



ADVISORS for
WHAT'S NEXT



MESSIAH
Lifeways™

Navigating PBJ

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Disclaimer

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Learning Objectives >

- Identify the PBJ required timelines and submission data
- Define how PBJ is utilized in the facility's 5-Star Quality Rating: Staffing
- Articulate steps when a PBJ audit is received
- Lessons learned



About Us >

MESSIAH LIFEWAYS

Messiah Lifeways is a non-profit organization headquartered in Mechanicsburg, PA, that provides a network of services for adults 55+, including Resident Communities, Community Support Services, and Enrichment Opportunities

Messiah Village campus includes: Residential Living - 373 cottages/apartments; Enhanced Living (Personal Care) - 163 rooms; and Nursing - licensed at 139

- Our Story
- Mission & Values
- Residences & Care Options



About Us >

RKL

- Professional Advisory Firm
 - Senior Living Services Consulting
 - Operational and Clinical Consulting Services
 - Financial, Billing, and Advisory Services
 - Outsourced Billing, Financial, and Clinical Services
 - Electronic Health Record Implementation
 - Compliance and HIPAA Risk Assessments



Required Submission Data





Time Frames

Submissions must be received by 11:59 PM Eastern Time on the 45th calendar day after the last day of each fiscal quarter.

FISCAL YEAR 2024 TIME LINES

Fiscal Quarter	Start Date	End Date	Submission Due Date
1	October 1, 2023	December 31, 2023	February 14, 2024
2	January 1, 2024	March 31, 2024	May 15, 2024
3	April 1, 2024	June 30, 2024	August 14, 2024
4	July 1, 2024	September 30, 2024	November 14, 2024



Pay Codes

PAY CODES AND DESCRIPTIONS

Pay Code	Pay Type Description	Notes
1	Exempt	Employed by the facility. Employee is not entitled to overtime.
2	Non-Exempt	Employed by the facility. Employee is entitled to overtime.
3	Contract	Contracted by the facility.



Job Title Codes >

Administration and Physician related job codes and descriptions.

JOB TITLE CODES AND DESCRIPTIONS

Job Title Code	Job Description	Description of Services
1	Administrator	Administrative staff responsible for facility management as required under 483.75(d) such as the administrator and the assistant administrator.
2	Medical Director	A physician designated as responsible for implementation of resident care policies and coordination of medical care in the facility in accordance with 483.75(i).
3	Other Physician	A salaried physician, other than the medical director, who supervises the care of residents when the attending physician is unavailable, and/or a physician(s) available to provide emergency services 24 hours a day.
4	Physician Assistant	A graduate of an accredited educational program for physician assistants who provides healthcare services typically performed by a physician, under the supervision of a physician.



Job Title Codes (cont.) >

Register Nurse related job codes and descriptions.

JOB TITLE CODES AND DESCRIPTIONS

Job Title Code	Job Description	Description of Services
5	Registered Nurse Director of Nursing	Professional registered nurse(s) administratively responsible for managing and supervising nursing services within the facility. Do not additionally reflect these hours in any other category.
6	Registered Nurse with Administrative Duties	Nurses (RN) who, as either a facility employee or contractor, perform the Resident Assessment Instrument function in the facility and do not perform direct care functions. Also include other RNs whose principal duties are spent conducting administrative functions. For example, the Assistant Director of Nursing is conducting educational/in-service. Facilities with an RN waiver who do not have an RN as DON report all administrative nursing hours in this category.
7	Registered Nurse	Those persons licensed to practice as registered nurses in the State where the facility is located. Includes geriatric nurse practitioners and clinical nurse specialists who primarily perform nursing, not physician-delegated tasks. Do not include Registered Nurses' hours reported elsewhere.



Job Title Codes (cont.) >

Licensed Practical/Vocational Nurse related job codes and descriptions.

JOB TITLE CODES AND DESCRIPTIONS

Job Title Code	Job Description	Description of Services
8	Licensed Practical/Vocational Nurse with Administrative Duties	Those persons licensed to practice as licensed practical/vocational nurses in the State where the facility is located, and do not perform direct care functions. Also include other nurses whose principal duties are spent conducting administrative functions. For example, the LPN Charge Nurse is conducting educational/in-service, or other duties which are not considered to be direct care giving.
9	Licensed Practical/Vocational Nurse	Those persons licensed to practice as licensed practical/vocational nurses in the State where the facility is located. Do not include those hours of LPN/LVNs reported elsewhere.



