Oregon Department of Human Services
Express Payment & Reporting System (eXPRS)

eXPRS
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PSW Electronic Visit Verification (EVV)

Frequently Asked Questions (FAQs)
(v11; 7/5/2019)

Below are **NEW QUESTIONS** & answers for PSWs on the implementation & use of **eXPRS Mobile-EVV** that were asked during the in-person **Statewide EVV Orientation Sessions in May – July 2019**.

Q: I'm a PSW who provides support to an individual who lives with me and I am with them 24/7, but only get paid for a set number of hours. How do I bill for that in EVV? Am I supposed to clock in/out every time I do something for/with them, like 10 minutes here & then 15 minutes later, etc.??

> **A:** PSWs should use *eXPRS Mobile-EVV* to bill for the time worked providing services in accordance with their service agreement. *eXPRS Mobile-EVV* will allow PSWs to bill multiple shifts in a single day, if needed, even for short periods of time. Meaning a PSW can "clock in/clock out" multiple times in a day, to record the time they are providing care. *eXPRS Mobile-EVV* captures your start & end times to the minute, so there is no need to round up/down to the nearest quarter hour.

Q: How to apply for an EVV "waiver"?

> **A:** There is no "waiver" from using EVV for individuals receiving services or their employers. *eXPRS Mobile-EVV* is a method to record the dates & time worked by a PSW for the time they work providing attendant care services. The PSW can request an exception to using *eXPRS Mobile-EVV* if they meet specific exception criteria. The EVV Exceptions process is not "on hold," but is in the process of being finalized for release & use. ***More information on EVV Exceptions & the process to request one will be available in the fall of 2019***.

Q: Do I have to "clock out" & not get paid when I support a person while they attend a medical, PT or other type of appointment? I need to be with them to assist/support them in participating in the appointment, but I've been told by my CME that I need to "clock out" during the appointment & cannot be paid for my time/support provided to the individual during that time

A: If the PSW is providing attendant care services to an individual while they attend an appointment in accordance with the PSW's Service Agreement, then that time would be considered paid time worked. You would not need to "clock out" during that appointment, and then "clock in" again when the appointment is over.

Q: Am I able to claim the time it takes to transport the individual to the store or other activity/location in the community? I am claiming mileage reimbursement for transporting the individual to/from the community but have been told by my CME that I cannot also claim/bill for that time we travel as attendant care. Is that true?

A: If the PSW is providing attendant care services to an individual while they are being transported in accordance with the PSW's Service Agreement, then that time would be considered paid time worked. You would not need to "clock out" during that transportation time, and then "clock in" again when you arrive at the destination.

Please note, that transportation to/from medical appointments is considered **medical transportation and is not a type of transportation that is authorized or can be claimed & paid via eXPRS.

Q: Can I deduct the cost of a mobile device & a cell/data plan monthly service fees on my taxes?

A: We are not able to provide any information or advice on what would be considered a tax-deductible expense. If PSWs have questions about if/what expenses would be tax deductible, they should consult a tax professional.

Q: What change reason do I use if I need to make corrections to my EVV time to fit within my authorized hours limit or my weekly hours limit? Since EVV won't let me put in the start/end time I want & captures my start/end times to the minute, a few minutes off here & there will eventually put me over my hours limit (weekly &/or SPA) and I'll have to adjust/make corrections to the time to get paid.

A: PSWs should be monitoring the number of hours they are working to ensure that they are working within their allotted work hours for the work week and/or their service agreement/authorizations. The *eXPRS Desktop* will show the number of hours billed for a specific individual's service authorization, so PSWs can view that information as needed. *eXPRS Mobile-EVV* only saves the PSW's time worked information as a

draft in the *eXPRS Desktop* website & will only check the billings against the PSW's hourly limits *when the billings are submitted* for payment processing, the same as how billings are processed now.

Q: Will I get in trouble if the GPS on my device doesn't accurately capture my location every time? For example, sometimes I'll use the location service for some apps on my device & it will say I'm in Eugene, when I'm really in Newport.

    A: ODDS recognizes that GPS can be inaccurate at times. Case managers may do follow up when there are GPS locations that are unexpected for the person receiving services. This may include speaking with the person receiving services or the employer to verify services being delivered. Genuine technical problems with GPS are expected and will not cause any action against the PSW.

