

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

May 22, 2018

ALTSA: NH #2018-013 TRANSITION TO PAYROLL-BASED JOURNAL (PBJ) STAFFING MEASURES ON THE NURSING HOME COMPARE TOOL AND FIVE STAR QUALITY RATING SYSTEM

Dear Nursing Facility/Home Administrator:

Staffing in nursing homes has a substantial impact on the quality of care and outcomes residents' experience. For more than 10 years, the Centers for Medicare and Medicaid Services (CMS) has been posting information on facility staffing measures on *Nursing Home Compare*. These staffing measures are also used to calculate each nursing home's star rating for the staffing domain as part of the *Five Star Quality Rating System*. CMS has been using staffing data collected through forms that are completed manually by nursing homes, and submitted approximately once a year (Forms CMS-671, Long Term Care Facility Application for Medicare and Medicaid, and CMS-672, Resident Census and Conditions of Residents). Since July 2016, nursing homes have also been submitting staffing data electronically through the Payroll-Based Journal (PBJ) system.

CMS has now issued a QSO memo (QSO-18-17-NH) outlining the following changes related to the collection and use of staffing data:

- Transition to Payroll-Based Journal (PBJ) Data Starting in April, 2018, CMS will use PBJ data to determine each facility's staffing measure on the Nursing Home Compare tool on Medicare.gov website, and calculate the staffing rating used in the Nursing Home Five Star Quality Rating System. The methodology and thresholds for the staffing ratings will change, and are detailed in the <u>QSO memo.</u>
- Staffing data audits CMS is providing lessons-learned from audits conducted, and guidance to facilities for improving their accuracy. The memo lists some common errors uncovered by the audits. Nursing homes whose audit identifies significant inaccuracies between the hours reported and the hours verified, or facilities who fail to submit any data by the required deadline will be presumed to have low levels of staff. This will result in a onestar rating in the staffing domain, which will drop their overall (composite) star rating by one star for a quarter.
- Requirement for registered nurse (RN) staffing CMS reminds facilities about the federal requirement to have an RN onsite 8 hours a day, 7 days a week. Nursing homes reporting 7 or more days in a quarter with no RN hours will receive a one-star rating in the staffing domain, which will drop their overall (composite) star rating by one star for a quarter. This action will be implemented in July 2018, utilizing data collected for the first quarter (January March, 2018). Please remember Washington State has more stringent requirements for RN staffing.
- Technical assistance CMS is continuing its efforts to help nursing homes submit accurate data, and there are a variety of ways described in the memo in which facilities can seek support.

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• Future Actions – As of June 1, 2018, facilities will no longer be required to complete the staffing portion of the CMS-671 form found on page 2. All other information requested on the CMS-671 unrelated to facility staffing (e.g., address, ownership type) will still be required. The form will ultimately be revised

Resources and contacts:

- QSO-18-17-NH
- For guestions on the QSO memorandum, please email: NHStaffing@cms.hhs.gov.
- Technical questions from vendors or software developers related to the data submission specifications should be sent to: NursingHomePBJTechIssues@cms.hhs.gov.
- The PBJ website, Policy Manual, and Frequently Asked Questions is available at https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/NursingHomeQualityInits/Staffing-Data-Submission-PBJ.html.

Thank you for your continued commitment to resident health and safety. If you have any questions, please contact Lisa Herke at 509-225-2819.

Sincerely,

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Candace Goehring, Director Residential Care Services

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