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**Center for Clinical Standards and Quality/Survey & Certification Group**

To Skilled Nursing Facility Administration:

This letter will serve to introduce the Payroll-Based Journal (PBJ) staffing audit team from Granite Dolphin and Myers and Stauffer. The PBJ audit team is assigned to conduct audits of the PBJ data submitted by your facility as part of a Center for Medicare and Medicaid Services' (CMS) effort to ensure that facilities are reporting accurate staffing data. The PBJ audit team will be careful not to interfere with facility operations and delivery of care as they complete their auditing activities.

The PBJ audit team will examine payroll records and other auditable data along with PBJ submission data to identify if staffing is being reported accurately based on hours staff are paid to work. This may include, but is not limited to, information from payroll, timekeeping systems, invoices for contracted staff, and interviews with staff responsible for PBJ data entry. The PBJ audit team will adhere to all applicable HIPAA and other confidentiality requirements.

The PBJ audit team will be operating in a data auditing role and will not be conducting a health and safety survey. If you have any questions, please contact Lorelei Kahn, the CMS Contracting Officer's Representative for Granite Dolphin at [lorelei.kahn@cms.hhs.gov](mailto:lorelei.kahn@cms.hhs.gov) or 410-786-9254.

Please note, at this time, we are piloting the audit process. Any findings from these audits will not result in sanctions or negative actions against the facility. At the end of the audit, the team will meet with you to discuss the findings.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Shulman".

Evan Shulman  
Deputy Director, Division of Nursing Homes