CNA Incentive Payment Template Questions

Q1: Does the certification statement need to be signed and submitted for the CNA Incentive Payment to obtain reimbursement for a qualifying pay-scale?

A: Yes, the certification statement that is included with the CNA Incentive Payment template must be initialed and signed for HFS to be able to make experience and promotion incentive payments.

Q2: Our organization only has information related to our CNA staff for the time they have been our employee. Are we required to determine their length of experience outside our organization?

A: Yes, facilities are required to provide full CNA work histories to the best of their knowledge. The years/months of experience for each CNA should reflect their full work history while working in a CNA role and performing CNA duties. This includes time worked at other nursing facilities or other healthcare providers whether in the state of Illinois or outside of it. A State does not need to have reciprocity for CNAs with Illinois to be included in the count of experience.

Q3: Are we able to rely on a conversation with the CNA to determine their full work experience? What happens if that turns out to be incorrect?

A: The certification statements simply ask that the completion of the CNA Incentive Payment template be completed to the best knowledge and belief of the signatory. For CNAs with experience outside the span of control of the organization, a conversation with the CNA to determine full work experience is appropriate. The CNA Incentive Payment is determined for a snapshot period of time. The Department will publish additional guidance for modifications and correction for future periods. As reflected in each facility’s template, the Department has also collected information from the state’s health care workforce registry and may examine this information for consistency with completed templates.

Q4: When must I complete and submit the CNA incentive payment template by to receive payment?

A: The initial completion date for the CNA incentive payment is midnight on June 30, 2022. However, the Department will allow for completed CNA Incentive payment templates with accompanying signed certification statements to be submitted up through July 31, 2022 for a retroactive start date back to July 1, 2022 (along with documentation that the pay-scale was posted and in effect as of July 1). However, in this case, the Department will also ask for a separate letter to be submitted by the facility by July 15, 2022, indicating that it implemented the pay scale effective July 1, and that they posted the pay scale for their employees by July 1. Facilities may also choose to implement a pay scale August 1 if they complete the required template, certification, posting, and also submit a separate letter indicating an August 1 implementation date – all by July 31. Thereafter, pay-scales would commence with the normal cadence of CNA template submission at the beginning of each calendar quarter. The Department will provide pre-printed letters that facilities can use for these
separate attestations, which are needed because the template now out for completion was not
designed with these enrollment options in mind, and would have to be modified to accommodate
them. Instead, the Department is offering this modified submission schedule along with additional
certifications for facilities choosing retroactive (July 1) or delayed (August 1) implementation.

Please note the following schedule for the various implementation options:

<table>
<thead>
<tr>
<th>Pay-scale implementation date</th>
<th>Deadline for within-facility posting of pay-scale</th>
<th>Due date for initial completed template*</th>
<th>Due date for letter of commitment to implement retroactive to July 1, 2022</th>
<th>Due date for letter of commitment to August 1 implementation**</th>
</tr>
</thead>
<tbody>
<tr>
<td>7/1/2022</td>
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</tr>
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<td>7/1 retroactive</td>
<td>7/1/2022</td>
<td>7/31/2022</td>
<td>7/15/2022</td>
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</tr>
<tr>
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<td>TBD but ~9/1/2022</td>
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<td>N/A</td>
</tr>
<tr>
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<td>N/A</td>
</tr>
<tr>
<td>4/1/2023</td>
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</tr>
<tr>
<td>etc.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*Facilities will continue to submit templates on a quarterly basis, post-implementation

**Though not required, facilities may also wish to alter the date in cell E3 of the template’s attestation (i.e., the
"Certification Statement" tab) from "July 1, 2022" to "August 1, 2022"

Q5: The employee ID numbers on the CNA Incentive Payment Template do not match my organizations
employee ID numbers that we transmit on our PBJ records to CMS. Where did these numbers come
from, and how can I reconcile to our internal employee ID numbers?

A: The Department is currently utilizing information from the “Payroll-Based Journal Employee Detail
Data 2021 Q4” public use file published by CMS for the hours and employee ID numbers included in
the CNA Incentive Payment template for the July 1, 2022 rate period. The Department is aware that
the employee ID numbers are a CMS system generated employee ID number and not the internal
employee ID numbers in each provider’s system. To reconcile these two IDs numbers, organization
can utilize their CASPER reporting systems to help generate a crosswalk of these two employee IDs.
To generate this crosswalk, each provider should run the “1700D Employee Report” for the applicable
data period (October 1, 2021 – December 31, 2021 for the July 1, 2022 rate period). Please ensure the
“Filter By Employee ID” box is checked prior to running the report. This will ensure the organizations
employee IDs will appear on the report, and allow for the reconciliation of the two employee ID
identifiers. This report can be exported to Microsoft Excel for convenience of the user.

