

To: Medicaid Nursing Facilities
Intermediate Care Facilities for Individuals with Intellectual Disabilities (ICFs/IID)
TennCare Health Plans

From: Kristeena Wilson, Assistant Deputy Chief, Operations, LTSS

CC: Patti Killingsworth, Assistant Commissioner and Chief of LTSS
Kim Hagan, Director Member Services
Department of Intellectual and Developmental Disabilities

Date: March 18, 2020

Subject: **COVID-19 Guidance Regarding Financial Eligibility Redetermination and PASRR Processes**

This memo provides IMPORTANT INFORMATION information regarding actions TennCare is taking to help minimize risk of exposure for those you support as well as administrative burden for your staff regarding COVID-19, the disease associated with the coronavirus (SARS-CoV-2), and to help ensure timely access to the important services you provide during this critical time.

Financial Eligibility Redetermination

In light of the impact of COVID-19 on nursing facilities (NFs) and ICFs/IID across Tennessee, TennCare has decided to delay renewals for the Institutional eligibility population living in these facilities at this time. Here are the details:

- The Institutional population that has been selected for March and April 2020 will be pushed back to at least May 2020. **They will receive a new packet between May 2020 and October 2020.** You should see this change reflected in TennCare Access within the next week.
- The Institutional population who were selected for February 2020 renewals but have not returned their Renewal packet **will not be terminated.** They will be sent a new renewal packet between May 2020 and October 2020.
- What if they were selected for renewal in February 2020 and **have returned** their packet? We will attempt to reapprove them without requesting verifications, if possible. If we cannot process the renewal with data already known to TennCare, then we will stop their renewal and remove their renewal due date, so they remain eligible. They will be sent a new renewal packet between May 2020 and October 2020.

PASRR

To expedite hospital discharge of patients no longer requiring acute care (and free up capacity for those with COVID-19 or other acute needs), we want to make sure you are aware of the appropriate process to follow to ensure compliance with federal PASRR requirements.

Pursuant to 42 CFR § 483.106(b)(2), a person who is found by a Level 1 screen to require a Level 2 evaluation may be exempted from such evaluation if the person:

- Is admitted to the NF directly from a hospital after receiving acute inpatient care at the hospital;
- Requires NF services for the condition for which he or she received care in the hospital; and
- The attending physician has certified before admission to the facility that the individual is likely to require less than 30 days nursing facility services.

Hospitals and/ or nursing facilities must still complete the level 1 screen, but the person will not have to complete the level 2 evaluation prior to discharge from the hospital and admission to the NF.

NFs remain obligated to ensure that if it is subsequently determined that the individual will remain in the facility beyond the 30-day approval, a level 2 evaluation is completed.