

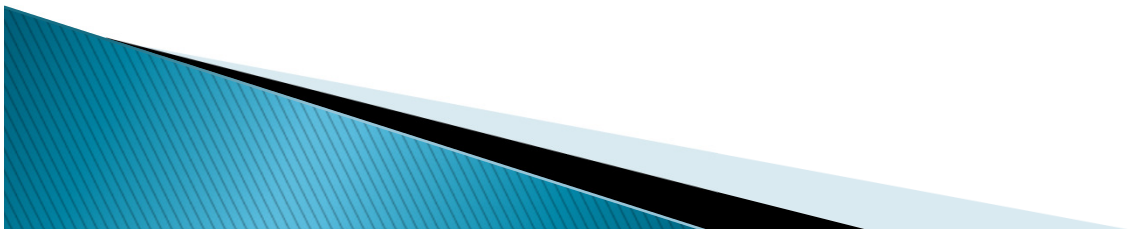


Required Staffing Plans

September 26, 2019

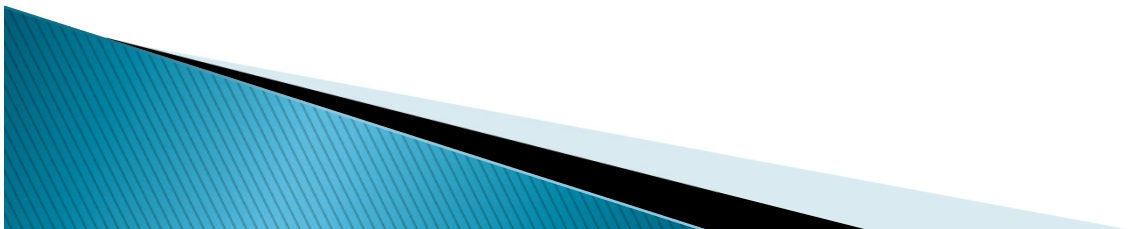
Public Act 101-0010 Requirements

- ▶ ...sufficient funds shall be allocated ... to establish a per diem add-on to the direct care per diem rate not to exceed \$70,000,000... for the purpose of addressing the facility's unique staffing needs...
- ▶ HFS has implemented by calculating a \$4.55 per day add-on to each facility's per diem rate for the July 2019 quarter.



Public Act 101-0010 Requirements

- ▶ The Act further requires that:
 - “facilities shall file quarterly reports documenting compliance with its annually approved staffing plan, which shall permit compliance with Section 3-202.05 of the Nursing Home Care Act.”
 - “A facility that fails to meet the benchmarks and dates contained in the plan may have its add-on adjusted in the quarter following the quarterly review.”



Nursing Home Care Act

Section 3-202.05 Requirements

- ▶ Effective January 1, 2014, the minimum staffing ratios shall be:
 - 3.8 hours of nursing and personal care each day for a resident needing skilled care, and
 - 2.5 hours of nursing and personal care each day for a resident needing intermediate care.
- ▶ Compliance shall be determined quarterly by comparing:
 - the total number of hours provided per resident per day using the Centers for Medicare and Medicaid Services' payroll-based journal and the facility's daily census, and
 - the minimum staffing standards (based on the facility's daily census, broken down by intermediate and skilled care as self-reported by the facility to the Department on a quarterly basis).

Staffing Plan Summary

Nursing Facility Staffing Plan for Compliance with Department of Public Health Minimum Staffing Requirements

Provider ID: _____
 Provider Name: _____

Staffing Plan:	Actual Staffing (PBJ)	Required Staffing (Census)	% of Required Staffing (data entry)	Required to maintain staffing funding (Calculation)
Staffing from PBJ 06/30/2019			#DIV/0! Start point	
Staffing goal for 12/31/2019			fill in	- Meets HPRD goal
Staffing goal for 03/31/2020			fill in	- Meets HPRD goal
Staffing goal for 06/30/2020			fill in	- Meets HPRD goal
Staffing goal for 09/30/2020			100% Required	- Meets HPRD goal

Staffing Plan Summary

- ▶ Nursing facilities will establish a base line comparison of actual staffing to required staffing levels based upon data from the quarter ending June 30, 2019.
- ▶ Minimum required staffing levels will need to be reached by the quarter ending September 30, 2020.
- ▶ Facilities will input their targeted quarterly incremental increases to meeting their required minimum staffing levels.
- ▶ Compliance on a quarterly basis will be determined based upon whether the actual staffing level for the quarter meets or exceeds the facility's goal for the quarter.



