

A Primer for Payroll-Based Journal Reporting



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Today's Agenda

Some of the What and Why

- Where PBJ Came From
- Objectives
- Key dates

A Lot of the How

- Getting setup with CMS
- Collecting the needed data
- Making your data PBJ-ready
- Submitting to CMS

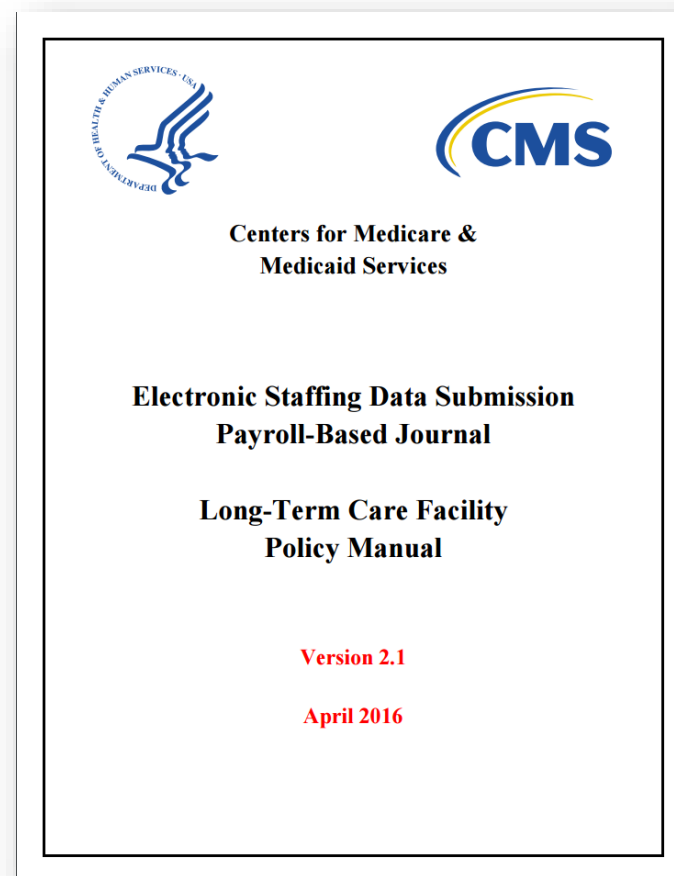
The screenshot shows the 'Add New Employee' form in the CMS Payroll Based Journal interface. The form is titled 'Add New Employee' and includes a 'Back to Previous Page' link. The form fields are:

- Facility:** A dropdown menu with a red asterisk indicating it is a required field.
- Pay Type Code:** A dropdown menu with a red asterisk indicating it is a required field.
- Employee ID:** A text input field with a red asterisk indicating it is a required field.
- Hire Date:** A date input field with a red asterisk indicating it is a required field, formatted as MM/DD/YYYY.
- Termination Date:** A date input field, formatted as MM/DD/YYYY.

At the bottom of the form, there are two buttons: 'SAVE NEW EMPLOYEE' and 'CANCEL'. The footer of the page includes the text 'Developed under contract with the Centers for Medicare & Medicaid Services (CMS)' and 'Accessibility Policy'.

Why Payroll-Based Journal (PBJ) Reporting?

- Improve accuracy of measuring staffing as one of the components of a nursing home's ability to provide quality care
- Section 6106 of the Affordable Care Act. Finalized Aug 4, 2015 as FY16 SNF PPS Rule 42 CFR §483.775
- Will (eventually) be used in Nursing Home Five Star Quality Rating System
- CMS' PBJ Policy Information:
<https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/NursingHomeQualityInits/Staffing-Data-Submission-PBJ.html>



Key Objectives

- More in depth reporting

- Staffing levels
- Turnover
- Tenure

- Data must be verifiable and auditable

- From payroll data for employees
- From contracts / invoices for non-employees
- CMS may audit your data

- Data collected more often than 671 / 672 forms

- Tracked daily and uploaded quarterly to new PBJ system
- 671 / 672 still in place after PBJ starts

Which is the PBJ Deadline?

