

MEMORANDUM  
August 10, 2011

TO: State Long-Term Care Ombudsmen

FROM: Louise Ryan, Aging Program Specialist  
HHS/Administration on Aging

RE: CLARIFICATION ON THE DEFINITION OF "FACILITY COVERAGE" FOR NORS REPORTING

During the past several years there has been a variety of interpretations of "facility coverage." This memo provides a clarification as to the definition of "facility coverage." AoA interprets "facility coverage" to mean that a facility received regular access/coverage only when an ombudsman made at least one visit per calendar quarter.

As a reminder, the National Ombudsman Reporting System (NORS) instructions (at p. 10) state:

***Facility Coverage***

Document the number of facilities (unduplicated count) covered on a *regular basis*, not in response to a complaint, by paid and volunteer Ombudsmen. ***Regular basis means no less frequently than quarterly.*** Note that the information requested is the unduplicated number of facilities visited, not the number of visits. If there is no visitation program, type N.A.

For the complete NORS instructions please see:

[http://www.aoa.gov/AoARoot/AoA\\_Programs/Elder\\_Rights/Ombudsman/NORS.aspx](http://www.aoa.gov/AoARoot/AoA_Programs/Elder_Rights/Ombudsman/NORS.aspx).

After reviewing the history and completing an internal AoA review, it was determined that the NORS "facility coverage" instruction of "no less frequently than quarterly" is best interpreted as, at a minimum, **one visit per calendar quarter.** We have reviewed this interpretation with the National Association of State Long-Term Care Ombudsman Programs (NASOP) representatives during a conference call on July 21, 2011. Many (if not most) states continue to report using this understanding of the NORS instructions.

We at AoA recognize that this may impact some state reports in the next reporting year and some of you will have met the intent of providing routine access but not having it count as "facility coverage" if one visit was missed in a particular calendar quarter. There is certainly room for debate about the meaning of "routine access" and it is likely we will continue to have a discussion of this issue in the future.

This clarification has been communicated with Harmony Software and they have indicated their plans to adjust Ombudsmanager reports accordingly. If your state uses another software program please work with your software developer to ensure that your state's FY 2011 report is consistent with this clarification.

If you have any questions please call or e-mail me. Thank you.