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Date: March 7, 2023 PASRR IN No: 22-002 **REVISED**

To: General Acute Care Hospitals
California Hospital Association
California Association of Public Hospitals
Department of Developmental Services
Skilled Nursing Facility Organizations

Subject: The State of California's Preadmission Screening and Resident Review (PASRR) Compliance by July 1, 2023

Purpose: This PASRR Information Notice (IN) clarifies responsibilities for the General Acute Care Hospitals (GACHs) and Medicaid-certified Skilled Nursing Facilities (SNFs) to comply with the PASRR Federal Laws and Regulations.

Reference: Social Security Act Section 1919(e)(7) [Title 42 of the United States Code (U.S.C.), Section 1396r(e)(7)] and Title 42 of the Code of Federal Regulations (C.F.R.), Chapter IV, Subchapter G, Part 483, Subpart C, Sections 483.100 through 483.138

Executive Summary

California's PASRR program is required to become preadmission compliant by July 1, 2023. To become preadmission compliant, all GACHs are required to complete training and enroll in the PASRR online system. Required training is available online on the PASRR website. GACHs will be required to submit Level I Screenings and complete the PASRR process prior to discharging an individual to a SNF once they are onboard the PASRR system. Federal Financial Participation (FFP) for SNF services will be available after the PASRR process is complete. The purpose of this PASRR IN is to explain the PASRR process, clarify roles and responsibilities for GACHs and SNFs, and provide information regarding the process for enrolling into the PASRR system.

Background

Per 42 C.F.R. sections [483.100 through 483.138](#), individuals identified with a serious mental illness (SMI) and/or intellectual disability, developmental disability, and/or related condition(s) (ID/DD/RC) must be screened and evaluated to

determine the required SNF level of care and specialized services in the least restrictive setting that best meets their needs (PASRR Determination). All individuals, regardless of payer source, seeking admission to a Medicaid-certified SNF must have a PASRR Determination by the State Mental Health Authority [Department of Health Care Services (DHCS)] or ID/DD/RC Authority [Department of Development Services (DDS)] prior to a SNF accepting admission. FFP is available for services once the PASRR process is completed prior to SNF admission (42 C.F.R 483.122).

The PASRR process begins with a preliminary screening (Level I Screening) to identify individuals with known or suspected SMI and/or ID/DD/RC. If the Level I Screening indicates SMI and/or ID/DD/RC, a Level II Evaluation is performed by a Level II Evaluation Contractor (Level II Contractor). The screening and evaluation information is used by DHCS or DDS' contracted regional center(s) to issue the PASRR Determination.

Since 2015, California has actively maintained a Corrective Action Plan (CAP) with the Centers for Medicare and Medicaid Services (CMS) due to the PASRR process not being completed prior to the SNF accepting admission. Per the current terms of the CAP, California is required to come to full preadmission compliance by July 1, 2023, meaning that the PASRR process must be completed prior to the individual being admitted to a SNF or by the time of discharge from a GACH. In an effort to meet this requirement, DHCS upgraded the PASRR online system allowing GACHs to enroll in the system, submit Level I Screenings to initiate the PASRR process, receive the PASRR Determination, and utilize the File Exchange feature to submit the medical documentation to the SNF electronically prior to the SNF accepting admission.