Q6: Where do the employees on the “Employee Listing” worksheet of the CNA Incentive Payment
Template come from?

A: The employee names are derived from the IDPH Healthcare Worker Registry. For the July 1, 2022
rate period, this includes any individuals with an open termination date field and an employment
verification date in calendar year 2021, or an employee with a termination date after October 1, 2021.
Q7: What do I do if an employee with hours on the “CNA Incentive” worksheet is not included in the “Employee Listing” worksheet?

A: If a needed employee is not available on the “Employee Listing” worksheet, the provider should simply enter their corresponding information to the bottom of the listing. Please ensure the name and other information exactly reflects information in the IDPH Healthcare Worker Registry when possible. The Department is aware that the information may not be fully complete.

Q8: What happens if there are employees on the “Employee Listing” worksheet that do not have hours on the “CNA Incentive” worksheet. Should they be deleted?

A: Employees on the “Employee Listing” worksheet without any hours on the “CNA Incentive” worksheet can simply be left blank, and should not be deleted. If any listed individuals are no longer employed by the provider at that location, please consider updating the IDPH Healthcare Worker Registry accordingly.

Q9: Should the “Employee Listing” worksheet, be updated to include all current CNA employees, or just those for the applicable data/reporting period?

A: Only CNA employees with hours on the “CNA Incentive” worksheet are required to be included and reconciled on the “Employee Listing” worksheet. CNA employees are defined as Payroll Based Journal job code 10 with an employee type of exempt or non-exempt.

Q10: What does our organization do if we have CNA promotion positions that are different than the CNA promotion positions included on the CNA Incentive Payment Template?

A: The organization should select the “Other” option in the “CNA Promotion Status” column and enter the title of that position in the “CNA Promotion Status Description” column. Any additional information can be entered into the “Comments” column at the discretion of the organization.

Q11: Do I enter my internal employee ID values into the “Employee Listing” worksheet, or do I utilize the CMS system generated employee ID that are included on the “CNA Incentive” worksheet.

A: Please enter the CMS system generated employee IDs into the appropriate column of the “Employee Listing” worksheet. This will ensure that the aggregated hours on the “CNA Incentive” worksheet can be tied to a specific employee name.

Q12: Who do I contact if I have further questions about the CNA Incentive Payment Program template?

A: Please email ILNF@mslc.com for any further questions relating to the CNA Incentive Payment Program template.

General Program Questions

Q1: Are the CNA experience and promotion payment programs mandatory?

A: No, these are optional programs that providers may participate in.

Q2: How do I become eligible to receive the CNA experience and promotion incentive payments?
A: To be eligible for the CNA experience and promotion incentive payment programs, provider must be the following:

1. Providers must publish and display the CNA Experience and Promotion pay scales at the site of work, in a prominent and accessible place where it can easily be seen by workers and in a manner and location similar to that of Federal workplace posters

2. Provider CNA Experience and Promotion pay scales must meet or exceed those specified by the Illinois Department of Healthcare and Family Services (HFS) for the CNA Incentive Payment period.
   a. For the July 1, 2022 payment period the CNA experience pay scale must meet or exceed the values in the following table:

<table>
<thead>
<tr>
<th>Additional Hourly Wage Increase Requirements</th>
<th>CNA Years of Experience</th>
</tr>
</thead>
<tbody>
<tr>
<td>$1.50</td>
<td>1 year</td>
</tr>
<tr>
<td>$2.50</td>
<td>2 years</td>
</tr>
<tr>
<td>$3.50</td>
<td>3 years</td>
</tr>
<tr>
<td>$4.50</td>
<td>4 years</td>
</tr>
<tr>
<td>$5.50</td>
<td>5 years</td>
</tr>
<tr>
<td>$6.50</td>
<td>6 or more years</td>
</tr>
</tbody>
</table>

   b. From the July 1, 2022 payment period the CNA promotion pay scale must meet or exceed $1.50 per hour

3. For each CNA Incentive Payment period, directly employed CNAs must be reimbursed additional hourly wage rates in accordance with posted CNA Experience and Promotion pay scales

Q3: Can I be a part of the CNA experience incentive payment program if my organization currently does not have CNA “promotion” positions at the current time? Additionally, could I participate solely in the CNA promotion incentive program and not the CNA experience incentive payment program if we so chose?

