Your Speaker

Nate Hoard

Senior PBJ Specialist – Simple

Agenda

- Frequent Issues with Exempt Staff

- Properly Removing Meal Breaks

- Nursing Categories

- Audit Advice

- Five Star and Turnover Calculation

- New PDPM Case-Mix Methodology

- Live Q&A

Live Poll

What component of your PBJ data are you the most confident in?

PBJ Missteps

- Not removing meal breaks for all employees

- Submitting overnight hours by shift start or end date

- Underestimating the importance of census and acuity

- Not auditing your data before submitting

- Waiting until the last minute to submit

rihca

simple.
a Netsmart solution

Frequent Issues with Exempt Staff

Exempt (salaried) staff have some unique PBJ challenges

- For all reported shifts, PBJ data should only include what was **worked and paid**:

Worked Hours **PBJ Hours** Hours Paid
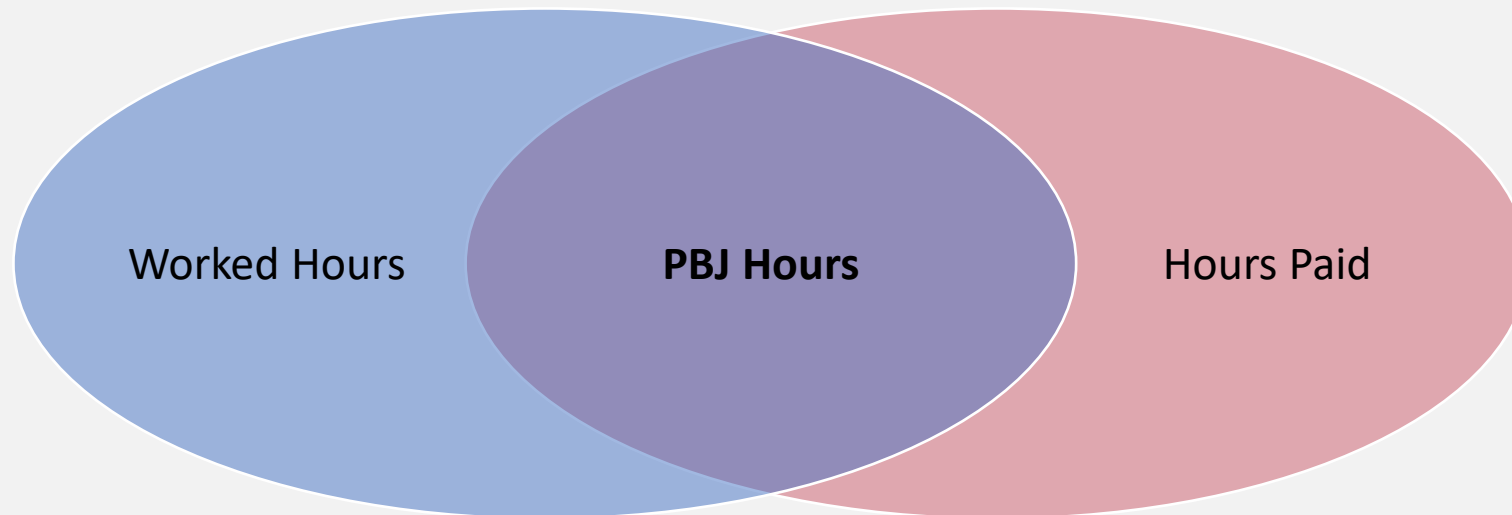
Frequent Issues with Exempt Staff

CMS only allows the reporting of hours in excess of 40 under the following conditions:

- The payment must be directly correlated to the hours worked and must be distinguishable from other payments.

- Additionally, the bonus payment must be reasonable compensation for the services provided.

Time must be auditable and verifiable

Frequent Issues with Exempt Staff

Unique considerations for Exempt staff:

- Double check to make sure exempt staff hours are included in your PBJ file
- For exempt nursing staff, consider adjusting their reported hours to capture any weekend shifts (if not paying for extra shifts directly)
- Ensure exempt shifts are sufficiently logged in case of an audit
- Pay extra attention to not include any PTO for your exempt staff

rihca   simple.
a Netsmart solution

Properly Removing Meal Breaks

CMS' rule for meal breaks:

- A 30-minute meal break is required to be removed from every 8-hour shift, whether it was observed or not

- For every additional 8 hours worked, an additional 30 minutes is required for each 8-hour shift

- Examples:
    1. CNA works 8.3 hours but doesn't clock out: 30 minutes should be removed for a shift total of 7.8 hours
    2. RN works 17.5 hours but doesn't show clocking out, 1 hour should be removed for a shift total of 16.5 hours

rihca simple.
a Netsmart solution

Nursing Categories

RN hours: Includes RN DON (job code 5), RNs with administrative duties (job code 6), and RNs (job code 7).