PASRR Process

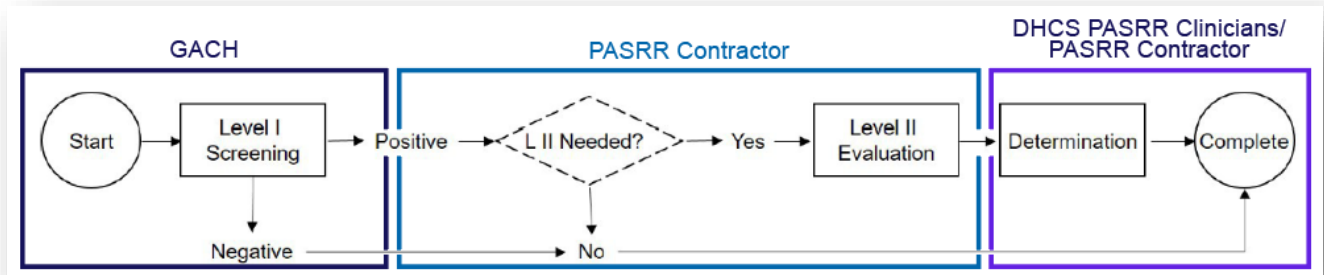
Per 42 C.F.R. section 483.112(c)(1), the PASRR process must be completed within an annual average of 7 to 9 working days once the Level I Screening is submitted by a GACH. As previously stated, DHCS is the designated State Mental Health Authority responsible for the SMI PASRR Determination and DDS is the State ID/DD/RC Authority responsible for the ID/DD/RC PASRR Determination. The PASRR process consists of three main steps.

1. Level I Screening is completed by a GACH.
2. Level II Evaluation:
 - a. Following a positive Level I for SMI individual, is completed by a DHCS independent contractor.
 - b. Following a positive Level I for ID/DD/RC individual, is completed by a DDS' contracted regional center(s).
3. Determination issued by DHCS or DDS' contracted regional center(s).

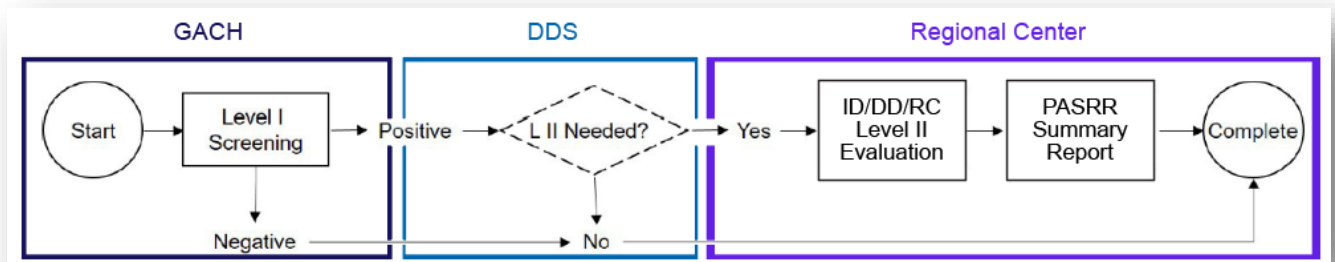
Please see the two flow charts below for a general overview of the PASRR process,

which must be completed prior to the individual being discharged from a GACH.

SMI PASRR Process Flow Chart:



ID/DD/RC PASRR Process Flow Chart:



The PASRR process begins with a Level I Screening completed in the PASRR system by the GACH staff as soon as there is an indication that the individual will be discharging to a Medicaid-certified SNF. This will promote a timely PASRR process and minimize delays in transitioning from a GACH to a SNF.

Once a Level I Screening is complete, it will either trigger positive or negative for SMI or ID/DD/RC. (See flow charts above.) If it is negative for either SMI or ID/DD/RC, a “No Need Letter” is generated and the case is closed in the PASRR system. The GACH is to print the “No Need Letter” from the PASRR system and provide the individual with a copy.

If the screening triggers positive for ID/DD/RC, it is automatically forwarded to DDS and their regional center(s) complete the Level II Evaluation and Determination steps. The DDS’ contracted regional center(s) will contact the GACH and arrange for a Level II Evaluation in person at the GACH or via telehealth and provide a PASRR Summary Report to the GACH staff. At this time, the GACH may discharge the individual.

If the results of the Level I Screening indicate the individual has a SMI, the information is automatically forwarded in the PASRR system to the DHCS' Level II Contractor. The Level II Contractor will then complete a Level II Evaluation in person or via a telehealth platform. The results of the screening and evaluation are used by DHCS to issue a Determination.