July
1



INTERNAL deadline
to start collecting
PBJ reportable data

Sept
30



INTERNAL deadline
to complete the first
quarter of
PBJ data collection

Nov
14



CMS DEADLINE
for first PBJ submission
(45th day after last day of
each fiscal quarter)

But We All Know These Deadlines Get Pushed...

“Leading Age respectfully requests that implementation of PBJ be deferred as necessary pending resolution of the above-detailed issues and concerns.” -

Katrinka Sloan, CEO Leading Age

On March 22, 2016, CMS Commissioner Slavitt responded:

“We believe the voluntary submission period **provides ample time for all facilities** to test their submission process. Once the mandatory submission period begins on July 1st, **we will provide feedback mechanisms** to providers, such as warnings, that will help facilitate compliance with this requirement.

However, we acknowledge that there is significant variation among facilities’ ability to meet the requirement. As with other instances of noncompliance, **CMS retains discretion on imposing certain sanctions**. For example, as providers are adjusting to this new requirement, **we may refrain from imposing enforcement remedies (e.g., for good faith efforts).**”

emphasis added

Getting Setup

Steps for Getting Setup with CMS

- **Get a CMSnet User ID and QIES Submission ID**

- <http://www.cmsruas.com/>
- <https://www.qtso.com/accesspbj.html>
- 2 users per facility
- Vendors can be authorized to submit on your behalf

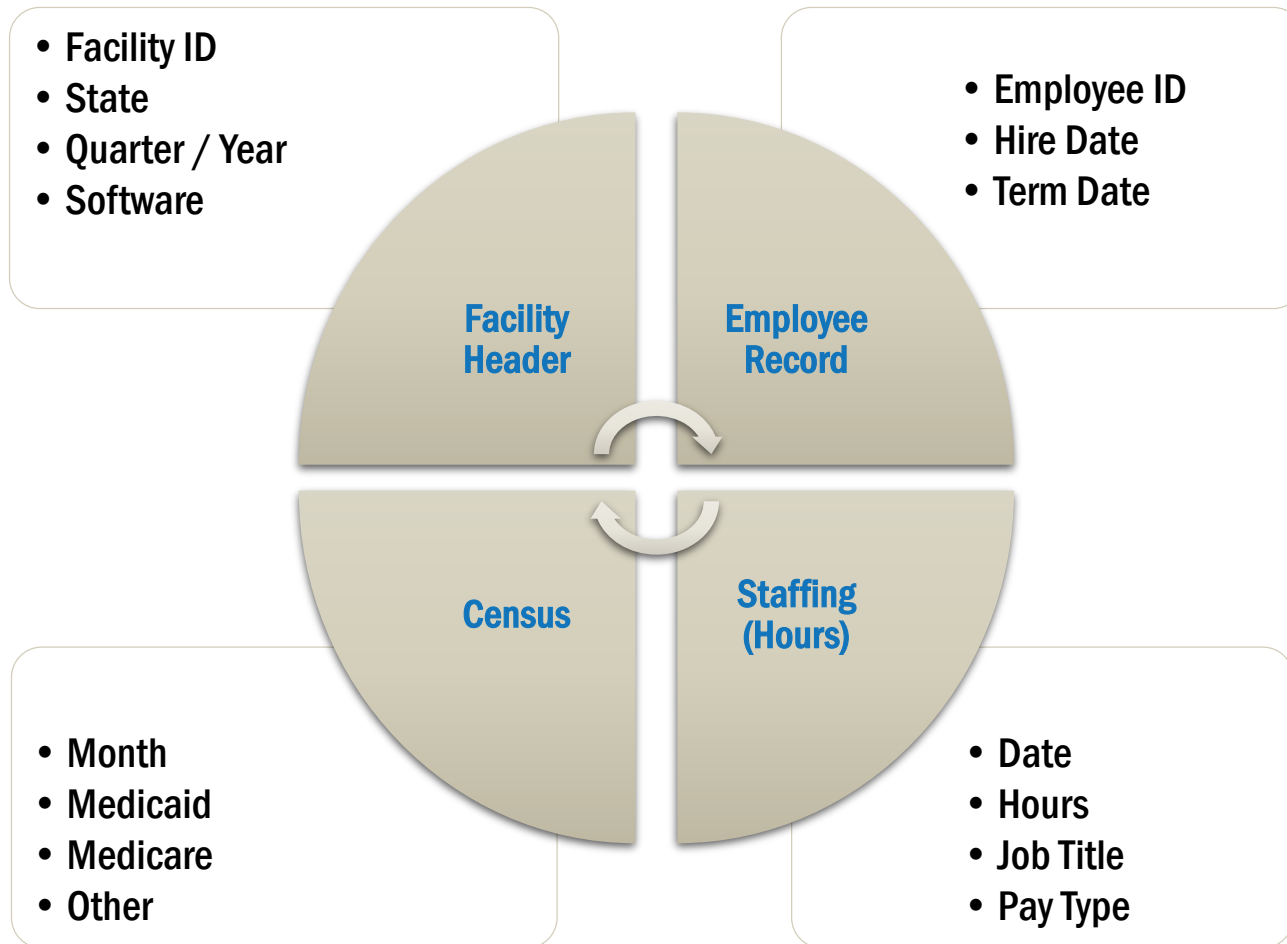
- **Install the software to access CMSNet**

