

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

June 6, 2024

Amended August 23, 2024

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

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 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 <u>who have or may</u> <u>have</u> SMI, and/or ID/RC.

Those individuals that have been identified with **any** of the qualifying criteria (SMI, and/or ID/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.

On **June 6**, **2024**, the Washington (WA) State Health Care Authority (HCA) provided clarification to Residential Care Services (RCS) regarding the PASRR process for SMI and which documents equate to the Preadmission Screening Evaluation. HCA has recently provided additional clarification in response to inquiries from NFs across the state seeking further guidance. The updated 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 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 <u>must</u> 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, and/or ID/RC.

#### ALTSA Provider Letter: CLARIFICATION TO THE PRE-ADMISSION SCREENING AND RESIDENT REVIEW (PASARR OR PASRR) LEVEL I SCREENING PROCESS FOR SERIOUS MENTAL ILLNESS (SMI)

August 23, 2024 Page 2

- 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.
- A person who is requesting admission to the NF and has a positive screening for SMI will need to have a Notice of Determination (NOD) from the regional SMI contractor *prior* to being admitted to the NF. The SMI/MH PASRR website for the regional contacts is listed <u>here.</u>
  - The NOD should be included in the paperwork from the hospital and provided to the NF for admission consideration. Once the finalized assessment has been approved it will be emailed to the NF by the HCA SMI PASRR team. The receipt of a NOD confirms that a Level 2 evaluation was completed.
    - If the NOD is *not* included in the paperwork, the NF needs to ensure that the negative Level I is received <u>AND</u> that it is accurate.
  - It is not expected that the NF will always have the finalized PASRR Level II/SMI evaluation prior to admission. It can take up to two (2) weeks for the completed evaluation to be finalized.
- If the PASRR Level I does not indicate SMI but the NF obtains additional information that confirms or raises suspicion of SMI (this happens often), the NF needs to contact the <u>SM/MHI team</u>.
- 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 <u>is or is not required</u> based on the updated guidance:
  - A referral for a Level II PASRR <u>is required</u> if:
    - <u>Any</u> of the questions in Section 1A (1, 2, **and/or** 3) are marked **Yes**: <u>OR</u>
    - 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 *not required* 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; <u>OR</u>
    - 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 PASRRR Level II assessment, known as an **Exempted Hospital Discharge.** This and the Categorical Determination (see below) are the <u>only</u> situations that

#### ALTSA Provider Letter: CLARIFICATION TO THE PRE-ADMISSION SCREENING AND RESIDENT REVIEW (PASARR OR PASRR) LEVEL I SCREENING PROCESS FOR SERIOUS MENTAL ILLNESS (SMI)

August 23, 2024 Page 3

exempt a person with SMI from having a Level II PASRR completed before NF admission.

- Categorical Determination: this process is treated like an Exempted Hospital Discharge. If referred for respite 30 days or less, *no* Level II is needed, and a NOD is not required nor completed. If respite exceeds 30 days and the Level I screening is positive, the Level II referral needs to be sent to SMI/MH PASRR contractor staff. If the original stay is less than 30 days but the stay changes and exceeds 30 days, it will be the NF's responsibility to contact the SMI/MH PASRR contractor staff by day 25 for a Level II evaluation. When reaching out to the SMI/MH PASRR contractor staff the Level I must be less than 45 days old. If older, the Level I must be redone by the NF.
- **Resident entering from a community setting**: NFs are responsible to complete the Level I and send all positive Level I screenings to the SMI/MH PASRR contractor staff to complete a Level II evaluation. CMS has confirmed that this is a preadmission requirement even if a resident is admitted from home or any facility that is not a hospital (i.e., adult family home or assisted living facility).

# Effective July 1, 2024

#### <u>NFs will:</u>

- 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.

## 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.

## Please Note:

 Hospitals are licensed and approved by the WA State Department of Health (DOH). Mandatory reporting requirements related to quality of care or transition planning practices will be filed with the DOH as a complaint by email or online.

Thank you for your continued commitment to resident health and safety. If you have questions related to:

#### ALTSA Provider Letter: CLARIFICATION TO THE PRE-ADMISSION SCREENING AND RESIDENT REVIEW (PASARR OR PASRR) LEVEL I SCREENING PROCESS FOR SERIOUS MENTAL ILLNESS (SMI)

August 23, 2024 Page 4

- *Nursing homes*, please contact <u>Tiffany Meyers</u>, Nursing Home Policy Program Manager, at (360) 464-0373;
- SMI/MH criteria 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; or
- *ID/RC criteria*, please contact <u>Heidi Johnston</u> at Developmental Disabilities Administration (DDA) PASRR Program Manager, at (564) 999-0214.

Sincerely,

amy ablott

Amy Abbott, Director Residential Care Services

DSHS: "Transforming Lives"

*Related References:* <u>42 CFR §483.100–138</u> <u>WAC 388-97-1915</u> Social Security Act §1919

## ALTSA Provider Letter: CLARIFICATION TO THE PRE-ADMISSION SCREENING AND RESIDENT REVIEW (PASARR OR PASRR) LEVEL I SCREENING PROCESS FOR SERIOUS MENTAL ILLNESS (SMI) August 23, 2024

Page 5