The DHCS' Clinical Consulting Psychologists (CPs) review the completed Level II Evaluation for SMI and issue a Determination letter with placement and treatment recommendations for the individual. Once the GACH has access to the Determination letter, they must forward a hard copy or share it electronically via the PASRR system's file exchange with the SNF that the individual will be discharged., To access the Determination letter in the PASRR system, the GACH will review the "Level I Case List" by the PASRR Client Identification (CID) number. If the case is closed, the "resolution" will state "Determination Letter Generated, Level II Categorical, or Level II Attempt." By clicking the "Action Icon" button, the GACH can download and print the Determination letter for SMI. More information is provided on the PASRR website at [Pre-Admission Screening and Resident Review \(PASRR\) \(ca.gov\)](https://www.dhcs.ca.gov/services/MH/Pages/PASRR_reconsideration.aspx).

Appeal Process

In the event the resident, facility staff, and or conservator disagree with the PASRR Determination for SMI and/or ID/DD/RC, a Request for Reconsideration may be submitted. The Request for Reconsideration form is located on the PASRR website. Upon receipt of the SMI PASRR Determination Request for Reconsideration, the DHCS CP that completed the Determination reviews the appeal. After review, the DHCS CP can agree or disagree with the Reconsideration Request. In the event the DHCS CP agrees with the request, an updated Determination Letter is sent to the requesting party.

Upon receipt of the ID/DD/RC PASRR Determination Request for Reconsideration, DHCS will forward the request to DDS for review. DDS will provide a written notification to requesting party of its final determination.

If the requesting party is still dissatisfied with the PASRR determination for SMI and/or ID/DD/RC result, they may request a State Fair Hearing with the California Department of Social Services (CDSS). For more information on Request for Reconsideration, visit the DHCS' PASRR website at https://www.dhcs.ca.gov/services/MH/Pages/PASRR_reconsideration.aspx.

Timeline

DHCS piloted the PASRR system by enrolling and onboarding six GACHs from December 1, 2022 through January 31, 2023. Starting January 2023, any GACH that is prepared to be preadmission may request DHCS permission to onboard the PASRR system. All remaining GACHs are required to complete training and PASRR Online System enrollment from February 2023 through April 2023. The Training Schedule is available on the PASRR website at [PASRR Information Notices \(ca.gov\)](#). Once enrolled in the PASRR system, the GACHs are expected to submit Level I Screenings in the PASRR system. This will support completion of the PASRR process for SMI and/or ID/DD/RC individuals prior to them being discharged to a SNF. The SNFs will not admit individuals without the completion of the PASRR process.

Implementation at the GACHs

The GACHs are responsible for developing an internal organizational process that identifies qualified staff to complete Level I Screenings to meet federal requirements. Any modifications to a GACH's discharge process must be made prior to enrolling to the PASRR system. Once the GACHs are enrolled in the PASRR system, they must complete the PASRR process prior to discharge. The GACH staff responsible for completing Level I Screenings must have:

- Knowledge of medical terminology.
- Knowledge related to the medical/behavioral history and current status of the individual.
- Met the individual or individual's family/conservator and is directly involved in the individual's care.

The GACHs must provide DHCS with the contact information of GACH staff who will be utilizing the PASRR system to complete the Level I screenings, interacting with the Level II Contractor, and forwarding the Determination letters to the SNFs. The information requested above can be submitted via the "The PASRR Facility Approver Certification Form," which can be accessed at the following link: [PASRR Enroll Facility Approver \(ca.gov\)](#).

Once the Level II Contractor contacts the GACH to schedule an in person or telehealth appointment to conduct the Level II Evaluation, it is critical that staff respond timely to ensure the entire PASRR process is completed within the 7 to 9 day timeline pursuant to 42 C.F.R. 483.112(c).

The GACHs must provide the DHCS, DDS, and the Level II Contractor access to the individual's electronic health/medical records or medical file and make them available for

the Level II Contractor to review when they conduct the Level II Evaluation¹.

If prior authorization to access an individual's medical records is required, the GACH should obtain the authorization prior to the Level II Contractor visiting the GACH to conduct the Level II Evaluation. As a best practice, DHCS recommends that the GACH develop a collaborative working relationship with the Level II Contractor to ensure the smooth and timely completion of the PASRR process.