Q: POLICY ISSUE: I understand that Medicaid services cannot be provided/paid for outside the US. What if the individual I work for & I *(as a PSW supporting them)* **visit a US Territory, like Puerto Rico or US Virgin Islands? Are those locations considered "inside the US" or "outside the US" for receiving/paying for Medicaid services? Can I be paid for the time I work there as a PSW?**

    A: Medicaid services cannot be provided/received outside the continental US States, Alaska or Hawaii. Sailing on a cruise ship in international waters would be considered "outside the US", regardless of the ship's port of origin.

Q: POLICY ISSUE: If I assist the individual I work for on their vacation which is a cruise, does the cruise ship need to be flying the American flag to be considered "inside the US" (has a US port of origin)? Is the cruise ship still considered "inside the US" if we don't leave the ship, even in international waters?

    A: Medicaid services cannot be provided/received outside the continental US States, Alaska or Hawaii. Sailing on a cruise ship in international waters would be considered "outside the US", regardless of the ship's port of origin.

Q: POLICY ISSUE: What if we cruise from San Diego to Hawaii & don't leave the ship (and thus do not need a passport)? Is the time we remain on the cruise ship between US ports considered "inside the US"?

    A: Medicaid services cannot be provided/received outside the continental US States, Alaska or Hawaii. Sailing on a cruise ship in international

waters would be considered "outside the US", regardless of the ship's port of origin.

Below are the previous questions & answers for PSWs on the implementation & use of **eXPRS Mobile-EVV**. <mark>*Updated information is noted in yellow-highlight*</mark>.

Q: What is EVV?

   A: Electronic Visit Verification (or **EVV**) is part of a federal law that was passed by Congress in 2016. It requires states to verify the delivery of Medicaid funded Attendant or Personal Care services in real time (meaning at the time the service is occurring) from providers. The EVV time capture feature in eXPRS will save PSWs time by reducing the amount of work PSWs must do to enter Service Delivered (SD) billings in eXPRS manually. eXPRS' EVV method will capture all the billing data required & save it in eXPRS automatically.

Q: What is "eXPRS Desktop"?

   A: *eXPRS Desktop* is what we call the regular eXPRS website PSWs use now to log in & view all their eXPRS related information, plus enter their SD billing & travel time data. *eXPRS Desktop* is best used from a regular desktop or laptop computer.

Q: What is "eXPRS Mobile-EVV"?

   A: *eXPRS Mobile-EVV* is what we are calling a new feature in eXPRS when eXPRS is accessed by a mobile device, such as a smart phone or tablet (not a computer or laptop) <mark>starting statewide July 16, 2019</mark>. *eXPRS Mobile-EVV <u>is not an "app"</u>* that is downloaded to your device.

   The eXPRS website has been updated to work on smartphones & tablets via the device's internet browser to track the time-worked by a PSW in real time (at the time the PSW is working). The new eXPRS features will also capture all the federally required EVV data elements. It is important to note that devices such as laptops that can also be used as tablets, may only be recognized as desktop devices, even if switched to "tablet" mode.

Q: What services require EVV & what services do not?

   A: EVV is only required for **Attendant or Personal Care type services**:
   - **OR526 –** Attendant Care

- **OR526/ZE –** Attendant Care 2:1 staff
- **OR507 –** Daily Relief Care
- **OR502 –** State Plan Personal Care

PSWs may continue to provide other types of **services that _do not_ require use of EVV**. Billing for these services will continue the standard way by using the *eXPRS Desktop*.
- **OR004**-Mileage Transportation
- **OR401**-Job Coaching Employment Supports
- *PSW Travel Time*

Q: Is using EVV required for PSWs?

A: Yes, PSWs working for an individual enrolled in services with a Case Management Entity (CME) will be required to use EVV when launched statewide. For those PSWs who do not have access to a smartphone or tablet that is needed to use *eXPRS Mobile-EVV*, please notify your authorizing CME. They can assist in the exceptions request process.

Q: What if I don't have a mobile device or cell phone, or my cell doesn't have smartphone web features, what do I do?

A: If you will never have access to a smartphone, tablet or a device with web features, notify your authorizing CME regarding an EVV Exception. This will enable ODDS to work with the CME to gather data for future EVV features & policy development. The PSW would then enter their SD billings the standard way, by using the *eXPRS Desktop* method.

The statewide EVV Exceptions process should be available for use beginning in the Fall of 2019.

