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General Comment

My name is Shyla Patera . I am an independent living specialist withNorth Central Independent Living Services,Inc.

I wish to comment on CMS 10680 electronicvisit verification compliance survey. I am an individual with a disability who will be impacted by electronic visit verification in the state of Montana. I have serious concerns about EVV and would rather not see it implemented at the present time due to privacy concerns for tracking a visit . There is often a serious lack of broadband and Internet in rural areas among other things . I have concerns about the fact that CMS is asking states to implement EVV at a time when many states have waiting lists or have cut home and community-based services.

One concern I wish to ask involves asking why should states be faced with penalties and potentially losing FMAPcoverage and match rates based upon limited compliance or what may be perceived as non-compliance in implementing EVV by CMS? Is CMS planning on having state Medicaid directors self-report the progress that has been made toward implementing EVV in their state? Will stakeholders and CFC \ PAS providersbe able to provide important information to CMS about successes. and challenges in real time how consumers and providers are implementing EVV in real time. I worry that State Medicaid directors will over self report to CMS on the progress of EVV. If technology contractors,such Sandata or Accumen cost states funds for technology misuse or billing glitches, how will states recoup general funds or state funds? Thank you for allowing me to comment on the issues I see in developing an EVV compliance survey.