Job Title Codes (cont.) >

Nurse Aide related job codes and descriptions.

JOB TITLE CODES AND DESCRIPTIONS

Job Title Code	Job Description	Description of Services
10	Certified Nurse Aide	Individuals who have completed a State approved training and competency evaluation program, or competency evaluation program approved by the State, or have been determined competent as provided in 483.150 and who are providing nursing or nursing-related services to residents. Do not include volunteers.
11	Nurse Aide in Training	Individuals who are in the first 4 months of employment and who are receiving training in a State approved Nurse Aide training and competency evaluation program and are providing nursing or Nursing related services for which they have been trained and are under the supervision of a licensed or registered nurse. Do not include volunteers.
12	Medication Aide/Technician	Individuals, other than a licensed professional, who fulfill the State requirement for approval to administer medications to residents.



Job Title Codes (cont.) >

Therapy related job codes and descriptions.

JOB TITLE CODES AND DESCRIPTIONS

Job Title Code	Job Description	Description of Services
18	Occupational Therapist	Persons licensed/registered as occupational therapists according to State law in the State in which the facility is located. Include OTs who spend less than 50 percent of their time as activities therapists.
19	Occupational Therapy Assistant	Person(s) who, in accord with State law, have licenses/certification and specialized training to assist a licensed/certified/registered Occupational Therapist (OT) to carry out the OT's comprehensive plan of care, without the direct supervision of the therapist. Include OT Assistants who spend less than 50 percent of their time as Activities Therapists.
20	Occupational Therapy Aide	Person(s) who have specialized training to assist an OT to carry out the OT's comprehensive plan of care under the direct supervision of the therapist, in accord with State law.
21	Physical Therapist	Persons licensed/registered as physical therapists, according to State law where the facility is located.



Job Title Codes (cont.) >

Therapy related job codes and descriptions.

JOB TITLE CODES AND DESCRIPTIONS

Job Title Code	Job Description	Description of Services
22	Physical Therapy Assistant	Person(s) who, in accord with State law, have licenses/certification and specialized training to assist a licensed/certified/registered Physical Therapist (PT) to carry out the PT's comprehensive plan of care, without the direct supervision of the PT.
23	Physical Therapy Aide	Person(s) who have specialized training to assist a PT to carry out the PT's comprehensive plan of care under the direct supervision of the therapist, in accordance with State law.
24	Respiratory Therapist	Persons(s) who are licensed under state law (except in Alaska) as respiratory therapists.
25	Respiratory Therapy Technician	Person(s) who provide respiratory care under the direction of respiratory therapists and physicians
26	Speech/Language Pathologist	Persons licensed/registered, according to State law where the facility is located, to provide speech therapy and related services (e.g., teaching a resident to swallow).



Job Title Codes (cont.) >

Social Worker and Activities related job codes and descriptions.

JOB TITLE CODES AND DESCRIPTIONS

Job Title Code	Job Description	Description of Services
27	Therapeutic Recreation Specialist	Person(s) who, in accordance with State law, are licensed/registered and are eligible for certification as a therapeutic recreation specialist by a recognized accrediting body.
28	Qualified Activities Professional	Person(s) who meet the definition of activities professional at 483.15(f)(2)(i)(A) and (B) or 483.15(f)(2)(ii) or (iii) or (iv) and who are providing an on-going program of activities designed to meet residents' interests and physical, mental or psychosocial needs. Do not include hours reported as Therapeutic Recreation Specialist, Occupational Therapist, OT Assistant, or other categories listed above.
29	Other Activities Staff	Persons providing an on-going program of activities designed to meet residents' needs and interests. Do not include volunteers or hours reported elsewhere.
30	Qualified Social Worker	Person licensed to practice social work in the State where the facility is located, or if licensure is not required, persons with a bachelor's degree in social work, a bachelor's degree in a human services field including but not limited to sociology, special education, rehabilitation counseling and psychology, and one year of supervised social work experience in a health care setting working directly with elderly individuals.
31	Other Social Worker	Person(s) other than the qualified social worker who are involved in providing medical social services to residents. Do not include volunteers.



Job Title Codes (cont.) >

Dietitian related job codes and descriptions.

