

PBJ Submission Review

Staffing data and iQIES review worksheets and an action plan.

REGULATION

42 CFR 483.70(p)

F-TAG

F851

SOURCES CHECKED

October 1, 2026

REVIEW FORMAT

Facility-led team
review

How to Use This Guide

1 Read the reference

Review each requirement, its source, and where surveyors look.

PAGES 2–3

2 Compare the evidence

Check the written procedure first, then records and submission results.

WORKSHEETS · PAGES 4–7

3 Assign and follow up

Log each gap with an owner, a target date, and a verification step.

ACTION PLAN · PAGE 8

Before You Begin

WHO TO INVOLVE

Administrator, PBJ submitter, payroll and HR leads, staffing coordinator, and software or vendor contact.

WHAT TO BRING

iQIES access list, payroll and staffing source records, employee ID crosswalk, file specification, submission results, and validation reports.

Review Areas at a Glance

NO.	REVIEW QUESTION	REFERENCE	WORKSHEET
01	Do the right people have working iQIES access?	Page 2	A · Page 4
02	Are systems and files using current specifications?	Page 2	A · Page 4
03	Are employee IDs linked and checked correctly?	Page 2	B · Page 5
04	Do submitted hours reconcile to source records?	Page 2	B · Page 5
05	Is the quarter submitted before the current deadline?	Page 3	C · Page 6
06	Are validation results and rejected records resolved?	Page 3	C · Page 6
07	Can the facility prove what was submitted?	Page 3	D · Page 7

Scope. CMS launched PBJ submission in iQIES on August 17, 2026, and stated that the September 11 manual and FAQ updates did not change PBJ policy. This guide focuses on access, validation, reconciliation, and proof of successful submission.

Educational process-review aid; not a substitute for the current PBJ Policy Manual, file specification, iQIES instructions, or reporting rules. Internal-control suggestions are Survey Alert recommendations, not additional CMS requirements. Verify current deadlines and system guidance.

PART 1 · REFERENCE

Key Review Areas for a Controlled PBJ Submission

01 Do the right people have working iQIES access?

PBJ submission moved to iQIES. The facility should confirm required roles, working credentials, and backup coverage before the reporting deadline. [1, 2]

WHERE TO LOOK

iQIES role list, dated login test, backup assignment, help-desk case, and access procedure.

02 Are systems and files using current specifications?

Staffing submission files must use FileSpecVersion 4.10.0; files with other versions are rejected. The separate employee-linking Administration Submission File remains version 1.00.0. Know which system creates, checks, and submits each file. [1, 3, 6]

WHERE TO LOOK

Vendor confirmation, file version, test result, interface map, change log, and contingency instructions.

03 Are employee IDs linked and checked correctly?

A single Employee ID, or a System Employee ID with linked IDs, cannot exceed 22.5 hours per day; iQIES error -1025 enforces that limit. Maintain a controlled crosswalk and resolve duplicate or changed identifiers. [1]

WHERE TO LOOK

Employee ID crosswalk, duplicate report, payroll identifier history, exception report, and corrected source records.

04 Do submitted hours reconcile to source records?

PBJ data should be auditable to payroll and other source records, with job categories and paid staffing hours handled according to current CMS policy. [1, 3]

WHERE TO LOOK

Payroll detail, timekeeping, agency invoices, category mapping, reconciliation report, and variance resolution.

PART 1 · KEY REVIEW AREAS (CONTINUED)

05 Is the quarter submitted before the current deadline?

Submissions are due by 11:59 p.m. Eastern on the 45th calendar day after the quarter ends. The Final Validation Report can take up to 24 hours, so leave time to review it and correct errors before the window closes. [1, 5]

WHERE TO LOOK

CMS deadline reference, internal calendar, reminder record, submission schedule, and escalation contacts.

06 Are validation results and rejected records resolved?

A completed upload does not show that every record was accepted. Review the Final Validation Report in iQIES: from PBJ Submission History, select View Report for the applicable submission. Confirm that the records were accepted and resolve fatal errors before the submission deadline. The last accepted submission before the deadline becomes the final submission. [1, 2, 5]

WHERE TO LOOK

iQIES PBJ Submission History and Final Validation Report, error log, corrected file, resubmission evidence, and final accepted status. Reports for files submitted through the former QIES system may remain available temporarily through CASPER.

07 Can the facility prove what was submitted?

Retain the final file, validation evidence, reconciliations, approvals, and reports needed to reconstruct the submission and respond to questions. [1, 2, 3]

WHERE TO LOOK

Final submitted file, validation and staffing reports, reconciliation, approval, archive index, and issue log.

