



245D & PCA WORKER TIMEKEEPING POLICY

Purpose

The purpose of this policy is to establish consistent requirements for documenting, verifying, and recording time for services provided under:

- PCA Choice Services (PCA)
- 245D Basic Support Services (including Individualized Home Supports without Training, Respite, Homemaker and Night Supervision).

This policy ensures compliance with:

- Minnesota Department of Human Services (DHS) program rules,
- Minnesota and federal Electronic Visit Verification (EVV) requirements, and
- Applicable state and federal rules and regulations.

Policy

All employees must submit worked time entries accurately and reflect services actually delivered. All worked time entries must comply with DHS program rules, Electronic Visit Verification (EVV) requirements, and applicable state and federal regulations. Fraud, waste, abuse, and misrepresentation of worked time is prohibited.

All work time entries must be recorded in real time, that is at the actual time the worker started and ended their shift. Employees are required to clock in at the start of each shift and clock out at the end of each shift to comply with EVV requirements.

For live-in caregivers, who want to qualify for the Minnesota Department of Human Services EVV live-in caregiver exemption.

- Must complete the required attestation process.
- Until the attestation is verified, live-in caregivers must continue to clock in and out in real time.
- Once the live-in caregiver status is verified, live-in caregivers are required to record all work entries into the EVV system on a daily basis.

Failure to follow worked time entry requirements may result in retraining or could lead to disciplinary or other corrective actions.



Lifeworks Roles and Responsibilities

Lifeworks is responsible for providing the systems and processes required for time entry and EVV in accordance with DHS requirements, including processing timesheets and EVV records for payroll and claims submission. This involves reviewing time entries for compliance with program rules and EVV validation, as well as notifying participants, employees, or live-in caregivers of any incomplete, or noncompliant entries. Lifeworks maintains all time entry and EVV records as required by DHS and applicable retention laws and offers training and technical assistance to support accurate and timely use of these systems. Lifeworks does not authorize services or verify service delivery beyond the compliant documentation submitted.

Support Manager Responsibilities

As the Support Manager, you are responsible for overseeing and approving time entries worked for employees providing services under PCA Choice and/or 245D Basic Services. This oversight is essential to ensure compliance and integrity with DHS program rules, EVV requirements, and applicable labor laws.

The Support Manager's responsibilities include, but are not limited to, the following:

1. Verification of Services Provided

- Ensure that services are delivered as authorized in the DHS-approved service plan including location.
- Approved service locations include, but are not limited to:
 - The person's home
 - The home of a family member or friend
 - Locations where community activities take place
- Confirm that the dates, times, and service types entered accurately reflect services actually received.

2. Review and Approval of Time Entries

- Review all employee time entries and EVV records before approval.
- Approve time entries only after confirming their accuracy and completeness.



- Submit approvals by established payroll cycle to avoid payroll or billing delays.
 - Sharing EVV login credentials or permitting another individual to approve time on your behalf is strictly prohibited and may constitute fraud. Violations may result in termination of your ability to continue to be the support manager with program oversight and termination of services. Please reference Lifeworks Fraud, Waste and Abuse Policy for further details.

3. EVV Oversight

- Ensure employees comply with EVV real time clock-in and real time clock-out requirements.
- Ensure employees that are live-in caregivers comply with EVV daily clock-in and clock-out time entry requirements.

4. Compliance

- Comply with all time entry and EVV requirements
- Comply with requirements for submitting, correcting, and approving time entries.

5. Prevention of Fraud, Waste, and Abuse

- Prohibit approval of time entries for services not provided, overlapping shifts, or unauthorized services.
- Monitor for patterns that may indicate inaccurate or improper time reporting.
- Report suspected errors, misuse, and fraud to Lifeworks promptly.

6. Employee Training and Communication

- Ensure employees understand time entry and EVV requirements.
- Communicate expectations for timely and accurate time submission.

