

DEPARTMENT OF SOCIAL AND HEALTH SERVICES

Aging and Long-Term Support Administration PO Box 45600, Olympia, Washington 98504-5600

June 6, 2024

ALTSA: NH #2024-027 CLARIFICATION TO THE PRE-ADMISSION SCREENING AND RESIDENT REVIEW (PASARR OR PASRR) LEVEL I SCREENING PROCESS

Dear Nursing Facility/Home Administrator:

The PASRR is a federal requirement (42 CFR §483.100–138) that requires all applicants to Medicaid-certified nursing facilities (NFs) be screened for possible serious mental illness (SMI), intellectual disability (ID), or related conditions (RC), and offered the most appropriate setting with the services they need.

This initial screening, referred to as PASRR Level I, is completed *prior* to the NF admission. The purpose of the Level I pre-admission screening is to identity individuals *who have or may have* SMI, ID, or RC.

Those individuals that have been identified with **any** of the qualifying criteria (SMI, ID, or RC), a positive screen, require PASRR Level II referral for evaluation and determination *prior* to admission to the NF. A Level I PASRR with **no** identified criteria, a negative screen, permits admission to proceed and ends the pre-screening process, unless possible SMI or ID arises later.

The Washington (WA) State Health Care Authority (HCA) recently provided clarification to Residential Care Services (RCS) regarding the PASRR process for SMI and which documents equate to the Preadmission Screening Evaluation. This guidance is as follows:

- The Level I form filled out by community partners (i.e., hospitals and referring providers)
 <u>does not</u> provide the level of detail needed for NFs to incorporate into the resident's
 assessment and care plan.
- The Level II evaluation is considered to be the *Vital Assessment* for residents with SMI, or ID. Section 1919(b)(3)(F) of the Social Security Act (*Requirements for Nursing Facilities*) requires that Preadmission Screening evaluations for PASRR *must* be performed *prior* to NF admission.
- The Level II evaluation identifies the specialized services, those which generally exceed the typical services provided by NFs, required for the resident. Specialized services are services that are specific to the resident's SMI, ID, or RC.
- The PASRR Level II referral is required to be made and evaluation completed *prior* to NF admission for residents with SMI (known or suspected) <u>irrespective</u> of the resident's reported stability or absence of serious functional limitations.
- WA State Behavioral Health PASRR has updated their interpretation of the Level I PASRR form based on guidance from the Centers for Medicare & Medicaid Services (CMS). The Level I PASRR form has not yet been updated to reflect this interpretation; however, the state is moving forward with the guidance issued by CMS. The expected revision of the form is scheduled for 2025. Please review the Level I PASRR form to determine when a referral for a PASRR Level II for SMI is or is not required based on the updated guidance:

ALTSA Provider Letter: **CLARIFICATION TO THE PRE-ADMISSION SCREENING AND RESIDENT REVIEW (PASARR OR PASRR) LEVEL I SCREENING PROCESS**June 6. 2024

Page 2

- A referral for a Level II PASRR is required if:
 - Any of the questions in Section 1A (1, 2, and/or 3) are marked Yes: OR
 - Sufficient evidence of SMI is not available, but there is a credible suspicion that a SMI may exist; and
 - The requirements for exempted hospital discharge do not apply.
- A referral for a Level II PASRR is <u>not required</u> if:
 - <u>All</u> of the question in Section 1A (1, 2, and 3) are marked NO, and there is no credible suspicion of SMI; OR
 - There are indicators of SMI in section 1A, but the requirements for exempted hospital discharge are met.
- In certain limited circumstances, an individual may be admitted to a NF without first having a PASRR Level II assessment, known as an Exempted Hospital Discharge. This is the <u>only</u> situation that exempts a person with SMI from having a Level II PASRR completed before NF admission.

Effective July 1, 2024

Nursing Facilities will:

- Review residents' Level I PASRR forms to determine when a referral for a PASRR Level II for SMI is required or not required following the guidance provided above.
- Ensure residents with a positive Level I PASRR screen have been evaluated by the
 designated state-authority, through the Level II PASRR process, and approved for
 admission prior to admitting to the NF.
- Be in noncompliance (at F645 or WAC 388-97-1915), when a resident with a positive Level I PASRR screen is not evaluated by the designated state-authority through the Level II PASRR process prior to NF admission.12

RCS Surveyors/Complaint Investigators will:

- Review residents' Level I PASRR forms to determine when a referral for a PASRR Level II for SMI is required or not required following the guidance provided above.
- When completing resident PASRR reviews, ensure residents with a **positive** Level I PASRR screen have a Level II PASRR completed **before** NF admission.
- Issue a citation to the NF for noncompliance (at F645 or WAC 388-97-1915), when a resident with a *positive* Level I PASRR screen is *not* evaluated by the designated state-authority through the Level II PASRR process *prior* to NF admission.

Thank you for your continued commitment to resident health and safety. If you have any questions related to *nursing homes*, please contact <u>Tiffany Meyers</u>, Nursing Home Policy Program Manager, at (360) 464-0373.

For *behavioral health* questions, please contact <u>Debbie Hoeman</u>, Behavioral Health Policy Program Manager, RCS, at (360) 725-3210,

ALTSA Provider Letter: **CLARIFICATION TO THE PRE-ADMISSION SCREENING AND RESIDENT REVIEW (PASARR OR PASRR) LEVEL I SCREENING PROCESS**

June 6, 2024 Page 3

For questions *related to the PASRR*, please contact Medical Assistance Program Specialists, HCA - <u>Beth Loska</u>, at (360) 725-1478 and <u>Tabitha Craven</u>, at (360) 725-1107.

Sincerely,

Amy Abbott, Director Residential Care Services

DSHS: "Transforming Lives"

Related References: 42 CFR §483.100–138 WAC 388-97-1915 Social Security Act §1919