

PASRR Overview

PASRR was mandated under the 1987 NH Reform Act; it is a Medicaid Function



- PASRR must identify all persons suspected of having MI/ID/RC
- Requires that "all" persons seeking admission into a Medicaid Certified NH are screened before admission and regardless of dx or payee source
- If MI/ID/RC is identified, is nursing home placement appropriate? Is State's Level of Care Criteria met?
 Do medical needs outweigh Mental Health needs?
- 3. Can "total" care needs be met in NH?

Level I Screening will identify:

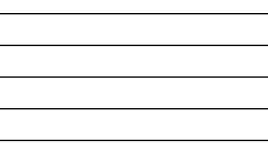
- Suspected MI/ID/RC
- Dementia
- Psychotropic meds for medical conditions
- Behaviors that are a danger to self/others
- The need for a Level II Evaluation

Level I Screening Rules

•Is completed before NF admission into a MCF

•RN must review the Level I Screening Form for accuracy by reviewing the corresponding medical records and "<u>if accurate</u>" signs and dates the Determination "<u>before admission</u>"





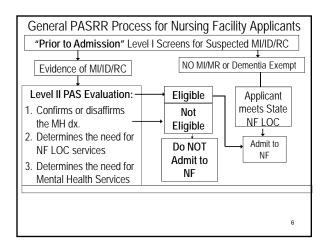
STATE REQUIREMENTS FOR DETERMINATIONS

- 1. Determinations must be both (a) signed & (b) dated by the admitting nursing home RN <u>before</u> admission
- 2. RN signature and date indicates that the Level I Form has been <u>reviewed prior to admission and it is</u> <u>"accurate" based on the corresponding medical</u> <u>records</u>

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RN Level I Form Review/Certification

- <u>The Admitting RN controls access into MCFs</u>
- Must review and <u>compare medical records to the</u> <u>completed Level I Screening Form to determine accuracy</u>
- The RN <u>only allows access</u> to Medicaid Certified Facilities if the Level I Form is (1) completed and (2) accurate.
- Admission <u>must be denied</u> if the Level I Form is not accurate/complete
- In some cases, it may be necessary for the RN to contact the referral source for <u>clarification and/or resubmission of the</u> <u>Level I Form</u>





THE LEVEL I SCREENING FORM THE FOUNDATION OF PASRR

4 STEPS to Compliance

- 1. Must be completed prior to admission
- 2. Must be "accurate" (must reflect med. records)
- 3. <u>Must have a "determination"</u> A Level I Form <u>is</u> <u>not valid</u> without a determination.
- 4. Complete PASRR Documentation must be accessible/available, <u>must be maintained in clinical file/chart</u> (complete means- (1) Level I Form (2) Determination (3) Corresponding Medical Records and (4) Level II Documentation, if applicable)

State of Alabama Department of Mental Health Level I Screening for (M) Intellectual Disability (D)Patiente Condition (RC) Use for Medicaid Certified Nursing Home (Only)								
Name: Joe Citizen	SSN:			DOB:	/	/		
Name of current residence a	t time of Level I su	bmission	Street a	ddress City,	State, Zip	County		
Check Type of Residence: □ □ Other		Home 🗆	l Assist	ed Living Fa	cility □ 0	Froup Home		
				•				
Other	e: individual who will ement in a resident	Addr fully and kn	ess:	/ causes ano	ther indiv	idual to certify		
 Other Legal Guardian, If Applicable Note: Under OBRA '87, any imaterial and false state 	e: individual who will ement in a resident espect to each ass	Addr fully and kn assessmer essment.	ess: owingl nt is sul	/ causes ano bject to a civi	ther indiv money p	idual to certify		

