

Subject:

Regarding the 1135 Waiver: Suspension of PASRR Level I and Level II Assessments for 30 days

Message:

1135 Waiver

Indiana's Family Social Services Administration has been approved to enact the 1135 waiver by the Centers for Medicaid and Medicare Services. One section refers to our ability to waive the PASRR Level I and Level II assessments for 30-days. This will be a temporary change in procedure for PASRR. Below, please find some clarification on what this means for this change in process.

1135: Suspend Pre-Admission Screening and Annual Resident Review Level I and Level II Assessments for 30-days.

- All new admissions can be treated like exempted hospital discharges.
- After 30 days, new admissions with mental illness or intellectual disability should receive a Resident Review as soon as resources become available.
- Reminder, under current law Level I and Level II screens are not required for residents who are being transferred between nursing facilities.

What does this mean for hospitals?

It means that hospitals can request to admit a patient to a nursing facility without completing a Level I, Level of Care, or Level II. Hospitals are still expected to only request admission of patients who have skilled nursing needs.

What does this mean for nursing facilities?

It means that the onus will be placed on the nursing facility to complete the Level I and LOC.

Do nursing facilities need to wait 30-days to complete these assessments?

Nursing facilities will have 30 days to initiate the Level I and LOC. However, you do not need to wait 30-days to complete the assessments. The Division of Aging encourages you to complete the Level I and LOC as quickly as possible upon resident admission. We encourage this for several reasons:

1. To more efficiently process payment of services
2. To ensure we are keeping track of where residents are in case of emergencies
3. To help you identify services for people who have a Level II condition
4. To prevent you from having a very long To Do list in 30-days
5. To prevent a back log of Level Is, LOCs, and Level IIs in 30-days

While we encourage you to complete upon admission, we know that this won't always be an option. The 30-days gives you flexibility in completion. However, we continue to encourage that you complete them as quickly as possible for the above reasons.

How will Level IIs be handled for the next 30-days?

You will have 30 days to complete the Level I and LOC. Once the Level I and LOC are submitted Ascend will handle the Level II within the usual 5-business days after Level I submission.

All Level IIs will be completed via telephonic interviews and Document Based Reviews. All face-to-face assessments will be suspended during this time. Assessors will contact the nursing facility to request interviews with residents and staff. We ask that you support the completion of the Level II by responding to these requests in a timely manner whenever possible. All telephonic interview assessments and DBRs will result in a short-term decision. The timeline on that short-term decision may vary. This ensures a face-to-face can be done for a more thorough assessment in the future, without delaying a need for current services. We ask that you discuss these decisions with residents to help them understand the purpose of the initial short-term decision and to encourage them to complete the telephonic interviews. Once a Level II is initiated Ascend will have the usual 5-business days to complete.

How are Resident Reviews being handled during this time?

As you know, we no longer require annual resident reviews. If you feel a person has had a significant change in status and requires a new Level II, you may suspend completion of that new Level II until resources become available. There is not a specific timeline on this as of today. We only ask you complete them when you have the capacity to do so. Please ensure your residents are receiving the services they need.

If the nursing facility waits to complete the Level I and Level of Care will they be back dated to admission?

We are unable to backdate a Level I or Level II, but the Assessment Reference Date on the LOC may be backdated to the date of admission. Please ensure you are properly recording those admissions in PathTracker to prevent approval delays.

What isn't changing?

Transfers from one nursing facility to another, or to a hospital and back, will be handled the same way and do not require a new series of assessments

A LOC only needs to be completed on residents who have Medicaid as a primary pay source and/or trigger a Level II assessment.

Further Questions

Please reach out to PASRR@fssa.in.gov with any further questions regarding these temporary procedures.

