Preadmission Screening and Resident Review (PASRR) Training

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What is PASRR?

- PASRR is a federally mandated process Medicaid agencies must oversee and administer in conjunction with the state Developmental Disability authority and the state Mental Health authority.

- Established as part of the deinstitutionalization process, PASRR works to ensure that individuals with a serious mental illness (SMI) and/or developmental disability (DD) are not inappropriately institutionalized or marginalized.

- PASRR regulations require that all individuals seeking admission to a Medicaid-certified nursing facility (NF), regardless of payer source, be assessed for indications of SMI and/or a DD.
PASRR Goals

- Created through language in the Omnibus Budget Reconciliation Act of 1987 (OBRA)

- The intent of the PASRR provisions in OBRA is to optimize an individual’s placement success, treatment success, and the individual’s quality of life

- Ensure that individuals seeking admission to a Medicaid-certified NF and as well as residents with a serious mental illness (SMI) and/or developmental disability (DD) are:
  - Identified
  - Appropriately placed in the least restrictive setting
  - Admitted or allowed to remain in a NF only if they can be appropriately and adequately served in that setting
98% of Ohio nursing facilities are Medicaid-certified and subject to PASRR requirements.

*Data provided by the Ohio Department of Health website through their Health Care Provider Real-Time Information database at [http://publicapps.odh.ohio.gov/eid/Provider_Search.aspx](http://publicapps.odh.ohio.gov/eid/Provider_Search.aspx)*
### PASRR Statutes and Regulations

<table>
<thead>
<tr>
<th><strong>Federal Statutes</strong></th>
<th><strong>State Regulations</strong></th>
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<tbody>
<tr>
<td>– §1919(e)(7) of the Social Security Act</td>
<td>– OAC 5160-3-15 Preadmission screening and resident review definitions</td>
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<td>– 42 CFR §483.100 - §483.138</td>
<td>– OAC 5160-3-15.1 Preadmission screening requirements</td>
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<td>– OAC 5160-3-15.2 Resident review requirements</td>
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<td>– OAC 5123:2-14-01 Developmental disabilities</td>
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<td>– OAC 5122-21-03 Serious mental illness</td>
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PASRR State Agency Primary Roles

Ultimate oversight of the PASRR process

Manages Level I Preadmission Screen (PAS) and issues level of care (LOC) determinations

Responsible for Level II evaluations for Serious Mental Illness (SMI)

Responsible for Level II evaluations for Developmental Disability (DD) and Related Condition (RC)
PASRR Secondary Role of other Agencies

- Completes in-person Level II assessment for OhioMHAS
- Completes in-person Level II assessments for DODD and arranges for supports/services
- Regulates Ohio-licensed nursing facilities
- Advocates for admission of individuals to the most integrated setting
The Structure of PASRR

PASRR

Level I
Level II

Resident Review
PASRR Components

- **Level I (Broad Screening)**
  - Refers to the screening used to identify whether a person has or is suspected of having a SMI and/or DD
  - Also known as the preadmission screening (PAS) when screening is conducted prior to nursing facility admission

- **Level II (Comprehensive evaluation & determination)**
  - Confirms or disconfirms a PASRR condition
  - Is the function of evaluating and determining whether NF services and specialized services are needed

Follow-up assessments

- Resident Review
- Conducted upon significant change in condition
Level I Screening

- Broad screening designed to identify the suspicion or diagnosis of serious mental illness (SMI) and/or developmental disability (DD)

- Usually administered by:
  - Hospital Discharge Planners or
  - Nursing facility social workers

- The Level I screen should yield a positive result if there is evidence or a suspicion that the individual might have an SMI and/or DD

- Applies to every admission to every Medicaid certified NF

- Must be completed before the individual can be admitted to the nursing facility
Level I Screening

- The Preadmission Screening/Resident Review (PAS/RR) Identification Screening tool (ODM 3622) is used to conduct the level I screening and to initiate a resident review

- The Preadmission Screening/Resident Review (PAS/RR) must be submitted electronically via the “Healthcare Electronic Notification System” (HENS)