LPN hours: Includes LPN/LVNs with administrative duties(job code 8) and LPN/LVNs (job code 9)

Nurse aide hours: Includes CNAs (job code 10), aides in training (job code 11),and medication aides/technicians (job code 12)

Note: only shifts worked in the facility can be reported for direct care staff

Audit Advice

CMS combs through facility PBJ data, any of these concerns can result in a PBJ audit:

1. Any days without at least 8 RN hours
2. At least 24 hours of Licensed Nursing Coverage
3. Excessively low weekend staff hours
4. High total nursing Hours per Resident Day (HRD) – greater than 6 HRD
5. Excessively low total nursing HRD – less than 1.5 HRD
6. Any Exempt staff with more than 40.0 hours in a single week (Sun-Sat)
7. Any staff with more than 80 hours in a single week (Sun-Sat)
8. Any staff with more than 300 hours in a single month
9. Total nursing HRD changed by more than 10% since last quarter

Audit Advice

Steps to proactively take to pass a PBJ audit:

1. Don't fly in the dark! Verify your PBJ data before submitting CMS
2. Scrub your data for each of the line items CMS is looking at
3. Regularly audit your internal census tracker to match what CMS is showing in their MDS census
4. Only report hours that are backed up by payroll records
5. Utilize any tools available to assist in the process

Five-Star Calculation

RN staff =

Registered Nurse DON **+** Registered Nurse with Administrative Duties **+** Registered Nurse

Total Nursing Hours =

Total RN **+** Total LPN **+** Total Aide

Registered Nurse DON **+** Registered Nurse with Administrative Duties **+** Registered Nurse **+** Licensed Practical/Vocational Nurse with Administrative Duties **+** Licensed Practical/Vocational Nurse **+** Certified Nurse Aide **+** Nurse Aide Training **+** Medication Aide/Technician

Currently: all RN positions equally weighted | all LPN and Aide positions equally weighted

rihca   simple.
        a Netsmart solution

Five-Star Calculation

Measure Calculation

$$\textbf{HRD}_{\textbf{Adjusted}} = (\text{HRD}_{\text{Reported}} / \text{HRD}_{\text{Case-Mix}}) * \text{HRD}_{\text{National Average}}$$

HRD → Hours Per Resident Day
HRD = Total Hours / Total Census
HRD = Total Hours / (Average Daily Census / Number of Days in the Quarter

$$\textbf{Hours}_{\textbf{Adjusted}} = (\textbf{Hours}_{\textbf{Reported}} / \textbf{Hours}_{\textbf{Case-Mix}}) * \textbf{Hours}_{\textbf{National Average}}$$

Variables Needed:
- ✓ Reported Nursing Hours
- ✓ Case-Mix Hours (PDPM)
- ✓ National Average Hours
- ✓ Census (MDS assessments entry, discharge, and death in facility)

Turnover – *Measures*

Turnover is identified based on **gaps in days worked.**
It is published quarterly as an **annual calculation**.

Turnover rate =
(Total Nurse and RN)

$$\text{Turnover rate} = \frac{\text{total number of employment spells that ended in turnover}}{\text{total number of eligible employment spells}}$$

Using this specification, the maximum turnover rate is 100%

Turnover number = total number of administrators who left the nursing home
(Administrator)

NOTE: Both **regular employees and agency/contract staff** are included in the turnover if they work sufficient hours to be eligible for the denominator.

rihca   simple.
a Netsmart solution

Turnover Calculation

Key definitions:

Employment spell = a period of work at the facility by an individual (*a minimum of 120 hours must be worked in a 3-month period to qualify as an employment spell*)

turnover signal ➡ **60-day gap** = 60 consecutive days in which an individual does not work **at all** at the facility

Turnover date = The last workday prior to the start of a 60-day gap

> NOTE: Individuals who return to the nursing home after a gap of more than 60 days can have multiple "employment spells" used in the turnover calculation if they meet the eligibility requirement for subsequent employment spell(s). Essentially, they are treated as new employees.