7. Record Accuracy and Cooperation with Reviews

- Maintain accurate records related to service delivery and time approval as required.
- Cooperate with Lifeworks and DHS reviews, audits, or monitoring activities.
- Respond promptly to requests for clarification or documentation related to time entries.



Employee Responsibilities

1. General Responsibilities: All employees are responsible for accurately documenting time worked and services delivered in accordance with:

- Minnesota DHS program requirements
- Federal and state EVV regulations
- The participant's authorized service plan
- Lifeworks policies

Employees must understand that time entry documentation is a **legal record** used for billing, audit review, and program integrity.

2. Accurate and Timely Time Entry: Employees must:

- Record **actual start and end times** worked for each service shift in real time
- Use the **approved EVV system**

Falsification, estimation, rounding, and "pre-entering" time are strictly prohibited.

3. EVV System Use: Employees providing EVV-required services must:

- Clock in and clock out **at the service location** using the Lifeworks-approved EVV method
- Follow Time Entry Policies for system errors, or technology issues
- Never share EVV login credentials or allow another individual to record time on their behalf. Sharing EVV login credentials or permitting another individual to record time on your behalf is strictly prohibited and may constitute fraud. Violations may result in the termination of employment

4. Corrections and Changes: If a time entry error occurs:

- The employee must notify their support manager immediately
- Corrections must be documented with an explanation and follow Lifeworks correction procedures
- Employees may not alter, delete, or modify time records without proper authorization
- All corrections must maintain a clear audit trail



5. Compliance and Ethical Conduct: Employees are responsible for:

- Complying with all DHS and federal EVV requirements
- Reporting suspected errors, misuse, and fraudulent documentation
- Cooperating with audits, reviews, and investigations related to time entry or EVV compliance
- Notify Lifeworks if a participant or Support Manager refuses to verify time or identifies a discrepancy
- Employees may not pressure or influence participants or Support Manager to approve inaccurate time entries

Failure to follow time entry and EVV requirements may result in corrective action, up to and including termination, or referral to DHS.

If EVV technology fails

If the EVV system is unavailable, or malfunctioning employees must contact CASupport@lifeworks.org immediately and provide:

- a detailed description of the error
- screen shots or images
- date/time error occurred

**This policy is subject to change to remain compliant with Minnesota DHS Program rules and Federal/EVV requirements. **

Resources

- DHS Community-Based Services Manual – EVV Policy: https://www.dhs.state.mn.us/main/idcplg?IdcService=GET_DYNAMIC_CONVERSION&RevisionSelectionMethod=LatestReleased&dDocName=mndhs-061562#
- DHS Community-Based Services Manual - Live-in caregiver EVV Policy: https://www.dhs.state.mn.us/main/idcplg?IdcService=GET_DYNAMIC_CONVERSION&RevisionSelectionMethod=LatestReleased&dDocName=mndhs-063378#
- Lifeworks Payroll Calendar – search “Payroll”: <https://www.lifeworks.org/resources/>



- Lifeworks Contact List:
 - Questions related to hours worked: contact EVVTimeSupport@lifeworks.org
 - Questions related to using the Cashé apps: contact CASupport@lifeworks.org
 - Questions regarding paychecks: contact Payroll@lifeworks.org
 - Questions regarding live-in caregiver attestation or other hiring questions: contact GetHired@lifeworks.org
 - Any other questions, please contact your Service Coordinator

Definitions

Time Entry

The documentation of actual hours worked, and services provided, including start and end times.

EVV (Electronic Visit Verification)

An electronic system that verifies in-home service delivery by capturing required data elements, including participant, caregiver, service type, date, time, and location.

PCA Choice Services

Consumer-directed personal care assistance services delivered under where the participant or Responsible Party directs care.

245D Basic Support Services

Services licensed under Minnesota Statutes Chapter 245D that provide assistance and supervision to ensure health, safety, and well-being.

Support Manager (SM)

An individual aged 18 or older authorized to act on behalf of a participant who is unable to self-direct PCA Choice services or 245D Basic Services.