



Will PBJ erase your star rating?

***How Payroll-Based Journal reporting
impacts your Five-Star***

Carl Moellenkamp, CPA, CliftonLarsonAllen

Don Feige, ezPBJ

Housekeeping

1. If you are experiencing technical difficulties, please dial: (877) 582-7011
2. Q&A session will be held at the end of the presentation
 - Submit questions anytime during the presentation
3. The webinar recording and handouts will be available tomorrow at www.simpleltc.com/pbj
 - Slides can be downloaded now from your “Handouts” panel

About Our Speakers

- A professional services firm with three distinct business lines

- Wealth Advisory

- Outsourcing

- Audit, Tax, and Consulting



- More than 5,400 employees

- Offices coast to coast

- Serve more than 8,000 health care clients

We promise to know you and help you

- **Carl Moellenkamp** is an engagement director on CLA's senior living team. He brings extensive experience in the nonprofit industry with a special focus on senior living and social service entities. Carl offers versatile expertise and experience in leadership, project management, software implementation, and resource allocation.



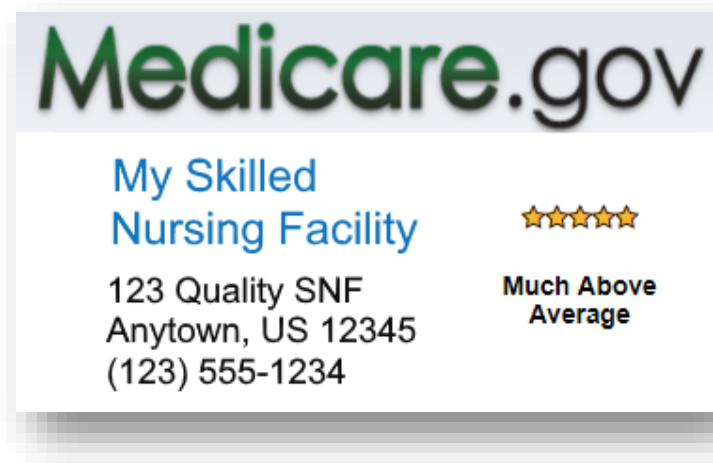
About Our Speakers

- ezPBJ provides easy-to-use software to manage all aspects of Payroll-Based Journal reporting
- ezPBJ assembles, validates and submits Payroll-Based Journal reports for facilities in 45 states
- ezPBJ just released a FREE PBJ benchmarking tool **ezPBJ Essentials**
- **Don Feige** is a software entrepreneur specializing in workforce solutions that solve healthcare staffing, scheduling and reporting challenges. Don has helped hundreds of skilled nursing facilities understand PBJ policy, design PBJ data capture processes, and improve PBJ reporting.



Today's Agenda

- **Before & After**
 - From 671 to PBJ
 - Early PBJ vs. Today's PBJ
 - Staffing Five-Star Ratings
- **Five-Star Fundamentals**
- **“Need to Knows” Going Forward**
 - How (Not) to Get a Staffing One Star
 - Stay PBJ Audit Ready
 - Brace for Census & MDS Impacts
 - And More...
- **PBJ Tools**
- **Q&A**



Before and After



Changes to Staffing Data Collection

What Was The 671

What Is PBJ

Frequency

Every 9 to 15 months,
during Survey
(2 weeks of data)

Every **3 months**
(Every day of the quarter)

Methods

Unaudited worked hours

Auditable worked AND paid hours
New LPN w/ Admin category
Overtime hours for Salaried Staff no
longer includable

Required

Page 1: Facility info
Page 2: **Staffing hours**

Page 1 only
(beginning June 1st)

Changes to PBJ Reporting

What Was PBJ Early Days

What Is As of April '18

Census

REQUIRED
report census on last day
of each month

OPTIONAL
(**Daily** Census is calculated by
CMS based on MDS submitted)

Optional Staff

OPTIONAL TO REPORT
38: Blood Service Worker
39: Housekeeping
40: Other Service Worker

