Skilled Nursing Facilities and Payroll-Based Journals

Analyzing the complexities of PBJ (Payroll-Based Journal) reporting. The ACA dealt skilled nursing facilities a slew of new quarterly reporting requirements.

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The acronym 'PBJ' which stands for payroll-based journal, takes on a whole new meaning if you work in t he payroll department of a Skilled Nursing Facility. No longer just the sandwich you packed your kids f or lunch yesterday, the launch of PBJ (Payroll-Based Journal) Reporting in 2016 under the Affordable C are Act handed skilled nursing facilities a slew of new detailed quarterly reporting requirements. And w hile the shared responsibility provisions of the Affordable Care Act have gone through changes and f uture developments are always under discussion, PBJ reporting looks like it's here to stay. So let's b reak PBJ down, so the complexities become no sweat.

What are PBJ reporting requirements?

Long-term care facilities, such as skilled nursing facilities, must submit information on a quarterly basis to the Centers for Medicare and Medicaid Services (CMS) detailing how many hours their staff works in specific job titles.

Which staff specifically must be included?

All direct care staff must be included, which means anyone who has interpersonal contact with patients or is involved in the management of that care. So, nurses and occupational therapists are in. Janitors are out. The facility must not only include its own direct care staff hours, but also any agency or contract staff that they hire for direct care from outside their organization.

What data is included in the reporting?

Skilled nursing facilities must include, for every direct care worker, the dates they worked, and the number of hours they worked on that day. In addition, each hour worked must be assigned to a Job Title Code. CMS has identified 40 job descriptions, each with a job title code and a labor category code (but reporting this latter code is optional). Every direct care hour worked by the facility staff must be reported under the proper job title to indicate in what capacity the person was working.

What if someone works at more than one job title?

Simple. The hours must be divided up and reported under the correct job title code. For example, if an employee works 4 hours as an Occupational Therapist and 4 hours as a Paid Feeding Assistant, the hours must be divided between the two jobs.

What about meal breaks?

Mealtimes, paid or unpaid, must not be reported; the time allotted for meals needs to be deducted from each employee's daily hours. CMS provides guidance as to the minimum amount of time to deduct per shift.

Is there any other information that must be reported quarterly?

Employees' must be classified as exempt, non-exempt, or contract. Employees' hire/termination dates used to be required, but that reporting is now optional. Similarly, patient census data, formerly required, is now optional, as CMS has found other sources for that information.

When and how do I submit the PBJ data?

Payroll-based journal reporting must be submitted to CMS quarterly within 45 days from the end of the quarter. For example, the filing deadline for the quarter ending December 31, 2019 is February 14, 2020. Data can be either uploaded in XML format to CMS or manually entered into the CMS system.

What is the point of PBJ reporting?

CMS has a rating system for long-term care facilities to give the public an easy way to access information when they are considering a facility for themselves or a loved one. The rating system also allows for easy comparison between facilities. There are 3 areas each facility is graded on – health inspections, staffing, and quality measures. These qualities combined result in an overall rating for the facility. The staffing rating is based on PBJ reporting, so it's essential that skilled nursing facilities have complete and accurate reporting so they can hopefully have the best rating possible. As you can see, understanding Payroll-based journal reporting is no big deal. However, getting it done can be a challenge. Accurate timekeeping, detailed recordkeeping, and the ability to produce compliant, XML formatted files are a must, so partnering with a provider who has the right technology and expertise is key.

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