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CMS is Releasing PBJ Data to the Public

According to the Centers for Medicare & Medicaid Services (CMS) [S&C Letter](#) released on September 25, 2017 related to Electronic Staffing Submission – Payroll-Based Journal (PBJ), the following updates and effective changes to PBJ and the Nursing Home Compare (NHC) Five-Star rating website were covered throughout the letter:

DEADLINE & SUPPRESSED RATINGS

The next PBJ data submission deadline is November 14, 2017 at 11:59pm PST. Providers that do not submit data by the required deadline will have their overall and staffing star ratings suppressed (e.g., removed) on NHC's website – <https://www.medicare.gov/nursinghomecompare/search.html>.

Also, CMS uses icons to indicate the status of each facility's latest submission. A green icon is used to indicate that a facility has submitted complete data by the deadline. Conversely, a grey icon is used to indicate that a facility has submitted incomplete or inaccurate data. For example, CMS deems any hours information submitted that deviates from the expected hours to be incomplete data. PBJ data submitted after the deadline will lift the facility's rating suppression, but the indicator will not be updated, as late submissions indicate noncompliance with the reporting requirement.

DATA TO BECOME PUBLIC INFORMATION

In an attempt by CMS to ensure transparency of submitted PBJ information for all facilities, they will begin posting data to be viewed by the general public. The data will be posted to <https://data.cms.gov/> beginning November 1, 2017. The data will include the total number of hours submitted for nursing services job categories (e.g., registered nurse, licensed practical nurse, and nurse aides) for each day in the quarter, in addition to each facility's census for each day in the quarter as calculated using minimum data set (MDS) submissions (see below).

Staffing measures currently displayed on the NHC website are derived from data reported on the CMS-671 and 672 forms. CMS does not expect data from these forms to exactly match the PBJ data for several reasons: hours captured across different spans of time (CMS-671 = 2 weeks; PBJ = 1 quarter), hours paid versus hours worked, and the alteration of certain job categories under PBJ.

The first public use file posted will include data submitted by facilities for the reporting period of calendar quarters 1 and 2, 2017, and submitted by the May 15th and August 14th deadline, respectively (data submitted after the deadline will not be posted). CMS will continue to post subsequent quarters of data as they become available.

RESIDENT CENSUS

CMS is making it optional for facilities to electronically submit, through PBJ, resident census data. CMS will use MDS data to calculate a daily resident census for each facility, and ultimately calculate staffing levels. They feel this will improve the accuracy of staffing levels and reporting of census information.

EMPLOYEE TENURE AND TURNOVER

One goal for CMS is to successfully calculate rates of tenure and turnover using each employee's unique identifier (ID). On occasion, employee IDs may change over time, so CMS will be providing a method for facilities to link an old employee ID with a new one. This will enable CMS to track each employee, regardless if their ID has changed.

NEXT STEPS?

Moving forward, CMS intends to analyze the submitted PBJ data and work on the methodology to calculate staffing measures. They intend to post these measures on the NHC website beginning in 2018, and use them in the Five Star Quality Rating System. Once posted, these measures will replace the CMS-671 and methodology for posted staffing information.

For more information around these most recent updates or to learn how to analyze your PBJ information before it gets submitted, please call us at (614) 448-1822 or email us at PBJ@squaredbusinessolutions.com.

Sincerely,

Squared Business Solutions