

Payroll-Based Journal Policies

Are you prepared to meet these initiatives?

Following improvements in facilities' submitting complete and accurate payroll-based journal (PBJ) data to the Centers for Medicare and Medicaid Services (CMS), CMS announced PBJ policy changes that began in April 2018. An overview of these policy updates includes:

Payroll-Based Journal Submission Data – CMS will use PBJ data to determine each facility's staffing measure on the Nursing Home Compare tool on the Medicare.gov website and to calculate the staffing rating used in the Nursing Home Five Star Quality Rating System.

Staffing Data Audits – CMS is conducting audits of facilities where issues have been identified. Nursing homes whose audit identifies significant inaccuracies between the hours reported and the hours verified and facilities that fail to submit any data by the required deadline will be presumed to have low levels of staff. This could ultimately result in a one-star rating in the staffing domain and will drop the facility's overall star rating by one star for a quarter.

Based on the audits that CMS has conducted, the following five items were identified as common issues found:

- Per the PBJ Policy Manual, meal times, paid or unpaid, shall not be reported for all staff (exempt, nonexempt, and contract)
- Each employee must have a unique identifier (ID)
- For accurate census calculations, providers must submit timely and accurate Minimum Data Set (MDS) assessments for every resident in the facility

- Providers must exclude hours for staff providing care to individuals in noncertified areas
- If a provider receives an audit, the provider must promptly respond to it

Requirement for Registered Nurse (RN) Staffing – RN staffing is important, and the requirements state the need to have an RN on site eight hours a day, seven days a week. As of July 2018, nursing homes reporting seven or more days in a quarter with no RN hours will receive a one-star rating in the staffing domain, which will drop their overall star rating by one star for a quarter.

Nursing Home Compare and the Five Star Quality Rating System – CMS will continue to post on Nursing Home Compare each facility's measures for nursing staff and physical therapy staff as the number of hours per resident per day (HPRD). The measures for these staff members will be calculated by totaling the number of hours for the relevant job categories submitted for each day of the quarter and dividing that by the sum of each day's census within the same quarter.

For more information and to learn how Kronos PBJ tools can help you meet PBJ requirements, visit kronos.com/ltc.

Centers for Medicare and Medicaid Services, "Transition to Payroll-Based Journal (PBJ) Staffing Measures on the Nursing Home Compare Tool on Medicare.gov and the Five Star Quality Rating System" (April 6, 2018), found at <https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/SurveyCertificationGenInfo/Downloads/QSO18-17-NH.pdf>.