- Software requires security protocols
- Get your Facility ID from your MDS coordinator

- **Take the training**

- <https://www.qtso.com/webex/qiesclasses.php>

Data Breakdown – What is Submitted to CMS



What A Zipped XML File Looks Like



PBJ-12345_04-22-2016.zip

```
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```

Cliffs Notes for the PBJ Policy Manual

How to Submit Daily Paid Hours for all Direct Care Staff

Submit Daily Paid Hours for all Direct Care Staff



- **Enter Data Manually or Upload an XML File** – via QIES website
- **Be Timely** – must be received by 11:59pm EST of the 45th calendar day after the last day in each quarter



- **Automated** – can only manually upload a zipped XML file
- **Outsourceable** – even if using a vendor to submit, the nursing home is ultimately responsible for meeting all requirements

Fiscal Quarter	Date Range	Submission Deadline
1	October 1–December 31	February 14
2	January 1–March 31	May 15
3	April 1–June 30	August 14
4	July 1–September 30	November 14



Submit **Daily** Paid Hours for all Direct Care Staff





Calendar Day – report paid hours by calendar day (midnight to midnight)

- **Unique Employee ID** – each staff member must be assigned a unique ID



- **Shifts or Payroll Day** – payroll systems allocate a shift's hours to a single day, even overnight shifts
- **Identifiable** – do not submit SSN, names or personally identifiable info

**PBJ
Alert**

-  **Follow the Midnight Split Rule**
- 
- 
- 

Submit Daily **Paid Hours** for all Direct Care Staff



- **Paid Hours** – report **paid hours** by calendar day (midnight to midnight)

- Salaried staff – paid (not worked)
- Shift workers – paid & verifiable
- Contractors – paid & verifiable

- **Based on Primary Role**

- *“It is understood that most roles have a variety of non-primary duties...facilities should still report just the total hours of that employee based on their primary role”*

- **Multiple Primary Roles**

- CMS requires Job Title and Pay Type for **each shift**. For **employees in multiple roles**, have a method to track which role they are working for each shift



- **Not Paid Hours** – hours not worked but paid, such as:

- Paid time off, sick time, FMLA
- In-service or training
- Exempt hours over paid (>40)

- **Other Non-reportable Hours**

- Service billed to Medicare or Medicaid or other payers
- Non SNF services to assisted or independent living, or day care

Submit Daily **Paid Hours** for all Direct Care Staff



Confirm that your Payroll or Timekeeping Reports can:

- Report paid hours by calendar day, not shift day
- Put Job Title and Pay Type on the hours (shifts) report

Staffing
(Hours)

- Date
- Hours
- Job Title
- Pay Type

**PBJ
Alert**

Follow the Midnight Split Rule

Report Pay Type & Job Title on Shifts

Submit Daily Paid Hours for all **Direct Care Staff**



- **Direct Care Staff are:**
 - *“...those individuals who, through interpersonal contact with residents or resident care management, provide care and services to allow residents to attain or maintain the highest practicable physical, mental, and psychosocial well-being”*
- **Use Primary Role (Job Title)**
 - The reported hours for each staff member must be categorized into one of the 40 CMS provided Job Codes and Descriptions



- **Not Direct Care**
 - Primary duty is maintaining the physical environment of the facility
 - **Other Direct Care Exclusions**
 - This is an area of significant confusion
- Refer to the CMS Job Title Codes and Descriptions and contact CMS with any questions

