Payroll Based Journal (PBJ) Staffing Hours
Oklahoma State Department of Health

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OSDH Payroll Based Journal Support Web Page Link

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Outline

- What is the Payroll Based Journal
- Evolution to the Payroll Based Journal
- How the Payroll Based Journal works
- What are provider requirements for the Payroll Based Journal
- How are Payroll Based Journal data used by CMS
- Auditing your <u>PBJ</u> Submissions
- What are the Nurse Staffing Waiver requirements
- Resources

Payroll Based Journal

A web portal to be used by providers for the quarterly reporting of employee hours worked each day

A record is created for each staff member with their own ID#, hire date, occupational specialty and termination date
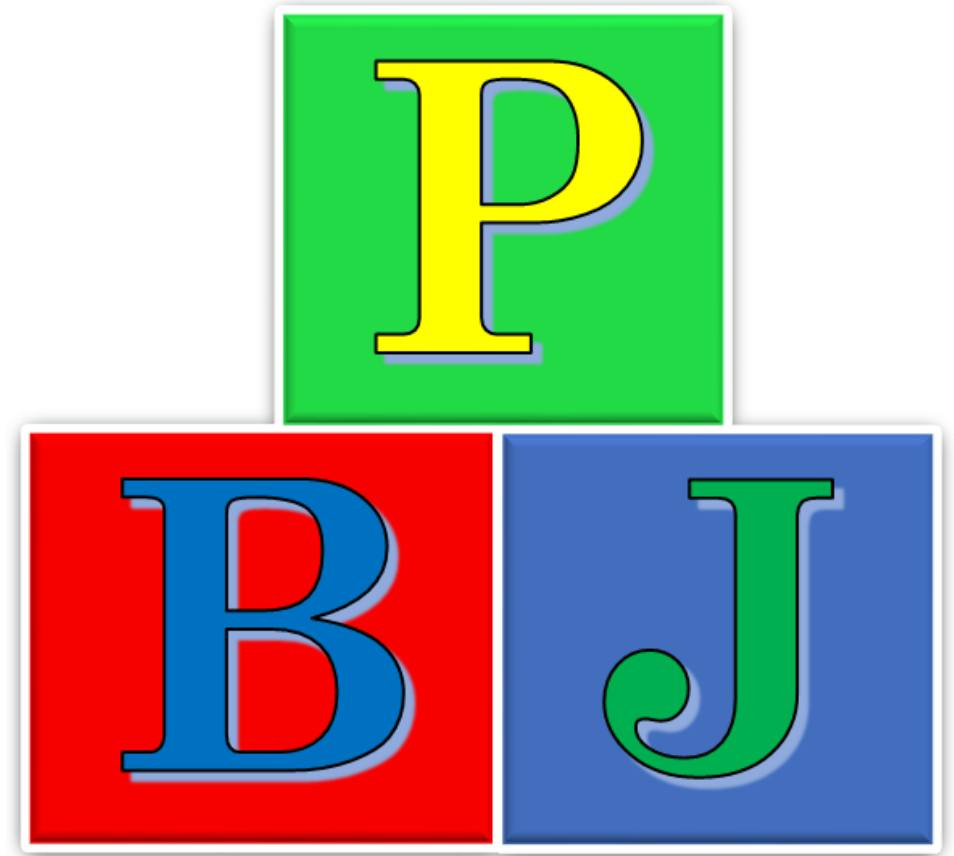
Electronic submission of Payroll-Based Staffing Information