- The submitter is responsible for gathering information from the individual, family, guardian and available medical records

- The submitter must be thorough as all the information gathered will assist in identifying the most appropriate placement, supports and discharge planning options
Level I Results

- Level I results determine whether an individual is subject to a level II evaluation

- Individuals with:
  - No indications of SMI and/or DD are not subject to further review
  - Indications of **SMI** are subject to further review by OhioMHAS
  - Indications of **DD** are subject to further review by DODD
  - Indications of **SMI and DD** are subject to further review by both OhioMHAS and DODD
  - Individuals over the age of 22 who have previously been ruled out by DODD are not subject to further review
PASRR Categorical Determinations

Determination which may be made for an individual with SMI and/or DD without a full Level II - PAS when there is sufficient documentation that the individual meets the criteria below:

**Emergency Nursing Facility Stay**
An individual being admitted to a nursing facility pending further assessment for a period not to exceed seven (7) days when the admission is necessary to avoid serious risk to the individual of immediate harm or death.

**Respite Nursing Facility Stay**
Admission of an individual to a nursing facility for a maximum of fourteen (14) days in order to provide respite to in-home caregivers to whom the individual is expected to return following the brief respite stay.
PASRR Categorical Determinations

- While categorical determinations abbreviate the PASRR process for individuals meeting the criteria, the NF must not admit an individual using a categorical determination until the NF receives a determination from the appropriate level II entity.

- NF must initiate a resident review (RR) for residents admitted under a categorical determination that require a NF stay longer than the specified time limit for the category.
  
  » Level II RR evaluation must be completed before the end of the period.
Hospital Exemption

The ODM 7000 (Hospital Exemption from Preadmission Screening Notification) must be submitted via HENS for the individual

- Individual admitted to NF directly from an Ohio hospital (non-psychiatric) after receiving acute inpatient care
  - or
- Ohio resident admitted to NF directly from out-of-state hospital (non-psychiatric) after receiving acute inpatient care

Individual requires level of services provided by a nursing facility for the condition for which they were treated in the hospital

Attending physician provides written certification that individual is likely to require the level of services provided by a nursing facility for less than thirty (30) days
Hospital Exemption Process

Discharging hospital requests a hospital exemption (ODM 7000) via HENS

ODM 7000 shall be signed and dated by the attending physician* no later than the date of discharge from the hospital

NF accepts admission of individual and acknowledges that the individual meets criteria of a hospital exemption

NF maintains hospital exemption documentation in the resident’s record

Nursing facility shall initiate the resident review process prior to the resident’s thirtieth (30th) day in the nursing facility

An individual is not eligible for hospital exemption if within the last sixty (60) days an adverse determination has been issued by OhioMHAS or DODD

When the resident requires a nursing facility stay longer than thirty (30) days a Level I screening shall be initiated by the NF in accordance with OAC 5160-3-15.1

The thirty (30) day time period for a hospital exemption does not stop or restart if the individual is admitted to a hospital or transferred to another nursing facility during that time frame
# Level II Evaluations

## Level II for Serious Mental Illness

Process by which OhioMHAS determines whether the individual who has a serious mental illness requires the level of services provided by a nursing facility or another type of setting, and whether they require specialized services.

Subcontractor completes the in-person level II evaluation for OhioMHAS and then forwards the results on to the MHAS for determination.

## Level II for Developmental Disability

Process by which DoD determines whether the individual who has a developmental disability requires level of services provided by a nursing facility or another type of setting, and whether they require specialized services.

