

## MEMORANDUM

**TO:** AAA Executive Directors                      **NOTICE#: 022717-2-PC-SWCBS**

**FROM:** Jeffrey S. Bragg, Secretary

**DATE:** February 27, 2017

**SUBJECT:** Notice of Policy Clarification: 701D and 701S Imminent Risk (IR) Definition and Designation

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The purpose of the Notice of Clarification is to provide guidance to the Aging and Disability Resource Centers (ADRCs) regarding the policy for imminent risk designations using the 701S screening form.

According to [NOTICE #:032515-1-PC-SCBS](#), **Notice of Policy Clarification: Imminent Risk (IR) Definition and Designation**, the IR designation no longer applies to individuals in nursing homes; rather, IR is defined as “Individuals in the community whose mental or physical health condition has deteriorated to the degree that self-care is not possible, there is no capable caregiver, **and** nursing home placement is likely within a month or very likely within three (3) months.”

The 701S screening form will currently produce an IR designation if the answer is “Y” to the question: “The individual is transitioning out of a nursing facility (NF)” or “Y” to the question: “The individual is at imminent risk of NF placement.” These questions are respectively numbered 19 and 20 on the 701S. As the current IR definition only includes those individuals in the community, only question number 20 on the 701S screening form should be used by the ADRC for IR designations.

In order for ADRC staff to determine whether an individual meets the IR definition listed in [NOTICE #:032515-1-PC-SCBS](#), the individual must express, at a minimum, the following to the ADRC screener during the 701S screening process:

- The individual or his/her caregiver expressed that the individual’s mental or physical health condition has deteriorated by answering “worse” or “much worse” on 701S screening question #31;

- The individual or his/her caregiver expressed there is no capable caregiver, and the ability to continue receiving needed services is threatened (actual or anticipated and permanent – more than 30 days);
  - This IR situation applies if (1) an individual’s caregiver was providing services but is no longer or will no longer be designated the caregiver and able to provide services, or (2) an individual or his/her caregiver is arranging and paying for services through a paid service provider and the services have or will be ending with no alternative means for service provision.
  - Please note that in order for a client to be considered experiencing this IR situation after meeting one of the two criteria in the above, a real or anticipated date of caregiver or service loss must be expressed and documented on the 701S screening form in order to show the client meets the IR definition timeframe for potential nursing facility placement. For clients residing within an assisted living facility (ALF), an eviction notice stating the eviction date, must have been received by the client or caregiver.
- The individual or his/her caregiver expressed the individual’s inability to perform self-care by needing “assistance (but not total help)” or “assistance (cannot do at all)” with at least one or more ADL(s), question #38; **and**
- The individual or his/her caregiver expressed that nursing facility placement is imminent due to the fact that the individual may no longer reside at home without services in place or that services cannot continue to be provided through the ALF due to a pending eviction.

The ADRC must document the above information in as much detail as possible in the notes section of the DOEA 701S screening form. The screener must then request supervisor review and approval of the IR designation. The ultimate IR designation will be at the supervisor’s discretion but must demonstrate in the 701S notes section that the client meets the definition for IR. **All** individuals designated IR in CIRTS must have supervisor approval documented in the 701S screening form, including the date of review and approval and the supervisor’s first and last name.

The above requirements for an IR determination are minimum requirements, and additional information may be needed to support an IR designation. If the validity of an IR designation is unclear to the ADRC supervisor during the supervisory review, the client information may be sent to the Department contract manager for review and approval on a case-by-case basis. As of the date of this policy clarification, non-ALF IR designated cases will not require Department review and approval unless specifically requested by the ADRC supervisor or during ADRC contract monitoring activities. All IR designations for ALF residents shall be sent to the Department contract manager along with a copy of the eviction notice for final approval.

The changes included in this notice have been incorporated into the attached 701D Instructions for ADRC reference when completing the 701S screening.

Thank you very much for your cooperation. If you have any questions, please contact your contract manager.