- Staff specific hire and termination dates gives data on turnover, and tenure

- Auditable back to payroll data

- Required by Section 6106 of the Affordable Care Act

- Funding provided by the IMPACT Act of 2014

Figure 1: Sample Employee Entry Screen

Figure 2: Sample Staffing Hours Entry Screen

Table 1: Labor and Job Codes and Descriptions

Labor Category Code	Job Title Code	Labor Description	Job Description	Description of Services
1	1	Administration Services	Administrator	Administrative staff responsible for facility management as required under 483.70(d) such as the administrator and the assistant administrator.
2	2	Physician Services	Medical Director	A physician designated as responsible for implementation of resident care policies and coordination of medical care in the facility in accordance with 483.70(h).
2	3	Physician Services	Other Physician	A salaried physician, other than the medical director, who supervises the care of residents when the attending physician is unavailable, and/or a physician(s) available to provide emergency services 24 hours a day.
2	4	Physician Services	Physician Assistant	A graduate of an accredited educational program for physician assistants who provides healthcare services typically performed by a physician, under the supervision of a physician.
3	5	Nursing Services	Registered Nurse Director of Nursing	Professional registered nurse(s) administratively responsible for managing and supervising nursing services within the facility. Do not additionally reflect these hours in any other category.
3	6	Nursing Services	Registered Nurse with Administrative Duties	Nurses (RN) who, as either a facility employee or contractor, perform the Resident Assessment Instrument function in the facility and do not perform direct care functions. Also include other RNs whose principal duties are spent conducting administrative functions. For example, the Assistant Director of Nursing is conducting educational/in-service. Facilities with an RN waiver who do not have an RN as DON report all administrative nursing hours in this category.
3	7	Nursing Services	Registered Nurse	Those persons licensed to practice as registered nurses in the State where the facility is located. Includes geriatric nurse practitioners and clinical nurse specialists who primarily perform nursing, not physician-delegated tasks. Do not include Registered Nurses' hours reported elsewhere.

Why This Focus?

- A top concern among residents, families

- Coordination of care to meet resident needs

- Direct correlation to quality of care

- Putting loved ones in someone else's hands

- RN Staffing Requirement
  - 8 consecutive hours a day, 7 days a week.
  - 1819(b)(4)(C) and1919(b)(4)(C) of the Act, and 42 CFR §483.35(b))

Evolution of Staffing Information

From 671 to PBJ...

- CMS 671 form

  - Covers 2-week periods

  - Submitted approximately annually

but...

  - Does not capture changes, is not auditable

- Payroll-Based Journal

  - Voluntary at first

  - Then became mandatory

  - Incorporated into CMS Nursing Home Compare Website

Latest PBJ changes

- PBJ now source of Five-Star staffing hours rating

- 671 staffing hour section obsolete

- PBJ ID linking

- New ratings criteria:

  - RN staffing requirements

  - Exclusion criteria

- Census from MDS, not PBJ

- CMS is now posting hours for non-nursing staff

Five Stars, Many Uses

What exactly is the Five-Star Rating system used for?

- A tool for consumers

- Adopted by other programs
  - Medicare/Medicaid
  - Medicare Advantage plans
  - Hospital discharge planners

- One source of information about nursing homes

Five-Star Staffing Calculation

Who is Included?

RN
- 5 - Registered Nurse Director of Nursing
- 6 - Registered Nurse with Administrative Duties
- 7 - Registered Nurse

LPN
- 8 - Licensed Practical/Vocational Nurse with Administrative Duties
- 9 - Licensed Practical/Vocational Nurse

Nurse Aid
- 10 - Certified Nurse Aide
- 11 - Nurse Aide in Training
- 12 - Medication Aide/Technician

Five-Star Staffing Calculation

How is Adjusted Hours Per Resident Per Day (A-HRD) calculated?

- Sum staff hours and daily census for the quarter

- Calculate Reported Hours Per Resident Per Day (R-HRD)

    R-HRD = staff hours/census

- Calculate Expected Hours Per Resident Day (E-HRD) using [CMS Staff Time Resource Intensity Verification (STRIVE) Study](#)

- Calculate Adjusted Hours per Resident Day (A-HRD) using the formula below:

A-HRD = (R-HRD / E-HRD * HRD Nat'l Avg.)

Source: CMS Five-Star Quality Rating System Technical Users Guide

Five-Star Staffing Calculation

How is a Star Rating Assigned?

- RN and total nurse staffing ratings are calculated individually
- The overall staffing rating is based on the combination of the two individual ratings

Table 4

Staffing and Rating (updated April 2019)

RN rating and hours		Total nurse staffing rating and hours (RN, LPN and nurse aide)				
		1	2	3	4	5
		< 3.107	3.107 – 3.573	3.574 - 4.037	4.038 – 4.403	≥4.404
1	< 0.316	★	★	★★	★★	★★★
2	0.316 - 0.500	★★	★★	★★	★★★	★★★
3	0.501 – 0.723	★★	★★★	★★★	★★★	★★★★
4	0.724 – 1.041	★★★	★★★	★★★★	★★★★	★★★★
5	≥1.042	★★★	★★★★	★★★★	★★★★★	★★★★★

Note: Adjusted staffing values are rounded to three decimal places before the cut points are applied.

Source: CMS Five-Star Quality Rating System Technical Users Guide

Suppression Rules

Staffing data are suppressed (i.e. displayed as "Data Not Available") if any of the following are true:

- No MDS census data available for all days in the quarter.