Q: What if I don't have internet or cell service during a full shift, what do I do?

A: Enter your SD billings for that date worked the standard way using the *eXPRS Desktop*, selecting the appropriate reason from the dropdowns available for each SD billing manually entered.

Q: What if I don't want to have eXPRS Mobile-EVV track my geo-location *(for privacy)*? **Can I still work?**

A: No; capturing geo-location information is required by the federal law for EVV & must be enabled on your device **_and_** browser app used with *eXPRS Mobile-EVV*.

*eXPRS Mobile-EVV __will only__ capture a "**point-in-time**" snapshot of where you are when your shift starts and ends.*

Q: The eXPRS site is down, but I need to start/end my shift, what do I do?

A: Work as scheduled & then use *eXPRS Desktop* to enter your SD billing manually, selecting the appropriate reason from the dropdowns available for each SD billing manually entered.

Q: I forgot to start a shift, what do I do?

A: Start your shift using *eXPRS Mobile-EVV* on your device as soon as you are able. End your shift with your mobile device using *eXPRS Mobile-EVV* as normal. Then, login to the eXPRS website (meaning *eXPRS Desktop*) to edit the SD billing entry created to correct the start time & select the appropriate reason from the dropdowns available for each SD billing corrected.

Q: I forgot to end a shift, what do I do?

A: *eXPRS Mobile-EVV* will prompt you to end any open shifts, as needed, the next time you log in on your mobile device. Log in to *eXPRS Mobile-EVV* as soon as you are able & end the open shift. If additional SD billing corrections are needed, such as updating the end time for a shift, log in to the *eXPRS Desktop*, correct the end time & select the appropriate reason from the dropdowns available for each SD billing corrected.

Q: I'm about to start my shift in eXPRS Mobile-EVV, but the service I provide isn't listed for the individual I'm working with, what do I do?

A: First, confirm what service are you scheduled to provide.

- If it's a non-EVV service (such as Mileage-**OR004** or Job Coaching-**OR401**), continue to work as normal & enter your SD billings for these services manually via the *eXPRS Desktop*, as you always have.

- If the service you are to provide *IS an EVV required attendant care service* (**OR526**, **OR507** or **OR502**) & it is not listed, contact the authorizing CME. PSWs cannot work unless they have an active (accepted) authorization for the individual + service in place for the days they need to work.

** _PRO TIP_ ➔ Be sure to confirm your active authorizations are in place *BEFORE* you are scheduled to work by logging in to *eXPRS Desktop* & going to the regular billing pages. If your authorizations show on the regular billing pages in *eXPRS Desktop* for the dates you need to work, they will show up in *eXPRS Mobile-EVV*.

Statewide - FAQs for EVV PSWs (v11; 7.5.19)

Q: I'm about to start my shift in eXPRS Mobile-EVV, but the individual I work with isn't listed in eXPRS Mobile-EVV, what do I do?

    A: Contact the authorizing CME if you do not see the individual listed for the service & date you are scheduled to work in *eXPRS Mobile-EVV*. PSWs cannot work unless they have active (accepted) authorization for the individual + service in place for the days they need to work.

    ** _PRO TIP_ → Be sure to confirm your active authorizations are in place **_BEFORE_** you are scheduled to work by logging in to *eXPRS Desktop* & going to the regular billing pages. If your authorizations show on the regular billing pages in *eXPRS Desktop* for the dates you need to work, they will show up in *eXPRS Mobile-EVV*.

Q: The eXPRS Mobile-EVV has timed me out/logged me out, is my shift still going?

    A: Yes, the shift timer runs in the online *eXPRS Desktop* application.

Q: Can I make or receive calls or texts on my smart phone once I have a shift running?

    A: Yes, since your shift information is saved immediately in the eXPRS website, using your smartphone for other things, such as making/answering calls or texting, should not be an issue.

Q: If I must use eXPRS Mobile-EVV, but can't afford to buy a smartphone, what do I do? Will the state purchase a smartphone for me?

    A: No, the state will not purchase a smartphone or tablet for you. If you do not have access to the required technology for EVV (meaning a smartphone or tablet), please contact your CME regarding a possible EVV Exception.

Q: What if I arrive for my shift, but need technical assistance at that time with eXPRS Mobile-EVV? Will there be technical assistance available? Even after 5pm or on weekends?

