

CORPORATE POLICY

Manual/Library Name: Regulatory Compliance	No: COMP-RCC 4.48
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Policy Title: Role Definition In Pre-Admission Assessment	Effective Date: 09/30/22
	Previous Versions: 06/30/19, 09/27/11, 07/01/10
	Approved By: Executive Leadership Team
	Approval Date: 09/27/22

I. Scope:

This policy applies to Tenet Healthcare Corporation and its subsidiaries and affiliates other than Conifer Holdings Inc. and its direct and indirect subsidiaries (each, an “Affiliate”), any other entity or organization in which Tenet or an Affiliate owns a direct or indirect equity interest of greater than 50%, and any entity in which an Affiliate either manages or controls the day-to-day operations of the entity (each, a “Tenet Entity”) (collectively, “Tenet”).

II. Purpose:

To define the qualifications and role definitions of individuals who may perform Behavioral Health, Inpatient Rehabilitation, and Skilled Nursing preadmission assessments prior to admission to a Tenet program.

III. Policy:

Individuals, regardless of clinical qualifications, assigned to business development functions such as marketing and community relations will not conduct clinical pre-admission assessments for the purpose of determining if the admission criteria are met for a skilled nursing, behavioral health, or an inpatient rehabilitation program.

IV. Procedure:

- A. Facilities must have clinical assessment and business development functions clearly separated on the program’s organizational chart and in the position descriptions.
- B. Individuals may not, under any circumstances, simultaneously serve in both a clinical assessment role and a business development role (e.g., a 1.0 FTE working as a .5 FTE clinical assessment nurse and .5 FTE community outreach coordinator).
- C. Pre-admission assessment personnel can be involved in the delivery of community education discussions or presentations for the sole purpose to educate on the features of the program, the quality outcomes of the program, or clinical intervention practices applied to patients served in such programs.
- D. Only qualified Behavioral Health, Skilled Nursing, and Inpatient Rehabilitation professionals may perform preadmission assessments. Unlicensed persons cannot perform pre-admission clinical assessments.

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1. Behavioral Health pre-admission assessment documentation must be completed by qualified clinicians who are permitted to perform assessments within their state scope of practice and have evidence of training and competency to perform pre-admission assessments for behavioral health.
 2. Skilled Nursing pre-admission assessment documentation must be completed by qualified clinicians who are permitted to perform assessments within their state scope of practice and have evidence of training and competency to perform pre-admission assessments for skilled nursing.
 3. Rehabilitation pre-admission assessment documentation must be completed by licensed clinicians who are permitted to perform assessments within their state scope of practice, with knowledge and training of medical and functional diagnoses. They shall have evidence of training and competency to perform pre-admission assessments and must be approved by the rehabilitation physician.
- E. Another licensed clinician such as a Physical Therapist Assistant (PTA), Certified Occupational Therapy Assistant (COTA), Licensed Social Worker (LSW), or Licensed Vocational Nurse (LVN) / Licensed Practical Nurse (LPN) must complete the data collection process. This type of clinician may only perform data collection and chart review activities for the purpose of providing information used by the assessing clinician for completion of the pre-admission assessment. The assessing clinician conducting and documenting the pre-admission assessment must review and approve any data collected by the data collection clinician. The data collection clinician may not perform patient assessments or make recommendations regarding the pre-admission assessment.
- F. If facility personnel should have questions regarding the appropriateness of an individual's duties, the Hospital Compliance Officer should be contacted to discuss the concern and involve appropriate corporate resources as needed.

V. Enforcement:

All employees whose responsibilities are affected by this policy are expected to be familiar with the basic procedures and responsibilities created by this policy. Failure to comply with this policy will be subject to appropriate performance management pursuant to all applicable policies and procedures, up to and including termination. Such performance management may also include modification of compensation, including any merit or discretionary compensation awards, as allowed by applicable law.

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VI. References:

[Medicare Benefits Policy Manual, Ch 1-110 Inpatient Hospital Services Covered Under Part A Inpatient Rehabilitation Services](#)