

State I/DD Agency Considerations for Pre-Admission Screening and Resident Review (PASRR) During COVID-19 Emergency

Most states have elected to request exceptions to PASRR requirements during the COVID-19 pandemic using Section 1135 of the Social Security Act. The Centers for Medicare & Medicaid Services (CMS) is suspending the PASRR Level I and Level II requirement for 30 days with approved Section 1135 waivers, allowing the state to treat all Medicaid nursing facility (NF) admissions like exempted hospital discharges. New NF admissions of individuals with mental illness (MI) or intellectual disability (ID) under this waiver should receive a Resident Review after the 30-day period or as soon as resources become available.

In theory, individuals with ID or related conditions (RC) can be admitted to a NF during and/or as a result of the Coronavirus emergency without provisions for specialized supports for their individualized needs and according to their home and community-based services (HCBS) person-centered service plan. The following points are important for state I/DD agencies to consider when assuring individuals in the DD service system receive adequate supports during a NF stay while PASRR Level I and Level II requirements are suspended via a state's approved 1135 waiver.

Identification and Tracking of NF Placements

- Regardless of an 1135 waiver of PASRR, it is important to know when individuals with ID are being admitted to a NF. State I/DD agencies should continue to keep an accounting of these admissions as they would under normal operational conditions.
- In addition to tracking individuals who are admitted to a NF, states will find it helpful to collect information on the admission date and target date for completion of the Resident Review (by the 40th-day post-admission). Maintaining an awareness of timelines for each person will avoid individuals with ID/RC unnecessarily becoming long-term residents of NFs or going for an extended period of time without necessary Specialized Services.

Specialized Services

- Under provisions of an 1135 waiver, states can delay completion of the PASRR Level II for 30 days which thus delays the identification of specialized services needed for an individual while receiving NF care. However, most people with ID/RC already will have a person-centered service plan with support elements that can be provided, even on a smaller scale, via telecommunications during a NF stay. This may be an opportunity to assure service continuity without formal PASRR recommendations for specialized services.
- Telecommunications are ideal methods for maintaining contact with and providing support to individuals with ID/RC in NFs during informal and formal guidance to maintain social distancing and practice infection prevention protocols.

Support for NF Care

- As in all corners of the health care field, NF staff are particularly focused on resident safety and infection control. This may create challenges for NF staff to provide supports unique to the individual with ID/RC. Again, telehealth is ideal to ensure ongoing supports are in place for individuals, especially while PASRR actions are suspended.

Following the COVID-19 Crisis

- The CMS 1135 Waiver approvals indicate that a Resident Review should be completed 30 days post-admission or as soon as resources become available. It is advantageous for states to enact PASRR Level I and Level II within this time period to avoid a back-log of PASRR actions when the COVID-19 emergency subsides and Medicaid exception time frames expire.
- State I/DD agencies may consider additional oversight of PASRR implementation following the COVID-19 crisis to assure that Level I and Level processes are completed timely, Specialized Services are identified and provided and discharge planning is enacted so individuals may return to the community and integrated settings as soon as possible.