



# The National **Long-Term Care** **Ombudsman** Resource Center

## **Coding Complaints**

Webinar September 29, 2011

# **NORS TRAINING**

# **PART II**

# PURPOSE of TRAINING

- Improve consistency in NORS reporting
- Provide clarifying information on Coding Complaints by:
  - Reviewing the Basic Principles,
  - Reviewing the major Complaint Code Categories,
  - Answering the Quiz coding scenarios,
  - Answering questions related to the Quiz scenarios and answers, and
  - Responding to other questions and examples.

# Initial Comments on Coding

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**Working to Improve NORS Consistency**

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# Coding Complaints

## Basic Principles

- 1 Complaint = 1 Complaint Code
- A – M: complaints against the facility
- N-Q: complaints not against the facility
  - N – O: complaints against Licensing and Certification or Medicaid
  - P: complaints against/involving individuals ≠ facility managers/staff or Medicaid
  - Q: complaints about services in other settings or by outside providers

# Coding Complaints: Basic Principles

## Coding Abuse and Neglect

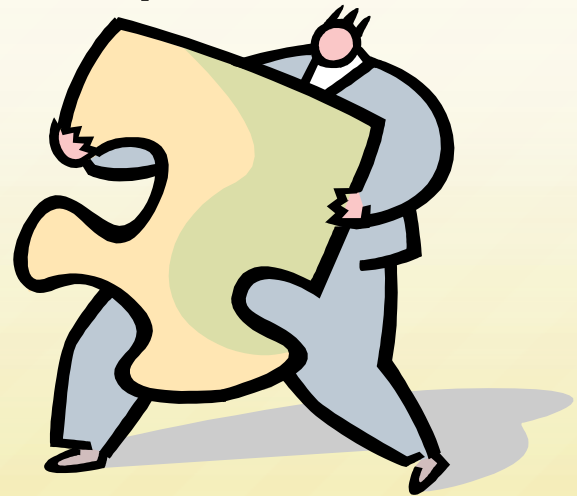
- Use categories in Group A [Abuse, Gross Neglect, Exploitation] only for serious complaints of **willful** mistreatment of residents by facility staff, management, other residents etc.
- Use P.117 and P.121 for complaints of abuse, neglect, exploitation by family members, friends and others whose actions the facility could not reasonably be expected to oversee or regulate.
- For **all** categories in Part A, use the definitions in the Older Americans Act.

# Coding Abuse and Neglect continued

- Use NORS code for allegation of abuse or other complaint if the complaint is made to the LTCO and requires LTCO involvement, action and resolution.
- If the ombudsman and another agency are both actively involved in complaint investigation and resolution, it can be counted an ombudsman case.

# Complaint Code Categories

- An overview of each major category
- Your Key Words index
- Ask, What is the primary element of the complaint? to quickly identify the best category.



# **A: Abuse, Gross Neglect, Exploitation**



Previously covered with the  
Basic Principles.



## **B. Access to Information by Resident or Resident's Representative**

- Access to information or assistance made by or on behalf of the resident or the resident's representative.
- Use B.9 if the ombudsman is denied access in response to a complaint.
- Categories B.14, D.29, and M.96 all involve communication/language barriers and yet are different.
  - Use B.14 if information regarding rights, medical condition, benefits, services, etc. is not communicated in an understandable language.

## **C. Admission, Transfer, Discharge, Eviction**

- Complaints involving placement, within or outside of the facility.
- If resident requests assistance in transferring to another facility and there is no stated problem (complaint), record as information and assistance (consultation) to individuals.
- If a resident requests assistance in moving out of the facility but there are no feasible alternative options, record as P.128 "Request for less restrictive placement," since the problem is a lack of care alternatives within the long-term care system.

## **D. Autonomy, Choice, Preference, Exercise of Rights, Privacy**

- Complaint involving the resident's right, as stated in the category.
  - If it is a related problem, but not one specific to this heading, use a different category.
    - For example, if the resident is permitted to choose her personal physician but that physician is unavailable, use P.125.
- Note that D.29, B.14 and M.96 all involve communication/language barriers and yet are different.
  - Use D.29 if the resident has a communication or language barrier.
  - Use M.96 if staff have the communication or language barrier.

## **E. Financial, Property, except Financial Exploitation**

- Complaints involving non-criminal mismanagement or careless with residents' funds and property or billing problems.
- Use A.4 for complaints involving willful financial exploitation, including, but not limited to, criminal activity.

## F. Care

- Complaints involving negligence, lack of attention and poor quality in the care of residents.
- If the care situation is so poor that the resident is in a condition of overall neglect which is threatening to health and/or life, use A.5, “gross neglect.”

# G. Rehabilitation or Maintenance of Function

- Complaints involving failure to provide needed rehabilitation or services necessary to maintain the expected level of function.



# H. Restraints, Chemical and Physical

- Complaint involving the use of physical or chemical restraint.



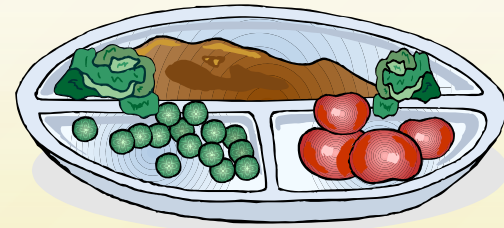
# **I. Activities & Social Services**

- Complaints involving social services for residents and social interaction of residents.
- Note that transportation is included in category I.65 because community interaction is sometimes (not always) dependent upon transportation.