JOB TITLE CODES AND DESCRIPTIONS

Job Title Code	Job Description	Description of Services
16	Dietitian	A person(s), employed full, part-time or on a consultant basis, who is either registered by the Commission of Dietetic Registration of the American Dietetic Association, or is qualified to be a dietitian on the basis of experience in identification of dietary needs, planning and implementation of dietary programs.
17	Paid Feeding Assistant	Person who meets the requirements specified in C.F.R. Section 483.35(h)(2) and who is paid to feed residents by a facility, or who is used under an arrangement with another agency or organization. Paid feeding assistants can only feed residents who do not have complicated feeding problems that would require the training of a nurse or nurse aide. Paid feeding assistants must not feed any residents with complicated feeding problems or perform any other nursing or nursing-related tasks.



Job Title Codes (cont.) >

Mental Health job codes and descriptions.

JOB TITLE CODES AND DESCRIPTIONS

Job Title Code	Job Description	Description of Services
34	Mental Health Service Worker	<p>Staff (excluding those included under therapeutic services) who provide programs of services targeted to residents' mental, emotional, psychological, or psychiatric well-being and which are intended to:</p> <ul style="list-style-type: none">• Diagnose, describe, or evaluate a resident's mental or emotional status;• Prevent deviations from mental or emotional well-being from developing; or• Treat the resident according to a planned regimen to assist him/her in regaining, maintaining, or increasing emotional abilities to function. <p>Among the specific services included are psychotherapy and counseling, and administration and monitoring of psychotropic medications targeted to a psychiatric diagnosis.</p>



Job Title Codes (cont.) >

Other REQUIRED job codes and descriptions.

JOB TITLE CODES AND DESCRIPTIONS

Job Title Code	Job Description	Description of Services
13	Nurse Practitioner	A registered nurse with specialized graduate education who is licensed by the state to diagnose and treat illness, independently or as part of a healthcare team.
14	Clinical Nurse Specialist	A registered nurse with specialized graduate education who provides advanced nursing care.
15	Pharmacist	The licensed pharmacist(s) who a facility is required to use for various purposes, including providing consultation on pharmacy services, establishing a system of records of controlled drugs, overseeing records and reconciling controlled drugs, and/or performing a monthly drug regimen review for each resident.



Job Title Codes (cont.) >

Optional job codes and descriptions.

JOB TITLE CODES AND DESCRIPTIONS

Job Title Code	Job Description	Description of Services
32	Dentist (NOT REQUIRED/OPTIONAL)	Persons licensed as dentists, according to State law where the facility is located, to provide routine and emergency dental services.
33	Podiatrist (NOT REQUIRED/OPTIONAL)	Persons licensed/registered as podiatrists, according to State law where the facility is located, to provide podiatric care.
35	Vocational Service Worker (NOT REQUIRED/OPTIONAL)	Evaluation and training aimed at assisting the resident to enter, re-enter, or maintain employment in the labor force, including training for jobs in integrated settings (i.e., those which have both disabled and nondisabled workers) as well as in special settings such as sheltered workshops.
36	Clinical Laboratory Service Worker (NOT REQUIRED/OPTIONAL)	Entities that provide laboratory services and are approved by Medicare as independent laboratories or hospitals.

Job Title Codes (cont.) >

Optional job codes and descriptions (continued).

JOB TITLE CODES AND DESCRIPTIONS

Job Title Code	Job Description	Description of Services
37	Diagnostic X-ray Service Worker (NOT REQUIRED/OPTIONAL)	Radiology services, ordered by a physician, for diagnosis of a disease or other medical condition.
38	Blood Service Worker (NOT REQUIRED/OPTIONAL)	Blood bank and transfusion services.
39	Housekeeping Service Worker (NOT REQUIRED/OPTIONAL)	Services, including those of the maintenance department, necessary to maintain the environment. Includes equipment kept in a clean, safe, functioning and sanitary condition. Includes housekeeping services supervisor and facility engineer.
40	Other Service Worker (NOT REQUIRED/OPTIONAL)	Record total hours worked for all personnel not already recorded (For example, librarian).



Submitting Data >

Data can be submitted to the portal in the following methods.

SUBMISSION METHODS

- XML Zip File – Files received from outside therapy companies, and exported out of payroll systems often come pre-zipped. Alternatively, CMS has instructions and a template to allow you to create your own XML Zip files for submission.
- Manually Entered – Alternatively data can be manually entered into each day.

XML Zip Files >

PROS

- This produces a clean audit trail for you if the data is questioned.
- If you import data into the CMS template you are less likely to have typos or other data entry mistakes.
- You can import multiple files. So, you can have your payroll import, as well as an import from therapy, and an import from Agency.

CONS

- Can be tricky to learn the first few times.
- You could inadvertently replace prior submitted information.