    A: No, there will not be technical assistance available in the form of someone answering live calls. If you can't use *eXPRS Mobile-EVV* due to a technical issue, enter your time worked manually via the *eXPRS Desktop* & select the appropriate reason from the dropdowns available for each SD billing manually entered.

Q: What if I provide an EVV required service & a non-EVV service at the same time? How do I track each?

A: You would track the EVV required service using the *eXPRS Mobile-EVV* on your device, and you would enter your SD billings for any non-EVV services the standard way, using the *eXPRS Desktop* method.

Q: Will eXPRS Mobile-EVV use up all my mobile minutes/data?

A: *eXPRS Mobile-EVV* only uses mobile minutes/data when you are actively using your device for EVV, such as when you start or end a shift. Once you log out of *eXPRS Mobile-EVV* on your device, your active shifts will continue in the *eXPRS Desktop* website but will not use your minutes/data.

Q: How do I report an unpaid meal break during my shift?

A: If you are still "on duty" providing care during your lunch, then you are still working, so your shift would continue. If you are relieved from duty** (such as another provider arrives & takes over, or you can leave the individual to run an errand, purchase lunch, etc.) during your break, then you would end your shift via *eXPRS Mobile-EVV* and start a new shift when you return from your break.

**Labor rules define "relieved from duty" to mean the PSW can leave the setting or individual & doesn't need to check back in for a certain amount of time. In that case, the PSW would end their shift via *eXPRS Mobile-EVV* & start a new shift when they return.

PSWs do not need to end current/start new shift for paid rest breaks.

Additional information is available on the BOLI website: https://www.oregon.gov/boli/pages/index.aspx

Q: How will I make EVV SD billing corrections, if needed?

A: *eXPRS Mobile-EVV* will provide you with a confirmation message prior to starting your shifts. Please review that information carefully. Use the **red** back button in the *eXPRS Mobile-EVV* application (*not* your mobile device's browser button) to make corrections *BEFORE* you start your shift. If corrections are needed after the shift has ended, use the *eXPRS Desktop* method to make those changes.

Q: How do I submit my EVV SD billings for payment at payroll time?

A: The SD billings created by *eXPRS Mobile-EVV* are sent to & saved in *eXPRS Desktop* website as *draft* SD billings.

At payroll time, you will login to *eXPRS Desktop* & review/submit any *draft* SD billings you wish to be paid for, just like you do now.

Q: Will I still need to print & submit paper timesheets signed by my employer?

    A: Yes. Nothing is changing about the ==SD billing submission== & timesheet process. Your employer will still need to review & sign your timesheets, and you need to turn in the signed timesheets + any other required documentation to your CME, just as you always have.

Q: Will I get paid for attending an in-person EVV Orientation?

    A: No

Additional questions gathered from EVV Pilot Orientation Sessions – Jan 2019

eXPRS-EVV Related Questions/Answers

Q: Are there limits to where attendant care services can be delivered to an individual by a PSW? (see scenarios below) **How does EVV billing work for these situations?**

For example:

- **In the community?**

  A: ODDS does not restrict community locations where PSWs can provide services when that care is provided consistent with the person's needs & preferences. Using *eXPRS Mobile-EVV* should not change the location where service will be provided. *eXPRS Mobile-EVV* is accessed in community locations using mobile data or Wi-Fi with your device.

- **At the PSW's home instead of the individual's home? Is this allowed for PSWs who are family members only? Allowed for any PSW?**

  A: ODDS does not restrict community locations where PSWs can provide services when that care is provided consistent with the person's needs & preferences. Using *eXPRS Mobile-EVV* should not change the location where service will be provided. *eXPRS Mobile-EVV* is accessed in community locations using mobile data or Wi-Fi with your device.

- **Out of state** (to support the individual while on vacation or to see a specialist)**?**

  A: ODDS does not restrict community locations where PSWs can provide services when that care is provided consistent with the person's needs & preferences. Using *eXPRS Mobile-EVV* should not

change the location where service will be provided. *eXPRS Mobile-EVV* is accessed in community locations using mobile data or Wi-Fi with your device, even if services are provided while the individual is temporarily out of state.

- **Out of the country** (to support the individual while on vacation)**?**
  A: Medicaid funded services cannot occur outside of the United States.

