

# **OPERATIONAL MEMO**

<b>Title:</b> Pre-Admission Screening and Resident Review (PASRR) Exempted Hospital (EHD) Update	Topic: PASRR
Audience: 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.	<b>Sub-Topic:</b> Exempted Hospital Discharge (EHD)
Supersedes Number: N/A	<b>Division:</b> Compliance and Innovation Division
Effective Date: August 11, 2023	Office: Office of Community Living
Expiration Date: August 11, 2025	<b>Program Area:</b> Preadmission Screening and Resident Review (PASRR)
<b>Key Words:</b> Pre-Admission Screening and Resident Review, PASRR, Hospital Discharge, Nursing Facility Admission, Hospital, Nursing Facility	
Legal Authority: 10 CCR 2505-10, 8.401.18, 42 CFR 483.106(a)(2)	
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Operational Memo Number: HCPF OM 23-050	
Issue Date: August 11, 2023	
Approved By: Bonnie Silva	

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## Purpose and Audience:

The purpose of this Operational Memo is to provide updated guidance to Pre-Admission Screening and Resident Review (PASRR) stakeholders about the Exempted Hospital Discharge (EHD) PASRR provision.

The audience for this communication includes PASRR reviewers and evaluators, Hospitals, Nursing Facilities (NF), Case Management Agencies (CMA), Telligen (The state's PASRR contracted vendor) and all agencies and individuals involved in the PASRR Process.

### Information:

As of May 11, 2023, and the end of the COVID-19 Public Health Emergency (PHE), CMAs and hospitals are required to submit Level I PASRR screens. This requirement was waived during the PHE. Any hospitalized individual discharging to a Medicaid-certified nursing facility needs to have the PASRR process completed prior to nursing facility admission.

Updated Guidance:

One of the provisional options when completing a PASRR Level I Screen is the Exempted Hospital Discharge (EHD). Compliance with Federal PASRR regulation (42 CFR 483.106(a)(2) is based on the following EHD guidance:

"For an individual to be eligible for the EHD provision they must meet the following criteria: (A)Who is admitted to any nursing facility directly from a hospital after receiving acute inpatient care at the hospital; AND

(B) Who requires nursing facility services for the condition for which they received care in the hospital; AND

(C) Whose attending physician has certified before admission to the facility that the individual is likely to require less than 30 days nursing facility services."

In accordance with Federal rule, Colorado will now require the individual's attending physician to certify in writing that the individual meets the criteria for the EHD PASRR provision. To do this, hospitals may:

- Use the form titled "Exempted Hospital Discharge Form- May 2023" located on the PASRR webpage. Use the attending physician's signature imbedded in a physician progress note; or
- Utilize a "dot phrase"/smart phrase/auto text/medical template electronically signed by the attending physician; or
- Hospitals can choose to create their own form.

Any progress note, "dot phrase"/smart phrase/auto text/medical template or hospital created form must include all the information on the "*Exempted Hospital Discharge Form- May 2023*" including all regulatory language and regulatory reference numbers.

The completed EHD form must be uploaded into Qualitrac (Telligen's PASRR submission portal) at the time of the Level I Screen submission.

Please note, documents cannot be added once the Level I Screen has been completed. Once the "Level I Outcome Letter" has been issued, Telligen will not

consider any new documentation. If there are changes or a document was omitted, a new Level I screen must be submitted with an explanation of why all required documents were not included in the previous submission.

If the individual was admitted to the hospital from a nursing facility, they would not qualify for the EHD.

HCPF is in the process of developing a FAQ which will be located on the PASRR webpage (link below) upon completion.

## Action To Be Taken:

Please ensure you have updated your facilities policies and procedures to comply with the EHD PASRR provision.

#### Attachment:

Find the link to the Emergency Hospital Discharge Form on the <u>main HCPF PASRR</u> page.

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