rihca   simple.
a Netsmart solution

Turnover Calculation

Figure 1: Time Period Used for Calculating Turnover Measures
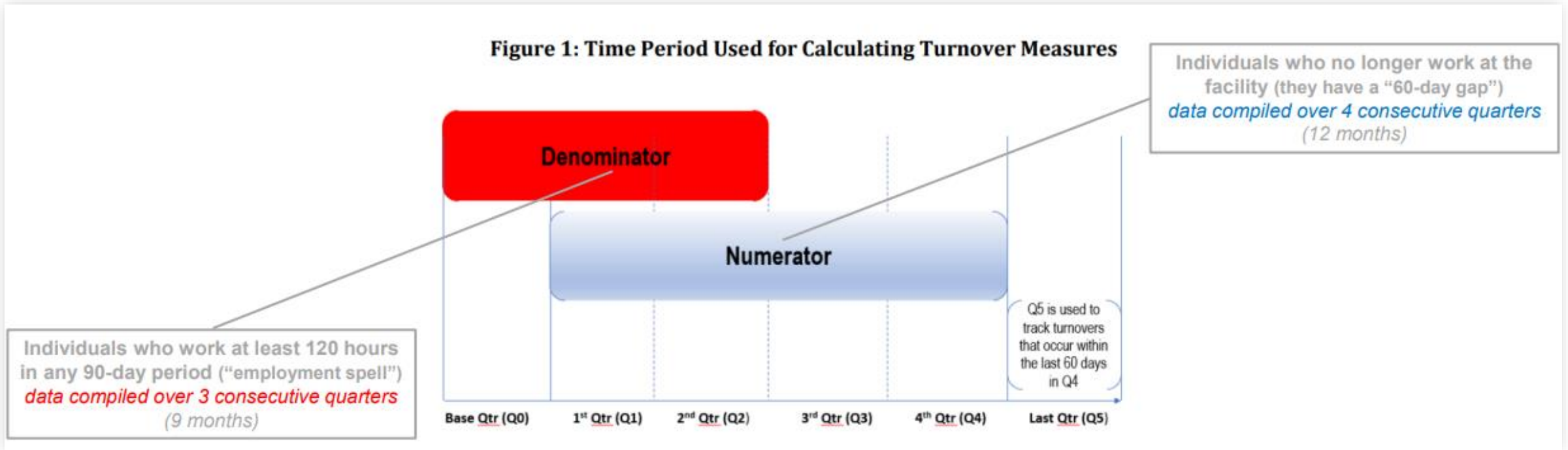
Turnover – *Current Calculation Timeline*

Lookback Timeline: Total Nursing and RN Turnover (April 2024 – June 2024 Five-Star Reports)					
Q0	Q1	Q2	Q3	Q4	Q5
Jul – Sep 2022	Oct – Dec 2022	Jan – Mar 2023	Apr – Jun 2023	Jul – Sep 2023	Oct – Dec 2023
Denominator					
	Numerator				

12-Month Reporting Period: Administrator Turnover
October 2022 – September 2023

Points for Each Measure

Staffing Measure	Maximum Score
RN Case-Mix Adjusted HRD	100
Total Nursing Case-Mix Adjusted HRD	100
Total Nursing Case-Mix Adjusted for weekend days	50
% of total nursing staff that left the SNF over a 12-month period	50
% of RNs that left the SNF over a 12-month period	50
Number of administrators that left the SNF over a 12-month period	30

Total Score Cut Points

Total Score Cut Points: Staffing Star Rating				
★	★ ★	★ ★ ★	★ ★ ★ ★	★ ★ ★ ★ ★
< 155	155 – 204	205 – 254	255 – 319	320 - 380

Turnover Scores

Reasons for Exclusion
Data "Not Available"

Nursing Staff and RN Turnover Exclusions

- A SNF has less than 5 RNs

- 100% nurse or RN turnover on a single day
  (usually caused by a sudden change of all EmployeeIDs)

Note: "Other reason" can also be applied.

Turnover Scores

Reasons for Exclusion
Data "Not Available"

Administrator Turnover Exclusion

- No eligible administrator staff

- Too many administrator staff reported (12 or more days during the measuring period with five or more different staff reported under job code 1 on the same day)

Note: "Other reason" can also be applied.

Turnover – *Exclusion Scenario*

In this scenario, data is not available for both total nursing and RN turnover measures.
100 points are removed from the maximum possible points and the point total is then rescaled.

| Staffing Measure	Data for Provider		Maximum Possible Points
	Measure Value	Points	
Adjusted Total nurse staffing (7 day)	2.716	10	100
Adjusted RN staffing (7 day)	0.326	20	100
Adjusted Total nurse staffing (weekends)	2.301	5	50
Total nursing turnover (%)	N.A.	N.A.	50
RN turnover (%)	N.A.	N.A.	50
Number of administrator departures	3	10	30
Raw point total		45	
Total points after rescaling (if any)		61	380
Staffing rating	★		

45 points / 280 = 61 points / 380

New PDPM Case-Mix Calculation

- In July, Five-Star Reports will start showing HRD staffing scores based on a new PDPM Case-Mix calculation

- This is due to the change to the MDS assessment in October 2023

- The April, May, and June Five-Star Reports will show frozen HRD measures from what was calculated in January 2024

- The 3 HRD staffing measures are:

    - Adjusted Total Nurse Staffing
    - Adjusted RN Staffing
    - Adjusted Weekend Total Nurse Staffing