Subcontractor completes the in-person level II evaluation for DODD and then forwards the results to DODD for determination.
Level II Evaluation

- Comprehensive evaluation designed to “look behind” the diagnosis of record to make level II determination

- Individualized – in person evaluation is conducted onsite by the appropriate level II subcontractor

- The results of the level II evaluation are sent to the appropriate level II agency for determination

- Once the level II entity has made its determination, they will send results directly to the submitter
# Resident Review

- A resident review is a post admission level II evaluation that results in a determination for NF residents that must be initiated by the NF when:

<table>
<thead>
<tr>
<th>Condition</th>
<th>Determination</th>
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<tr>
<td>Individual admitted under the Hospital Exemption criteria</td>
<td>Individual transferring to a NF or being readmitted to the same NF after an</td>
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<tr>
<td>found to require more than 30 days of service in the NF</td>
<td>intervening hospital stay for psychiatric treatment</td>
</tr>
<tr>
<td>Individual is transferring to a NF and there are no PASRR records available</td>
<td>Individual has experienced a significant change in condition</td>
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<td>from the previous NF</td>
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<tr>
<td>Individual was admitted under a categorical determination and is found</td>
<td>Individual received a specified determination and has since been found to</td>
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<tr>
<td>to require a stay in the NF longer than the specified time limit for that</td>
<td>require a stay in a NF exceeding the period</td>
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<tr>
<td>category</td>
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<tr>
<td>Individual received a specified determination and has since been found to</td>
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<tr>
<td>exceed the period</td>
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Resident Review Process

- The NF is responsible for initiating a resident review
- The NF is must initiate the resident review via HENS
- Supporting documentation must be included with the resident review request
- Individuals determined to have no indications of SMI and/or DD are not subject to any further review and may continue to reside in the NF
- The NF is responsible for maintaining the resident review determination and all supporting documents in the residents file
Level II and Resident Review Determination

- OhioMHAS and DODD may approve a determination for an **unspecified** or **specified** period of time
  
  » A specified period of time may not exceed 180 days

- If an individual was admitted for a specified time and requires a longer stay beyond the specified time period, a request for an extension beyond the original **specified** period of time may be requested.
PASRR Extension Request

- An extension is **only** available on a previously issued time-specified **approvals**

- The extension **does not** alter the intent of the original decision

- Extensions are issued to allow time for the completion of therapies or for discharge planning

- An extension request must be submitted at least 30 days prior to expiration of approval

- Extensions will not be approved for more than 90 days at a time

- An extension request must include detailed documentation of the efforts taken by the NF to secure a safe and orderly discharge
Timeframe for PASRR

- Level II preadmission assessments must be completed within an annual average of 7 to 9 working days of referral by the entity that performs the Level I identification screen.

- PASRR is a recurrent process as long as the resident resides in a NF.

  » An individual who originally does not trip for SMI or DD must be reevaluated after a significant change in their condition.

- The definitive end point for the PASRR process is when the individual is discharged from the NF.
PASRR Transcends Level of Care (LOC)

Even if an individual meets the rule-based standard for nursing facility services (NF-LOC), **PASRR must still determine the most appropriate and integrated setting in which that individual’s needs can be met**

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<thead>
<tr>
<th><strong>NF-LOC</strong></th>
<th><strong>PASRR</strong></th>
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<tr>
<td>Determines if the minimum, rule-based criteria is met</td>
<td>Uses <strong>LOC</strong> criteria as a starting point to determine that services are provided in the most integrated setting</td>
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<tr>
<td>Issued by Dept of Aging or Managed Care organization</td>
<td>Facilitates access to needed disability-specific supports and services in the least restrictive environment</td>
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<tr>
<td>Eligibility determination for Medicaid reimbursement</td>
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<tr>
<td>Unrelated to appropriateness of placement</td>
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PASRR Resources


- Nursing Facility Admissions: Most Common Scenarios for Preadmission Screening and Resident Review (PASRR) and Level of Care (LOC) Reference Sheet: http://medicaid.ohio.gov/Portals/0/Providers/ProviderTypes/LongTermCare/IICF/MostCommonScenarios.pdf

- PASRR Training Presentation: https://medicaid.ohio.gov/Provider/ProviderTypes/LongTermCareFacilities
Helpful Contacts

- Please direct any PASRR and level of care policy and procedure questions or compliance issues to ODM at PASRR@medicaid.ohio.gov

- Nursing facilities should direct HENS system questions to the PASSPORT Administrative Agencies (PAAs)

- Technical issues with HENS should be reported to ODA_ISD_Helpdesk@age.ohio.gov