PASRR Online System

There are two types of account roles available for each GACH: Approver and User. Staff who are given the role of "Approver" are responsible for adding authorized "Users" to the PASRR system.

To enroll in the PASRR system as an Approver, the Approver Certification Appointment Form, which is available on the PASRR website at [PASRR Facility Approver Certification Appointment Form](#), must be completed and submitted to DHCS via email at PASRRIT@dhcs.ca.gov. Please visit the PASRR website at [PASRR Enroll Facility Approver \(ca.gov\)](#) for instructions on how to submit the Approver Certification Appointment Form. Once the Approver(s) have received the email invitation, it is important that they complete the activation process. After the Approver is enrolled in the PASRR system for a GACH, they can add and inactivate other staff as Users.

To add a User, the Approver must go to the user list under the Admin menu. The Approver must complete all mandatory fields indicated with a red asterisk and submit the request, which is sent directly to the DHCS' PASRR team for approval. The User will receive an invite via email with instructions on how to complete the activation process. If the activation process is not complete, the User will not be able to access the PASRR system.

SNF Responsibility

Starting January 2, 2023, the six pilot GACHs listed below are considered "preadmission" and are responsible for submitting Level I Screenings and working with the Level II Contractor to ensure the PASRR process is complete prior to an

¹ GACHs may disclose, without a patient's authorization, protected health information (PHI) about the patient as necessary for treatment, payment, and health care operations purposes. Treatment is the provision, coordination, or management of health care and related services for an individual by one or more health care providers, including consultation between providers regarding a patient and referral of a patient by one provider to another. A disclosure of PHI by one Covered Entity (CE) for the treatment activities undertaken by another CE is fundamental to the nature of health care. Psychotherapy notes are protected and do require written authorization. [Why HIPAA Is NOT A Barrier to Getting PASRR Done](#) and page 15 of [Guide to Privacy and Security of Electronic Health Information](#)

admission to a Medicaid-certified SNF. Starting February 1, 2023, additional GACHs will onboard the PASRR online system to become preadmission compliant. If the individual is being admitted from a GACH that is onboard the system, the SNF may **not** admit the individual without a PASRR Determination. A SNF must receive all PASRR documentation via a GACH Approver initiated electronic file transfers through the PASRR online system or hard copies from the GACH. **Please NOTE**, file transfers cannot be accepted by the incoming SNF Approver until the individual arrives to the SNF.

Six Pilot GACHs:
Memorial Hospital Los Banos
Arrowhead Regional Medical Center
Eisenhower Health Medical Center
San Bernardino Mountains Community Hospital
Martin Luther King Jr Community Hospital
Hi-Desert Medical Center

SNFs will continue to complete a Level I Preadmission Screening (PAS) for all admitted individuals except for individuals transferred from GACHs that have not enrolled in the PASRR system. SNFs must review the Onboarding Schedule at [PASRR Information Notices \(ca.gov\)](#) for list of GACHs and their “Go Live Dates.” If the individual is coming from the community, the SNF needs to submit a Level I PAS and receive the Determination Letter for the individual before admission.

If the Minimum Data Set (MDS) does not match the Level I Screening from GACHs that are onboard the PASRR system (preadmission compliant) or there is a significant change in the individual’s mental or physical condition, the SNF is responsible for completing a new Level I Screening to initiate a Resident Review (RR). All individuals, regardless of payer source, seeking admission to a Medicaid-certified SNF must have a PASRR Determination by DHCS or DDS prior to a SNF accepting admission. FFP is available for services once the PASRR process is completed prior to SNF admission (42 C.F.R 483.122).

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References

For further guidance, please visit the PASRR website at [Pre-Admission Screening and Resident Review \(PASRR\) \(ca.gov\)](#).

For training material, please visit the PASRR website at https://www.dhcs.ca.gov/services/MH/Pages/PASRR_training.aspx.

For questions regarding this Information Notice, please contact the DHCS' PASRR program staff at ITServiceDesk@dhcs.ca.gov.

Sincerely,

ORIGINAL SIGNED BY KYNA KEMP

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