

ODDS Response to Feedback on E&I website regarding EVV Compliance Actions

ODDS appreciates those who took the time and opportunity to review this proposal. We value your input in making our program better.

ODDS has made every effort to address the comments received and acknowledge input regarding current ODDS policy.

Current Policy

Compliance

Comments indicated that current EVV policy has not effectively enforced PSW requirement to use EVV. Based on the comments and referrals for Provider Action, clarification of roles /responsibilities of ODDS and CMEs require clarification. Feedback indicated an existing assumption that ODDS has an internal process to identify PSWs requiring action, independent of CME referral. This may explain why ODDS has not received many CME referrals for Provider Action. Without CME referral ODDS is unable to identify non-compliant PSWs. eXPRS only documents when an exception has been approved.

As part of ODDS plan to implement EVV Compliance, time entries were reviewed for EVV utilization. An exceptionally high number of time entry corrections were identified. Some PSWs are using eXPRS correction for a majority of or every time entry, circumventing the EVV requirement.

use of time correction and limiting inappropriate use. Defining the “use of EVV” with a minimum standard of use, limiting corrections to a reasonable level will assure compliance, allow for the occasional error, and prevent misuse or circumvention of the requirement.

Exception Renewals

A commenter stated that during PEAA renewal process EVV exceptions renewals were not processed by ODDS per current policy. PSWs reported to CMEs they aren’t getting a response after providing information and request for renewal. Renewals are not being updated in eXPRS. ODDS internal discussion affirms that EVV renewals have not been reviewed as the policy requirement has not been added to the PEAA renewal process. ODDS will address this issue.

Given the feedback received ODDS will be delaying implementation of the draft policy on a short-term basis. This will allow the agency to engage stakeholder’s more effectively, make necessary clarifications, modify internal processes.

During this reprieve CME’s are encouraged to submit a referral for Provider Action to inactivate or terminate a PSW in violation of EVV requirement to:

ODDS.ProviderActionRecommendation@dhsosha.state.or.us

Referral form:

[Recommendation to take action](#)