Quarterly PBJ Webinar

The latest answers on PBJ, staffing, and more before the Nov 14 deadline

Q4 2024 Edition THU, NOV 7 | 2 PM CT





PBJ SUBMISSION GIVEAWAY

Submit your PBJ early & you could win! The PBJ deadline is Thursday, Nov 14



Submit your PBJ data through SimplePBJ by midnight ET on Nov 11 for a chance to win

VISA

1st prize: \$100 Visa gift card (use anywhere)
2nd prize: 40 oz. Stanley tumbler (choose your color)

Winners announced Nov 13

Your Speakers





Nate Hoard

PBJ Solution Strategist – Simple

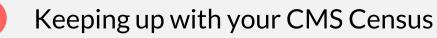
Jolene Johnson

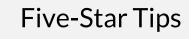
President - Luminate Healthcare

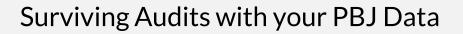


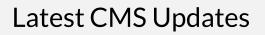


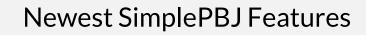
Key PBJ Must-Do's

















What component(s) of the PBJ process concerns you the most? Select all that apply

PBJ Must-Do: meal break requirements

Unpaid or paid?

Mealtimes, paid or unpaid, shall not be reported for all staff including:

Exempt | Non-exempt | Contract

Example using unpaid meal breaks:

- 8-hour shifts and are paid to work 7.5 hours (with a 30-minute unpaid meal-break) 7.5 hours shall be reported.
- 8.5-hour shifts and are paid to work 8 hours (with a 30-minute unpaid meal-break) 8 hours shall be reported.
- 12-hour shifts and are paid to work 11.5 hours (with a 30-minute unpaid meal-break) 11.5 hours shall be reported.
- 16-hour shifts (two 8-hour shifts) and are paid to work 15 hours (with two 30-minute unpaid meal-breaks) 15 hours shall be reported.
- 17-hour shifts (two 8.5-hour shifts) and are paid to work 16 hours (with two 30-minute unpaid meal-breaks) 16 hours shall be reported.

PBJ Must-Do: submitting overnight hours

Requirements:

- The day and date associated with the number of hours paid to work.
- When reporting hours per day, hours reported shall be by the calendar day.
- Midnight is the cutoff for each day reported.

For example:

- Shift starts at 11:00 PM on 4/5 and ends at 7:00 AM on 4/6
- 1 hour would be recorded for 4/5
- 7 hours for 4/6



Keeping up with your CMS Census

Steps to take:

Run MDS 3.0 MDS Roster (under MDS 3.0 Provider Reports Header) and Review to assess if residents are present on the listing who are no longer in house.

For those residents who are no longer in house, ensure the Entry and Discharge MDS assessments match on MDS: Full Name, Birth date, Gender and social security number AND have been accepted into the state database. If there are discrepancies reach out to your MDS consultant or State RAI automation coordinator.

Also, ensure your Casper MDS missing assessment report is clear.



Turnover – Current Calculation Timeline

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

12-Month Reporting Period: Administrator Turnover

April 2023 - March 2024



Five-Star Tips

- Ensure a minimum of 8 RN hours are worked every day
- Increase nurse staffing over the weekends if possible
- Pay close attention to Agency nursing staff and whether they will qualify for turnover calculations (denominator: 120 hours worked over any 90-day period; numerator: then 90 consecutive days of no shifts)
- Continually coordinate with your MDS and administrative team to make sure your CMS census is accurately measured.
- Be vigilant when it comes to coding staff as 1 Administrator. This should only apply to licensed administrators and assistant administrators.



DEPARTMENT OF HEALTH & HUMAN SERVICES Centers for Medicare & Medicaid Services 7500 Security Boulevard, Mail Stop C2-21-16 Baltimore, Maryland 21244-1850



Center for Clinical Standards and Quality/Quality, Safety & Oversight Group

HOW TO PREPARE FOR CMS-PBJ AUDIT

April 14, 2023



RE: Payroll-Based Journal (PBJ) Staffing Data - October 1, 2022 through December 31, 2022 Quarter

Dear Administrator,

CMS and their PBJ audit contractor (Conrad and Myers and Stauffer) have reviewed staffing data submitted on behalf of your long term care facility to determine compliance with the submission requirements (in accordance with 42 CFR 483.70(q)) and the PBJ policy manual.

Upon review of the data submitted by <u>February 14, 2023 for the time frame of October 1 – December</u> <u>31, 2022</u>, we are conducting an assessment of the data for your facility that were submitted to the PBJ staffing hours system. This assessment may also include conducting phone interviews with selected staff in your facility.

Please submit the information identified on Attachments A, C and E of this letter by the 7th day following the delivery date of this certified letter, as indicated by the United States Postal Service delivery tracking service. The facility's certified mail tracking number is **Example 1**. Instructions on how to submit data can be found on Attachments B, F and G of this letter.

If you do not comply with responding to this request for information supporting the accuracy of your data submission or the results of our review of the submitted PBJ staffing hours shows a significant variance in your Hours per Resident Day (HRD) based on the supporting documentation, your facility will receive a one-star staffing rating in the 5-star Quality Rating System, which may reduce the facility's overall (composite) rating by one star for three months.

For further questions regarding the documents that are requested, contact Carlo Pompei at Cpompei@mslc.com.

