

DATE: August 25, 2021

TO: Medicaid Nursing Facility (NF) Providers
Tennessee Hospitals
TennCare Health Plans

FROM: Kristeena Wilson, RN, Assistant Deputy Chief, LTSS Operations

CC: Dr. Wendy Long, M.D. M.P.H., President and CEO, Tennessee Hospital Association
Patti Killingsworth, Assistant Commissioner and Chief of LTSS

SUBJECT: PASRR Guidance

As you may recall, shortly after the COVID-19 public health emergency (PHE) commenced, TennCare requested and received approval from the Centers for Medicare and Medicaid Services (CMS) for certain waivers as part of Tennessee's 1135 Emergency Waiver application pertaining to the COVID-19 PHE. This included a one-time ability to suspend all pre-admission screening and resident review (PASRR) assessments for 30 days. This was a **one-time waiver** that commenced on December 22, 2020 and terminated on January 21, 2021. To date, CMS has not provided authorization for States to request a second exemption to the PASRR process.

Nonetheless, in an effort to support timely hospital discharge as COVID-19 hospitalizations are on the rise, we want to provide a reminder of the exemptions that *are* available to you as part of the standard PASRR process. These exemptions allow for individuals *in certain circumstances* to bypass the full level 2 PASRR evaluation process. It is important to remember that these exemptions are monitored and should be accurately requested. If the level 1 PASRR assessor determines this is an inaccurate submission, the level 1 exemption request may be sent for a full level 2 PASRR evaluation. The exemptions are as follows-

- Exempted Hospital Discharge (EHD) – a person is currently admitted to the hospital and is going to the NF for treatment of the condition for which s/he received hospital care, and whose physician certifies will likely require **30 days or fewer of NF services**
- Convalescent Care – a person is currently admitted to the hospital and is going to the NF for treatment of the condition for which s/he received hospital care, and whose physician certifies will likely require **60 days or fewer of NF services**.
- Terminal Illness – a person has a terminal illness, and whose physician certifies s/he has a **life expectancy of 6 months or less**. This outcome provides 180 calendar days in the NF.
- Severe Physical Illness – a person who has a coma, ventilator dependence, functioning at brain stem level, or diagnoses, such as, Parkinson's disease, Huntington's disease, or ALS, which result in a level of impairment so severe that the individual could not be expected to benefit from specialized services. This is not a time limited stay, although the person's physician must certify the individual's condition. A new level I screen should be submitted should there be any improvement in the person's physical condition.

In addition to the reminder about requesting appropriate exemptions, if you have an individual for whom you are seeking an expedited discharge and they will be entering a COVID Skilled Care Unit (CSCU), the level 1 submitter should indicate such in the comments section. This will alert our PASRR vendor to expedite the level 1 process. We hope this information is helpful.