Submit Daily Paid Hours for all **Direct Care Staff**

Report Direct Care hours for Staff who are primarily administrative

- Develop a reasonable methodology for calculating the number of hours spent providing Direct Care by administrators, medical directors, etc. when applicable

PBJ Alert

 **Follow the Midnight Split Rule**

 **Report Pay Type & Job Title on Shifts**

 **Capture Partial Direct Care**



Submit Daily Paid Hours for all Direct Care Staff



- **Staff = Employees + Non Employees**

- Employees
- Contractors
- Agencies
- *Anyone paid to provide Direct Care*

- **Hours Based on Auditable Data**

- Payroll or timekeeping software
- Contracts or invoices
- *A reasonable methodology for calculating and reporting the number of hours spent conducting primary responsibilities*



- **Aggregating Vendor Staff**

- Every person must have a unique ID and be reported with the first date and last date providing Direct Care at each facility

- **Created at Quarter End**

- Log, track or obtain justifiable data from your vendors every day and week for a verifiable methodology

Submit Daily Paid Hours for all Direct Care Staff

Labor Category	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	Registered Nurse with Administrative Duties
3	Nursing Services	7	Registered Nurse
3	Nursing Services	8	Licensed Practical/Vocational Nurse with Administrative Duties
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 Category	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
8	Podiatry Services	33	Podiatrist
9	Mental Health Services	34	Mental Health Service Worker
10	Vocational Services	35	Vocational Service Worker
11	Clinical Laboratory Services	36	Clinical Laboratory Service Worker
12	Diagnostic X-ray Services	37	Diagnostic X-ray Service Worker
13	Administration & Storage of Blood Services	38	Blood Service Worker (OPTIONAL)
14	Housekeeping Services	39	Housekeeping Service Worker (OPTIONAL)
15	Other Services	40	Other Service Worker (OPTIONAL)

Potential Contractor Staff

- You must collect Daily Paid Hours for non-employee staff providing Direct Care
- Engage your vendors to provide this data or put a time capturing process in place

Submit Daily Paid Hours for all Direct Care Staff

Capture and Report Contractor and Agency Staff

- Update your vendor contracts – require them to provide electronic hours and staff detail
- Add each individual to your punch system (monitor missed punches!)
- Track and log their time at the front desk sign in

PBJ Alert

 **Follow the Midnight Split Rule**

 **Report Pay Type & Job Title on Shifts**

 **Capture Partial Direct Care**

 **Report Contractors & Agencies**

Ready, Set, Go!

Recommendations

Start developing your processes

- Confirm your payroll data is ready
- Get started with vendors – especially compiling employee IDs and hire dates
- Develop your processes for the Direct Care hours you plan to report

Do a test submission

- Evaluate your preparedness by submitting data to CMS for earlier quarters by May 15 or August 14.



Your Software Options

Buy One, Get One

Upgrade your scheduling or timekeeping system and get a PBJ reporting add-on

OnShift

SmartLinx™
PEOPLE | PRODUCTIVITY | POWER

StaffScheduleCare

KRONOS®

attendance®
ON DEMAND
Employee Time and Attendance

prime care
TECHNOLOGIES

Uploaders

SIMPLELTC™

Universal data
conversion and
vendor management
software tools

ezPBJ

PBJ Specialists Network

at www.ezPBJ.com/partners

Launching mid-May, 2016

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Thank You!



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