- Total nurse staffing (job codes 5-12), aggregated over all days in the quarter with both nurses and residents is excessively low (<1.5 HRD)

- Total nurse staffing (job codes 5-12), aggregated over all days in the quarter with both nurses and residents is excessively high (>12 HRD)

- Nurse aide staffing (job codes 10-12) aggregated over all days in the quarter with both nurses and residents is excessively high (>5.25 HRD)

Downgrade Rules: One-Star Overall and RN Rating

- Nursing homes that fail to submit <u>any staffing data</u> by the deadline for the quarter.

- Nursing homes that report <u>four or more days </u>in the quarter with no RN staffing on which there were one or more residents in the facility.

- Nursing homes that fail to respond to <u>PBJ audits</u>, or for which the audits identify significant discrepancies

Nursing Home Compare Search Results

Nursing Home Search Results

Nursing home information ⓘ ▲ ▼	Overall Rating ⓘ ▲ ▼	Health inspections ⓘ ▲ ▼	Staffing ⓘ ▲ ▼	Quality measures ⓘ ▲ ▼
	★●●●● Much Below Average	★●●●● Much Below Average	★●●●●[12] Much Below Average	★★●●● Below Average

Facility Specific Staffing Tab in Nursing Home Compare

		OKLAHOMA AVERAGE	NATIONAL AVERAGE
Staffing rating	⭐●●●● 12 Much Below Average		
Average number of residents per day	49.1	62.8	86.0
Total number of licensed nurse staff hours per resident per day	1 hour	1 hour and 16 minutes	1 hour and 33 minutes
RN hours per resident per day	13 minutes	19 minutes	40 minutes
LPN/LVN hours per resident per day	48 minutes	57 minutes	53 minutes
Nurse aide hours per resident per day ⓘ	2 hours and 25 minutes	2 hours and 23 minutes	2 hours and 20 minutes
Physical therapist staff hours per resident per day ⓘ	2 minutes	3 minutes	7 minutes

Registered Nurse (RN) staffing only

Registered nurses (RNs) are licensed healthcare p
residents. Some nursing home residents who are s
be better able to meet the needs of those residents

> This facility either didn't submit staffing data, has reported a high number of days without a registered nurse onsite, or submitted data that couldn't be verified through an audit.

		OKLAHOMA AVERAGE	NATIONAL AVERAGE
Registered Nurse (RN) staffing rating	⭐●●●● 12 Much Below Average		
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RN hours per resident per day	13 minutes	19 minutes	40 minutes

How to read staffing charts | About staff roles

Staffing Concerns

Registered Nurse (RN) Staffing

Nursing homes are required to have an RN onsite at least 8 consecutive hours a day, 7 days a week. There is also a strong relationship between RN staffing and quality.

- Some nursing homes don't report any RN hours for some days, particularly on weekends.

Significantly low weekend staffing

Most facilities report lower staffing on weekends. However, we are concerned about some facilities showing significantly low staffing.

Payroll Based Journal Audit

- Facilities are selected for audits based on data analysis.

- There are two types of audits:
  - Targeted audits looking at a specific issue which may indicate inaccurate reporting and;
  - General audits looking at overall PBJ reporting

- Facilities receive a letter from Myers and Stauffer, the audit firm contracted by CMS.

- Facilities have 5 business days to submit the requested data to a secure FTP site.

- If the facility does not comply with the request, they will receive a 1 star rating in the 5-star Quality Rating System, which will reduce the facility's overall (composite) rating by one star for three months.

- For More Information about Payroll Based Journal Audits please visit: www.PBJ.health.ok.gov

Lessons Learned –Common Errors

- Not excluding time for meal breaks

- Failure to assign unique IDs

- MDS assessments not completed for all residents

- Including hours for staff providing care to individuals in non-certified areas

- Submitting corporate staff hours for non-direct facility care

- For administrators that are also RN,, not recording RN hours when working in that role

- Not submitting corporate RN staff hours for direct facility care

- Submitting corporate staff hours for non-direct facility care

You Will Make Mistakes.... .... Learn From Them

PBJ CASPER REPORTS for Providers

✓ Verify data submitted to PBJ

✓ Cross-check with Payroll Data

✓ Verify data prior to deadline

✓ All PBJ data can be viewed via CASPER Reports

✓ QTSO helpdesk: 1-888-477-7876

- **See Chapter 12 of CMS' Users Guide on Casper PBJ Reports here:** https://qtso.cms.gov/system/files/qtso/cspr_sec12_mds_prvdr_4.pdf

- **1700D EMPLOYEE REPORT** – lists total Staffing Hours per Employee ID for a User-specified time period.

- **1702D INDIVIDUAL DAILY STAFFING REPORT** – lists daily Staffing Hours per Employee ID for a User-specified time period.

