

Payroll Based Journals Update

Jennifer Breen, Assistant Director of Reimbursement
California Association of Health Facilities

2201 K Street, Sacramento, CA 95816

What PBJ IS and What PBJ ISN'T

PBJ IS	PBJ ISN'T
Payroll Based Journal	Peanut Butter and Jelly
Direct Care Staff Hours (CMS Definition)	Nursing Hours (CA Definition)
Case Mix and Censes Data (per MDS)	Census Data per daily survey
Will be used to calculate portions of the 5-Star Rating starting in 2018	Used to Calculate 3.2 (or 3.5/2.4) Direct Care Hours
Required by CMS	Complete Data



2201 K Street, Sacramento, CA 95816

PBJ Timeline

- **July 1, 2016:** First Mandatory reporting period began. Submission due 45 days after end of quarter.
- **September 2017:** CMS began suppressing 5-Star ratings for facilities who did not Submit PBJ.
- **November 1, 2017:** PBJ Public Use Files (PUF) were made available on the CMS Website.
- **APRIL 2018:** CMS began using PBJ data in calculating 5-Star.
 - CY 2017 Q4 was first PBJ data set used for 5-Star.
 - CMS revised the Star Rating Thresholds in conjunction with the implementation of the PBJ data in 5-Stars – Keeping the relative proportion of facilities in each star category the same nationwide.
- **April 2019:** CMS Updated 5-Star Scoring methodology

2201 K Street, Sacramento, CA 95816

PBJ & 5-Star Reporting Periods

Year	PBJ Data Period	PBJ Submission Deadline	5-Star Updated
2017	Oct - Dec	February 14, 2018	April, 2018
2018	Jan - Mar	May 15, 2018	July, 2018
	April - June	August 14, 2018	October, 2018
	July - Sep	November 14, 2018	January, 2019
	Oct - Dec	February 14, 2019	April, 2019
2019	Jan - Mar	May 15, 2019	July, 2019

2201 K Street, Sacramento, CA 95816

Early PBJ Issues

MDS Bed Day over counting.

- MDS Bed Day over counting is caused by delayed discharge MDS' being processed.
- CMS's documentation also addresses the MDS Bed Day over counting.

Inaccurate Reporting of Hours by facilities

- Some Facilities have NO RN hours reported, or NO LPN Hours reported
- Issues with facilities properly cross-walking/ time-coding

Understated Nursing Hours Per Patient Day due to issues 1 and 2 above.

- NHPPD is not reported directly in PUF however can be calculated simply based on the data provided in the PUF.

2201 K Street, Sacramento, CA 95816

April 2019 5-Star Update

Changes in all 5-Star Domains:

- Survey
 - Unfreezing Surveys and incorporating new survey method into 5-Star
- Quality
 - Removed physical restraints measure
 - Added long stay hospitalization and Emergency Department visits measures.
- Special Focus Facilities
 - Nursing Home Compare no longer ratings for Special Focus Facilities

2201 K Street, Sacramento, CA 95816

April 2019 5-Star Update - Focus on RN Staffing

RN Staffing Requirement Changes

- CMS was already assigning 1-star staffing rating to facilities with 7 or more days in a quarter with no RN.
- Now 4 or more days in quarter with no RN will result in a 1-Star rating.

Updates star thresholds for RN and Total Nursing Hours

2201 K Street, Sacramento, CA 95816

April 2019 5-Star Update - Focus on RN Staffing

RN Staffing	New	Old	Total Nursing	New	Old
☆	<0.316	<0.246	☆	<3.107	<3.176
☆☆	0.316 - 0.500	0.246 - 0.382	☆☆	3.107 - 3.573	3.176 - 3.551
☆☆☆	0.501 - 0.723	0.383 - 0.586	☆☆☆	3.574 - 4.037	3.550 - 4.009
☆☆☆☆	0.724 - 1.041	0.578 - 0.883	☆☆☆☆	4.038 - 4.403	4.010 - 4.237
☆☆☆☆☆	≥1.042	≥0.884	☆☆☆☆☆	≥4.404	≥4.238

2201 K Street, Sacramento, CA 95816

April 2019 5-Star Update - Focus on RN Staffing

Table 4
Staffing and Rating (updated April 2019)

RN rating and hours	Total nurse staffing rating and hours (RN, LPN and nurse aide)				
	1	2	3	4	5
	< 3.107	3.107 - 3.573	3.574 - 4.037	4.038 - 4.403	≥4.404
1 < 0.316	★	★	★★	★★	★★★
2 0.316 - 0.500	★★	★★	★★	★★★	★★★★
3 0.501 - 0.723	★★	★★★	★★★	★★★★	★★★★★
4 0.724 - 1.041	★★★	★★★★	★★★★	★★★★★	★★★★★
5 ≥1.042	★★★★	★★★★★	★★★★★	★★★★★	★★★★★

Note: Adjusted staffing values are rounded to three decimal places before the cut points are applied.

Overall Staffing is average of RN and Total Staffing. If not a whole number "Round towards" the RN rating.