Manual Entry >

PROS

- Low barrier to entry. You already will know how to enter the information.
- Can be faster if you only have a few entries to make.

CONS

- Highly susceptible to data entry errors.
- Hard to track what information was typed in, which will make it difficult if you start and stop during the process, and make it difficult if those entries are pulled for audit.



Maintaining PBJ Submission Health >

- Validate PBJ Staffing and Census on the CASPER reporting
- Run the MDS 3.0 Missing OBRA Assessment report in iQIES
- Periodically assess payroll position mapping to PBJ
- Ensure accurate capture of agency staff and staff working additional shifts/positions
- Maintain consistent employee IDs.



Common Areas of Mistakes >

There are several areas that are often causes for facilities to mistakenly report their hours. These areas are listed below:

MISTAKES

- Training Time
- Exempt Employees
- Meal Breaks
- Agency Time

Training >

“Hours for staff (e.g. CNA) who are attending training (either onsite or offsite) and are not available to perform their primary role, such as providing resident care, shall not be reported. Also, if another staff member is called in to fill in for staff (e.g. nurse) that is participating in training, the hours for the called-in nurse shall be submitted. However, the hours for the nurse in training shall not be submitted.”

-CMS's PBJ Version 2.6 Policy Manual, Page 2-8

BEST PRACTICES

- Have a separate time code to record hours that fall within the above definition.
- Double check that the time codes are being used when processing payroll.

Exempt Employees >

BEST PRACTICES

- Have employees clock in.
- If employees do not clock in ensure that you have policies in place that clearly outline normal working hours
 - For example 8:00 am to 4:30 pm, with a 30 minute break, Monday through Friday.
- Make sure any additional hours worked and compensated are clearly documented.
 - For example, if your DON picks up a direct care shift for 3pm to 11pm, and you pay her to pick up this shift. You should have documentation showing that this is in excess of her normal working hours; and you should have documentation showing that she received additional compensation for this set of hours.

Meal Times >

“Meal times, paid or unpaid, shall not be reported for all staff (exempt, nonexempt, and contract).

*Facilities must deduct the time allotted for meals from each employee’s daily hours. 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**).”*

-CMS’s PBJ Version 2.6 Policy Manual, Page 2-5

“If staff take a meal break that is longer than 30 minutes during a shift, the actual time of the meal break should be removed and only hours actually providing services should be reported. ”

-CMS’s PBJ Version 2.6 Policy Manual, Page 2-6



Meal Times (cont.) >

BEST PRACTICES

- Have employees clock in and out for meal times.
- If your time system allows, automate the half hour reduction for PBJ purposes.
- Review your contract staffing submission process to ensure that this half hour is removed as well.
 - You must remove the meal time break even if you are paying for the full amount of time they are on site.



5-Star Quality Rating: Staffing



5-Star Quality Rating >

The 5-Star Quality Rating involves many components and it is important for the entire facility to understand their impact.

DETERMINING THE OVERALL RATING

- Health Inspection** – Start with your Health Inspection star rating
- Staffing – Add one star for a five star staffing rating, subtract one star for a one star staffing rating
- Quality Measure – Add one star for a five star quality measure rating, subtract one star for a one star quality measure rating

* The overall star rating cannot be more than five or less than one.

** If your health inspection star is one, your overall star rating cannot be upgraded by more than one star based on staffing and quality measure ratings.



Collected Measurements >

The ratio for staffing for the quality rating system is based on six measures

MEASURES

- Case-mix adjusted total nursing hours per day (RN + LPN + nurse aide hours) for a quarter averaged across all days
- Case-mix adjusted RN hours per resident day for a quarter, averaged across all days
- Care-mix adjusted total nursing hours per resident day (RN + LPN + nurse aide) averaged across all weekend days (Saturday and Sundays)
- The percentage of nursing staff that left the nursing home over a 12-month period
- The percentage of RNs that left the nursing home over a 12-month period
- The number of administrators that left the nursing home over a 12-month period

PBJ Job Codes Utilized >

REGISTERED NURSE HOURS

- Director of Nursing – Job Code 5
- Registered Nurse with Administrative Duties – Job Code 6
- Registered Nurse – Job Code 7

LICENSED PRACTICAL/VOCATIONAL NURSE HOURS

- Licensed Practical/Vocational Nurse with Administrative Duties – Job Code 8
- Licensed Practical/Vocational Nurse – Job Code 9

NURSE AIDE HOURS

- Certified Nurse Aides – Job Code 10
- Aides in training – Job Code 11
- Medication Aides/Technicians – Job Code 12

Additional Information Utilized >

PBJ STAFFING DATA

- Data that is incorporated includes the all positions with the job codes described previously. This includes: Full-time, Part-time, PRN/Pool staff, and contact/agency staff.