- **1702S STAFFING SUMMARY REPORT** – summarizes total Staffing Hours by Job Title for a User-defined time period. Breaks down the hours by Exempt, Non-Exempt, and Contractor.

- **1703D JOB TITLE REPORT** – lists per day the Staffing Hours per Job Title for a User-specified time period. Breaks down the hours by Exempt, Non-Exempt, and Contractor.

- **1704S Daily MDS Census Summary Report** – lists total daily census, based on MDS assessments submitted to QIES, for a User-defined time period.

- **1704D Daily MDS Census Detail Report** – lists Internal Resident ID's per day which make up the total daily census.
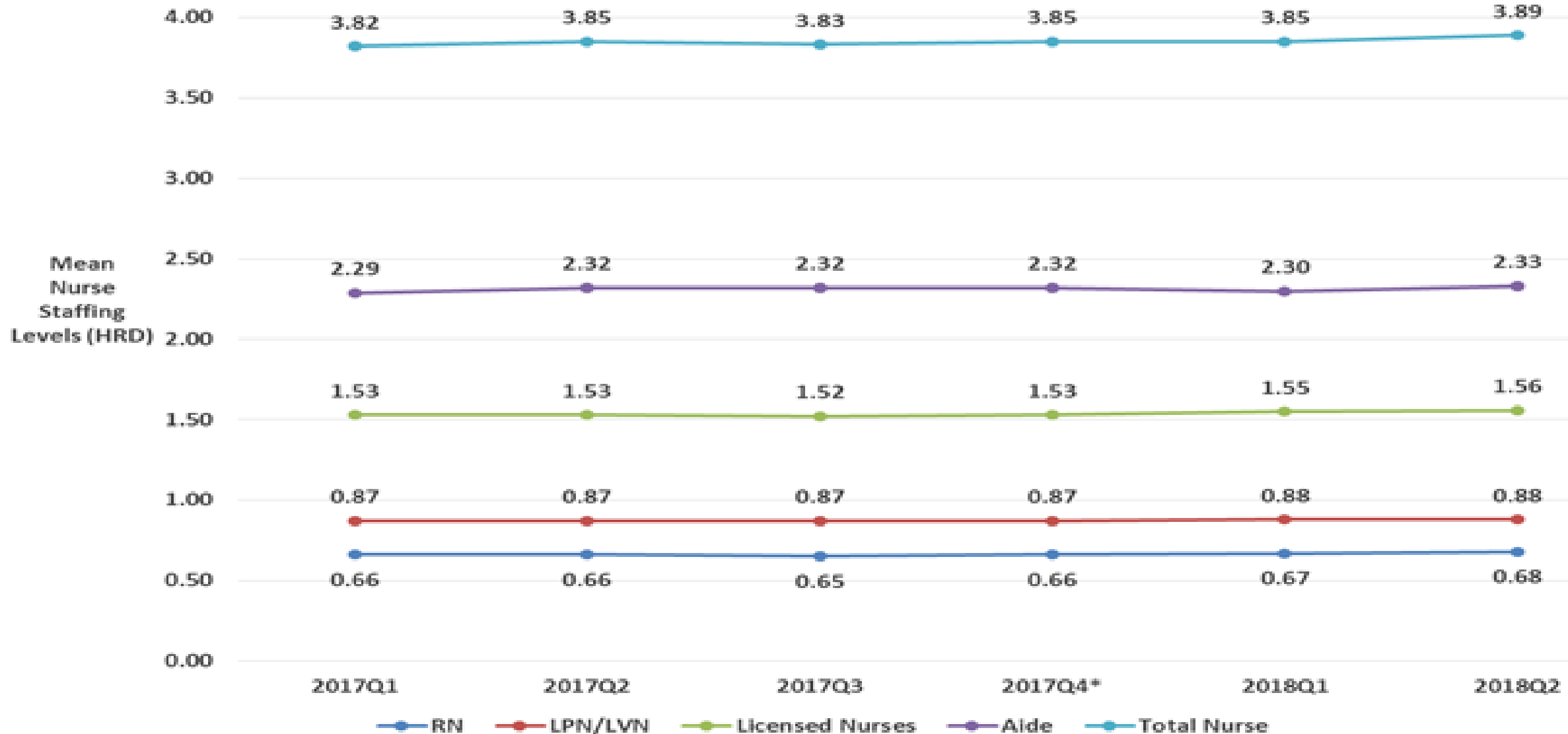
Completeness and Quality of PBJ Data

- Most nursing homes are submitting data through the PBJ system.