TEAM DISCUSSION · FICTIONAL EXAMPLE

The upload completes, but no one reviews rejected records or reconciles the accepted hours to payroll. What must the team check before treating the quarter as complete?

Sources and Resources

[1] [CMS PBJ staffing data submission page](#)

[2] [QTSO: PBJ in iQIES reminder](#)

[3] [QTSO: iQIES PBJ manuals](#)

[4] [42 CFR 483.70\(p\): staffing data](#)

[5] [CMS PBJ Policy Manual v2.8 \(Aug. 2026\)](#)

[6] [QTSO: PBJ submission specs v4.10.0](#)

Sources checked October 1, 2026. PBJ launched in iQIES August 17, 2026; FileSpecVersion 4.10.0 required for staffing files submitted on or after April 1, 2026; Administration Submission File remains 1.00.0.

PART 2 · REVIEW WORKSHEET A OF D

Review Areas 1-2

FACILITY _____ REVIEWERS _____ DATE _____

PROCEDURE TITLE AND REPORTING QUARTER _____

REVIEW AREA 01

Do the right people have working iQIES access?

WHAT TO CHECK

Primary and backup access, role assignment, login testing, and the path for access problems. [1, 2]

WHERE TO LOOK

iQIES role list, dated login test, backup assignment, help-desk case, and access procedure.

1 What does your policy or procedure say?

STATUS ☐ Supported ☐ Gap ☐ N/A ☐ Not checked

PROCEDURE SECTION

2 What does your evidence show?

STATUS ☐ Supported ☐ Gap ☐ N/A ☐ Not checked

EVIDENCE LOCATION

1 What does your policy or procedure say?

STATUS ☐ Supported ☐ Gap ☐ N/A ☐ Not checked

PROCEDURE SECTION

2 What does your evidence show?

STATUS ☐ Supported ☐ Gap ☐ N/A ☐ Not checked

EVIDENCE LOCATION

REVIEW AREA 02

Are systems and files using current specifications?

WHAT TO CHECK

FileSpecVersion 4.10.0 for staffing files (Administration File stays 1.00.0), vendor readiness, testing, change ownership, and fallback. [1, 3, 6]

WHERE TO LOOK

Vendor confirmation, file version, test result, interface map, change log, and contingency instructions.

Status key. Supported = found in the material reviewed · Gap = missing, unclear, or inconsistent · N/A = explain why · Not checked = review remains open. Review the written procedure first, then the evidence. Carry every gap to the action plan on page 8.

PART 2 · REVIEW WORKSHEET B OF D

Review Areas 3–4

FACILITY _____ REVIEWERS _____ DATE _____

PROCEDURE TITLE AND REPORTING QUARTER _____

REVIEW AREA 03

Are employee IDs linked and checked correctly?

WHAT TO CHECK

ID linkage against the 22.5-hour daily limit (error -1025), duplicate IDs, terminations, rehires, and agency records. [1]

WHERE TO LOOK

Employee ID crosswalk, duplicate report, payroll identifier history, exception report, and corrected source records.

1 What does your policy or procedure say?STATUS ☐ Supported ☐ Gap ☐ N/A ☐ Not checked

PROCEDURE SECTION

2 What does your evidence show?STATUS ☐ Supported ☐ Gap ☐ N/A ☐ Not checked

EVIDENCE LOCATION

REVIEW AREA 04

Do submitted hours reconcile to source records?

WHAT TO CHECK

Totals, categories, dates, agency hours, non-worked time treatment, and unexplained differences before submission. [1, 3]

WHERE TO LOOK

Payroll detail, timekeeping, agency invoices, category mapping, reconciliation report, and variance resolution.

1 What does your policy or procedure say?STATUS ☐ Supported ☐ Gap ☐ N/A ☐ Not checked

PROCEDURE SECTION

2 What does your evidence show?STATUS ☐ Supported ☐ Gap ☐ N/A ☐ Not checked

EVIDENCE LOCATION

Status key. Supported = found in the material reviewed · Gap = missing, unclear, or inconsistent · N/A = explain why · Not checked = review remains open. Review the written procedure first, then the evidence. Carry every gap to the action plan on page 8.

PART 2 · REVIEW WORKSHEET C OF D

Review Areas 5–6

FACILITY _____ REVIEWERS _____ DATE _____

PROCEDURE TITLE AND REPORTING QUARTER _____

REVIEW AREA 05

Is the quarter submitted before the current deadline?