MDS DATA

- Daily census is calculated for the specified quarters using MDS data.
- Ensure the accuracy of MDS assessments, including discharge assessments and deaths in facility tracking reports.

CASE-MIX ADJUSTED CALCULATION

- $\text{Hours}_{\text{Adjusted}} = (\text{Hours}_{\text{Reported}} / \text{Hours}_{\text{Case-mix}}) * \text{Hours}_{\text{National Average Case-Mix}}$
- *As of July 2024, CMS adjusted the reported staffing ratios for case-mix, using the nursing CMGs and corresponding CMI from the Patient-Driven Payment Model (PDPM).*
 - *CMS calculates “case-mix hours” based on the distribution of nursing CMGs within each facility, PDPM nursing CMIs, and the reported national average staffing level.*

Case-Mix Adjustment Calculation >

- Case-mix nurse staffing HPRD for a given nursing home are calculated as follows:
 1. The MDS is used to assign a PDPM nursing CMG to each resident for each day in the quarter;
 2. The above is aggregated to generate a resident count in each of the 25 PDPM nursing CMGs;
 - Nursing CMGs not represented = 0
 - Residents with insufficient MDS information to assign CMG are not included
 3. Average Nursing CMI in the quarter is calculated for each nursing home;
 - Calculated by dividing aggregate nursing CMIs across nursing CMGs by the number of resident days in the quarter

Case-Mix Adjustment Calculation >

- Case-mix nurse staffing HPRD for a given nursing home are calculated as follows:
 4. A national weighted-average nursing CMI is calculated using data from all nursing homes;
 5. CMI ratio is calculated as the ratio of its weighted-avg CMI to the national weighted-avg CMI
 6. For each nursing home, its case-mix staffing hours per resident day is calculated as:
$$\text{Case-mix hours (total nursing, RN, or weekend) per resident day} = \text{Facility nursing CMI ratio} \times \text{national mean of reported hours per resident day}$$



Case-Mix Adjustment Calculation >

PDPM Nursing Case-Mix Indexes by Nursing CMG

<i>Nursing CMG</i>	<i>Nursing CMI</i>
<i>ES3</i>	<i>3.84</i>
<i>ES2</i>	<i>2.90</i>
<i>ES1</i>	<i>2.77</i>
<i>HDE2</i>	<i>2.27</i>
<i>HDE1</i>	<i>1.88</i>
<i>HBC2</i>	<i>2.12</i>
<i>HBC1</i>	<i>1.76</i>
<i>LDE2</i>	<i>1.97</i>
<i>LDE1</i>	<i>1.64</i>
<i>LBC2</i>	<i>1.63</i>
<i>LBC1</i>	<i>1.35</i>
<i>CDE2</i>	<i>1.77</i>
<i>CDE1</i>	<i>1.53</i>
<i>CBC2</i>	<i>1.47</i>
<i>CA2</i>	<i>1.03</i>

