



DEC 14 2018

Administrator
Washington, DC 20201

Ms. Katie Smith Sloan
President and CEO
LeadingAge
2519 Connecticut Avenue, NW
Washington, DC 20008

Dear Ms. Sloan:

Thank you for your letter and interest in how the Centers for Medicare & Medicaid Services (CMS) is monitoring and reporting on staffing in nursing homes through the Payroll-Based Journal (PBJ) program and Nursing Home Five Star Quality Rating System. Adequate staffing is a critical component of caring for residents in nursing homes, and the new PBJ data provide unprecedented insight into how facilities are staffed, which can be used to analyze how facilities' staffing levels relate to quality and outcomes. In your letter, you raised concerns regarding the impact of inaccurate data as a result of mistakes made by the facility in reporting its data, and by CMS in using this data in the Five Star Quality Rating System.

CMS is committed to making accurate and useful information available for residents, families, and caregivers. Since the PBJ program's launch in 2015, CMS has worked closely with nursing homes to assist in the submission of accurate data. This effort includes providing a nine-month voluntary submission period for facilities to test their submission process, providing individualized monthly feedback to each facility, and publishing additional guidance¹ on lessons learned and best practices as a resource for facilities to improve their reporting. As a result, more than 97 percent of nursing homes have successfully submitted data through the PBJ system. This indicates that the vast majority of nursing homes are able to meet the technical requirements for submitting data and can avoid any issues related to technical mistakes and missing the submission deadline (e.g., receiving a one-star staffing rating).

Aside from submitting data timely, we understand that some facilities may still be struggling to submit accurate data. However, we believe nursing homes have been provided adequate notification and training on how to submit accurate data (see Quality Safety Oversight Group memorandum 18-17-NH posted on Apr. 6, 2018). Nursing homes may review and correct their data up to 45 days after the end of each quarter, prior to its inclusion on the Nursing Home Compare website and the Five Star Quality Rating System. It is critical that nursing homes

¹ PBJ website: <https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/NursingHomeQuality/Inits/Staffing-Data-Submission-PBJ.html>.

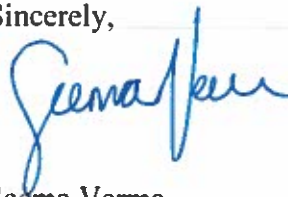
Also see QSO 18-17-NH at <https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/SurveyCertificationGenInfo/Policy-and-Memos-to-States-and-Regions-Items/QSO18-17-NH.html?DLPage=1&DLEntries=10&DLFilter=pbj&DLSort=3&DLSortDir=descending>

review and correct their data to allow CMS to post accurate information on the website. CMS continues to provide technical assistance to nursing homes to improve their staffing and data submissions. In addition, we will continue to monitor the program closely and make any adjustments as necessary.

Thank you again for your attention to this important matter. We appreciate the hard work of all your members to improve the public reporting of staffing information. If your members have any specific questions about their data, please encourage them to email:

NIStaffing@cms.hhs.gov for a swift resolution. Ultimately, we believe our combined efforts will lead to improved staffing and result in better quality and care for nursing home residents.

Sincerely,



Seema Verma