including effects on service access and workforce capacity.
- Feedback from individuals, families, advocates, and providers will continue to guide these evaluations and help ensure access is not unintentionally reduced.

Timeline for Implementation



- ODM anticipates **July 1, 2027**, as the effective date for Ohio Administrative Code modifications required to implement program changes, including updated live-in-caregiver and GPS requirements.
- Existing rules will remain in place until the revised rules take effect.
- The effective date of new services requiring EVV has not yet been determined.

Stay Informed

Sign up for EVV news using the Subscribe Form | Medicaid.

- For EVV News choose **EVV stakeholders**
- For EVV Rule and other waiver program updates from HCBS Policy choose **Home- and Community-Based Waiver Programs**

To monitor ODM rule notices, please visit Legal and Contracts | Medicaid page for important postings.

- You can also create an account and sign up for specific OAC Rule Filing Activity Notifications through OAC Rule Watch.
- To receive certain ODM Agency rule review eNotifications, through the Ohio Common Sense Initiative: eNotifications Sign Up | Governor Mike DeWine

Next EVV Stakeholder Group Meeting



October 27, 2:30pm – 4:00 p.m.

To register for future Stakeholder meetings visit [Electronic Visit Verification | Medicaid]

EVV Alternate Vendor Survey Reminder



[ODM - Alternate EVV Vendor Survey]

As part of ODM's ongoing oversight of certified Alternate (Alt) EVV systems, certified Alt vendors are required to complete the Alt EVV Vendor Survey.

Providing updated information through this survey is essential to ensure ODM maintains accurate and current records for all certified Alt vendors.

Survey responses are requested as soon as possible.

Additional Questions about the survey may be sent to: odmevv@sandata.com

THANK YOU

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