ALSO OPTIONAL:

32: Dentist
33: Podiatrist
35: Vocational Service Worker
36: Clinical Lab. Service Worker
37: Diagnostic X-Ray Service Worker

Dates Hired/ Terminated

REQUIRED
Report first and last date
each staff is paid
(employees/contractors)

OPTIONAL
(turnover and tenure will be
calculated by CMS by a TBA method)

Changes to Staffing Five-Star Calculations

What Was
Last Quarter

What Is
Starts April '18

Source Data

Staffing hours: 671

Staffing hours: **PBJ**

Case-Mix Adjustment

RUGS-III
(53)
1995-1997 time study

RUGS-IV
(66)
STRIVE time study

Reported to Adjusted

Staffing Five-Star Ratings will continue to be risk adjusted to account for differences in resident acuity. The formula is unchanged:

$$\text{Hours}_{\text{Adjusted}} = (\text{Hours}_{\text{Reported}} / \text{Hours}_{\text{Expected}}) * \text{Hours}_{\text{National Average}}$$

Resident RUG-IV data based on most recent MDS and “drawn” on last business day of the last month of the quarter



Staffing Five-Star Fundamentals

Timing of PBJ & Staffing Five-Star Rating

PBJ Reporting Quarter	PBJ Deadline	Approx. Five-Star Posting to NHC
Jul 1 – Sep 30 2016	11/14/16	PBJ not used
Oct 1 – Dec 31 2016	2/14/17	PBJ not used
Jan 1 – Mar 31 2017	5/15/17	PBJ not used
Apr 1 – Jun 30 2017	8/14/17	PBJ not used
Jul 1 – Sep 30 2017	11/14/17	PBJ not used
Oct 1 – Dec 31 2017	2/14/18	4/26/2018
Jan 1 – Mar 31 2018	5/15/18	7/25/18
Apr 1 – Jun 30 2018	8/14/18	10/24/18
Jul 1 – Sep 30 2018	11/14/18	1/23/19
Oct 1 – Dec 31 2018	2/14/19	4/24/19

PBJ Job Titles Used in Five-Star Calculations

Labor Cat.	Labor Description	Job Title	Job Description
1	Administration Services	1	Administrator
2	Physician Services	2	Medical Director
2	Physician Services	3	Other Physician
2	Physician Services	4	Physician Assistant
3	Nursing Services	5	Registered Nurse Director of Nursing
3	Nursing Services	6	RN with Administrative Duties
3	Nursing Services	7	Registered Nurse
3	Nursing Services	8	LPN with Administrative Duties (NEW)
3	Nursing Services	9	Licensed Practical/Vocational Nurse
3	Nursing Services	10	Certified Nurse Aide
3	Nursing Services	11	Nurse Aide in Training
3	Nursing Services	12	Medication Aide/Technician
3	Nursing Services	13	Nurse Practitioner
3	Nursing Services	14	Clinical Nurse Specialist
4	Pharmacy Services	15	Pharmacist
5	Dietary Services	16	Dietitian
5	Dietary Services	17	Paid Feeding Assistant
6	Therapeutic Services	18	Occupational Therapist
6	Therapeutic Services	19	Occupational Therapy Assistant
6	Therapeutic Services	20	Occupational Therapy Aide

