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Payroll Based Journal FAQs

AHCA's responses to frequently asked questions on the Payroll Based Journal.

1. **What facilities are subject to the Payroll Based Journal requirement?**
    a. Only long-term care facilities that are subject to meeting the Requirements for Participation as specified in 42 CFR Part 483, Subpart B are subject to the PBJ reporting requirements. This requirement does not apply to swing beds.

2. **Can staff/consultants/contractors who bill their services directly to Medicare, or an entity other than the SNF have their hours counted?**
    a. Only those individuals that are paid directly by the SNF can have their hours reported. For instance, if someone is being paid directly by Medicare, those hours cannot be reported.

3. **Should hours for feeding assistants, laundry staff, etc. be reported in the Payroll Based Journal?**
    a. Please refer to Table 1 in the PBJ Policy Manual. For any position that does not match one of the descriptions in the table, they can be coded as "other".

4. **What vendors can help us meet the requirements of the Payroll Based Journal?**
    a. AHCA has developed a list of the vendors that offer their clients a Payroll Based Journal solution. This list is not endorsed by AHCA but is meant to serve as a reference for members.

5. **How will CMS audit the data?**
    a. CMS has not disclosed how they will be auditing the data collected through the Payroll Based Journal. They have stated in an S&C memo entitled *Payroll Based Journal (PBJ) - Implementation of required electronic submission of Staffing Data for Long Term Care (LTC) Facilities* that, "as with all Requirements for Participation, CMS expects LTC facilities to comply with the requirements set forth in 42 CFR §483.75(u) according to CMS specifications. CMS maintains authority to issue enforcement remedies, such as the imposition of civil money penalties (CMPs), for noncompliance with this requirement. As providers are adjusting to this new requirement, we may refrain from imposing enforcement remedies (e.g., for good faith efforts). Additionally, we will provide feedback mechanisms to providers, such as warnings, that will help facilitate compliance with this requirement."

6. **Can you explain the midnight divide?**
    a. Hours for staff have to be reported each calendar day; therefore, for night shift staff their hours need to be distributed between the two calendar days that they work. For example, if an employee worked from 8:00 p.m. on 6/30/15 to 4:00 a.m. on 7/1/15, the hours would be submitted as 4 hours for 6/30/15, and 4 hours for 7/1/15.

7. **How should hours be reported for corporate staff?**
    a. Hours for corporate staff can only be reported if they are performing duties involving resident care, then those hours can be reported even if the individual is being paid by the corporate payroll. Note, you should not include any hours that a corporate staff members spends at the SNF performing monitoring duties or helping staff prepare for survey.

8. **If a SNF has a contract with a Medical Director that states they will spend 10 hours per month performing administrative services listed in the contract for a flat fee of $1,500 per month, is an invoice sufficient auditable documentation for reporting 10 hours per month? If yes, can we report the hours on any day of the month?**
    a. An invoice is sufficient auditable documentation. The hours should be reported for the days the MD performs the services.

9. **Is a bedhold counted for census?**
    a. Bedholds should not be counted.

10. **How should hours for exempt staff be counted? Do you report the actual hours worked or the hours paid?**
    a. Only the hours paid for exempt staff can be counted.

11. **If we have staff hours by day in an Excel worksheet can we easily create an XML file?**
    a. No, an Excel file cannot simply be created into an XML file. You must consider all of the CMS specifications when creating the XML file, if the specifications are not met, then the file will not be accepted.

12. **When entering employee data (discreet ID, hire date, etc.) into the system, does that have to be done manually or can it be done via an XML?**
    a. Employee data can be added in manually or via the XML upload.

13. **Can hours for hospice workers be reported?**
    a. Only hours for staff that are directly paid by the SNF can be reported. If the hospice worker is paid for by Medicare, Medicaid, or private pay their hours cannot be counted.

14. **Can hours spent in orientation be counted?**
    a. Hours spent in orientation are not included. The only training hours that can be included are those when the employees are actually on the floor and available for direct patient care.

15. **Can off-site training hours for RNs be counted?**
    a. If staff is attending training (off-site or on-site) and are not able to provide resident care, then those hours should not be reported.