 Does the individual have a suspected diagnosis or history of an Intellectual Disability or a Related Condition? Yes No
1a. Specify.
D: Intellectual Disability Did the ID develop before age 18?
Unknown Yes No NA
RC: □ Autism Did the Autism develop before age 22?
Unknown Ves No N/A
□ Cerebral Palsy Did the Cerebral Palsy develop before age 22?
Unknown DYes DNo DNA
Die Epilepsy/Seizure Disorder Did the Epilepsy/Seizure Disorder develop before age 22?
□ Unknown 2 □ Yes □ No 2 □ N/A
Did the Other RC develop before age 22?
2. Does the individual have a current, suspected or history of a Major Mental Illness as defined by the Diagnostic & Statistical Manual of Mental Disorders (DSM) current edition? Choose "No" If the person's symptoms are situational or directly related to a medical condition. (e.g. depressive symptoms caused by hyperhypoidsm, depression caused by stroke or anxiety due to COPD, these conditions must be documented in the medical records by a physician UTVs = INV
2a. If yes, check the appropriate disorder below. Schizophrenia Schizoaffective Disorder Psychotic Disorder NOS
Aaior Depression Depressive Disorder NOS Disorder NOS
Bipolar Disorder 🗖 Generalized Anxiety Disorder 🗖 Panic Disorder
PTSD OCD Somatoform Disorder Conversion Disorder
Personality Disorders Unspecified Mental Disorder Other Mental Disorder in the DSM or (no above option) Mild Depression, Depression, Paranoid Explosive DO Other Mental Disorder in the DSM or (no above option) Mild Depression, Depression, Paranoid Explosive DO
Dotter mental Disorder in the DSM of the above option) mild bepression, bepression, Paranold Explosive DO
2b. Are any of the diagnoses checked on question #2 situational or conditions that are directly related to a medical condition? □ Yes □ No
Reminder: If the diagnoses are situational or directly related to a medical condition, do not check these conditions on #2. 9 However, you must ensure that this information is documented in the person's medical records by the physician, for example, depression related to stroke or anxiety due to COPD)

- Has the individual's "Medical Condition" required the administration or prescription of any anti-depressant, anti-psychotic, and/or anti-anxiety medications within the last 14 days? □ Yes □ No 3a. If yes, list psychotropic medications for the <u>Medical Condition</u> (Do not list PRN medications): 4a. If yes, complete the MSE. (If unable to test <u>due to Dementia</u>, enter "0" as a valid MSE score; if unable to test due to any other condition, check unable to test, and leave MSE score blank) Provide MSE Score: ____ Check it unable to test: □ 4b. If #4 is yes, check level of consciousness: □ Alert □ Drowsy □ Stupor □ Coma □ N/A 4c. If #2 & #4 are yes, which diagnosis is primary?: Dementia Dementia N/A (The primary diagnosis must be documented in the medical records as "primary" by a physician) 5. Does the individual's current behavior or recent history within 1 year indicate that they are a danger to self or others? (Suicidal, self-injurious or combative) Yes No 5a. If yes, explain: Sa. If yes, Kayrann.
 Submission of this Level I is due to one of the following:
 Mew Nursing Facility Admission
 (For current NH residents, select <u>one</u> of the below Significant Changes):
 Medical Improvement
 Mental Illness Improvement
 Mental Illness Improvement
 Behavioral Changes
 Short Term to Long Term Stay (<u>only</u> for MI/D/RC Categorical Convalescent Care Residents)
 Mental This Disgnosis Change (*i.e. New MH diagnosis*)
 Previous Level I Incorrect (*For NH use only*)
 No Level I and Determination or/and Level II and

7. Select Long Term Care or the applicable Short Term Care Option: □ Long Term Care

Short Term Care with the intent to return to the community after: Convalescent Care Applicable for patients with or without MI/ID/RC diagnoses For MI/ID/RC patients (1) you must have PT and/or OT orders as prescribed by a physician for 5x aveck for 120 days or less (2) is not a danger to self or others and (3) must be currently in the hospital w/ a <u>direct</u> admission into the NH.

