



STATE OF WASHINGTON  
DEPARTMENT OF SOCIAL AND HEALTH SERVICES  
*Aging and Long-Term Support Administration*  
*PO Box 45600, Olympia, Washington 98504-5600*

October 23, 2020

**ALISA: NH #2020-076**

**CLARIFICATION ABOUT FACILITY TESTING OF PASRR EVALUATORS  
AND OTHER ESSENTIAL PERSONNEL**

Dear Nursing Facility/Home Administrator:

In response to the COVID-19 pandemic, the Centers for Medicare and Medicaid Services (CMS) suspended or amended rules under the authorization of 1135 waivers and section 1812(f) of the Social Security Act. One of the rules CMS amended with a [blanket waiver](#) was regarding Preadmission Screening and Resident Review (PASRR or PASARR). The amended rules permit facilities to admit new residents who have not received Level 1 or Level 2 PASRR screening. As the blanket waiver describes, the PASRR screenings are deferred, not waived: "On or before the 30th day of admission, new patients admitted to nursing homes with a mental illness (MI) or intellectual disability (ID) should be referred promptly by the nursing home to State PASARR program for Level 2 Resident Review."

Residential Care Services amended state PASRR regulations (WAC 388-97-1915 and 388-97-1975) to align with the amended federal regulations. The rule text is at [WSR 20-17-048](#).

Because the screenings are required under regulation, the PASRR evaluators who complete the Level 2 screenings are considered essential personnel, and must be permitted access to the resident in order to complete their evaluations.

Under [testing rules](#) released by CMS on August 25, 2020, facilities must test facility staff, including those providing services under arrangement, which includes PASRR evaluators and other essential personnel. Facilities must also have a procedure addressing those who refuse or are unable to be tested. To facilitate on-site staff testing, CMS provided each facility with a Point of Care testing device.

Clarification about testing of essential personnel:

- The facility is responsible for testing. PASRR evaluators or other essential personnel should NOT be billed for testing, nor should their health insurance carrier.
  - Many insurance companies do not cover asymptomatic or repeat testing, or testing without a documented rationale by a primary care provider.
- Under Medical Commission standards, physicians who order tests are required to provide staff, including contracted or other essential staff, with the results of any test they conduct.
- The staff person may share the test results with other locations that require or request testing.
- Facilities must conduct testing as frequently as required by CMS testing standards. If testing is required for a staff person, the testing should be completed prior to an on-site facility visit, not after.
- Facilities or laboratories should not run any test without the knowledge and consent of the person providing the test sample.
- Facilities must continue to screen for symptoms and exposure risk before each on-site visit.

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Thank you for your continued commitment to resident health and safety. If you have any questions, please contact Lisa Herke, Nursing Home Policy Program Manager, at (509) 209-3088 or [lisa.herke@dshs.wa.gov](mailto:lisa.herke@dshs.wa.gov).

Sincerely,



Candace Goehring, Director  
Residential Care Services

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