Sincerely,

Evan Shulman Director, Division of Nursing Homes

Surviving Audits with your PBJ Data



- Attachment A, sample list of employees being reviewed
- Attachment D, Provider Survey
- Payroll records (this will show PTO, holidays, sick pay, training pay etc)
 - Timecards punch in and out
- - Invoices for all contracted employees, timecards , and proof of payment
 - Employee Handbook



Surviving Audits with your PBJ Data

Announced o Revised	r Title	Component	Report Number(s)	Expected Issue Date (FY)	Summary
November 2023	Audit of Nursing Homes' Nurse Staffing Hours Reported in CMS's Payroll-Based Journal	Office of Audit Services	WA-24-0011 (W-00-24- 31575)	2025	Nursing homes are required to electronically submit complete and accurate direct care staffing information to CMS's Payroll-Based Journal (PBJ) system on a quarterly basis We will review the nurse staffing hours reported in the PBJ to determine whether the reported hours are accurate.
January 2023	Assessment of CMS's Early Use of Payroll-Based Journal Data To Improve Enforcement of Nursing Home Staffing Standards	Office of Evaluation and Inspections	OEI-04-22- 00550	2025	In October 2022, CMS began to provide State surveyors with extracts of PBJ staffing data for use in annual nursing home certification surveys/inspections. CMS instructed State surveyors to use this data to investigate specific instances of noncompliance with hourly staffing standards (for example, the requirement to have a registered nurse on duty for a minimum of 8 hours per day). Additionally, CMS instructed State surveyors to review PBJ data for indications of whether a nursing home has met the requirement to have sufficient staffing. Our objective is to assess the early results of CMS's strategy to use PBJ data to improve the enforcement of Federal nursing home staffing standards by State surveyors. We will review CMS's plan for monitoring the success of the strategy and explore State surveyors' experiences with using the data in their surveys.

https://oig.hhs.gov/reports-and-publications/workplan/active-item-table.asp#example=fpbj



Latest CMS Updates

- October Five-Star reports release the 2nd cycle of the new PDPM Case-Mix calculations
- CMS continues to establish a new base-line of Case-Mix expectations
- Impact two key elements of the Adjusted HRD formula
 - 1. Facility-level Case-Mix HRD
 - 2. National average Case-Mix HRD



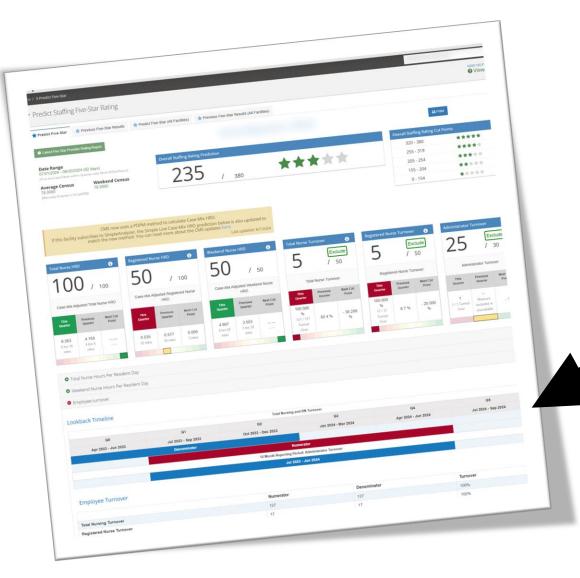
Latest SimplePBJ Updates

Now Simple customers who subscribe to SimplePBJ *and* SimpleAnalyzer can see an enhanced HRD prediction of the new calculations:

Reported Hours Actual 29,436.00 9,367.25 1,857.50 40 Staffing Cost (2 Update Staff Salary Current Cost Average Wage \$412,104.00 \$14.00 \$206,079.50 \$22.00 \$78,015.00 \$42.00 \$78,015.00 \$42.00 \$6 Staffing Percent Current Percent 72% 23% 5% 100 Reported HRD (Reported HRD (Reported HRD (Based on MDS & PDPM) Simple, Live Case-Mix (Last Update 04/09/2024) 1.9698235535481978 1.hr 58 mins 1.072 1.hr 4 mins 0.41535599660() 40	Average Resident Census 95.0000 D + (Manually Entered in SimplePBJ)	
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(HRD Reported / HRD Case-Mix)	1.483	
	3.33051 3 hrs 20 mins	

SimplePBJ.

Latest SimplePBJ Updates



Turnover look-back period added to the Employee Turnover view!

Easily reference the CMS calculation period for the selected quarter.







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



Scan to learn more or visit simpleltc.com/pbj



PBJ Consulting:

Full service PBJ review & CMS data submission PBJ compliance audits & Myers and Stauffer audits

MDS Consulting:

PDPM, CMI, Quality Measures, Compliance Reviews, Medicare

Education on new PBJ focus areas for state surveys

Education/Orientation for PBJ staff (facility or corporate)



Jolene Johnson

President jolene@luminatehcc.com



Scan to learn more or visit luminatehcc.com

Questions





Thanks for attending! Recording & slides available here: <u>www.simpleltc.com/PBJ-Q4-2024</u>





Resources

https://www.cms.gov/medicare/provider-enrollment-andcertification/certificationandcomplianc/downloads/usersguide.pdf

https://oig.hhs.gov/reports-and-publications/workplan/active-item-table.asp