- Respite for no more than 7 days & is not a danger to self or others (Respite is not reimbursed by Medicaid under the NH Program)
- NH admission for an <u>Emergency</u> situation requiring protective services by DHR, person can not be a danger to self or others, if admission will exceed 7 days, the OBRA office <u>must</u> be contacted immediately to prevent non-compliance (Not applicable if currently in a hospital or other protective environment)
- Other Short Term Stay (If applicable, persons with MI/ID/RC must have the Level II complete prior to admission) □ IV Therapy □ Wound Care □ Diabetes Care □ Home (in community) Convalescent Care □ Other (please specify)

Other (please specify) list "continued OT/PT" for persons currently in NH

Is this individual terminally ill (life expectancy of six months or less), comatose, ventilator dependent, functioning at brain stem level or diagnosed as having Cerebella Degeneration, Advanced ALS, or Huntington's Disease as certified by an MD? "J vs | No

Level II Determination Rules

- Completion of the Level II Evaluation, 7 days from receipt of the determination (Due date is located on Level I Determination)
- Determines (1) State's Level of Care Criteria (2) Appropriateness for NF placement (3) If total care needs can be met in the nursing facility (4) Specialized Services Needs and (5) NF Eligibility
- Verbal results are conveyed to the Level I referral source to expedite hospital discharges and nursing facility admissions. Afterward, the Level Il documents are mailed or faxed to the referral source as written confirmation.

Per Federal Regulations, Section 483.112 (c), verbal approval is acceptable and valid for admission into a Medicaid Certified Nursing Facility

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What is a PASRR Significant Change?

May include any of the following: (not an exhaustive list)

- Significant Changes can be Medical Improvements (may impact continued eligibility)
- Can be Medical Declines in residents with diagnoses of MI/ID/RC (does it impact the MI/ID/RC?)
- Significant Changes can be increased psychiatric, mood-related or behavioral symptoms of individuals with a MI/ID/RC diagnosis
- Individuals <u>without</u> a previous Level II history who obtain a new MH diagnosis require a Significant Change
- Individuals <u>without</u> a MI/ID/RC diagnosis, but current behavioral symptoms suggests that a MI/ID/RC diagnosis may be present (suicidal ideations, self injurious behaviors, etc.)

Significant Change continued

- A Significant Change is required for MI/ID/RC residents who were approved under a 120 Day Time <u>limited Categorical</u>, Convalescent Care Determination and are now <u>expected to</u> <u>stay beyond the approved timeframe</u>.
- <u>NH residents who are discharged to the hospital</u> and <u>return to the NH</u>, always monitor this group to determine if a Significant Change update is needed
- Significant Changes/Level I Updates must be completed within 14 days of the status change
- Who is monitored for a SC?
- NOTE: Nursing homes are mandated to monitor residents to ensure their continued LOC eligibility and continued appropriateness for nursing home placement.

New Nursing Home Admissions

A New Admission is:

- A first time admission/ never been admitted into a NF
- A Re-admission is:
- A NF resident returning to the SAME NF from a hospital stay



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Re- Admissions require:

An updated Level I Screening Form "if" a significant change has occurred (significant medical improvement, new mental illness diagnosis, suicidal ideations, etc.)

If the resident is determined to have a SC, the Level I Update must be submitted within 14 days of the re-admission.

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Inter-Facility Transfers <u>do not</u> require

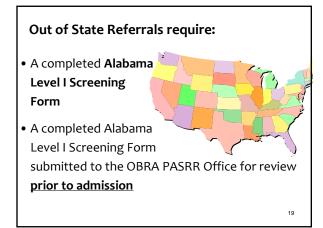
an updated Level I Screening or Determination

(unless there is a SC)



Based on PASRR regulations, the **Discharging NH** is responsible for ensuring that copies of the most current PASRR documentation accompanies the resident to the receiving NF.