Labor Cat.	Labor Description	Job Title	Job Description	
6	Therapeutic Services	21	Physical Therapist	
6	Therapeutic Services	22	Physical Therapy Assistant	
6	Therapeutic Services	23	Physical Therapy Aide	
6	Therapeutic Services	24	Respiratory Therapist	
6	Therapeutic Services	25	Respiratory Therapy Technician	
6	Therapeutic Services	26	Speech/Language Pathologist	
6	Therapeutic Services	27	Therapeutic Recreation Specialist	
6	Therapeutic Services	28	Qualified Activities Professional	
6	Therapeutic Services	29	Other Activities Staff	
6	Therapeutic Services	30	Qualified Social Worker	
6	Therapeutic Services	31	Other Social Worker	
7	Dental Services	32	Dentist	OPTIONAL
8	Podiatry Services	33	Podiatrist	OPTIONAL
9	Mental Health Services	34	Mental Health Service Worker	
10	Vocational Services	35	Vocational Service Worker	OPTIONAL
11	Clinical Lab. Services	36	Clinical Laboratory Service Worker	OPTIONAL
12	Diagnostic X-ray Services	37	Diagnostic X-ray Service Worker	OPTIONAL
13	Admin/Stor of Blood Svcs	38	Blood Service Worker	OPTIONAL
14	Housekeeping Services	39	Housekeeping Service Worker	OPTIONAL
15	Other Services	40	Other Service Worker	OPTIONAL

Job Titles used to calculate Five-Star Staffing currently

RN Hours

Total Nursing Hours

How Is the Staffing Five-Star Calculated?

The same hours (risk-adjusted) are being used:

- **RN Hours** Per Resident Day (except LPN with Admin. Duties removed)
- **Total Nursing Hours** Per Resident Day

1. Sum **Hours Paid** over the quarter
2. Sum **Daily Census** over the quarter
3. Calculate **Hours Per Resident Day** (divide Hours Paid / Avg Daily Census)
4. Calculate **Expected HPRD** using RUGS-IV expected times from STRIVE study
5. **Risk Adjust** measures by comparing Expected Staffing

$$\text{Hours}_{\text{Adjusted}} = (\text{Hours}_{\text{Reported}} / \text{Hours}_{\text{Expected}}) * \text{Hours}_{\text{National Average}}$$



PBJ: What You Need To Know

Staffing Five-Star Cut Points Table

Staffing Points and Rating (updated April 2018)							
↓ RN rating and hours			↓ Total nurse staffing rating and hours (RN, LPN and nurse aide) ↓				
			1	2	3	4	5
	Old 671-based		< 3.262	3.262 - 3.660	3.661 - 4.172	4.173 - 4.417	≥ 4.418
		New PBJ	< 3.176	3.176 - 3.551	3.552 - 4.009	4.010 - 4.237	≥ 4.238
1	< 0.283	< 0.246	★	★	★★	★★	★★★
2	0.283 - 0.378	0.246 - 0.382	★	★★	★★★	★★★★	★★★★
3	0.379 - 0.512	0.383 - 0.586	★★	★★★	★★★★	★★★★★	★★★★★
4	0.513 - 0.709	0.587 - 0.883	★★	★★★	★★★★	★★★★★	★★★★★
5	≥ 0.710	≥ 0.884	★★★	★★★★	★★★★★	★★★★★	★★★★★

Lose 1 Star

Add 1 Star


Distribution of Five-Star Ratings

- Overall distribution of Five-Star Staffing Ratings will be approximately the same using PBJ data as it was prior
- Average National Hours Per Resident Day for Risk Adjusted Calculation
 - | | <u>Previous</u> | <u>New</u> |
|---------|-----------------|------------|
| • RN | .7472 | .3804 |
| • Total | 4.0309 | 3.2285 |
- Significant change in calculation
 - RN and LPN Administrative hours split
 - Averages from latest PBJ data
 - STRIVE time study breaks out LPN and RN hours differently so expected hours ratio is different
 - RUGS distribution has likely changed recently

March 2018 Staffing Five-Star Distribution:

Five-Star Rating	# of Facilities	Distribution
None	976	6%
★	1,741	11%
★★	2,082	13%
★★★	4,311	28%
★★★★	4,735	30%
★★★★★	1,802	12%

How to Get a ★ One Star ★ in Staffing

- Fail to submit PBJ by submission deadline = ★ instead of 
 - Plus all staffing ratios removed from Nursing Home Compare
- Fail to respond to an Audit request = ★
- Fail to submit requested documentation in Audit = ★
- Significant gap in Hours reported vs. Hours validated in Audit = ★
- Report 7 or more days in a quarter with 0 (zero) RN hours = ★
 - Starts July, 2018 based on May 15 submission
 - Waivers allowed upon request

6% of facilities with complete PBJ data had 7 or more days with zero RN hours!