16. **Can hours for the Medical Director be counted if he/she is donating their time?**
    a. Only hours that the SNF is paying for can be reported.

17. **During the voluntary period, can we manually submit data and then go to a vendor if the manual entry does not work for us?**
    a. Yes, the voluntary period is your time to test the system. You may try submitting data manually and then switch to an XML upload. Note, it is also possible to submit data into the Payroll Based Journal using a combination of manual data entry and XML upload.

18. **Where do I get information on signing up for the voluntary period?**
    a. Information on signing up for the voluntary period can be found at: https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/NursingHomeQualityInits/Downloads/PBJ-QTSO-Registration-Training.pdf.

19. **Which of the 37 required job codes are considered direct care staff?**
    a. Please refer to Table 1 in the Policy Manual for a complete list of direct care staff that should be included.

20. **Can paid vacation and sick leave hours be counted?**
    a. Paid vacation and sick leave hours cannot be counted.

21. **Can paid lunch breaks be counted in the hours reported?**
    a. Paid lunch break hours cannot be reported, only hours when an employee is actually on the floor providing care can be counted.

22. **If I am part of a CCRC, can I report hours for staff that are caring for residents in non-certified beds?**
    a. Only hours for staff that are caring for residents in certified beds count. If you are sharing staff with assisted living, then only those hours of the staff that are dedicated to the residents of the SNF should be reported.

23. **For contract providers such as Lab, the vendor has several employees. Do we need to identify each person individually, or can we report the sum of their individual hours under the vendor?**
    a. Each individual needs a discreet ID, it is not possible to sum the hours of individuals under the vendor.

24. **Can hours be adjusted once the data has been submitted?**
    a. You have 45 days after the quarter ends in which to make corrections.

25. **What data needs to be submit on July 1st, 2016?**
    a. The mandatory data collection period starts on July 1st, 2016. The data collected from July 1st-September 30th must be submitted by November 14, 2016.

26. Can you explain where I can find my CCN number?

a. The CCN can be found in the CMS 2567 Statement of Deficiencies under the name Provider ID. It can also be found in the MDS under section A.

27. If we have LVN classes at our SNF, can we count those hours?

a. The only training hours that can be included are those when the employees are actually on the floor and available for direct patient care.

28. If I am manually submitting data, is it correct that I do not need to make any zip files?

a. Zip files only need to be created for the XML submissions.

29. Where can I find step by step instructions on submitting the data?

a. PBJ training modules are available on the QTSO e-University, go to https://www.qtso.com/webex/qiesclasses.php and select the PBJ option.

30. What is CASPER and how do we access it?

a. CASPER (Certification and Survey Provider Enhanced Reporting) is the application where users obtain reports about the PBJ data that is submitted of manually entered into the Payroll Based Journal. Information on accessing it can be found at https://www.qtso.com/webex/qiescat.php?Category=PBJ.

31. Will the facility upload data for the full year?

a. Facilities are required to upload data for every fiscal quarter. The data is due 45 days after the end of each quarter. All of the staffing data is collected at the daily level; however, facilities have the ability to submit the daily hours all at one time at the end of the quarter or at any increment during the quarter (daily, 2 weeks, and month).

32. Do we have to report hours for dietary and housekeeping?

a. Hours for dietary staff and housekeeping are optional.

33. If an RN is covering for a CNA, how should the hours be coded?

a. If the nurse is completely shifting primary roles, you can split the nurse's time between two categories. For instance, consider the following example. For example, a nurse who spends the first four hours of a shift as the unit manager, and the last four hours of a shift as a floor nurse. In these cases, facilities can change the designated job title and report four hours as a nurse with administrative duties, and four hours as a nurse (without administrative duties).

34. If I plan on having my vendor submit data, do I still have to register for the Payroll Based Journal?

a. Yes, all facilities need to be registered for the Payroll Based Journal.

35. **Should therapy staff be counted?**
    a. Centers are required to submit data on therapy staff. Please refer to Table 1 in the Payroll Based Journal manual.

