



OPERATIONAL MEMO

TITLE:	PRE-ADMISSION SCREENING AND RESIDENT REVIEW (PASRR) COVID-19 UPDATE
SUPERSEDES NUMBER:	HCPF OM 20-043
EFFECTIVE DATE:	MAY 11, 2023
DIVISION AND OFFICE:	COMPLIANCE AND INNOVATION DIVISION, OFFICE OF COMMUNITY LIVING
PROGRAM AREA:	PREADMISSION SCREENING AND RESIDENT REVIEW (PASRR)
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Purpose and Audience:

The purpose of this Operational Memo is to inform Pre-Admission Screening and Resident Review (PASRR) stakeholders of the reinstatement of all program requirements temporarily suspended as a result of the Public Health Emergency (PHE) and ensuing 1135 Waiver. The direction provided in this memo supersedes direction provided in Operational Memo 20-043 issued in March 2020.

The audience for this communication includes PASRR Reviewers and Evaluators, Hospitals, Nursing Facilities (NF), Single Entry Point (SEP) agencies, Community Centered Boards (CCB), Telligen and all agencies and individuals involved in the PASRR process.

Information:

Effective May 11, 2023, the Centers for Medicare & Medicaid Services (CMS) have declared an end to the Public Health Emergency that was initiated in March 2020 due to the COVID-19 pandemic. The Department of Health Care Policy & Financing (HCPF),

working with CMS, is ending the changes to the PASRR program instituted under the 1135 Waiver during the PHE.

Updated Guidance:

The PASRR process requires all applicants to Medicaid-certified Nursing Facilities be given a Pre-Admission Level I Screen (PAS) to determine whether they might have a Serious Mental Illness (SMI) and/or an Intellectual or Developmental Disability (IDD). Those individuals who screen positive at Level I screen are then referred for a more in-depth evaluation (Level II). The result of the Level II evaluation provides a determination of need, most appropriate setting, and a set of recommendations for services to inform the individual's care plan (42 CFR 483.100-138).

HCPF is reinstating the requirement that PASRR activities be performed as follows:

New Admissions:

- All new admissions will require a PAS be completed and submitted to HCPF's Utilization Review Contractor (URC), Telligen.
- Telligen will review the PAS and provide an outcome letter which acts as the authorization for NF admission, if there is no known or suspected PASRR condition. If there is a known or suspected PASRR condition, Telligen will complete a Level II Evaluation. The Level II Evaluation, and the Notice of Determination (NOD) must be completed prior to admission. HCPF will continue to work with Telligen and federal partners to identify flexibility to the reinstated requirements for in-person Level II evaluations in areas if there are limited Level II evaluators.
- For new admissions, SEP agencies will need a PASRR authorization from Telligen to issue a Level of Care Eligibility Determination for NF clients. The admission start date for members who do not require a Level II evaluation shall be the date that the Initial Screening and Intake Form and Professional Medical Information pages from the ULTC 100.2 are faxed to the SEP.
- The PASRR admission start date for members (the first date of care covered by Medicaid) shall be assigned after the required Level II evaluation and the State Mental Health Authority (SMHA) and/or the State Intellectual Disability Authority (SIDA) have issued the NOD.
- A PASRR Level I Screen must be completed for all members who are being admitted to a NF for hospice care.

Resident Transfers between NFs:

- Per 42 C.F.R. §483.106(b)(4) residents transferring between NF will require a new Level I screening. A new Level II is not always required if the Level II is still

clinically accurate and the SMHA/SIDA issues an updated/transfer NOD based on the previous Level II.

Current NF Residents:

- For current residents, Level II evaluations and Resident Reviews should be completed in-person by Telligen. Virtual contact can occur if facility visitation restrictions are in place as required by the state or county department of health guidelines. The Department will continue to work with Telligen and federal partners to identify flexibility to the reinstated requirements for in-person Level II evaluations in areas if there are limited Level II evaluators.
- NFs will be responsible for ensuring a Post Admission Level I is submitted to Telligen upon the expiration of the 30-day exemption (5/11/23 or previous) for all Level I and Level II admissions. NFs shall continue to follow all necessary documentation protocols using their PASRR progress notes to comply with federal regulations.

Payor Source Changes:

- For Pay Source Changes (PSC), the start date of the initial certification for long term care services shall be the latter of 1) the date the SEP receives the referral, or 2) the date the NF is within PASRR compliance, as shown through an authorization from Telligen, if the PSC referral was received by the SEP after day 30 of admission. If the PSC referral was received prior to the resident being in the NF for 30 days, the SEP can issue a certification without the receipt of a PASRR authorization.

Resident Review or Status Change:

- For Resident Review or Status Change approval the NF must provide the following information for the SEP to issue the start date: 1) Initial PASRR approval from the member's admission to the nursing facility. 2) Verification that the NF submitted the Resident Review or Status Change into Telligen's online portal. NFs have 10 business-days to submit the status change after the change in condition.

Please submit any questions you may have to [HCPF HCBS questions@state.co.us](mailto:HCPF_HCBS_questions@state.co.us).

Attachment(s):

None

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