PBJ Audits – What to Expect

- CMS contracts **Granite Dolphin and Myers & Stauffer**
- May be **on-site or off-site**
- Pilot Audits - Purpose is to **verify staffing hours** reported in PBJ
- Providers have **2 weeks** after being notified to provide response
- Requests an explanation of **payroll vs timekeeping** process, including the midnight cutoff process
- Includes **specific requests** for details on:
 - Corporate employees
 - Non-nursing hours and secondary positions
 - Exempt time recorded
 - Training hours recorded

PBJ Audits – Request For Information

1. **Contact name, phone number and email address** of the person who should be contacted by the audit team to address any questions or requests for additional information
2. **Daily census summary report** for the quarter including billed days at each payer source. Please only submit the number of residents by payer source per day, and do NOT submit any resident names
3. **Crosswalk between the employee ID numbers** used for the PBJ submission and the employees on the payroll records and any contracted employees
4. **Crosswalk between the job title code/labor category** code per the PBJ submission to the job titles per the payroll/time keeping systems
5. **Daily time system reports**, timecards or punch detail reports with quarterly totals
6. **Payroll records and reports**
7. **Nursing Staffing Assignment** and sign-in sheets supporting the daily schedule
8. Description of **payroll job code/department** listings used in the payroll system
9. **Invoices to support all contracted personnel reported** on the PBJ submission. Invoices should include name, job title, dates, daily hours, and/or other information used to calculate daily hours worked
10. Documentation and the methodology used to support any employee for whom a **portion of total hours worked** are included on the PBJ submission. For example, a nurse in a hospital-based facility who splits time between the hospital and the SNF
11. Payroll records for **any corporate office employees** who are being included on the PBJ submission and not included on the nursing home's payroll
12. Documentation (**e.g., contract, invoices paid**) and the methodology used to support the hours worked submitted for the **Medical Director(s)**

PBJ Audits – Common Issues

- Required **meal breaks are being reviewed** and have been excluded by auditors for each employee – even if they did not take a meal break
- **MDS discharge assessments not submitted timely** which will cause inaccurate Hours per Resident Day calculations (and potentially lower your Five-Star rating)
- Care provided to **non-certified nursing facility residents** must be excluded from reported time
- Audits will continue and **providers need to respond quickly** with the details requested once they are contacted
- **Corporate Staff hours** can be included but must be documented & verifiable
- Staff working **over 80 hours in a week or over 300 hours in a month** are commonly audited for proof those hours were paid in payroll
- Expect to provide **contractor documentation** for reported hours

PBJ Census Is Now Calculated Daily by CMS

- CMS is **calculating your census** based on MDS' submitted
 - Census is **calculated daily**, summed and averaged for the quarter
 - If there's no Discharge assessment, CMS will count a resident in your facility **for 150 days after the last MDS assessment** - then exclude them
- Inflated census will **lower your HPRD**, which may lower your Staffing Five-Star rating
- Studies have shown a **correlation** between missing Discharge Assessments and lower reported staffing HPRD