A: Yes, the CNA experience (tenure) incentive payment is exclusive from the CNA promotion incentive payment. The Department is not requiring organizations to establish promotable positions for CNAs. If no CNA promotion positions currently exist, the organization is simply not eligible for that payment stream, but does remain eligible for the CNA experience incentive payment. The Department’s CNA promotion program is designed to incentivize the creation of CNA career paths within organizations, with the hopes that these types of roles and position will begin to be offered in the future.

Conversely, an organization may also participate solely in the CNA promotion program, but not the CNA experience incentive program.
Q4: Is the Department requiring a standard statewide CNA base wage? Or will the additional hourly wage increases be determined against each provider’s individual pay scale?

**A:** The Department is not mandating or specifying a CNA base wage for participation in the CNA incentive payment programs. Additional hourly wage increases will be compared against the individual provider’s own base wage scale. The base wage scale should correspond to the value paid to new CNA hires without experience.

Q5: Do shift or weekend wage differentials or overtime payment rates need to be part of the published wage scales? Do they effect what is considered the base CNA wage from which the additional hourly wage increases are calculated?

**A:** Shift, weekend, and overtime wage differential do not need to be part of the published provider pay scale. Only the base CNA wage is required for inclusion on the provider’s published pay scale. However, to that same end, provider shift and weekend wage differentials must not be considered when determining if the CNA additional hourly wage payments required as part of this program have been satisfied. The CNA experience and promotional pay scale wage increments are to be added to, and not contingent upon, other criteria nor other forms of compensation.

Q6: Can organizational CNA experience and promotion pay scales differ from those required by the Department?

**A:** To be eligible for the CNA experience and promotion incentive payment programs, individual organizations must have a posted pay scale that is AT LEAST equivalent to the pay scale requirements denoted by the Department. As such, organizational pay scales may be greater than or equal to the Department’s pay scale requirement, but not less.

Q7: For each CNA promotion is my organization required to give the CNA an additional $1.50 per hour? Or is there a requirement for just one $1.50 raise regardless of the number of promotions received?

**A:** At the current time there is no CNA promotion hierarchy established. As such, regardless of the number of position or title changes the CNA receives the requirement is satisfied by a single wage increase of $1.50. This however, does not prevent the organization from paying the CNA additional increases in their hourly wage, but the Department will only reimburse for the single promotional increase.

Q8: If my organization currently has an experience or merit pay scale in place, is the Department requiring that the additional hourly wage increases be paid in addition to my historic pay scale and wages?

**A:** No, additional hourly wages will be compared only against the providers base wage in the posted pay scale and are not additive when compared to historic experience and merit raises organizations have provided to their CNAs. For Example:

1. A CNA with 1 year of experience has previously received a $0.25 raise over the organization’s base pay rate prior to enrollment in the CNA incentive payment program. The organization would need to add an additional $1.25 raise to the CNAs hourly pay in order to satisfy the requirements of the program
2. A CNA with 15 years of experience is paid $22 per hour while the organization’s current base CNA hourly wage is $15 prior to enrollment in the CNA incentive payment program. The organization would not have to adjust this CNA’s wage as they exceed the $6.50 additional hourly wage maximum.

Note: the legislation establishing the pay scale subsidy clearly states that qualifying pay scales should lead to increases in worker compensation. Our understanding is that where pay scales exist across the state, they are much less generous than the minimum scale included in the legislation (and described here) and, as a result, that an organization’s compliance with the new minimum pay scale (rather than adding the new minimum to an existing scale as described in this question) will result in substantial increases in worker compensation.

Q9: Will the Department reimburse me for my total costs of implementing the CNA experience and promotion incentive payment programs?