Staffing Plan Data Sources

- ▶ Actual Staffing levels – will be pulled from Payroll Based Journal (PBJ) quarterly data.
- ▶ Public Act 101–0010 requires discrepancies between job titles in law and the PBJ to be addressed by rule.
- ▶ Statutory job titles include:
 - Registered nurses,
 - Licensed practical nurses,
 - Certified nurse assistants,
 - Psychiatric services rehabilitation aides,
 - Rehabilitation and therapy aides,
 - Assistant directors of nursing,
 - 50% of the Director of Nurses' time,
 - 30% of the Social Services Director's time.

Staffing Plan Data Sources

PBJ Crosswalk of Job Titles

- ▶ Initial proposal of PBJ data crosswalks for IDPH rule include:
 - Registered nurses, assistant director of nursing, and the director of nursing shall correspond to PBJ job titles:
 - 5 Registered Nurse – director of nursing (50%)
 - 7 Register Nurse
 - 13 Nurse Practitioner
 - 14 Clinical Nurse Specialist
 - Licensed practical nurses shall correspond to PBJ job title:
 - 9 Licensed Practical/Vocational Nurse
 - Certified nursing assistants shall correspond to PBJ job titles:
 - 10 Certified Nurse Aide
 - 11 Nurse Aide in Training
 - 12 Medication Aide/Technician

Staffing Plan Data Sources

PBJ Crosswalk of Job Titles – cont.

- ▶ Initial proposal of PBJ data crosswalks for IDPH rule include:
 - Psychiatric services rehabilitation aides and psychiatric services rehabilitation coordinators shall correspond to PBJ job title:
 - 34 Mental Health Service Worker
 - Rehabilitation and therapy aides shall correspond to PBJ job titles:
 - 19 Occupational Therapy Assistant
 - 20 Occupational Therapy Aide
 - 22 Physical Therapy Assistant
 - 23 Physical Therapy Aide
 - 25 Respiratory Therapy Technician
 - 29 Other Activities Staff

Staffing Plan Data Sources

PBJ Crosswalk of Job Titles – cont.

- ▶ Initial proposal of PBJ data crosswalks for IDPH rule include:
 - Social service directors shall correspond to 30% of the greater of the following PBJ job titles:
 - 28 Qualified Activities Professional
 - 30 Qualified Social Worker
 - Licensed physical, occupational, speech and respiratory therapists shall correspond to PBJ job titles:
 - 18 Occupational Therapist
 - 21 Physical Therapist
 - 24 Respiratory Therapist
 - 26 Speech/Language Pathologist

Staffing Plan Data Sources

Census Data

- ▶ Statutory language requires census data to be:
 - Self-reported by nursing facilities,
 - Broken down by intermediate and skilled care,
 - Reported quarterly.
- ▶ Definitions for intermediate and skilled care
 - Intermediate care means basic nursing care and other restorative services under periodic medical supervision.
 - Skilled care means skilled nursing care, continuous skilled nursing observations, restorative nursing, and other services under professional direction with frequent medical supervision.
 - These definitions need to be further refined in metrics that can be identified and measured objectively. Discussions are ongoing between State departments and stakeholders.

Staffing Plan Data Sources

Census Data

- ▶ Example of quarterly census reporting:

Date	Skilled Care Days	Intermediate Care Days	Total Days	
4/1/19	40	60	100	
4/2/19	40	59	99	
4/3/19	38	59	97	
4/4/19	41	61	102	
4/5 - 6/26/2019	3,486	4,814	8,300	aggregated for display
6/27/19	45	55	100	
6/28/19	45	55	100	
6/29/19	48	52	100	
6/30/19	48	52	100	
Total	3,831	5,267	9,098	A
	42%	58%		
Required Hrs/day	3.8	2.5		
Required Hours	14,557.8	13,167.5	27,725.3	B
Required Minimum Hours per Resident Day for the Quarter:			3.05	B/A

Staffing Plan Data Sources

Census Data

Statutory Staffing Requirements					
Based on Percentage of Residents Classified as Skilled					
% of Residents Classified Skilled	Skilled Care HPRD	Intermediate Care HPRD	Required HPRD	Required Nursing HPRD	Required RN HPRD
	3.80	2.50			
100%	3.80	-	3.80	0.95	0.38
90%	3.42	0.25	3.67	0.92	0.37
80%	3.04	0.50	3.54	0.89	0.35
70%	2.66	0.75	3.41	0.85	0.34
60%	2.28	1.00	3.28	0.82	0.33
50%	1.90	1.25	3.15	0.79	0.32
40%	1.52	1.50	3.02	0.76	0.30
30%	1.14	1.75	2.89	0.72	0.29
20%	0.76	2.00	2.76	0.69	0.28
10%	0.38	2.25	2.63	0.66	0.26
0%	-	2.50	2.50	0.63	0.25

HPRD = Hours per Resident Day

Staffing Plan Summary

Baseline Calculation

- ▶ Initial staffing data will come from the quarter end June 30, 2019.
 - Census data will need to be reported when final decisions are made regarding the definitions of skilled and intermediate care.
 - PBJ data will be available at the end of September. HFS is reviewing the options of calculating the staffing hours and providing to facilities (via MEDI download or LTC Exchange).
 - Based upon the difference between the baseline data and the required minimum staffing levels, facilities will be required to set quarterly targets for compliance.