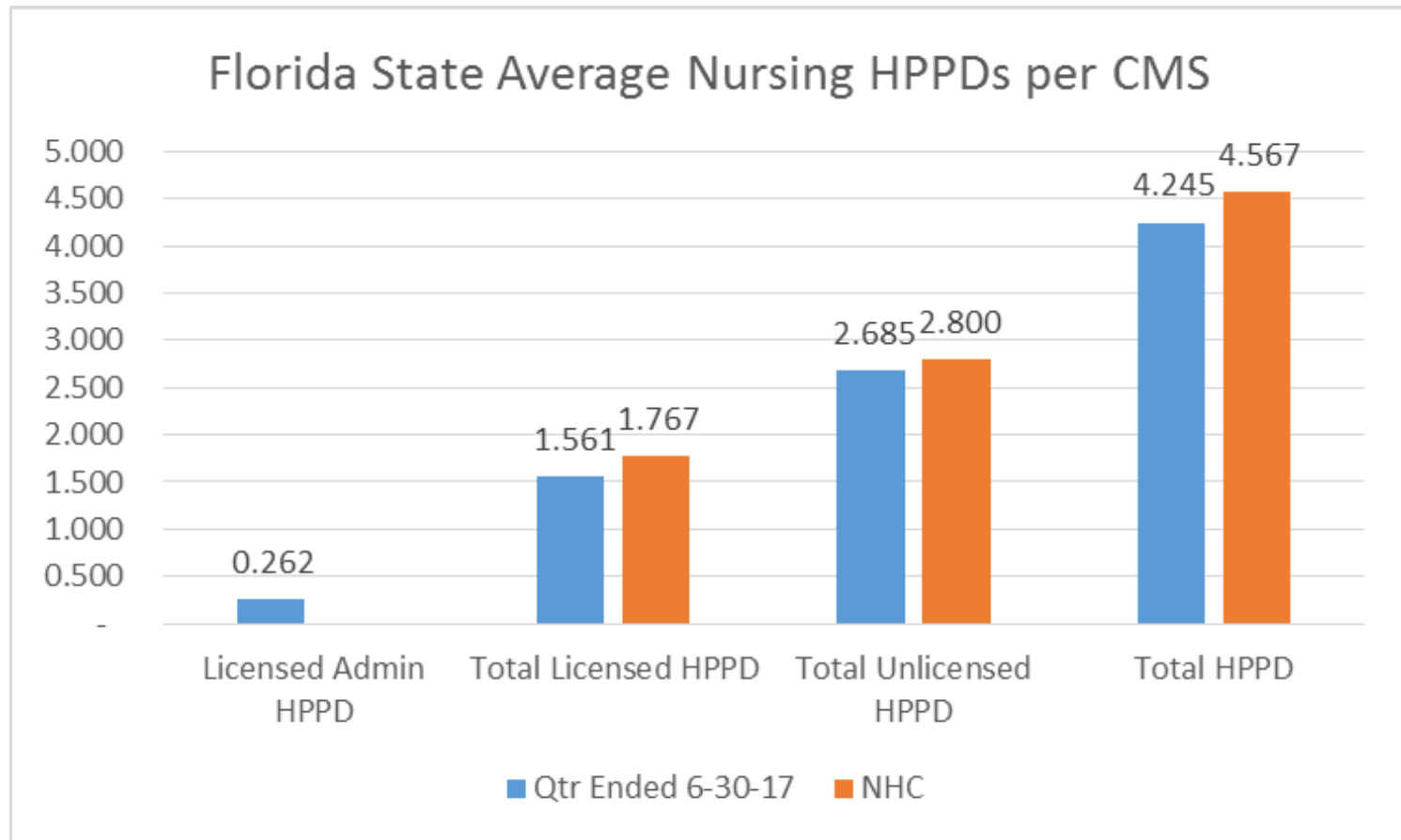
Timely & accurate MDS Discharge Assessments are key to accurate census counts for PBJ ratios

What Else Is Important

- **Turnover** and **Tenure** as a Quality / Staffing Measures are expected to be added in future
 - To avoid inaccurate turnover calculations, keep consistent ID's (use Employee ID linking utility)
- **Aberrant HPRD** is calculated. Facilities with Aberrant HPRD are **NOT reported** and display a "Data Not Available" on NHC
 - Excessively Low total nurse staffing (job codes 5-12): **< 1.5 HPRD**
 - Excessively High total nurse staffing (job codes 5-12): **> 12 HPRD**
 - Excessively High nurse aide staffing (job codes 10-12): **> 5.25 HPRD**
- Everyone's PBJ data is **publicly available** – on a 4-6 month lag at <https://data.cms.gov>