Note: For Inter-facility transfers, always ensure that the PASRR documentation exists, is complete, and accurate



1.Identify <u>all</u> adr determined b 2.The Report is 3. If there are "n	nissions, diso y the OBRA due by the 1 o changes" a	EVEL II OBRA PAS charges, and deceas PASRR Office. 0 th of the month. (R an email or fax Notifi telephone number,	sed residents who h egulatory Tracking ication <u>must</u> be sent	nave a diagnosis of <u>I</u> Requirement) t by the 10th that inc	ludes the facility
NAME	SSN	Admit/Re-Admit Date	D/C and Transfer Date	Location	Deceased Date
Facility Name: Telephone #	Completed by: The above is true and correct			Address:	
	to the best of my knowledge			Administrator:	
Note: When (MI/IE)/RC) Categor	ical Convalescent Ca	re residents are disc	charged from the NH	prior to 120 days,
these disch	narnes must h	e included on this re	nort		

PASRR TRACKING/MONTHLY LEVEL II REPORT REQUIREMENTS

1. Must be completed by the **<u>10th</u>** of every month

 If there are no changes, you <u>must</u> send a notification for that month by the 10th, stating, "Level II Report, NO CHANGES" fax to 334-353-7661 <u>or</u> 334-242-0862

Note: Every month the OBRA Office must receive Tracking Documentation whether it is (1) A completed Level II Report or (2) A notification indicating "no change"

 "If" 120 Day MI/ID/RC Categorical Convalescent Care residents are discharged from the NH prior to the 120th day, they <u>must</u> be listed on the Monthly Level II Report 21

"PASRR AWARENESS"

IS

YOUR MEDICAID CERTIFIED FACILITY COMPLETELY PASRR COMPLIANT?

Mandatory PASRR Items for Medicaid Certified Facilities



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- 1. Accurate Completion of the Level I Screening Form "prior to admission"
- 2. RN Review/Certification of the Level I Form "accuracy" prior to admission (signature and date)
- 3. Completion of the Level II Evaluation (when applicable)
- Completion of Significant Changes (when applicable)
- 5. Completion of <u>Monthly</u> Tracking Requirements/ Level II Report Form
- Awareness of "<u>Time Sensitive</u>" Determinations (categorical-convalescent, emergency, respite)

PASRR Non Compliance Issues for Nursing Homes

- Ø No Level I Screening Form <u>&</u> Determination before admission
- Ø Level I Screening Form completed before admission but "not
- accurate" Ø No nursing facility RN signature and date on Level I Determination
- Ø No hursing lacing RN signature and data is "after admission"
- Ø Nursing Facility RN signature and date is "after admission"
- Ø Level I Screening Form not updated for a significant change
- Ø Level II Evaluation not completed (when required)
- Ø Categorical Determinations not reported to OBRA upon admission
 Ø Not submitting monthly placement/tracking changes (Level II Repor MI/ID/RC persons) by the 10th of every month
- Ø Not complying with "<u>Time Sensitive"</u> Categorical Determinations (categorical-convalescent, emergency, respite)

PASRR Authorities

- Omnibus Budget Reconciliation Act of 1987 (OBRA)
- Title XIX of the Social Security Act (sec 1919)
- 42 CFR Part 483-Requirements for States and Long Term Care Facilities, Subpart C
- Medicaid Administrative Code, Ch.10 (LTC)
- Medicaid Provider Manual, Ch. 26
- Federal Enforcement Agency (CMS)
- Public Health Agency Surveyors

Level II Evaluation Requirements

The Level I Determination will "always" alert you "if" and "when" a Level II Evaluation is required.

(NEVER assume <u>ALWAYS</u> read "<u>EACH</u>" determination!)

