



STATE OF WASHINGTON
DEPARTMENT OF SOCIAL AND HEALTH SERVICES
Aging and Long-Term Support Administration
PO Box 45600, Olympia, Washington 98504-5600

March 1, 2019

AL TSA: NH #2019-005

**QSO 19-02-NH PAYROLL BASED JOURNAL (PBJ) POLICY MANUAL UPDATES,
NOTIFICATION TO STATES AND NEW MINIMUM DATA SET (MDS) CENSUS REPORTS**

Dear Nursing Facility/Home Administrator:

The purpose of this letter is to inform you of updates the Center for Medicare and Medicaid Services (CMS) has made to PBJ processes. Details are in the CMS issued memo [QSO-19-02-NH](#), Payroll Based Journal (PBJ) Policy Manual Updates, Notification to States and New Minimum Data Set (MDS) Census Reports.

Staffing in long-term care nursing facilities significantly affects the care delivered to residents. Since July 2016, nursing homes have been submitting data electronically through the PBJ system as required under section 1128I(g) of the Social Security Act and 42 CFR §483.70(q). In April 2018, CMS began using PBJ data to calculate staffing levels and star ratings on the Nursing Home Compare website and in the Five Star Quality Rating System.

Notification to States: While CMS is encouraged by facilities' efforts to improve staffing, they are also concerned about some of the findings from the new PBJ data. For example, some facilities across the U.S. are reporting several days in a quarter without a registered nurse (RN) onsite and/or significantly low nurse staffing levels on weekends. Since nurse staffing is directly related to the quality of care that residents' experience, CMS is very concerned about the risk to resident health and safety that these situations may present. Therefore, CMS will begin informing state survey agencies of facilities with potential staffing issues: facilities with significantly low nurse staffing levels on weekends; and facilities with several days in a quarter without an RN onsite.

For facilities identified as having low staffing on weekends, Residential Care Services (RCS) will now be required to conduct at least fifty percent of the required off-hours surveys on weekends using the list of facilities provided by CMS.

For facilities identified as having reported days with no RN onsite, when conducting a scheduled standard or complaint survey (regardless of the type of complaint), surveyors will investigate compliance with 42 CFR 483.35(b)(1), which is the requirement for a facility to provide the services of an RN seven days a week, eight hours a day. If a surveyor confirms that this requirement has not been met, the facility would be cited for noncompliance under deficiency F-tag 727.

Updates in the PBJ Policy Manual and Frequently Asked Questions (FAQs): CMS is expanding the guidance on the meal breaks policy to ensure consistency. In addition, CMS is adding guidance regarding reporting hours for "Universal Care Workers," who are typically certified nurse aides (CNAs) who perform additional duties outside of the nurse aide role, such as food preparation or light housekeeping services. CMS has added language to both the PBJ Policy Manual and the PBJ Policy FAQ to instruct facilities that they must use a reasonable methodology to allocate the hours that these employees are providing CNA services and report

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these hours accordingly. Hours spent on other duties (i.e. housekeeping, cooking etc.) must not be reported as CNA hours. The PBJ Policy Manual and FAQs can be found in the "Downloads" section of the [PBJ Website](#).

Additional Technical Support for Facilities: CMS has created two reports for providers to help ensure data is submitted accurately and in a timely manner. These reports use the same methodology CMS uses to calculate each facility's census, which is then used to calculate the number of staff hours per resident per day posted on the Nursing Home Compare website. The reports are 1) The MDS Census Summary Report, which allows users to retrieve the daily MDS-based resident census (i.e., count of residents) for each day in a quarter, and 2) The MDS Census Detail Report, which allows users to retrieve a list of the residents that the MDS-based census is comprised of on a given date or dates.

More information on these reports can be found at <https://qtso.cms.gov/reference-and-manuals/casper-reporting-users-guide-pbj-providers>.

- Select Section 12 - Payroll Based Journal (PBJ) Reports from the right side in the blue box.
- Find the specific report you would like to run and go to the page number cited.
- Follow the steps to pull the report.

For questions related to the QSO memo, please contact NHStaffing@cms.hhs.gov. For information on the state process for implementing off-hours surveys or conducting RN staffing complaint investigations, contact the Nursing Home Policy Program Manager, [Lisa Herke](#), at (509) 225-2819.

Thank you for your continued commitment to resident health and safety.

Sincerely,



Candace Goehring, Director
Residential Care Services

DSHS: "Transforming Lives"