Q: We live with the individual we are PSWs for, and like to go camping in the summer where there is no cell or internet service. How do we use EVV to bill for the supports we provide to the individual while we are camping?

A: At any time that you are in a location without the ability to use *eXPRS Mobile-EVV*, you will need to enter any SD billings for services provided during that time manually using the *eXPRS Desktop* (regular eXPRS website), selecting the applicable dropdown option for the reason why the SD was not entered using *eXPRS Mobile-EVV*.

Q: Is it really legal for EVV to track where PSWs deliver services? Are PSWs implying consent to this EVV location "*tracking*" by being a provider?

A: The **21st Century CURES Act**, a law enacted by Congress, outlines the requirements for EVV, including the electronic capture of the location where Medicaid attendant care services are delivered. ODDS is committed to only capturing the information required by the CURES Act. *eXPRS Mobile-EVV* does not continuously track a PSW during, before or after their shift. *eXPRS Mobile-EVV* only captures "point-in-time" information for the location at the time the PSW "clocks in" (starts a shift) and "clocks out" (ends a shift).

Q: How will EVV work for PSWs who are family members living with the individual they support? Often these PSWs are only authorized a limited number of hours per week they can be paid but provide 24/7 care. How do these PSWs use EVV to record time for care that is provided intermittently or in "as needed" bursts of time (*15-minutes for ADLs in the morning, 30-minutes to prepare a meal, getting up in the middle of the night to deal with an illness, etc.*)**?**

A: ODDS expects PSWs to only bill for hours when the PSW is providing attendant care. This expectation has not changed. ODDS does not allow for PSWs to bill for blocks of time where services are not being provided. PSWs will need to use *eXPRS Mobile-EVV* to "clock in" (start a shift) and "clock out" (end a shift) for actual time worked providing attendant care consistent with the person's needs & preferences.

Q: How much of my cell minutes or data is used for starting or ending a shift *(ie: "clocking in" or "clocking out")***?**

> **A:** For an approximate 1.5 minutes it would take to "clock in" (start a shift) & "clock out" (end a shift) using *eXPRS Mobile-EVV*, you would use 0.00125 GB of data.

Q: How will "*group***" services be handled with EVV? Will the PSW need to make corrections to the billings or split them up to account for other individuals in the "***group***"?**

> **A:** No, *eXPRS Mobile-EVV* will know when you are "clocked in" for multiple individuals & will automatically adjust/pro-rate the amount each individual's plan is charged to equal the PSW's hourly wage for any time the PSW is working with more than one individual.

Q: What will the Location information captured by EVV look like?

> **A:** The geographical location information captured will show as a series of numbers – the latitude & longitude GPS coordinates for where you were when you started/ended your shift. For the Pilot, ODDS is not expecting your Employers or the CMEs to review/validate this geo-coordinate information for your timesheets during the pilot.

Q: What do I do if I need to bill for additional awake hours during the night when I'm also providing Daily Relief Care-OR507?

> **A:** For Daily Relief Care-OR507, use *eXPRS Mobile-EVV* to track the start/end of your full 24-hour shift. If additional awake hours were provided during that shift (billed under OR508-Hourly Relief Care), notify your authorizing CME. The CME will add an authorization for those additional awake hours & you will bill for them manually using the *eXPRS Desktop* after that authorization is in eXPRS & active.

Q: How do I use EVV when I provide multiple, consecutive days of Daily Relief Care-OR507?

> **A**: For multiple, consecutive days of **Daily Relief Care-OR507,** PSWs will use *eXPRS Mobile-EVV* to "clock out" (end a shift) at the end of a 24hr period, then immediately "clock in" (start a shift) for the next 24hr period providing relief care.

Q: Will EVV know when I reach my weekly hours limit & prevent me from clocking in? Or will EVV give me a warning that I'm reaching my weekly hours limit? What if I work over my weekly hours limit, how do I adjust the time, so my billings aren't rejected *(suspended)***?**

> **A:** No, there is currently no edit in eXPRS or *eXPRS Mobile-EVV* to warn

the PSW that they are getting close to or have exceeded their weekly hours limit. **_PSWs will need to monitor this themselves, as they do now._**

SD billings created by *eXPRS Mobile-EVV* are created & saved as **draft**. Those SD billings are not validated against any authorization limits (or overlapping, etc.) until they are submitted by the PSW for payment processing, just as they are now.