36. **How will CMS calculate turnover rates?**
    a. CMS has not provided information on how they will calculate turnover rates.

37. **Are contract therapy companies required to directly submit to CMS or to the SNF?**
    a. Contract staff hours are required to be reported. Facilities have several options for including contract hours including the examples listed below:
        i. Facilities can include contract staff hours in their attendance system (e.g., have contractors "swipe in and out"), or enter contractor hours manually through the PBJ online data entry process.
        ii. Facilities can have the contract staff enter hours as a designee of the facility in the PBJ system.
        iii. The vendor can provide the facility with an XML file that meets the technical specifications, and the files can be uploaded and merged.

38. **Can we use the name as a unique identifier if we have a way to distinguish between the similar names?**
    a. No personally identifiable information should be utilized as the discreet ID.

39. **Do we need to count the hours that an intern works at our center, if we do not pay the intern?**
    a. Only hours paid by the facility can be reported.

40. **If we have a nurse practitioner who provides medical care but is paid by Medicare Advantage, can those hours be counted?**
    a. Hours that are not paid for directly by the SNF cannot be counted.

41. **What if a therapist only works with a resident for 30 minutes? How do you report that?**
    a. If the facility is paying the therapist for their services, then the 30 minutes is reportable.

42. **Can multiple XML files be submitted by the same facility?**
    a. You are able to submit multiple XML files for the same facility. Be sure to review the XML specification and utilize the correct merge and replace functions.

43. **Can employees show at multiple business units within one company and, if so, do they have to have different unique IDs?**
    a. Discreet IDs are at a facility level so every employee at the facility needs a unique ID. If a company would like to use the same ID for the same person at each facility, they can do that. For further guidance, please see Chapter 2 Section 2.1 A which can be found at https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/NursingHomeQualityInits/Downloads/PBJ-Policy-Manual-Draft-V11.pdf.

44. Where can I find the specification for XML?

a. The Payroll Based Journal XML specifications can be found at https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/NursingHomeQualityInits/Staffing-Data-Submission-PBJ.html.

45. How do I report the hours for a universal worker?

a. Per CMS, the primary duties that are performed by the employee the majority of the time is how they should be classified. Facilities should categorize staff based on the closest match to the positions described in the PBJ policy manual. If this individual spends 52% of their time as a CNA and 48% as an activity aid, the facility would report the hours that the individual works under each of these job codes.

46. How should hours be reported for lab/radiology workers?

a. Currently, their hours should be tracked and they need to be verifiable against accounts payable. AHCA is currently working with CMS to try and get further guidance on this issue.

47. Does CMS have a XML spreadsheet template that facilities can use?

a. CMS does not have stepwise instructions on how to create an XML. Nursing homes have the ability to submit data in the PBJ System manually, if they choose not to work with a vendor or software developer to create an XML. PBJ training modules can be found on QTSO e-University (website below), select the PBJ option. https://www.qtso.com/webex/qiesclasses.php

48. Does the Payroll Based Journal keep track of who is logging in and submitting data for a SNF?

a. Yes, the system keeps track of who is logging in and submitting data for a SNF.

49. For contract labor, do we report total hours on a particular day or do we need to report the actual start and stop times?

a. You need to report the total hours per day.

50. For termination date are they wanting last day worked or the actual date we terminated them?

a. The termination data is the last date a staff member is employed and paid for services. The termination data is the last date that the facility or the agency communicates that the contract individual will no longer be providing services at the facility (either voluntary or involuntary).

51. Can you submit contractor information separately from the facility Payroll XML for the same time period?

a. Yes, data for the same time period can be submitted separately.

52. **An employee has worked for the facility several different times throughout her tenure, do we use the original hire date or most recent hire date?**
    a. If the employee has been terminated in the past (which it sounds like the employee has left and returned more than once) then they should use the most recent hire date.

53. **What about retro paid hours for a previous pay period, say a person who did not clock in or out. Can we count that time?**
    a. All data for a quarter must be submitted 45 days after the quarter ends.

54. **Does time for full time and part time status need to be separated?**
    a. The Payroll Based Journal does not require specification of full time or part time status.