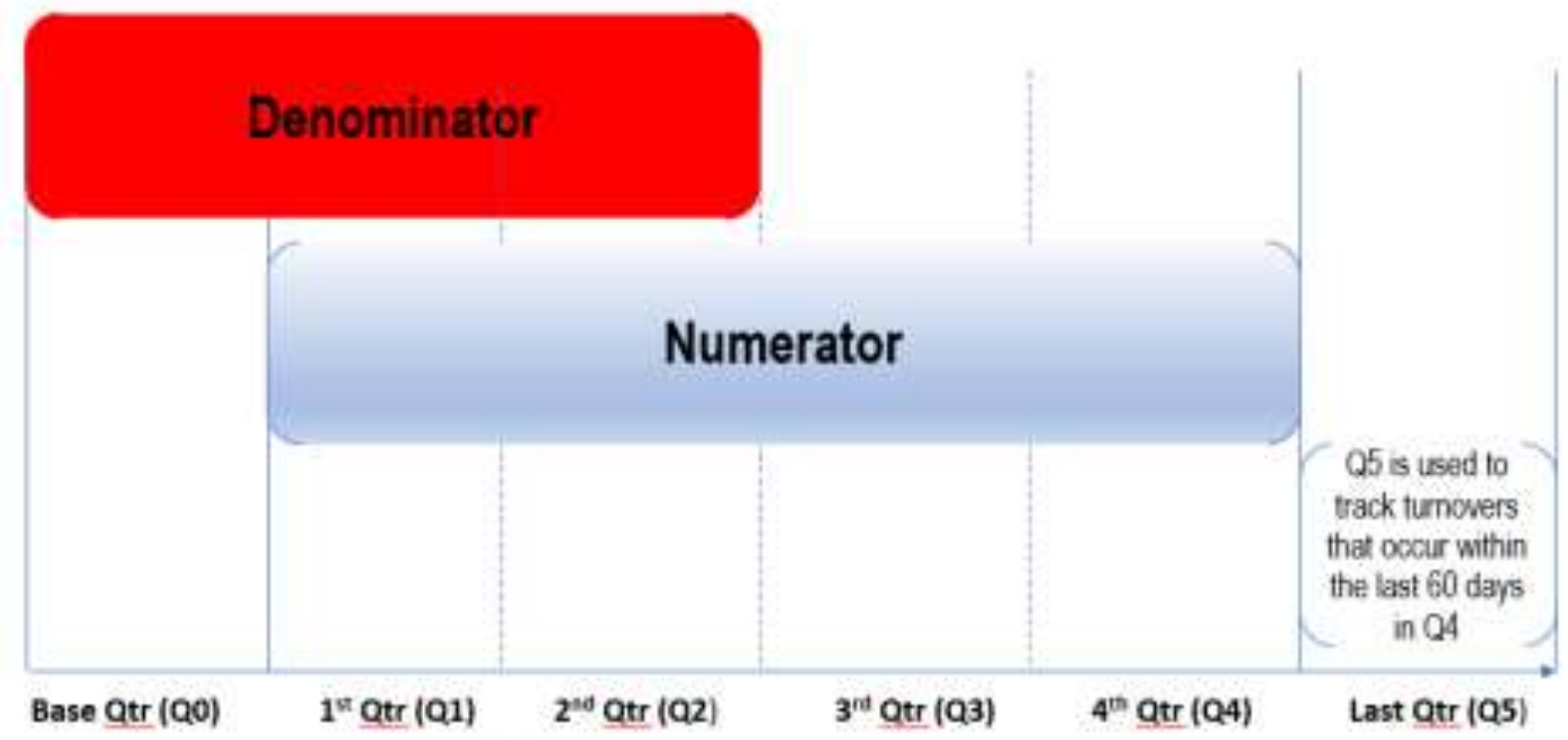
<i>CBC1</i>	<i>1.27</i>
<i>CA1</i>	<i>0.89</i>
<i>BAB2</i>	<i>0.98</i>
<i>BAB1</i>	<i>0.94</i>
<i>PDE2</i>	<i>1.48</i>
<i>PDE1</i>	<i>1.39</i>
<i>PBC2</i>	<i>1.15</i>
<i>PA2</i>	<i>0.67</i>
<i>PBC1</i>	<i>1.07</i>
<i>PA1</i>	<i>0.62</i>

Turnover Calculation >

- Three staff turnover measures are reported and are included in the staffing rating:
 - Total nurse;
 - Registered nurse (RN); and
 - Nursing home administrator.
- The annual turnover measure requires six consecutive quarters of PBJ data.
- Turnover is identified by gaps in days worked.
- Eligible employees work at least 120 hours in the 90-day period starting from the first workday observed across the baseline quarter.
- Individuals who no longer work at the nursing home are defined as eligible individuals who have a period of at least 90 days in which they do not work at all.
- Agency Staff and Contracted Staff **are** included in this calculation.

Turnover Calculation >

Figure 1: Time Period Used for Calculating Turnover Measures





One-Star Issues >

There are several scenarios that will cause your facility to automatically receive a one-star staffing rating. These scenarios are described below.

SCENARIOS

- Four or more days in the quarter with zero RN hours.
- Failure to submit PBJ data by the submission deadline.
- Failure to respond to an audit request or to provide requested information.
- PBJ audit results with hour discrepancies*

* This is further discussed in the audit section of the presentation

Information Publically Available >

REMINDER – INFORMATION IS PUBLIC

- Nursing Home Staffing calculations are available for all certified nursing homes through both the Nursing Home Compare website and through the CMS's data website.
- Additionally, summarized information daily PBJ information by entity is available through the CMS's data website.



PBJ Audits



Red Flags to CMS >

The following items are examples of red flags that can cause an audit to be triggered.

