

September 3, 2020

Dear Colleague,

The MHA recently learned of an impending administrative change within the Omnibus Budget Reconciliation Act of 1987 (OBRA) division of the Michigan Department of Health and Human Services (MDHHS) that will impact hospitals' patient transfer workflows. We want members to be fully aware of and prepared for this change. Below is background information and necessary steps for your hospital(s):

Background

Since 1987 a federal regulation, OBRA, mandates that all individuals who are entering Medicare/Medicaid-certified nursing facilities must receive a comprehensive mental health assessment if they are identified as having serious mental illness or developmental/intellectual disability. The purpose of OBRA is to prevent individuals with a mental illness and/or developmental disability who need treatment from being placed in nursing homes unless nursing home care is truly necessary. This requirement is active in Michigan, **and hospitals have always complied with the law via the use of two paper forms.**

What is Changing?

Beginning later this year, the Michigan OBRA Division will abandon the use of the paper forms and move to an online system. The OBRA Division first attempted to notify discharging facilities and referral sources through the OBRA Coordinators at the Community Mental Health Authorities. The MHA is not certain who within the member hospitals received this notice last year. The MHA is sharing this [notice](#) to a comprehensive list of hospital contacts in an effort to spread the information much further than the initial distribution. Here are some additional details on this change:

- **What is changing?** The new process is an electronic method for initiating a Level I Screen (DCH-3877 and DCH-3878 forms) for persons with a mental health diagnosis (MI/ID/DD) and/or who is receiving mental health treatment for whom a discharging facility is requesting admission to a nursing facility.
- **When?** This new process is scheduled to tentatively go live in the Fall of 2020.
- **Why?** The purpose of this design change and quality improvement initiative is to update, standardize and improve the preadmission screening/annual resident review (PASARR) process across the state.

Brian Peters, Chief Executive Officer

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All hospitals, nursing facilities, primary care physicians, and any other referral sources are required to use the electronic method for submitting the DCH-3877 and DCH 3878 forms. The OBRA Division provided a [Communication Regarding Level-I OBRA System](#) and explanation of [Level-I Roles and Permissions](#) with additional details.

The OBRA Division has stated that it is each organization's responsibility to prepare for the new process and ensure that staff are properly trained. They will make available a web-based training for all user roles in September 2020. As of September 3, 2020, the web-based training sign-up schedule was not yet publicly available.

The OBRA Division is strongly encouraging staff attend a training as soon as possible to not delay the admission/discharge referral process. If your facility is part of a larger corporation, please contact your liaison with this information to move forward in a timely manner.

OBRA asks anyone with questions to please forward these to mdhhs-obra-helpdesk@michigan.gov or call 517-241-5881. For more information about the OBRA move to an electronic method, you may also contact [Vickie Kunz](#) at the MHA.

Sincerely,

Laura

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