Staffing Plan Summary

Baseline Calculation

- ▶ Actual PBJ staffing is 2.50 HPRD while a census of 42% skilled required 3.05 HPRD.
- ▶ Facility is currently at 82% of the required staffing level.
- ▶ Facility must enter quarter staffing targets to become compliant by staffing in quarter ending September 2020.

Staffing Plan:	Actual Staffing	Required Staffing	% of Required Staffing	Required to maintain staffing funding
Data Source:	(PBJ)	(Census)	(data entry)	(Calculation)
Staffing from PBJ 06/30/2019	2.50	3.05	82% Start point	
Staffing goal for 12/31/2019			85% fill in	- Meets HPRD goal
Staffing goal for 03/31/2020			90% fill in	- Meets HPRD goal
Staffing goal for 06/30/2020			95% fill in	- Meets HPRD goal
Staffing goal for 09/30/2020			100% Required	- Meets HPRD goal

Staffing Plan Summary

Quarterly Compliance

- ▶ Compliance for a quarter will be based upon “Actual Staffing” compared to “Required Staffing” times the “% of Required Staffing”.
- ▶ Since the Actual Staffing meets or exceeds the Required Staffing to Maintain Funding, the facility is compliant for the 12/31/19 quarter.

Staffing Plan:	Actual Staffing (PBJ)	Required Staffing (Census)	% of Required Staffing (data entry)	Required to maintain staffing funding (Calculation)
Staffing from PBJ 06/30/2019	2.50	3.05	82% Start point	
Staffing goal for 12/31/2019	2.65	3.05	85% fill in	2.59 Meets HPRD goal
Staffing goal for 03/31/2020			90% fill in	- Meets HPRD goal
Staffing goal for 06/30/2020			95% fill in	- Meets HPRD goal
Staffing goal for 09/30/2020			100% Required	- Meets HPRD goal

Staffing Plan Summary

Quarterly Compliance

- ▶ Compliance can change on a quarterly basis.
- ▶ By the 09/30/2020 quarter, the facility must be at 100% of the required minimum staffing levels to maintain compliance.

Staffing Plan:	Actual Staffing	Required Staffing	% of Required Staffing	Required to maintain staffing funding
Data Source:	(PBJ)	(Census)	(data entry)	(Calculation)
Staffing from PBJ 06/30/2019	2.50	3.05	82% Start point	
Staffing goal for 12/31/2019	2.65	3.05	85% fill in	2.59 Meets HPRD goal
Staffing goal for 03/31/2020	2.80	3.10	90% fill in	2.79 Meets HPRD goal
Staffing goal for 06/30/2020	2.90	3.10	95% fill in	2.95 Did not meet HPRD goal
Staffing goal for 09/30/2020	3.05	3.05	100% Required	3.05 Meets HPRD goal

Staffing Plan Summary

Quarterly Compliance

- Below is a table detailing the applicable rate quarters that will be affected by the first four quarters of Staffing Plan Compliance:

Timing of HFS Per Diem Rate Adjustment		
PBJ Data	PBJ Data Available:	Any Adjustments Applied to HFS Rate Quarter Beginning:
QE 6/30/19	September 2019	
QE 12/31/19	April 2020	7/1/2020
QE 3/31/20	July 2020	10/1/2020
QE 6/30/20	October 2020	1/1/2021
QE 9/30/20	January 2021	4/1/2021

Skilled vs Intermediate Care Definitions

- ▶ The definitions in statute require further refinement, allowing providers the ability to assign the appropriate care level to their residents.
- ▶ The final definitions will be added to the section of the staffing plan shown below, allowing providers to complete their census reporting.

Definitions for Census Reporting:

Skilled care is defined as:

Intermediate care is defined as:

Staffing Plan

Narrative Summary of Activities by Quarter

- ▶ The final section of the Staffing Plan allows the provider to detail the events, activities and strategies they will utilize to hire and retain staff necessary to achieve or maintain compliance with minimum staffing standards.
- ▶ This section is separated by quarter.

Define Plans for Improvement including goals, steps to accomplish, responsible staff and timelines:

12/31/2019 Quarter:

Staffing Plans

Future Actions

- ▶ HFS will update and repost the Staffing Plan template as soon as there is additional information available regarding the definitions of Skilled and Intermediate Care.
- ▶ HFS will determine the ability to furnish provider specific staffing calculations, from PBJ data, through HFS systems.
- ▶ HFS will notify providers of the initial due date for the annual staffing plan.



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