SCENARIOS

- Days with no RN hours;
- Exempt staff with more than 40 hours in a week;
- Staff with more than 80 hours in a week;
- Staff with more than 400 hours in a month;
- Excessively high nurse staffing (more than 8 hours per resident day);
- Excessively low nurse staffing (less than 1.5 hours per resident day); and
- Changes in nurse staff by more than 10% since the previous quarter.

What to Expect >

Letter will come through the U.S. postal service, certified, From “Center for Clinical Standards and Quality/Quality, Safety & Oversight Group and will have the following:

- Identification of quarter under audit.
- Instructions for setting up a web portal (due within 3 days of receiving the letter).
- Requests for the following information (due within 7 days of receiving the letter):
 - Completed staff sample;
 - Completed provider survey;
 - Payroll records;
 - Invoices for contracted personnel ;
 - Company handbook/policy manual detailing work requirements;
 - Daily census reports for the period question; and
 - Checklist of provided information.



Staff Sample >

The letter will provide a staff sample list which will list the following information, this is typically referred to as “Attachment A”:

- PBJ Employee ID (populated)
- Job Code (populated)
- Pay Type (populated)
- Total Reported PBJ Hours (populated)
- **Staff Name (for you to fill in)**
- **Employee ID if Different from PBJ Employee ID (for you to fill in)**
- **Highlight any contracted personnel on the list**

Provider Survey >

The Provider Survey is not a publically available document. However, it will generally include questions such around the following:

- General contact and Provider Information.
- Explanation of the facility's PBJ submission process.
- PBJ ID policy.
- Method of submission, time keeping, and payroll/time clock vendors.
- Payroll Days covered under period under audit (Beginning date, ending date, and pay date).
- How time is tracked separately for employees working with SNF residents versus with non-SNF residents. This would include payroll/time codes utilized in this process.
- Do you include any corporate/shared employees that are not on the nursing facility's payroll in the submission? How is reporting done to ensure that only paid hours are reported?

Provider Survey (cont.) >

The Provider Survey is not a publically available document. However, it will generally include questions such around the following:

- Non Exempt shift times used within the payroll and time system.
- Exempt shift time, are they required to punch in? How is are their hours tracked?
 - Are exempt employees working more than 40 hours?
 - Are the additional hours submitted under PBJ?
 - Are the additional hours compensated?
- Meal Breaks:
 - Are they paid or unpaid?
 - Do you clock in and out for the breaks?
 - Is the required length documented in the employee handbook?
 - Are contract staff following the policy?

Provider Survey (cont.) >

The Provider Survey is not a publically available document. However, it will generally include questions such around the following:

- Are there hours that were not submitted to PBJ, and if so who and why?
- Do nursing staff perform non-nursing functions? If so, how is their time tracked between the two?
- Do you have any nursing staff perform their job remotely? If so provide the PBJ Employee ID and hours reported.
- So you use the required midnight cutoff?
- Explanation of how training time is excluded and confirm if this is being done in accordance to the requirements.
- Explanation of the reconciliation process between payroll and the PBJ submission for any manual or error corrections.

Payroll Records >

You will need to provide payroll and other records for the entire period under audit for the employees listed on the staff sample. The items requested are generally:

- Detailed payroll records (such as employee earnings statements and employee pay stubs) that include detail on hours paid, both worked and time off. They should distinguish between regular pay, overtime pay, vacation pay, holiday pay, sick pay, training pay, etc.
- Punch detailed reports. If you do not have punch detail reports by day by employee, they will also accept time cards, or daily time system reports.
- Note the above are two separate requests and **cannot** be combined.



Invoices >

If you have contracted or agency staff on the Staffing Sample you will need to provide the following for the full quarter covered under the PBJ submission under audit:

- Actual invoice which includes the contacted staff's name, job title, and daily hours worked.
- Proof of payment of the invoices through either canceled checks or bank statements.



Company Handbook >

The request around the company handbook is specifically for the policies detailing work requirements.

Typically, the following policies should be in the handbook and provided:

- Required schedules and shifts. This includes exempt employee normal working hours.
- Meal time policies.
 - Is this paid time?
 - Do they clock in and out?
- Break policies during different shift lengths.

Daily Census >

- This will be something that comes out of your EHR system (such as PointClickCare or MatrixCare).
- Generally the audit will request the census to be structured as follows:
 - Detailed by pay type;
 - Bed Hold days should be separately reported; and
 - Certified and non-certified beds should be distinguished.



