Guidance in an environment where several key requirements remain unclear, is unhelpful and

then copies of provider notification, building a system such as this in the absence of

provisions of interoperability. To date, states have received no written guidance from CMS on

questions, which will not provide any public comment from impacted stakeholders,

receive sub-regulatory guidance in the form of a single, Medical Director Letter and Frequently

complete the regulatory implementation process prior to the 2019 deadline. Instead, CMS plans to

answer conference call in January. In fact, CMS has stated that they do not have time to

answer conference call by the Centers for Medicare & Medicaid Services (CMS), which has not had

enough time to do more than offer two transition overviews in December and one question and

answer conference call by the Centers for Medicare & Medicaid Services (CMS), which has not had

This unworkable implementation deadline is exacerbated by the lack of regulation and guidance

and providers when corrections and changes to the system must be made after roll-out.

result in additional expense to the state and federal governments and frustration for consumers.  

consumers of the use of the system and reviewers. IRIS, through any of these steps can only

enabling federal funding to build the system, produce E2V vendors, and train staff and

legislature provide funding in the 2017 legislative session to develop business requirements. Each

legislative session. If it does not provide sufficient time, our

Frank delivered on time in October 2016 on E2V

Washington State, along with many other states, faces significant implementation challenges and

Washington State. By January 1, 2017, we have an operational reduction of federal

home of Medicare benefits. By January 1, 2019, or face a progressive reduction of federal

11.425%), signed into law on December 13, 2016. An E2V system will electronically verify that

Electronic Direct Verification (EDV) requirements included in the 2017 Omnibus (H.R. 1)

We would like to bring to your attention our serious concerns with the implementation of the

DEAR CONGRESSWOMAN MURPHY:

RE: Electronic Direct Verification (EDV) Implementation

WASHINGTON, DC 20510
154 Russell Senate Office Building
U.S. Senate
THE HONORABLE PATTY MURPHY

February 12, 2018
Federal and reductions of both

Encourage Congress to evaluate in execution an exclusion in either the 2019 deadline, the exception from

examination limited influence for the exception from federal guidance. We the system. We do not believe that this is a reasonable or achievable deadline. Due to the

approved for reimbursement of home-based administration in open and rear growth, and install

allows the exception amount of home-based delivery and the maximum and education for

exceptions, CMS has clarified that the exception is limited and would only apply for one year.

Although the CMS bar reduces a potential delay from the matching and education for state

the exception of a frailty provider network.

can only lead to costly mistakes that will negatively impact service delivery to beneficiaries and

Washington State is number one in the nation in providing high-quality and low cost long-term

an integrated and costly exercise that does not lead to improved programs and

result of regulations over 24-hour care models, such as be minimized or hourly limits on care, would be

subject to regulations over 24-hour care models, such as be minimized or hourly limits on care, would be

The services required 24-hour care models, such as be minimized or hourly limits on care, would be

be minimized or hourly limits on care, would be

some providers are paid a daily rate to provide care to multiple clients who share the support homes. In those settings,
in-home settings, where a consumer may live alone or with family members, should not be

other home-in-home settings.

other home-in-home settings.

other home-in-home settings.

other home-in-home settings.

other home-in-home settings.

other home-in-home settings.

of implementation of the requirements to

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Dear [Name],

Thank you for your assistance in providing the necessary resources to support our efforts in maintaining the progress we have made in [Area].

Please feel free to contact me at [Contact Information] with any follow-up questions.

Best regards,

[Signature]

[Name]