Latest SimplePBJ Updates

Live PDPM Case-Mix!
Be the first to see your facility's HRD predictions
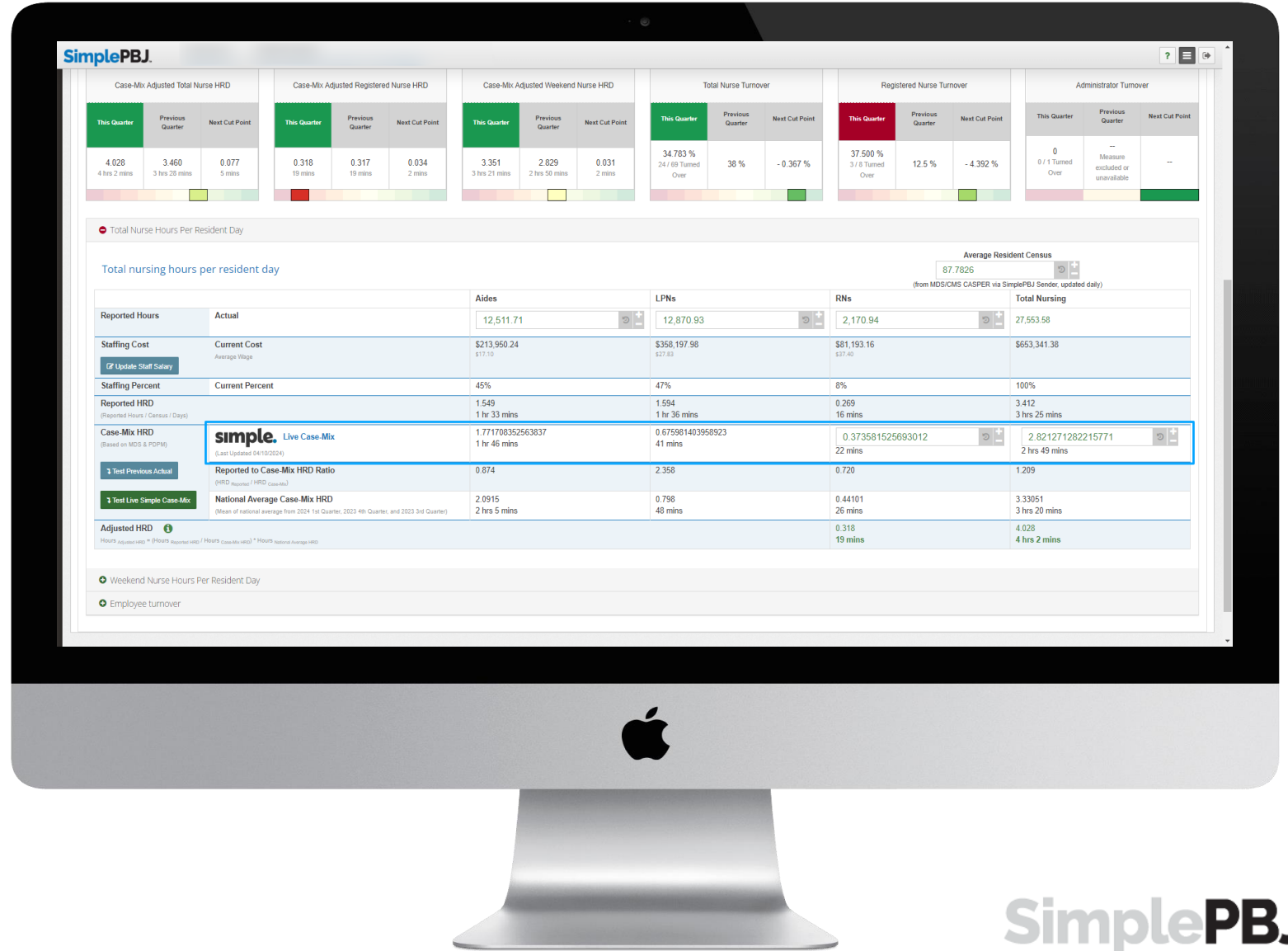
SimplePBJ™

Your one-stop shop for PBJ success

Assemble, validate and submit your PBJ

Predict Staffing Five-Star ratings

Submit PBJ reports with one click

Benchmark results against other facilities

REQUEST DEMO

QUESTIONS

Resources

https://www.cms.gov/newsroom/fact-sheets/medicare-and-medicaid-programs-minimum-staffing-standards-long-term-care-facilities-and-medicaid-0

https://www.regulations.gov/docket/CMS-2023-0144/comments

https://www.federalregister.gov/documents/2023/09/06/2023-18781/medicare-and-medicaid-programs-minimum-staffing-standards-for-long-term-care-facilities-and-medicaid

https://www.federalregister.gov/public-inspection/2024-08273/medicare-and-medicaid-programs-minimum-staffing-standards-for-long-term-care-facilities-and-medicaid

https://public-inspection.federalregister.gov/2024-08273.pdf