May xx, 2020

Seema Verma

Administrator

Centers for Medicare & Medicaid Services

Department of Health and Human Services

Attention: CMS-2418-P

B.O. Box 8016

Baltimore, MD 21244-8016

Re: Comments on Proposed Rule: Preadmission Screening and Resident Review

 CMS-2418-P

Dear Administrator Verma,

I’m writing to comment on CMS’ proposed changes to Preadmission Screening and Resident Review (PASRR). PASRR is an important tool to keep people with disabilities from being unnecessarily placed in nursing facilities and help them transition back to the community. Having strong PASRR rules is especially important now, with the rampant outbreaks and deaths from COVID-19 happening in nursing facilities around the country.

[As a person with a disability/family member of a person with a disability], I oppose the proposed changes to the PASRR rule that would make it easier for people to be admitted to nursing facilities and harder for people in nursing facilities to return to the community. First, the proposed rule would allow states to avoid screening and evaluation for many people before admitting them to a nursing facility, leading to admission of people who could instead be served in the community. The rule also would limit the services that nursing facilities have to provide once someone is admitted. Without all of the services they need, people will lose skills and not learn new skills that would make it easier for them to transition back to their communities. Finally, the rule would allow states to stop working on the transition of a person back to the community if the person does not have a community option currently available, even if everyone agrees the person could be best served in the community. The rule should instead require the person’s case manager to continue to work to identify community options.

All of these changes will mean more people will be admitted to or remain stuck in nursing facilities who don’t need to be. This not only violates the right of people with disabilities to community services, but is especially dangerous during this COVID-19 pandemic. [If you or your family member have any additional thoughts about people with disabilities being stuck in nursing homes or how they could be better served in the community, add them here]

I ask you to please substantially revise the proposed rule to remove any changes that would make it easier for people with disabilities to be admitted to or to remain in nursing homes unnecessarily. I would also like an opportunity to comment on the new rule once revised. The health and safety of people with disabilities around the country depends on it.

Thank you,

[Name]