

DATE: December 21, 2020

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

FROM: Kristeena Wilson, Assistant Deputy Chief, LTSS Operations

CC: Jesse Samples, Executive Director, Tennessee Health Care Association
Dr. Wendy Long, M.D., President and CEO, Tennessee Hospital Association
Patti Killingsworth, Assistant Commissioner and Chief of LTSS

SUBJECT: 30-day Suspension of PASRR Requirements Effective December 22, 2020

As you may know, on March 31st, TennCare received approval from the Centers for Medicare and Medicaid Services (CMS) for certain waivers requested as part of Tennessee’s 1135 Emergency Waiver application pertaining to the COVID-19 public health emergency. This includes the ability to suspend all pre-admission screening and resident review (PASRR) assessments for 30 days.

Importantly, the 30-day PASRR suspension is a **one-time waiver** which cannot be extended or renewed. Thus, it is critical that it is invoked at the time when it is determined to be most needed—when relieving the administrative burden of these requirements will yield the greatest value to Tennessee’s hospitals and nursing facilities. Tennessee’s waiver authority provides that “[t]he effective date of the 30-day suspension of PASRR reviews will be determined by the state, but will take place during the declared emergency period.” We have continued communicating closely with our association partners—THCA and THA, and have relied heavily on their advisement around that timing.

Based upon that advisement, the 30-day PASRR suspension period will commence on December 22, 2020 and terminate on January 21, 2021.

During the 30-day suspension period, all Level I screens and Level II assessments are waived. All new NF admissions can be treated like exempted hospital discharges. After the suspension period has concluded, individuals admitted during that time known or suspected to have mental illness (MI) or an intellectual disability (ID) should receive a Resident Review as soon as resources become available.

Additionally, please note that per 42 C.F.R. §483.106(b)(4), new preadmission Level I screens and Level II evaluations are not required for residents who are being transferred between nursing facilities (NF). If the NF is not certain whether a Level I had been conducted at the resident's evacuating facility, a Level I can be conducted by the admitting facility during the first few days of admission as part of intake, and transfers with positive Level I screens will require a Resident Review as resources become available.

Starting January 21, 2021, or sooner if possible, all PASRR processes must resume with full compliance with federal PASRR processes.