A: The Department will base its payments to facilities on the Medicaid portion of minimum qualifying wage increments. The Department will calculate the CNA incentive payment as follows:

1. **CNA Experience Incentive Payment**
   
   Aggregate CNA hours by years of experience X Minimum Qualifying Hourly Wage Increment X Medicaid Utilization % = CNA Experience Quarterly Payment

2. **CNA Promotion Incentive Payment**
   
   (LESSER of Aggregate CNA Hours for Promoted Status CNAs OR 15% of total CNA Hours from PBJ records) X Minimum Qualifying CNA Promotion Wage Increment (Currently $1.50) X Medicaid Utilization % = CNA Promotion Incentive Quarterly Payment

Both the CNA experience and promotion incentive payments will be paid monthly. Monthly amounts will be derived by the quarterly CNA incentive payment divided by three. For the initial CNA incentive reporting period (July 1, 2022 – September 20, 2022) organizations may enter the program in July or August. As such, the Quarterly Payment calculation will be prorated by the number of months in which the organization was actively participating.

It should be noted, that the Department will only pay based on the minimum qualifying additional hourly wage increases. If organizations pay additional hourly wage increases greater than the published Department’s requirements, they will only receive incentive payments calculated based on the Department’s values.

For the July 1, 2022 rate period, the Medicaid Utilization Percentage to apply to the CNA incentive payments will be determined based on Medicaid days from the Department’s MMIS system for 12 months ended 9 months prior to the rate effective date DIVIDED BY Total Occupied Bed Days from Provider Tax Records for 12 months ended 9 months prior to the rate effective date.

Q10: Are hours for Temporary Nurse Aides or Nurse Aide in Training included in the CNA experience and promotion incentive payment programs?

A: No, only fully certified CNA that are employed by the facility are included in the calculation of the CNA experience and promotion incentive payment programs
Q11: Does time spent as a Temporary Nurse Aide or a Nurse Aide in Training count towards the years/months of CNA experience that are to be reported on the CNA Incentive Payment Template?

A: No. CNA Experience should be counted starting with the CNA’s individual certification date. Months/Years of experience should be counted where the CNA has worked as a CNA and performing CNA duties for at least 1 hour during the month.

Q12: Do I count month/years of CNA experience differently if the employee is full-time versus part-time?

A: Yes. The Department is providing an option for facilities to pro-rate a qualifying pay-scale for years in which a CNA works part time

- Facilities opting into the pay-scale subsidy for experience may elect to pro-rate annual experience--based increases for part-time CNA employees as follows:
  - Prorated pay-scale increments would be equal to the posted increment for the relevant year times the ratio of the number of hours the part-time CNA employee worked that year divided by the number of hours that would have qualified the employee for full time status (up to a maximum ratio of 1).
  - Pro-rating could only be applied to years of work during their current term of employment.
  - Pro-rating, if elected, is to be applied to each calendar year independently on an annual cycle coincident with an employee’s work anniversary. The resulting experience wage increments -- pro-rated or not -- would accumulate additively over an employee’s tenure with a facility.
  - All CNAs with at least one pro-rated year of experience must receive at least the wage increment corresponding to six years of experience under their employer’s pay-scale by the time they reach their 8th work anniversary with that employer, regardless of part-time or full-time status during those 8 years.

- Facilities would count prior CNA work experience in the same way as for full-time employees, and as currently described in the template’s instructions: giving credit for experience in any month in which the CNA worked at least an hour.

- Beginning with the templates submitted in advance of the October-December 2022 quarter, the Department will revise the template to include facility designation of its election to pro-rate part-time workers’ experience, to identify workers considered (and paid) as part-time and, if necessary, to account separately for work experience accumulated after 12/31/2020.
  - Based on the method for counting prior employment experience, the pay-scale subsidies for the July-September 2022 quarter would not be different for facilities, and therefore there is no need for facilities to distinguish part-time from full-time employees to calculate initial payments beginning with July 1 or August 1 implementation.

- Facilities opting to pro-rate each year of experience for part-time CNA employees must post that election for their employees, beginning with the quarter starting October 1, 2022.

- As a reminder, the pay-scale only applies to employees.

Q13: Is the CNA incentive payment program a one-time payment? Or is this a permanent program?
A: The CNA experience and promotion incentive payment programs are permanent programs. They are optional for providers to enroll and participate in.

Q14: Do I have to post each individual’s CNA wage to qualify?

A: No, individual CNA wages do not need to be publicly posted. Organizations must simply publish and display the CNA Experience and Promotion pay scales at the site of work, in a prominent and accessible place where it can easily be seen by workers and in a manner and location similar to that of Federal workplace posters, and in such a way that CNAs could reasonably apply the posted scale to their own wages and circumstance.

Q15: Who do I contact if I have issues with accessing information from the SharePoint site:

A: Please contact the Department at HFS.LTC@Illinois.gov for questions relating to the SharePoint site.