

2-10-2025 Weekly Clinical Update

Keeping the theme of the revisions to regulations published in QSP-25-12-NH, PBJ is one of the revisions made. PBJ reporting has frequently been cited as a deficient practice since the requirements were originally released to providers by CMS. This revision actually helps facilities. Most of the deficiencies in this state have revolved around inaccurate information on the PBJ report...NOT the failure to submit the report. Now those concerns will be reviewed from F725 & F727 & in **almost** all cases (but not all), surveyors find the facility actually had the staff, but they just weren't coded accurately on the PBJ report.

AHCA has provided excellent resources for many of the revisions and more are promised. Here is the F-Tag Action Tool from AHCA.

F-Tag Action Tool: §483.70(p), F851, Mandatory submission of staffing information based on payroll data in a uniform format

Effective March 24, 2025, CMS updated the surveyor guidance for F851, Submission of Staffing Data.

Skilled Nursing facilities are required to submit on a quarterly basis to CMS staffing data through the Payroll Based Journal (PBJ). In [QSO-25-12-NH](#), CMS provided information on the updates made to the guidance for F851. Surveyors are instructed to review prior to the visit the most recent quarter of data from the PBJ Staffing Data Report and confirm that PBJ data was submitted by the facility. The PBJ Staffing Data Report found on CASPER will highlight "Failed to Submit Data for the Quarter" if the provider has failed to submit this data. In these cases, the surveyors must cite F851 at an F scope and severity.

Key Takeaways:

- Surveyors will review the PBJ Staffing Data Report to evaluate if the facility failed to do any one of the following:
 - o Submit the required staffing information based on payroll data in a uniform format; or
 - o Complete data for the entire reporting period, such as hours paid for all required staff; or
 - o Provide accurate data; or
 - o Provide data by the required deadline.
- Failure to submit PBJ will result in a deficiency citing of F851 at an F scope and severity.

- In extremely rare cases, the surveyors may contact CMS if the PBJ Staffing Data Report indicates that the facility failed to submit data, but the surveyors believe the facility should not be cited.
- Noncompliance at F851 focuses on the submission of staffing data.
- If the surveyor identifies concerns related to registered nurse (RN) coverage eight hours a day, licensed nurse (LN) coverage 24 hours a day, or sufficient staffing, surveyors should investigate these concerns using the Sufficient and Competent Staff Critical Element Pathway, and guidance at §483.35 Nursing Services (F725 & F727).

Action Items

- Review the PBJ Policy Manual and PBJ Manual FAQs to be familiar with PBJ requirements.
- Create a plan to submit staffing data frequently and early. It is recommended that facilities submit and remediate their data on a weekly or biweekly basis.
- Review the PBJ CASPER reports frequently and revise submitted data prior to the submission deadline. Recall, no revisions can be made to the submitted data post the deadline.
- If you are working with a vendor to support your PBJ submissions, discuss with them what processes they have in place to ensure data is submitted in a timely manner. As a provider it is your responsibility to ensure that your data is submitted in a timely and accurate fashion even if you are working with a vendor.
- Identify a backup staff member to submit the data in the event the lead is not available.
- If there is a specific reason that the facility was not able to submit data for a particular quarter, have an explanation and supporting documentation/data present to discuss with the survey team.

Additional Resources

- AHCA Resources
 - o Payroll-Based Journal: Best Practices for Submitting Data
 - o Payroll-Based Journal FAQs
 - o Questions: staffdatacollection@ahca.org
- CMS Resources

- o PBJ Policy Manual

- o PBJ Policy Manual FAQ

- o General User, Registration and Submission FAQ

- o PBJ User Manual

- o PBJ Policy Questions: Nhstaffing@cms.hhs.gov

- o QTSO Help Desk Hours: 8am - 8pm EST

- Phone: 800-339-9313

- E-mail: iqies@cms.hhs.gov