



Compliance News

APRIL 25, 2016

Is your NF ready for PBJ reporting? The following guide can help you assess your progress and identify your next steps.

By Jennifer Kearn

Phase 1: (should be complete)

1. Access to the QIES PBJ System is setup:
 - a. Requested and received CMSNet user ID and Password
 - b. Installed Juniper Software
 - c. Requested and received QIES PBJ user ID and Password
2. Implemented, upgraded or verified that you have a Time and Attendance system that is able to assist with PBJ Reporting:
 - a. Time system is able to handle the end of day issues.
 - b. Time system is able to provide pre-submission PBJ reports to allow providers to review PBJ data prior to preparing the XML file.
 - c. Time system is able to export the PBJ information in the PBJ prescribed format that is required for PBJ upload.
3. Performed a review of your Time system setup to verify the following:
 - a. Standardization of time system coding. This would include review of any existing job codes, job titles, locations, and other lists already in use for potential modification to encompass the detail needed for PBJ reporting.
 - b. Verify that your time system setup contains fields necessary to pull PBJ information correctly for reporting purposes.
 - c. Review the current Employee Setup in the time system and make sure all necessary PBJ information is entered correctly in the time system.
4. Communicated with your vendors and determined if your time system or other admin processes will allow for tracking of vendor time, or is your vendor willing to provide staff hours detailed to Direct Care & NF.

Phase 2: (should be completed by May 15th at the latest)

1. Run current reports from your time system, obtain vendor hour reports, and monthly census data for use in testing.
2. Perform tests of your pre-submission reports for both your employee hours' data and your vendor hours' data.
3. Begin test uploading employee data, employee hours, and census. (This should be for both payroll employees and vendor employees)

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PBJ Checklist

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Hotlines

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To effectively communicate, we must realize that we are all different in the way we perceive the world and use this understanding as a guide to our communication with others. Tony Robbins

Phase 3: (should be completed by June 30th at the latest)

1. Continue to screen, upload, and test PBJ systems and processes.
2. Prepare for PBJ system and upload format changes to be implemented on June 26, 2016.
3. Perform management review of PBJ Data prior to mandatory reporting to determine if it is within expected ranges and review significant variances from expectations based on historical surveys and allocations that may have been used in prior years.

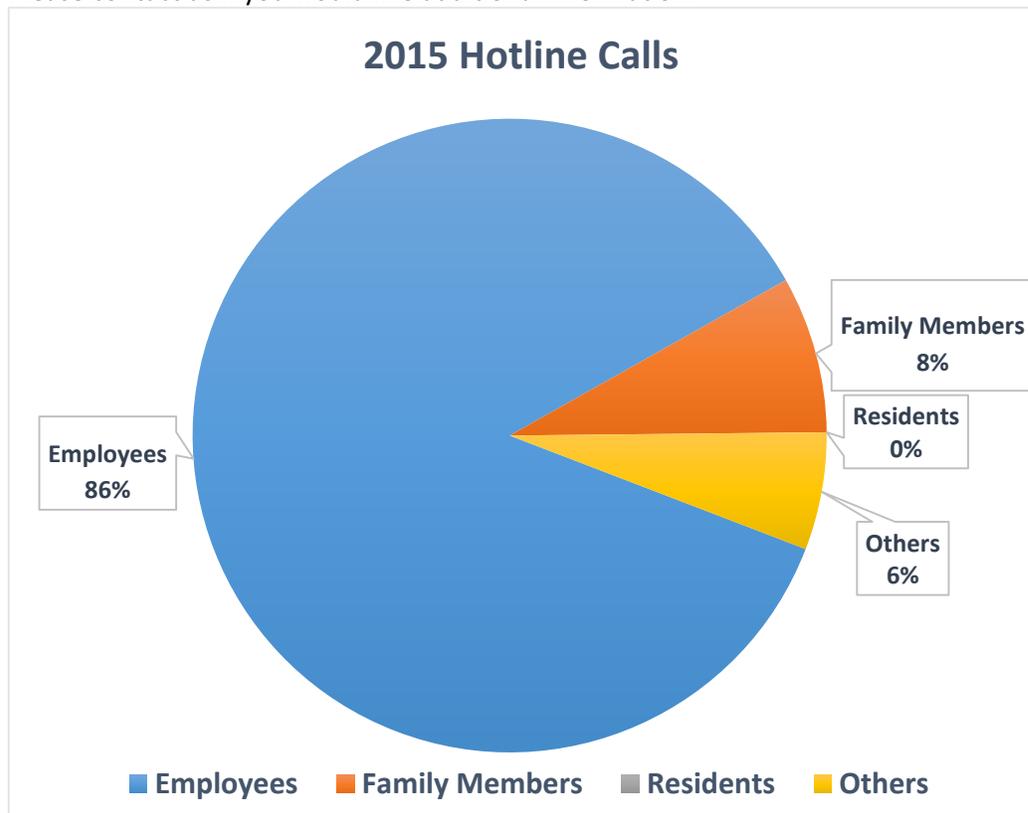
7 Elements of Compliance: HOTLINES

By Karen Steggerda

BCG Research continues to provide "Hotline" services for our clients. This method of Anonymous Communication is an important component of a successful Corporate Compliance Program.

We think it's important to note that during 2015 our Hotline service received 0 email communications. During 2015 86% of the Hotline calls received came from Employees (see chart). There were no calls from Residents and approximately 14% of the calls came from Families and Other. These results are very consistent with prior years.

Please contact us if you would like additional information.



Remember OIG Regulations request both open and anonymous forms of communication for all staff, residents, and resident families. Information about your communication systems should be posted in public areas available for everyone to see and accessible for use. If you don't have a hotline system, please contact us and for \$155 year, we can get you set up.