Q: **Will EVV be updated to allow for "*leeway*" or a "*tolerance limit*" for "clocking in" or "clocking out"?**
For example: **a PSW arrives to work at 6am, but doesn't get a chance to clock in until 6:12am due to care needs. Will EVV auto-correct back to actual start time? Or do the PSWs have to do this correction manually every time it's needed?**

   A: Currently *eXPRS Desktop* & *eXPRS Mobile-EVV* use to-the-minute times on SDs, either manually entered or *eXPRS Mobile-EVV* generated. If corrections are needed to a SD start or end time, those corrections can be made via the *eXPRS Desktop* while the SD is still in **draft** status. Be sure to choose the applicable change reason from the dropdowns for any start/end time edits made.

Questions asked, but not specifically related to EVV

Q: **Are there limits to where or how far from the individual's home the PSW can drive/claim for OR004-Mileage if transportation support is authorized & provided?**
For example:

   • **Need to assist to an appointment in a different county than where the individual lives** (lives in Grants Pass, but has an appointment in Medford)**?**

   A: Claims for mileage must meet the definition of community transportation, which is as follows:

   The purpose of community transportation through K-Plan services is to enable eligible individuals to access their local community to engage in services necessary to meet their Activities of Daily Living (ADL) and Instrumental Activities of Daily Living (IADL).

   Medical transportation (transportation to/from medical or professional treatment/therapy services) is not an allowable use of community transportation. Reimbursement for medical

transportation must be coordinated through the individual's local OHP/medical card services office, <mark>and *is not* authorized or paid via eXPRS</mark>.

- **Out of state** (for example, to support the individual to see a specialist in Vancouver, Seattle or Boise)**?**
  - **A:** Claims for mileage must meet the definition of community transportation, which is as follows:

    > ***The purpose of community transportation through K-Plan services is to enable eligible individuals to access their local community to engage in services necessary to meet their Activities of Daily Living (ADL) and Instrumental Activities of Daily Living (IADL).***

    Medical transportation (transportation to/from medical or professional treatment/therapy services) is not an allowable use of community transportation. Reimbursement for medical transportation must be coordinated through the individual's local OHP/medical card services office, <mark>and *is not* authorized or paid via eXPRS</mark>.

Q: Can a guardian of an adult with I/DD also be paid as their PSW? Can a guardian be the individual's EOR? Can a guardian be a PSW + the EOR?
- **A:** ODDS has a **Conflict of Interest Policy** (APD-PT-15-009) outlining the allowable roles for each of these titles. That policy is available here: https://www.dhs.state.or.us/policy/spd/transmit/pt/2015/pt15009.pdf

Q: Can a PSW bill for services provided to an individual when the individual is not present or with the PSW? Such as a PSW taking clothes to their own home to mend for the individual. Or the PSW does community tasks, such as pick up medications from the pharmacy or groceries, but the individual stays at home. How would the PSW use EVV to bill for these "*indirect*" service hours?
- **A:** ODDS expects that all attendant care services are provided in person. In rare cases, there may be specific reasons for some IADL supports to be provided without the individual present. Those tasks & the specific reasons should be agreed upon in a service agreement, and consistent with the person's needs & preferences. In these situations, the PSW would use *eXPRS Mobile-EVV* to "clock in" (start a shift) & "clock out" (end a shift), the same as any other attendant care service.
  - **** *Point of clarification*:** ODDS *does not* consider mending clothing a type of attendant care that would be provided by a PSW.

Q: Our CME refuses to accept timesheets, progress notes or other items Electronically & has a 5pm cutoff for turning in paperwork. Is there

something that ODDS can do to approach an alternative to this with the CME? Other CMEs accepts electronic documents from PSWs.

> **A:** Local Case Management Entities (CMEs) can establish business processes & practices for their specific agency, as long as they are within the rules & policies established by ODDS.

Q: Our CME has told PSWs that we are not allowed to provide services to more than 1 individual at a time (eg: in a "group")**. Is this true?**

> **A:** ODDS policy allows for group services to be delivered by PSWs that are consistent with the individuals' service needs, preferences & individual support plan.

Q: A CME Manager has informed their staff to not refer individuals to using PSW providers, as the time it takes to process PSW timesheets, etc. by their agency staff is too time consuming & cumbersome. Is this allowed?

> **A:** No, CME staff must offer the full choice of provider types to all individuals eligible for the service.