



## POLICY MEMO

---

<b>TITLE:</b>	<b>ELECTRONIC VISIT VERIFICATION (EVV) ADDRESS CONFIDENTIALITY PROGRAM (ACP) GUIDANCE</b>
<b>SUPERSEDES NUMBER:</b>	<b>HCPF PM 20-001</b>
<b>EFFECTIVE DATE:</b>	<b>AUGUST 17, 2020</b>
<b>DIVISION AND OFFICE:</b>	<b>BENEFITS &amp; SERVICES MANAGEMENT DIVISION, OFFICE OF COMMUNITY LIVING; BENEFITS AND SERVICES DIVISION, HEALTH PROGRAMS OFFICE</b>
<b>PROGRAM AREA:</b>	<b>ELECTRONIC VISIT VERIFICATION</b>
<b>KEY WORDS:</b>	<b>ELECTRONIC VISIT VERIFICATION, EVV, ADDRESS CONFIDENTIALITY PROGRAM, ACP, CURES ACT</b>
<b>POLICY MEMO NUMBER: HCPF PM 20-007</b>	
<b>ISSUE DATE: AUGUST 17, 2020</b>	
<b>APPROVED BY: WILLIAM HELLER</b>	

---

*HCPF Memo Series can be accessed online: <https://www.colorado.gov/hcpf/memo-series>*

### **Purpose and Audience:**

This memo provides policy guidance for stakeholders to comply with Address Confidentiality Program (ACP) rules while collecting Electronic Visit Verification (EVV) records for appropriate Health First Colorado services.

### **Information:**

#### Address Confidentiality Program

The Address Confidentiality Program (ACP) provides a confidential address and telephone number that may be used instead of actual locations for the provision of services in Colorado. Participants are issued documentation certifying their involvement in ACP. Full program information is available at [www.colorado.gov/dcs/acp](http://www.colorado.gov/dcs/acp). It is the Department's commitment to ensure full compliance with the ACP.

### ACP locations in EVV

Providers using EVV are advised that ACP participants will notify providers of ACP participation. Providers and caregivers should then discuss situation-specific processes for using ACP locations. Providers are strongly encouraged to assure the safe use of EVV records for Medicaid Member ACP Participants:

#### *Providers using Provider Choice Systems*

When a program participant submits a current and valid ACP authorization card to a provider, the provider should enter the ACP-provided address and phone number into all relevant fields in the EVV system. Any locations that may be used to infer or deduce actual locations in the EVV tool should be changed to the ACP address or phone number; only the ACP address and phone number should be maintained in the EVV tool.

EVV records should also be collected in a manner that only uses ACP location information:

- Provider Choice System users are advised that ACP addresses may need to be manually entered for EVV visit records
- If Provider Choice System functionality automatically collects location via GPS, alternate EVV methodologies like telephonic visit verification or manual entry should be used.
- Provider Choice System users are encouraged to work with their vendors for specific guidance.

#### *Providers using the State EVV Solution*

When a program participant submits a current and valid ACP authorization card to a provider, the provider should enter the ACP-provided address and phone number into all relevant fields in the EVV system, including the Client Module in the Sandata administrative tool. Any locations that may be used to infer or deduce actual locations in the EVV tool should be changed to the ACP address and phone number; only the ACP address and phone number should be maintained in the EVV tool. The State EVV Solution allows multiple addresses to be entered for each client; additional addresses should never indicate actual locations of ACP participants.

EVV records should also be collected in a manner that only uses ACP location information:

- Manually entering EVV records for ACP participants is the recommended way to assure that EVV records are completed while complying with ACP.
- If using Telephonic Visit Verification (TVV) technology, caregivers and providers should ensure that only the ACP address is entered in the system for use.
- Caregivers are specifically advised: do not use the State EVV Solution Mobile Visit Verification (MVV) application when providing services to ACP participants as the GPS location is recorded automatically in place of the ACP address. If MVV is used in error, modify the collected GPS location with the ACP location as soon as possible.

#### *Live-in Caregivers*

Live-in Caregivers cohabitate with the member receiving care. If either the Medicaid Member or the Live-in Caregiver is an ACP participant, the provider should enter the ACP-provided address and phone number into all relevant fields in the EVV system. Location information for these individuals should be collected and protected as indicated above.

#### Questions regarding EVV and ACP

All questions, comments, or concerns about ACP should be directed to the Colorado Department of Personnel and Administration at [acp@state.co.us](mailto:acp@state.co.us).

EVV record collection and usage questions for ACP participants should be directed to the Department of Health Care Policy and Financing at [evv@state.co.us](mailto:evv@state.co.us).

#### **Attachment(s):**

None

#### **Department Contact:**

<http://www.colorado.gov/hcpf/evv>  
[evv@state.co.us](mailto:evv@state.co.us)