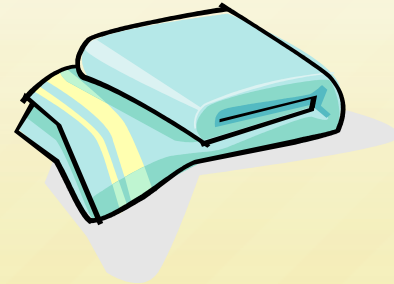
# J. Dietary

- Complaints involving food and fluid intake.
- Use the appropriate category under A (A.1 or A.5) for willful cases of food deprivation.



# K. Environment/Safety

- Complaints involving the physical environment of the facility and resident's space.



# L. Policies, Procedures, Attitudes, Resources

- Acts of commission or omission by facility managers, operators or owners in areas other than staffing or specific problems included in previous sections.



## M. Staffing

- Complaints involving staff unavailability, training, turnover, and supervision.



# Complaints Not Against Facility

Complaints involving decisions, policies, actions or inactions by the state agencies which license facilities and certify them for participation in Medicaid and Medicare.

- N. Certification/Licensing Agency
- O. State Medicaid Agency
- P. System/Others
  - Complaints against or involving individuals who are not managers/staff of facilities or of the State's licensing and certification or Medicaid agency.

# Complaints Not Against Facility, continued

## Q. Services in settings Other Than LTC Facilities or by Outside Provider

- Complaints accepted and acted upon by the ombudsman involving individuals living in private residences, hospitals or in hospice care, and congregate and/or shared housing not providing personal care. Also use for services in a facility provided by an outside provider.

# QUIZ Section A

Question #, Answer

1 A 4

2 A 1

3 A 6

4 A 5

5 A 3

6 A 2

# QUIZ Section B

- Question #, Answer
  1. B 9
  2. B 14
  3. B 11
  4. B 8
  5. B 13
  6. B 10
  7. B 12



# QUIZ Section C

- Question #, Answer
  1. C 22
  2. C 21
  3. C 18
  4. C 17
  5. C 20
  6. C 19
  7. C 16

# QUIZ Section D

- Question #, Answer

1. D 29
2. D 34
3. D 32
4. D 26
5. D 28
6. D 25
7. D 30
8. D 31
9. D 27
10. D 33
11. D 24

# QUIZ Section E

- Question #, Answer
  1. E 37
  2. E 38
  3. E 36

# QUIZ Section F

- Question #, Answer

1. F 47
2. F 45
3. F 42
4. F 40
5. F 41
6. F 48
7. F 44
8. F 50
9. F 46
10. F 43
11. F 51
12. F 49

# QUIZ Section G

- Question #, Answer

1. G 59

2. G 55

3. G 57

4. G 58

5. G 56

6. G 53

7. G 54

# QUIZ Section H

- Question #, Answer
  1. H 62
  2. H 61

# QUIZ Section I

Question #, Answer

1. I 65
2. I 64
3. I 67
4. I 66

# QUIZ Section J

- Question #, Answer

1. J 69

2. J 73

3. J 71

4. J 75

5. J 70

6. J 74

7. J 72



# QUIZ Section K

- Question #, Answer

1. K 84
2. K 82
3. K 80
4. K 79
5. K 81
6. K 77
7. K 85
8. K 86
9. K 78
10. K 83

# QUIZ Section L

- Question #, Answer

1. L 92

2. L 87

3. L 90

4. L 89

5. L 93

6. L 91

7. L 94

8. L 88

# QUIZ Section M

- Question #, Answer
  1. M 97
  2. M 96
  3. M 99
  4. M 102
  5. M 100
  6. M 98
  7. M 101

# QUIZ Section N

- Question #, Answer
  1. N 107
  2. N 103
  3. N 109
  4. N 105
  5. N 106
  6. N 104
  7. N 108

# QUIZ Section 0

- Question #, Answer
  1. O 115
  2. O 112
  3. O 111
  4. O 114
  5. O 113

# QUIZ Section P

- Question #, Answer
  1. P 122
  2. P 119
  3. P 117
  4. P 121
  5. P 118
  6. P 120
  7. P 127
  8. P 123
  9. P 124
  10. P 128
  11. P 126
  12. P 125

# QUIZ Section Q

- Question #, Answer
  1. Q 130
  2. Q 132
  3. Q 129
  4. Q 131

# QUESTIONS?





# SUMMARY

1 Complaint = 1 Code



Consider:

- Is the complaint against the facility?
- What code best fits the problem?

Need more clarity related to coding?

- Contact WINC, Shelley Hitt, Chair

(303) 722-0300 ext.508 or 1-800-288-1376

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# **NORS Training Parts III & IV**

Part III: November 10, 2011

Part IV: January 2012

Watch for registration announcements.



# The National **Long-Term Care** **Ombudsman** Resource Center

The National Long-Term Care  
Ombudsman Resource Center (NORC)

[www.ltcombudsman.org](http://www.ltcombudsman.org)

The National Consumer Voice for Quality Long-Term Care  
(formerly NCCNHR)

<http://www.theconsumervoice.org/>

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