



Nursing Facility Staffing Hours Verification

Westchase Health and Rehabilitation Center

Results in Brief

Why OIG Conducted This Inspection

The Texas Health and Human Services (HHS) Office of Inspector General Audit and Inspections Division (OIG Inspections) conducted an inspection of Westchase Health and Rehabilitation Center (Westchase), a skilled nursing facility.

In 2020, the U.S. Department of Health and Human Services Office of Inspector General conducted a review of nursing facility staffing levels for 2018. The report revealed staffing levels varied considerably from day to day, which raised concerns some facilities may not fully meet the needs of their residents.

OIG Inspections initiated this inspection because of potential health and safety concerns caused by staffing shortages at nursing facilities.

Summary of Review

The inspection objective was to determine whether the direct care licensed nursing hours recorded at Westchase supported the hours submitted to the U.S. Centers for Medicare and Medicaid Services (CMS) in compliance with federal requirements.

The inspection scope covered the period from January 1, 2021, through June 30, 2021.

Key Results

Westchase Health and Rehabilitation Center (Westchase) accurately reported direct care licensed nursing hours to the U.S. Centers for Medicare and Medicaid Services (CMS) for 85 percent of the 964 payroll records reviewed as part of this inspection. However, Westchase did not:

- Have documented processes for reporting complete and accurate direct care licensed nursing hours to CMS through the Payroll-Based Journal reporting system. As a result, Westchase (a) both overreported and underreported some direct care licensed nursing hours worked and (b) inconsistently accounted for required meal break deductions.
- Consistently maintain complete payroll records to document (a) all direct care licensed nursing hours worked or (b) the number of direct care hours worked by administrative staff.
- Maintain historical daily nurse staffing data.

Recommendations

Westchase should:

- Develop, document, and apply a consistent process for application of its seven-minute rule.
- Implement a quality review process to ensure the direct care hours worked are accurately reported to the Payroll-Based Journal as required by CMS.
- Implement quality review processes to ensure payroll records are complete.
- Document, in the payroll records, direct care hours worked by administrative staff before reporting licensed nursing hours to CMS through the Payroll-Based Journal.
- Ensure compliance with state and federal requirements by maintaining daily nurse staffing data.

Management Response

Westchase agreed with the inspection recommendations and indicated corrective actions would be fully implemented by September 2022.

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