

MDS Alert

Quality of Care: Understand How CMS Will Collect Your Staffing Data

New PBJ system created to submit staffing and census information.

Get ready for your staffing and census information to come under scrutiny and to begin affecting your quality scores. The **Centers for Medicare & Medicaid Services** (CMS) has a whole new system to collect this type of data from your facility.

Background: Section 6106 of the Affordable Care Act (ACA) requires nursing facilities to electronically submit staffing information (both contract and regular staff) to CMS using payroll or other auditable data, according to the **CMS Compliance Group Inc.** (CMSCG) in Melville, N.Y. CMS will require you to submit staffing and census data on a quarterly basis.

The staffing data will impact your Nursing Home Compare and Five Star Quality Rating System scores (see "Brace Yourself: Your Quality Ratings Could Take A Nosedive," MDS Alert, Vol. 13, No. 2, page 19, and "Don't Be Surprised If You Lost Valuable Quality Stars, Vol. 13, No. 3, page 25).

What the New System Will Do

CMS has developed the Payroll-Based Journal (PBJ), a new system for nursing facilities to submit staffing and census information. All long-term care facilities will have access to the PBJ system at no cost.

When: You can begin submitting staffing data through the PBJ system voluntarily beginning on Oct. 1, 2015, and then submission will become mandatory on July 1, 2016. Registration for voluntary submission will begin in August 2015, and CMS will provide training on both voluntary and mandatory data submission.

"PBJ will allow nursing homes to collect staffing and census information more regularly and frequently than they do now," stated a recent provider alert from the **Texas Department of Aging and Disability Services** (DADS). "In addition, the information will be auditable to ensure accuracy."

Check Out the Types of Data CMS Will Collect

CMS will use the direct care staffing information combined with census data to report on the level of staffing in each nursing home, as well as employee turnover and tenure, all of which can impact quality of care.

Census data includes your facility's census on the last day of the quarter, according to CMSCG. Staffing data includes the number of hours worked by each staff member each day within the quarter, and includes entries for:

- Administration;
- Physician services;
- Nursing services;
- Pharmacy services;
- Dietary services;
- Therapeutic services;
- Dental services;

- Podiatry services;
- Mental health services;
- Vocational services;
- Clinical laboratory services;
- Diagnostic x-ray services;
- Administration and storage of blood;
- Housekeeping services; and
- A generic "other services" category for staff not included in one of the previous categories.

You'll Face Real Enforcement Actions for Noncompliance

But reporting staffing and census data in the PBJ system is only the first step in a larger process, according to CMS.

"Future steps will address activities such as how the data will be verified, how compliance will be enforced, and how the information will be publicly reported (such as quality measures on the Nursing Home Compare website)," CMS states. "Information about these future steps will be communicated over the next several months."

Beware: In the PBJ Policy Manual draft, CMS has set forth strict guidelines for the timeliness of data submission, as well as auditing the accuracy of staffing information to ensure compliance, CMSCG says. "Facilities that are found out of compliance will be subject to enforcement actions that have not yet been defined based on available documentation."

Resources: CMS has created a webpage for the Staffing Submission PBJ at www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/NursingHomeQualityInits/Staffing-Data-Submission-PBJ.html. The webpage contains pertinent information and updates regarding the PBJ system. CMS has also posted the PBJ Policy Manual draft and the PBJ 1.0 Submission Specs, at the bottom of this webpage in the Downloads section.

You can submit questions regarding the PBJ Policy Manual to nhstaffing@cms.hhs.gov, and submit questions about the PBJ Data Specifications to NursingHomePBJTechIssues@cms.hhs.gov.