



RI EOHHS MEDICAID POLICY

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| Subject: | <i>Revision to Signatories for PM1 Form for Determining Nursing Home Needs-Based Level of Care</i> | | |
| Applicability: | Individuals applying for Medicaid Long Term Services and Supports (LTSS) | | |
| Issue Date: | Effective Date: | Transmittal #: | Supersedes #: |
| March 22, 2021 | March 22, 2021 | 21-01 | New |

Purpose

The purpose of this policy is to clarify requirements pertaining to the PM1 Form (Physician Medical Form). The PM1 is used by the Rhode Island Executive Office of Health and Human Services (EOHHS) and the Department of Human Services (DHS) to determine if an individual who is disabled or over 65 meets a Nursing Home needs-based level of care (LOC). A LOC is necessary to determine an individual Medicaid LTSS eligible. EOHHS and DHS have identified that the collection of the physician's signature on the PM1 Form is a source of delay for determining NH LOC. Although a PM1 Form is still required, this policy clarifies that certain non-physicians may sign the PM1 prior to submission to the State.

Scope

This policy pertains to any individual applying for Medicaid Long Term Services and Supports (LTSS) under the following citations.

- [Rhode Island General Law Section 40-18-3](#)
- Attachment D of the [Rhode Island Comprehensive 1115 Waiver Demonstration](#)
- [210-RICR-50-00-5 Medicaid Long-Term Services and Supports: Functional/Clinical Eligibility](#)

Medicaid LTSS covers both medical care and non-medical living supports that assist with normal daily tasks like eating, dressing and using the bathroom. LTSS is available in a person's home and in community settings like assisted living as well as in health facilities like nursing homes.

Statement of Policy or Procedure

Effective as of March 22, 2021 the PM1 Form does not need to be signed by a physician. The PM1 form can be signed by other qualified medical staff that are a part of the applicant's care team. The PM1 Form may be signed by the applicant's physician, PA, NP, as well as a registered nurse or discharge planner (who holds, at a minimum, a bachelor's degree in nursing or social work).

To determine whether a Medicaid LTSS applicant meets the NH LOC criteria as defined in Attachment D of the [Rhode Island Comprehensive 1115 Waiver Demonstration](#), and therefore is eligible to receive HCBS services, EOHHS will still require that a PM1 Form be submitted with the applicant's LTSS application. For a list of documents required for LTSS eligibility, please see the [LTSS Verification Checklist](#) on www.DHS.RI.Gov.

Background

Special Term and Condition (STC) #27 of the Rhode Island Comprehensive 1115 Waiver Demonstration explains that there are three (3) LOCs - Highest, High, and Preventive - and that to qualify as a Highest or High LOC, the individual must demonstrate, based on medical need, to either “require the institutional level of care” or “to benefit from either the institutional level of care or a significant level of home and community-based services.” Attachment D of the [Rhode Island Comprehensive 1115 Waiver Demonstration](#) describes the criteria that an individual must meet to demonstrate that they meet a Nursing Home LOC.

Historically, from an operational perspective, EOHHS staff that were conducting eligibility determinations required a PM1 Form be submitted and signed by the applicant’s physician. The PM1 Form provides a description of the applicant’s health status and medical needs. Regulatorily, a physician’s signature is not required.

As explained in [210-RICR-50-00-5.4](#), the process to determine an individual’s LOC is “initiated when the information necessary to evaluate an applicant's current health status and functional service needs become available to the State through one or more” sources, one of which is the PM1 Form). Additionally, [Rhode Island General Law Section 40-18-3](#) does not explicitly require a physician’s signature on such form, but rather refers to the applicant’s physician as one option for an individual that completes and signs the comprehensive assessment.

To ensure that Medicaid LTSS applicants receive timely determinations, and subsequent timely access to needed services, EOHHS is no longer requiring that a PM1 Form be signed by a physician and will accept signatures from the applicant’s physician, PA, NP, as well as a registered nurse or discharge planner (who holds, at a minimum, a bachelor’s degree in nursing or social work). Except for the change in required signatories on the PM1 Form, all other procedural steps in the determination of a NH LOC remain unchanged.

Questions?

If you have any questions, please contact Lissa DiMauro via email at lissa.dimauro@ohhs.ri.gov.