Checklist >

- This is a document provided in the initial request.
- It is a list of the information they are requested that must be:
 - Checked off;
 - Signed; and
 - Dated.



Follow Up >

- After information is submitted you will be contacted by an agent who is handling your PBJ audit case.
- They will request follow up information on the answers to questions as well as request additional information or explanation of any variances that they observed.
- Responses are generally requested within 2 business days.

Final Results >

- Final results will be provided on the Web Portal, and you will be notified via email when they become available.
- If you disagree with the results, you have 7 days to respond with additional documentation.
- You will receive a document outlining the findings by CMS policy. It will calculate the total hours difference, and calculate the ending error percentage.
- Based on your error percentage (i.e., >4%) could impact your Staffing Five-Star Quality Rating (i.e., 1 Star).
 - CMS has indicated that “The audit process and methodology (for extrapolation) are not available to the public”.



Our Timeline of Events >

- January 2024: Messiah Lifeways/RKL PBJ Audit Kickoff Call
 - Involved: RKL Representatives, NHA, DON, Compliance Manager, Nurse & CNA Schedulers, Accountant, CFO
 - Reviewed: Audit Questionnaire (Similar to CMS PBJ Questionnaire), planned for onsite visit, review of computer systems utilized for scheduling/timekeeping, set up shared folders, discussed current processes
- February 8, 2024: RKL Onsite & Notification of CMS PBJ Audit
- February 9, 2024: Received certified CMS letter



Our Timeline of Events >

- February 13, 2024: Follow-up call with RKL
 - Check-in to identify any potential red flags or questions that we may want to address prior to the submission of data to CMS
- February 14, 2024: NHA, Accountant, & Compliance met to review all documentation prior to submission to CMS
- March 15, 2024: PBJ Exempt vs Non-exempt discussion with RKL; continued to work with RKL on internal audit process; and communications back and forth between Messiah and CMS
- May 6, 2024: Final RKL report for our facility
- June 21, 2024: CMS audit complete, NHA received final letter



Final Results >

Dear Administrator:

We have completed our review of the information provided to support data submitted to the Payroll-Based Journal (PBJ) system for the quarter ending September 30, 2023. We compared the hours submitted to the hours we verified based on the supporting documentation provided and the policies described in the Payroll-Based Journal Policy Manual. We also compared the facility's reported census that we requested in our original letter to the census obtained from Minimum Data Set (MDS) records, which is provided to us by CMS. We found that the Hours Per Resident Day calculated from our verified PBJ hours and the MDS census did not significantly vary from the Hours Per Resident Day calculated from the reported PBJ hours. There will be no further action as a result of our review. Thank you for your cooperation.



Lessons Learned





What did we learn and/or change? >

- Creating Exempt Policy
 - Expanded Wage & Clocking In and Out
 - Generally, salaried employees do not clock in and out. However, if you have an expanded wage to work in a different role from your salaried role, you will need to clock in and out of your expanded wage role.
 - Salaried team members are expected to clock in/out of their expanded wage role for the times that do not overlap with their salaried role.

What did we learn and/or change? >

- Creating Exempt Policy
 - To further clarify –
 - A team member that works their salaried role 8:00 am - 4:30 pm, but picks up 2nd shift hours either as staff nurse or as a Supervisor, would clock in at 4:30 pm, when their salaried role ends.
 - Ex. ADON works in exempt ADON role 8-4:30, then clocks in as staff nurse 4:30pm - 11:15 pm for the staff nurse role that would otherwise be 3:45 pm - 11:15pm.

What did we learn and/or change? >

- We are working on an internal document outlining the step-by-step process for auditing and submitting PBJ data.
- Schedulers verify agency staff hours worked against our schedule and ensure that Messiah team members are assigned the correct job codes.
 - The Accountant sends the Schedulers the PBJ report and they randomly audit several team members against our schedule.



Other Considerations >

- How do you verify Medical Director hours?
- Do contracted entities include supporting documentation when sharing PBJ data your way?
- What are you currently doing, if anything, to audit your PBJ data?

Do you have questions?



Resources >

PBJ MANUAL AND XML TEMPLATE

- <https://www.cms.gov/medicare/quality/nursing-home-improvement/staffing-data-submission>

FIVE STAR RATING SYSTEM TECHNICAL USER GUIDE

- <https://www.cms.gov/medicare/health-safety-standards/certification-compliance/five-star-quality-rating-system>

PBJ SUBMISSION WEBSITE

- https://web.qiesnet.org/qiesmds/mds_home.html



Thank You for Joining Us

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