

Electronic Staffing Data Submission

Payroll Based Journal (PBJ)



Electronic submission of Staffing Information

- Background
- Section 6106 of the Affordable Care Act
- Funding provided by the IMPACT Act of 2014
- Strengthen public reporting and Five-Star Quality Rating System
- Objectives
- Report staffing levels, turnover, and tenure
- Auditable back to payroll data and other verifiable sources
- Report staffing information throughout the year (more frequently than 671/672 forms)
- Finalized through FY16 SNF PPS Rule as 42 CFR 483.75(u)

(https://www.federalregister.gov/articles/2015/08/04/2015-18950/medicare-program-prospective-payment-system-and-consolidated-billing-for-skilled-nursing-facilities)

Electronic submission of Staffing Information

Payroll-Based Journal (PBJ):

- Exported file (XML) from automated systems (e.g., payroll, timekeeping), or
- Manual entry directly through PBJ system, or
- Combination of XML and manual entry (merging data)

Voluntary submission period: October 2015 to June 30, 2016 Mandatory submission period begins July 1, 2016

Submission Deadlines

- Direct care staffing and census data will be collected for each fiscal quarter. Staffing data
 includes the number of hours each staff member is paid for working each day within a
 quarter. Census data includes the facility's census on the last day of each of the three
 months within a quarter.
- Submissions must be received by the end of the 45th calendar day (11:59 PM Eastern Standard Time) after the last day in each fiscal quarter in order to be considered timely.

FISCAL QUARTER	REPORTING PERIOD	DUE DATE
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

The deadline for the first required submission is November 14th, 2016

Registration and Training

Electronic submission of staffing data through the Payroll-Based Journal (PBJ) is required of all Long Term Care Facilities in 2016. <u>ALL</u> nursing homes will need to register to submit data in order to meet this requirement and maintain compliance.

Please follow the below instructions to register:

- <u>Step 1</u>: Obtain a CMSNet User ID for PBJ Individual, Corporate and Third Party users, if you don't already have one for other QIES applications (https://www.qtso.com/cmsnet.html) (many users may already have this access for MDS submission).
- <u>Step 2</u>: Obtain a PBJ QIES Provider ID for CASPER Reporting and <u>PBJ system access</u> (https://mds.qiesnet.org/mds home.html)
- <u>Training</u>: PBJ Training Modules for an introduction to the PBJ system and step by step registration instruction are available on QTSO e-University, select the PBJ option https://www.qtso.com/webex/qiesclasses.php

Voluntary Reporting

- We strongly recommend facilities register <u>and</u> submit voluntary data.
- Voluntary reporting is aimed at enabling facilities to test their processes in order to meet the mandatory requirement.
- Voluntary data will not be used for survey or enforcement purposes, and not used in the Five-Star Quality Rating System.
- Facilities may submit data:
 - for each quarter of the voluntary period, or
 - for any time-frame within the voluntary period (e.g., a month, a few days, etc.), or
 - at any time (does not need to be after the end of a quarter).
- What are the risks for registering and submitting voluntary data? NONE

Employee Entry Screen

Figure 1: Sample Employee Entry Screen



Note: Pay Type Code will be moved to Staffing Hours screen prior to July 1

Staffing Hours Entry Screen



Sample PBJ XML File

```
<header fileSpecVersion="2.00.0">
       <facilityId>fac1234</facilityId>
       <stateCode>IA</stateCode>
       <reportQuarter>4</reportQuarter>
       <federalFiscalYear>2016</federalFiscalYear>
       <softwareVendorName>CMS</softwareVendorName>
       <softwareVendorEmail>help@qtso.com</softwareVendorEmail>
       <softwareProductName>Timecard Software</softwareProductName>
       <softwareProductVersion>1.4.2</softwareProductVersion>
                                                                    </header>
<employees>
       <employee>
               <employeeId>EM123456/employeeId>
               <hireDate>2010-02-15</hireDate>
               <terminationDate>2017-05-15</terminationDate>
       </employee>
</employees>
<staffingHours processType="merge">
       <staffHours>
               <employeeId>EM123456/employeeId>
               <workDays>
                      <workDav>
                              <date>2016-07-01</date>
                              <hourEntries>
                                      <hourEntry>
                                             <hours>5.8</hours>
                                                      <jobTitleCode>5</jobTitleCode>
```

Enforcement

- CMS retains enforcement authority (e.g., civil money penalties (CMPs)) for noncompliance with all requirements for participation, including this new requirement (§483.75(u))
- We will provide feedback mechanisms to providers that will help facilitate compliance with this requirement
- CMS may refrain from imposing enforcement remedies while providers adjust to the new requirement (e.g., for good faith effort)

Who Should I Contact with Questions?

- Questions regarding PBJ policy issues should be directed to <u>NHStaffing@cms.hhs.gov</u>
- Questions regarding the PBJ Data Specifications should be directed to <u>NursingHomePBJTechIssues@cms.hhs.gov</u>. Software developers or vendors that provide services such as automated payroll or time and attendance systems that will support electronic submissions should use this address.

More Information:

PBJ Website: http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/NursingHomeQualityInits/Staffing-Data-Submission-PBJ.html

Survey and Certification Memo S&C 13-16-NH: https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/SurveyCertificationGenInfo/Policy-and-Memos-to-States-and-Regions.html