WHAT TO CHECK

Calendar ownership for the 45-day deadline (11:59 p.m. ET), an internal cutoff that allows 24 hours for the Final Validation Report, escalation, and backup. [1, 5]

WHERE TO LOOK

CMS deadline reference, internal calendar, reminder record, submission schedule, and escalation contacts.

1 What does your policy or procedure say?STATUS ☐ Supported ☐ Gap ☐ N/A ☐ Not checked

PROCEDURE SECTION

2 What does your evidence show?STATUS ☐ Supported ☐ Gap ☐ N/A ☐ Not checked

EVIDENCE LOCATION

REVIEW AREA 06

Are validation results and rejected records resolved?

WHAT TO CHECK

Final Validation Report results, records accepted, fatal errors resolved before the deadline, resubmission, and the last accepted file. [1, 2, 5]

WHERE TO LOOK

iQIES PBJ Submission History (View Report), error log, corrected file, resubmission evidence, and final accepted status.

1 What does your policy or procedure say?STATUS ☐ Supported ☐ Gap ☐ N/A ☐ Not checked

PROCEDURE SECTION

2 What does your evidence show?STATUS ☐ Supported ☐ Gap ☐ N/A ☐ Not checked

EVIDENCE LOCATION

Status key. Supported = found in the material reviewed · Gap = missing, unclear, or inconsistent · N/A = explain why · Not checked = review remains open. Review the written procedure first, then the evidence. Carry every gap to the action plan on page 8.

PART 2 · REVIEW WORKSHEET D OF D

Review Area 7 and Summary

FACILITY _____ REVIEWERS _____ DATE _____

PROCEDURE TITLE AND REPORTING QUARTER _____

REVIEW AREA 07

Can the facility prove what was submitted?

WHAT TO CHECK

Record location, retention, access, final sign-off, post-submission review, and correction history. [1, 2, 3]

WHERE TO LOOK

Final submitted file, validation and staffing reports, reconciliation, approval, archive index, and issue log.

1 What does your policy or procedure say?STATUS ☐ Supported ☐ Gap ☐ N/A ☐ Not checked

PROCEDURE SECTION

2 What does your evidence show?STATUS ☐ Supported ☐ Gap ☐ N/A ☐ Not checked

EVIDENCE LOCATION

Review Summary

Circle one per column: S = Supported · G = Gap · N/A = explain why · NC = Not checked

NO.	REVIEW AREA	PROCEDURE				EVIDENCE				TARGET DATE	OWNER
01	iQIES access	S	G	N/A	NC	S	G	N/A	NC		
02	Current file specifications	S	G	N/A	NC	S	G	N/A	NC		
03	Employee ID linkage	S	G	N/A	NC	S	G	N/A	NC		
04	Hours reconciliation	S	G	N/A	NC	S	G	N/A	NC		
05	Deadline management	S	G	N/A	NC	S	G	N/A	NC		
06	Validation and rejections	S	G	N/A	NC	S	G	N/A	NC		
07	Proof of submission	S	G	N/A	NC	S	G	N/A	NC		

Status key. Supported = found in the material reviewed · Gap = missing, unclear, or inconsistent · N/A = explain why · Not checked = review remains open. Carry every gap to the action plan on page 8.

PART 3 · ACTION PLAN

Action Plan and Follow-Up

Log each gap or unresolved question from the review summary. Copy this page as needed.

FACILITY _____ SHEET _____ OF _____

REVIEW AREA NO. / NAME _____	IDENTIFIED _____	REVIEWER _____
GAP / UNRESOLVED QUESTION + EVIDENCE REFERENCE _____		
PLANNED ACTION / PROCEDURE WORDING OR WORKFLOW TO REVISIT _____		
OWNER _____	TARGET DATE _____	FOLLOW-UP DATE _____
HOW WE WILL VERIFY THE CHANGE IS WORKING _____		
FOLLOW-UP RESULT / REMAINING ACTION _____		
STATUS ☐ Open ☐ In progress ☐ Verified complete		

REVIEW AREA NO. / NAME _____	IDENTIFIED _____	REVIEWER _____
GAP / UNRESOLVED QUESTION + EVIDENCE REFERENCE _____		
PLANNED ACTION / PROCEDURE WORDING OR WORKFLOW TO REVISIT _____		
OWNER _____	TARGET DATE _____	FOLLOW-UP DATE _____
HOW WE WILL VERIFY THE CHANGE IS WORKING _____		
FOLLOW-UP RESULT / REMAINING ACTION _____		
STATUS ☐ Open ☐ In progress ☐ Verified complete		

Resolve rejected records and deadline risks promptly — do not hold them for the next review cycle.