



## CMS-671

# Time and Attendance System Streamlines Quality Reports for Nursing Homes Participating in Medicare and Medicaid

### Summary

Each year, Centers for Medicare and Medicaid (CMS) conducts an annual survey of nursing homes participating in Medicare or Medicaid. Facilities are judged on three criteria (health inspections, quality measures and staffing) and assigned a rating in each area as well as an overall rating based on a five-star system. Nursing homes participating in Medicare or Medicaid can help ensure their highest staffing star rating by using a time and attendance system to capture and report accurate staffing hours on form CMS-671.

## Five-Star Quality Rating System

In an effort to distinguish high- and low-performing nursing homes participating in Medicare and Medicaid, CMS (Centers for Medicare and Medicaid Services) adopted a five-star quality rating system based on the results of a survey such care facilities must complete annually.

Nursing homes are rated on a five-star system based on their performance in three areas: health inspections, quality measures and staffing. Ratings received in these areas contribute to an overall quality rating for the care facility, and all ratings are made available to the public on Nursing Home Compare, ([www.medicare.gov/nhcompare/](http://www.medicare.gov/nhcompare/)) a website that lets residents and their families access ratings of nursing home facilities by state.

## Staffing Rating

Although performance in three areas (health inspection, quality measures and staffing) contributes to a facility's overall rating, staffing is a key performance measure. A CMS staffing study showed a correlation between staffing levels, staffing stability and resident outcomes. Specifically, the study pinpointed staff-to-resident ratios below which residents face a greater risk of quality issues.

A staffing rating is based on two criteria: total nursing hours per day per resident and RN hours per day per resident.

Total nursing hours include RN, LPN and nurse aide hours for registered nurses, RN director of nursing, nurses with administrative duties, licensed practical/ licensed vocational nurses, certified nurse aides, aides in training and medication aides/technicians. Contract staff (nursing staff under contract by the facility to provide specific services but not on the payroll) hours are also included. Not included are "private duty" nursing staff hired by a resident's family, hospice staff, feeding assistants and volunteers.

As part of its annual survey, CMS sources data for staffing measures from the Long Term Care Facility Application for Medicare and Medicaid, otherwise known as CMS-671. (To accurately calculate staff-to-resident ratios, resident data is pulled from form CMS-672, Resident Census and Conditions of Residents).

## Reporting Hours on CMS-671

Form CMS-671 requires facilities to provide detailed breakdown of nursing staff hours. Full-time hours (considered 35 hours or more per week, excluding meal breaks of 30 minutes or more) are reported separately from part-time and contract hours.

Typically, facilities are given a 14-day collection period prior to the survey date to record and report staff hours. Even if the 14-day period does not mirror the facility's pay period, it must adhere to the collection "window" and report staff hours only during those two weeks.

Specifically, facilities must report on the actual (not scheduled) hours qualified staff work during the two weeks as well as overtime. Non-work related hours and leaves and non-productive work hours are not included as work time. If an employee serves in more than one capacity, hours must be separated by the service performed.



## How a Time and Attendance System Will Help

Because of the specific hourly breakdowns required by form CMS-671, the staff included (and excluded) from hourly counts, and the dictated 14-day collection period which can differ from a facility's pay period, payroll information will not provide adequate information to complete the form. Additionally, tallying hours "by hand" leads to potential calculation errors that put higher ratings in jeopardy.

Most experts recommend using an automated time and attendance system to track and report staffing hours for CMS-671 because it ensures accuracy, captures hours worked and allows for easy reporting.

## Advantages of a Time and Attendance System in Staff Reporting

Employing a time and attendance system to report staff hours offers specific advantages to care facilities by accurately capturing staffing data and simplifying the CMS reporting procedure for facility administrators.

- **Capture comprehensive staffing data.** A time and attendance system tracks actual hours worked and overtime as well as breaks, lunches and leaves that must be subtracted from CMS-671 totals. Because hours are entered directly into the system by the employee, the information is accurate and limits distortion from a data "middle man."
- **Manage staff-to-resident ratios.** Time and attendance systems with a Coverage Budget feature let facility managers create budget targets based on statistics, such as resident census, ensuring the optimal level of staff to residents without incurring unnecessary overtime. This means nursing homes can provide high quality care while limiting unnecessary labor costs.
- **Track time in multiple job capacities.** With staff who work in two or more job capacities, CMS will expect these hours to be broken out into their respective categories. A time and attendance system will capture job codes along with time worked (so managers can see who spent time doing what), but also allow employees to "transfer" from one job to another. For instance, an RN who picks up an extra shift for a Certified Nurse Aide (CNA) can use a different job code to log the CNA shift, ensuring her pay is appropriately calculated and her RN hours are captured separately from the CNA hours.
- **Get more detailed data than payroll systems.** Because the 14-day reporting period for CMS-671 may not correspond with a facility's pay period, payroll data can be difficult to rely on for staffing hours. In some cases, payroll will not capture all the data required since contract staff hours are required to be reported but contract staff are not on the payroll.
- **Run reports customized to the CMS-671 requirements.** Time and attendance systems with customizable reporting provide exactly the data required by the form. This makes accurately completing the form faster and gives the facility a record of the data provided to CMS.



## Conclusion

As part of three criteria that contribute to a five-star rating, staffing helps CMS establish a nursing home's resident-to-staff ratio, a measure CMS uses to predict successful resident outcomes. Accurately capturing and reporting staff hours on CMS-671 with a time and attendance system not only streamlines the reporting requirement but helps ensure a facility's performance is reflected in its CMS star rating.

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## References

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