  - Overall, 97.2% of nursing homes submitted some nursing data for 2018 Q2.
  - Number of nursing homes submitting data has increased though it has been stable for the past two quarters.

- The completeness and quality of the submitted data have increased as well.

PBJ Deadline Processing

❖ PBJ Cut-off Dates (at 11:59 PM ET)

  ✓ Roughly 6 weeks after end of quarter

❖ August Cutoff Example

  • Aug 7 2018: 49 million staffing records submitted

  • Aug 14, 2018: (at cut-off) 87 million staffing records submitted in total

  • 44% of Staffing Records were submitted in the final week

CMS reminds facilities to submit data before the deadline and not to wait until the last two weeks to submit and encourages them to submit monthly, if possible.

CFR Nurse Staffing Waiver Criteria [42 CFR 483.35(e) and CMS SOM 7014.1.1]

- (1) Demonstrates diligent efforts w/ wages at prevailing rate
- (2) State determines will not endanger health or safety
- (3) Must **have** registered nurse or physician obligated to respond immediately to telephone calls from the facility;
- (4) Subject to annual State review;
- (5) May be required by State to use other qualified, licensed personnel;
- (6) State must provide notice of waiver to the Long-Term Care Ombudsman and APS; and
- (7) The facility must notify residents of the facility and their representatives.

PBJ-related resources

- PBJ Data Downloads: data.cms.gov
- Chapter 12 of CMS' Users Guide on Casper PBJ Reports:
  https://qtso.cms.gov/system/files/qtso/cspr_sec12_mds_prvdr_4.pdf
- CMS PBJ Policy Manual:
  https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/NursingHomeQualityInits/Downloads/PBJ-Policy-Manual-Final-V24.pdf
- CMS PBJ Policy Manual FAQ:
  https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/NursingHomeQualityInits/Downloads/PBJ-Policy-Manual-FAQ-09-26-17.pdf
- CMS Staffing Data Submission PBJ:
  https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/NursingHomeQualityInits/Staffing-Data-Submission-PBJ.html
- CMS Five-Star Quality Rating System Technical Users Guide:
  https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/CertificationandComplianc/downloads/usersguide.pdf
- CMS memo: Transition to PBJ Staffing Measures for Five-Star Quality Rating System:
  https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/SurveyCertificationGenInfo/Downloads/QSO18-17-NH.pdf
- CMS Employee ID Linking Methodology:
  https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/NursingHomeQualityInits/Downloads/PBJ-Linking-Methodology.pdf
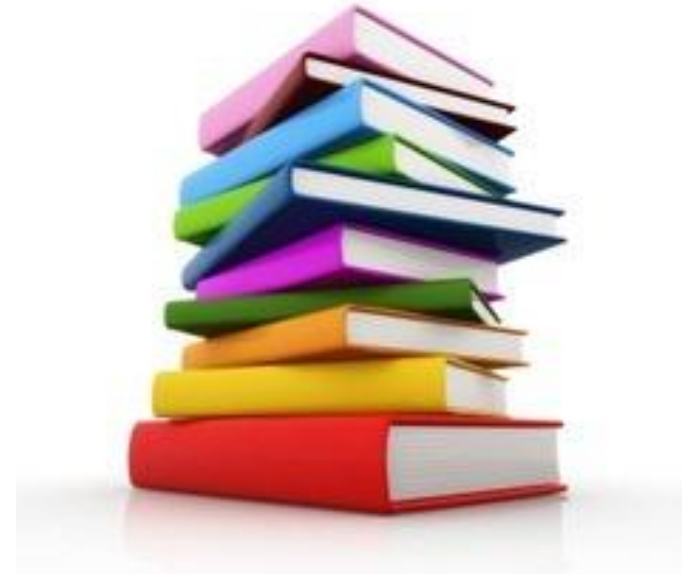
OSDH PBJ Page

OSDH PBJ RN Staffing Survey

- Link will be distributed via email to administrators
- Delivery expected in last week of August
- Questions on:
  - Who submits PBJ data
  - Who audits PBJ data
  - RN Wages
  - RN Contract Staffing
  - Nurse staffing recruitment and retention practices

Who Should Providers Contact?

- Questions regarding PBJ Policy issues should be directed to NHStaffing@cms.hhs.gov

- Questions regarding the PBJ Data Specifications or PBJ Technical Issues should be directed to NursingHomePBJTechIssues@cms.hhs.gov. (Software developers or vendors that provide services such as automated payroll or time and attendance systems that will support electronic submissions should use this address.)

- Providers requesting access to CASPER reports, or needing to register to submit PBJ data should contact the QTSO helpdesk at 1-888-477-7876.