2201 K Street, Sacramento, CA 95816

Impact of April Update

Star change	Total Staffing	RN Staffing
Lost 1 or more	615	565
No change	505	573
Gained 1 or more	77	59

2201 K Street, Sacramento, CA 95816

Adjusted Staffing Hours – 5-Star

CMS Calculates an Adjusted NHPPD for use in 5-Star based on:

Actual NHPPD (PBJ)

Expected NHPPD (MDS)

National Average NHPPD (PBJ)

$$Adj\ NHPPD = \frac{Actual}{Expected} * Nationwide\ Ave$$

2201 K Street, Sacramento, CA 95816

Resources on Reported / Expected/ Adjusted Staffing Hours

- Nursing Home Compare Staffing Data Set:
 - Reported Staffing
 - Expected (or “Case-Mix staffing”)
 - Adjusted Staffing
 - Does not specifically show nationwide averages – but can calculate based on data available.
 - RN Staffing = 0.375 (June 2019 5-Star – Q4 2018 data)
 - Total Staffing = 3.207 (June 2019 5-Star – Q4 2018 data)

2201 K Street, Sacramento, CA 95816

PBJ Pitfalls

Variable	Meaning	# of States	% of States	Acc. W/loss
ENC	0.14	5.60%	0.3%	425
ENC	0.14	11.80%	0.4%	316
ENC	0.14	20.60%	0.7%	265
ENC	0.07	6.54%	0.3%	246
DEER1	0.07	7.10%	0.3%	207
DEER2	0.14	10.01%	0.4%	203
DEER3	0.14	10.78%	0.4%	193
LMR2	0.07	5.20%	0.4%	211
LMR1	0.07	10.95%	0.4%	178
LMR3	0.14	10.95%	0.4%	178
LMR4	0.14	10.53%	0.7%	161
CDR2	0.07	11.24%	0.4%	194
CDR3	0.07	12.49%	0.6%	186
CDR4	0.14	11.24%	0.6%	186
CDR5	0.14	11.24%	0.6%	186
CAC	15.06	1.94%	0.1%	111
CW3	0.14	866.86%	24.8%	113
CB1	0.14	11.24%	0.6%	186
BA01	11.06	1.06%	0.1%	100
BA02	11.06	65.57%	3.2%	100
PKC2	0.07	2.07%	0.1%	146
PKC3	0.07	88.14%	4.4%	145
PKC4	0.14	5.55%	0.3%	121
PA2	15.06	2.06%	0.2%	7
PA3	0.14	421.46%	22.2%	7
PA4	15.06	26.20%	1.2%	7

2201 K Street, Sacramento, CA 95816

However, the Acumen study for PDPM included this chart of Average Wage-weighted Staff Time by PDPM nursing category.

2201 K Street, Sacramento, CA 95816

- All result in a 1 Star for the 5-Star Staffing Domain!**

2201 K Street, Sacramento, CA 95816

PBJ Audits

- CMS has hired outside firms to audit the accuracy of submitted PBJ Data.
 - Myers and Stauffer and Granite Dolphin
- Focused on examining payroll and other records to identify if staffing is accurately reported in PBJ.
- Document requests may include:
 - Payroll records
 - Timekeeping records
 - Invoices or contracts for contracted staff
 - Interviews with staff responsible for PBJ data and submission

2201 K Street, Sacramento, CA 95816

Special Issues with PBJ

- Salaried Staff working more than 8 hours:
 - Only 8 hours per day is captured by PBJ for salaried staff.
 - If a separate payment is made additional hours can be counted for salaried overtime:
 1. Payment must directly correlate to hours worked and be distinguishable for other payments.
 2. Payment must be reasonable compensation for services provided.
- Meal Breaks:
 - *"For each full shift that staff (exempt, non-exempt, or contract) are paid to work, a 30 minute meal break must be deducted from their shift (whether or not the employee actually takes a meal break)."*

2201 K Street, Sacramento, CA 95816

Special Issues with PBJ

- Corporate Staff:
 - May be reported if working on-site providing resident care, even though paid through corporate vs facility pay roll. This includes instances of corporate staff filling in for DON while on leave.
 - Do not count time spent in monitoring tasks – such as helping facility prepare for survey or chart reviews.
- Staff Training:
 - Do not count hours for staff who are in training and are **NOT** available to preform primary role.

2201 K Street, Sacramento, CA 95816

PBJ Employee ID Linking

- ▶ CMS is tracking turnover based on Employee ID.
 - ▶ May effect 5-Star in future.
- ▶ Employee ID may change due to:
 - ▶ Change in ownership
 - ▶ Change in job classification
 - ▶ Change in payroll system



CMS has Employee ID Linking Methodology to account for these Changes.
<https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/NursingHomeQualityInits/Downloads/PBJ-Linking-Methodology.pdf>

2201 K Street, Sacramento, CA 95816

PBJ vs CDPH Staffing Audits

PBJ staffing definitions are NOT 1-to-1 with CA Direct Care Staffing definitions.

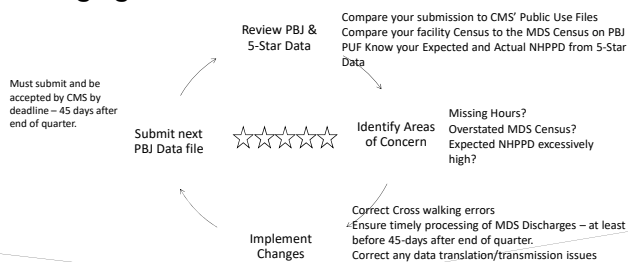
- Includes DON hours for all facilities.
- Does not include overtime worked by salaried employee
 - Unless paid separately for that time
- Does not make distinction between SNF and Subacute
- Based on PBJ reported data and MDS Bed Count – not detailed facility logs and census.

CDPH can utilize PBJ as supplemental data in preforming their audits (AFL 17-26).

- MDS Census from PBJ should not be used! Data issues with MDS Census reports (used in PBJ calculations) make it a poor source for census data.

2201 K Street, Sacramento, CA 95816

What you can do: Managing PBJ Process to maximize 5-Star



2201 K Street, Sacramento, CA 95816

Questions?

Thank you!

Jennifer Breen, Assistant Director of Reimbursement
California Association of Health Facilities
Jbreen@cahf.org

2201 K Street, Sacramento, CA 95816
