

Long-Term Care Survey Alert

SPECIAL FOCUS: Survey Compliance: Follow These Key Pointers About PASRR And Mental Illness

Ignore the requirements at your own peril.

Knowing the ins and outs of OBRA-required Preadmission Screening and Resident Review requirements will keep you from ending up seriously on the outs with surveyors.

For starters, everyone who applies for admission to a Medicaid-certified nursing facility needs a Level 1 identification screen to identify whether he might have statutorily defined mental illness or mental retardation (MI or MR), according to a **Centers for Medicare & Medicaid Services'** Webcast, "Mental Illness in Nursing Homes." A person identified by the Level 1 screen as having potential serious MI or MR requires a state-performed PASRR Level II evaluation to determine whether nursing home placement is needed -- and what specialized services the state is responsible for providing or arranging for to meet the person's needs.

Getting a pass on PASRR: The only exemption for PASRR applies to patients hospitalized for acute inpatient care who require convalescent care for the same condition, noted a handout for the CMS Webcast. In such cases, the physician must certify before admission that the person will likely require a 30-day-or-less stay.

Important tip: Nursing home providers have reported instances where a resident appeared appropriate for a nursing home placement based on referral information, observes **Evvie Munley**, senior policy analyst for the **American Association of Homes & Services for the Aging**. But after admission, the resident's primary care needs turned out to be mental-illness-related. And the long-term care transfer and discharge rules are "explicitly designed" to make involuntary discharge very difficult, Munley says. Thus, in such scenarios, facilities can find themselves with very little recourse other than emergency department or temporary psychiatric admissions, she notes.

The regulations require NFs to notify the state mental health authority when a resident appears to have been admitted with a previously undiagnosed serious mental illness -- or develops such an illness, according to the CMS Webcast. NFs should also notify the state mental health authority when a resident with a PASRR Level II evaluation undergoes a significant change in status assessment for a mental or a physical condition. The state authority will then determine whether the significant change impacts PASRR determinations and thus requires a resident review.