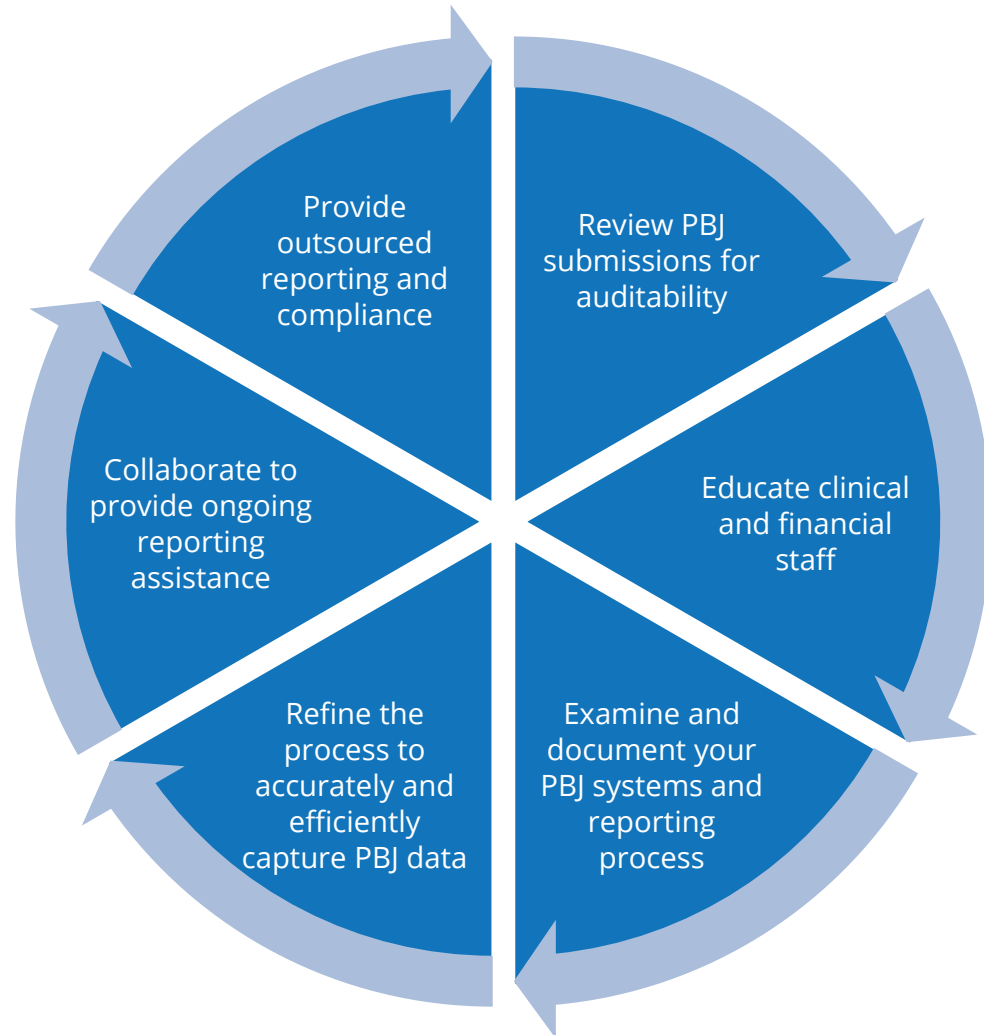
PBJ Florida Nursing Hour Averages

What public PBJ data can tell us



CliftonLarsonAllen's PBJ Services

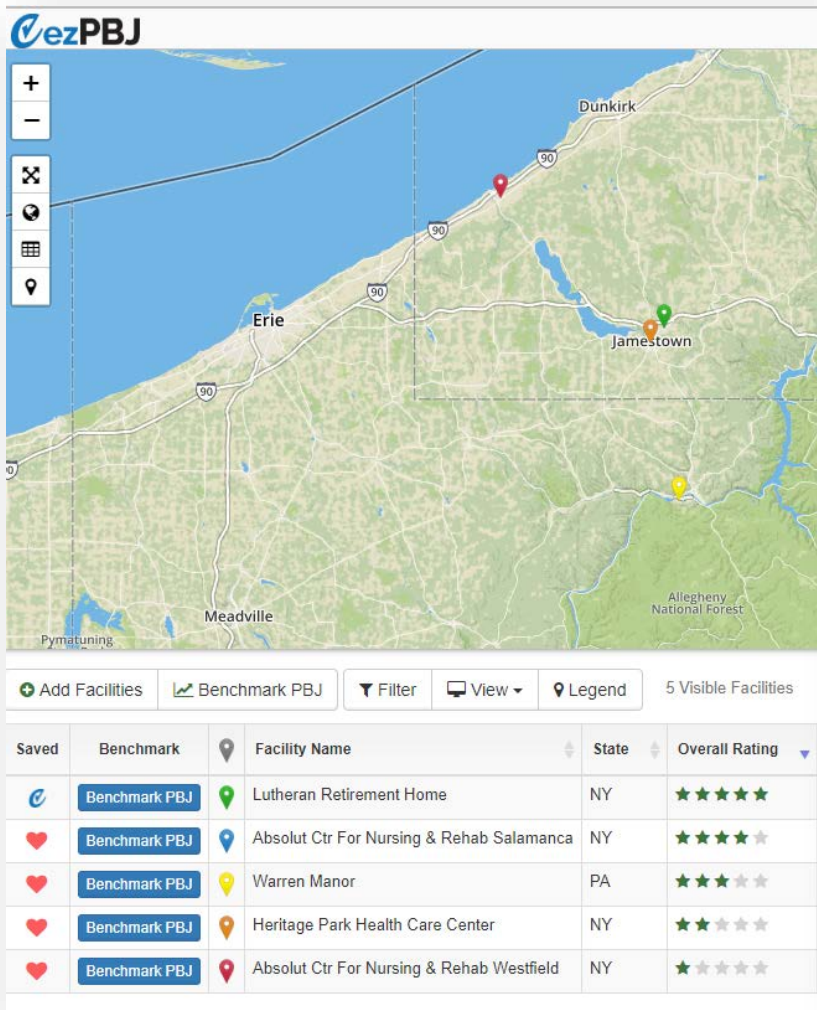
- CLA professionals can guide your navigation of the PBJ mandate, or can complete PBJ reporting on a monthly basis – so your team can focus on your residents



CliftonLarsonAllen

Essentials: Free PBJ Benchmarking Tool

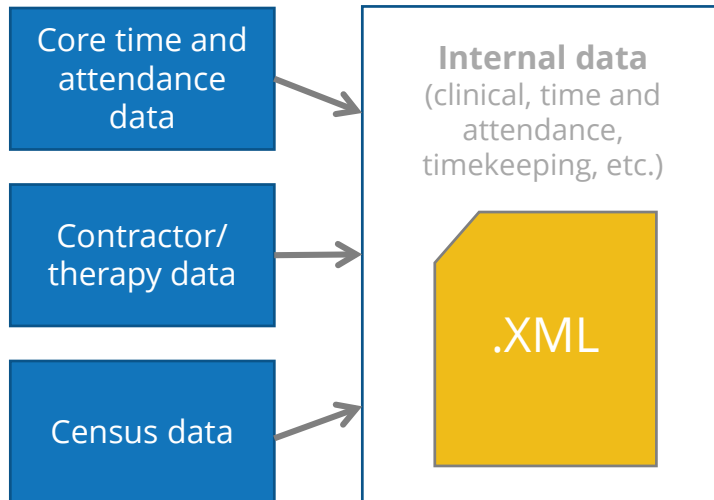
- www.ezPBJ.com/Essentials
- Analyze your PBJ metrics & run competitive comparisons of your facility's **Public PBJ data** and NHC **Five-Star** metrics