"3" Possible Level II Evaluation Scenarios

- (1) Must be completed prior to admission (7 day timeframe)
- (2) Must be initiated <u>upon admission</u> by contacting the OBRA Office to begin the Level II Evaluation process (MI/ID/RC categorical convalescent care, advanced chronic medical illness) <u>OR</u>
- (3) Must be completed <u>within a specified timeframe</u>, which will always be listed on the Level I Determination

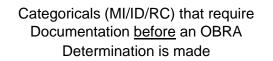
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Time Sensitive Determinations

What is a Categorical Determination? (MI/ID/RC)

- Respite Care (<u>up to 7 days without a Level II Evaluation</u>) if stay is <u>over</u> <u>7 days</u> must contact OBRA to start Level II)
- Emergency Care (<u>up to 7 days without a Level II Evaluation</u>) if stay is <u>over 7 days</u> must contact OBRA to start Level II)
- 3. Advanced Chronic Illness and Terminal Illness (must contact the OBRA Office upon NH admission to start the Level II Evaluation)
- MI/ID/RC 120 Day Convalescent Care (must contact the OBRA Office upon NH admission to start the Level II Evaluation)



- Terminal Illness and Advanced Chronic Illness (must contact the OBRA Office <u>upon NH admission</u> to start the Level II Evaluation)
- 2. Respite Care (up to 7 days without a Level II Evaluation) "if" stay is over 7 days must contact OBRA to start Level II)
- Emergency Care (<u>up to 7 days without a Level II</u> <u>Evaluation</u>) "if" stay is <u>over 7 days</u> must contact OBRA to start Level II) (must have an open case with DHR & can not be in a protective environment, hospital, etc.)

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MI/ID/RC 120 Day Convalescent Care Categorical Determinations Requirements • Time Sensitive, only valid for 120 days! • Must contact the OBRA Office upon admission to begin the Level II Evaluation • If later determined that the resident needs to remain past the 120 day timed stay, a SC-ST to LT must be submitted to the OBRA Office & LOC assessed • Must be in the Hospital with a direct admission into the NH (can not be a danger to self or others and can not be in the community) • If the duration of 5x a week lessens, you no longer have a valid determination. Therefore, discharge or complete a SC-14, ST to LT, LOC assessed) • If therapy stops, you no longer have a valid determination. Therefore, discharge or complete a SC-14, ST to LT and LOC) • If discharged prior to 120 days, you must indicate discharge on the Monthly Level II Report Form by the 10th

Interfacility Transfers

2 Items you must consider:

- Does the transferring nursing facility have PASRR documentation? (Never assume)
- 2. Is the PASRR documentation accurate/complete?
 - Is there a Level I Screening Form?
 - Is there a Level I Determination?
 - Is there corresponding medical documentation?
 - (If) applicable, is there Level II Documentation?

Considerations for Facilities with High Employee Turnover

- Have you ever admitted a person into your facility without completing the PASRR process/Level I Screening Form?
- If so, what measures do you have in place to prevent this from happening again?
- How many PASRR professionals do you have? If you have a "primary" PASRR professional, are your measures <u>only</u> effective when they are present? Do they have an assigned back-up professional <u>who is</u> <u>adequately trained?</u>

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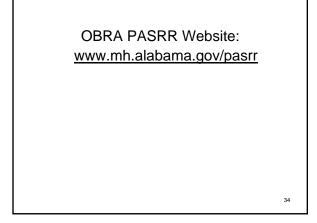
High Turnover continued

- If your primary person resigns, is there a protocol in place that **immediately transitions or educates** the **new PASRR person?**
- Is PASRR Training a part of your new employee orientation process? Are new employees required to take the next available PASRR Training course?
- Is there a <u>seamless awareness</u> that PASRR violations can result in <u>costly Medicaid</u> <u>recoupments</u>, <u>penalties</u>, and/or <u>sanctions</u>?

How many PASRR Violations have you had in the past year ____?

- Rare violation, isolated
- Numerous/Widespread (Are "all types" of PASRR violations common in your NH?)
- Repeat/Pattern of same type of violation (Is your facility known for the same type of violation? For example, NH IVY Green always neglects to contact the OBRA Office for Categorical Convalescents or continues to admit applicants without completing a Level I Screening Form prior to admission)
- Consecutive months of PASRR Violations
- If you have violations, have all of your PASRR violations been resolved?

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Thank You for your Participation, if you have any additional questions

Please contact our office at (1-800)548-2188 or (334)242-3946