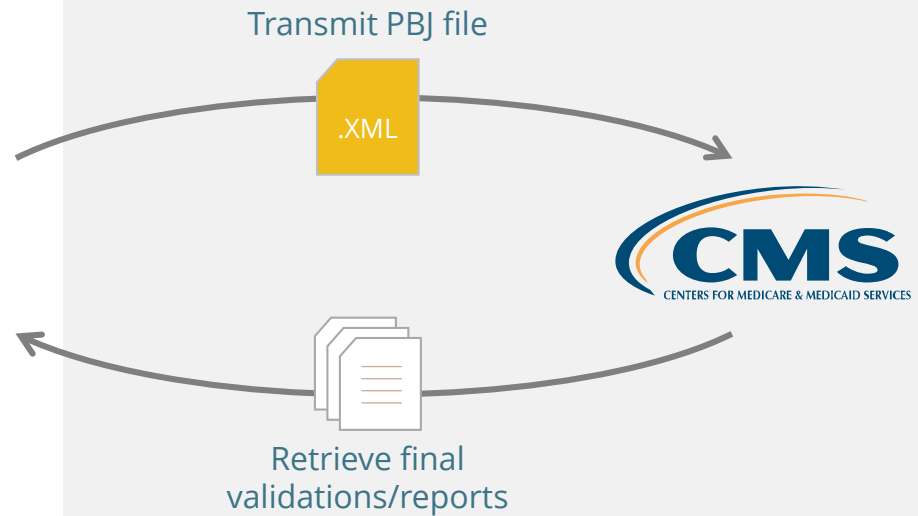
PBJ Submission Process



Data assembly, validation + file creation



Transmit files + retrieve reports



Submitting PBJ files to CMS

Upload your PBJ files

Use this page to manually upload your PBJ files to CMS. You may upload files using the upload box to the right. The file format must be **.zip**.

Choose File

[Send to CMS](#) or [Add Another File](#)

Tracking file submission progress

PBJ Transmission Activity

There are **14 days** remaining in federal fiscal **Q2-2018** to submit PBJ data. [Upload New PBJ](#)

Federal Fiscal Quarter: Status: Facility: [Refresh](#)

Upload Time & Facility	Quarter-Year	Count	Progress Tracker
04/24/2018 - 10:59AM - Suncrest Terrace <i>Download: PBJ report Jan thru March 2018.xml</i>	Q2-2018	223 / 223 / 3	Uploaded <input checked="" type="checkbox"/> Transmitted <input checked="" type="checkbox"/> Finalized <input checked="" type="checkbox"/> View the PBJ Final Validation Report
04/16/2018 - 04:39PM - Excelsior Palisades <i>Download: Census_2018_Q2</i>	Q2-2018	0 / 0 / 3	Uploaded <input checked="" type="checkbox"/> Transmitted <input checked="" type="checkbox"/> Finalized <input checked="" type="checkbox"/>

Retrieving PBJ reports

Start: End: Report: Facility: Show All Users:

Status	Requested	Report Title	Facility	Requester	Download
Completed	4/24/2018	1702S Staffing Summary Report	Bluffview Healthcare Center	RVictor	<input type="checkbox"/>
Completed	4/24/2018	1702S Staffing Summary Report	Suncrest House	RVictor	<input type="checkbox"/>
Completed	4/18/2018	1702D Individual Daily Staffing Report	Evergreen Mansion	RVictor	<input type="checkbox"/>

Q & A

Carl Moellenkamp, CPA, Director-Consulting

carl.moellenkamp@CLAconnect.com

630-954-8112

Don Feige, CEO

don@ezPBJ.com

585-582-5186

SimpleLTC support

support@simpleltc.com

simpleltc.com/pbj