



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

**THANKS FOR JOINING THE WEBINAR**

**WE WILL BEGIN IN A FEW MINUTES**



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

## **LTCOP RULE: SUPPORTING PERSON-CENTERED ADVOCACY- COMPLAINT INVESTIGATIONS AND ABUSE REPORTING**

*The LTCOP Rule & Ombudsman Program Representatives:  
Advocacy, Training, and Program Management  
(Part I of 2 Webinars)*

March 29, 2017

# Poll Questions

1. Are you located:

In the state Ombudsman office

In a local Ombudsman entity

Not an Ombudsman

2. Do you provide training for other representatives (staff and/or volunteers)?

Yes

No

3. I've been an Ombudsman program representative for:

More than 10 years

More than 5 years to 10 years

2 to 5 years

Less than 2 years

Not applicable

# Objectives of today's webinar

- Understand the complaint process responsibilities as outlined in the LTCOP Rule
- Remain focused on the primary role and duties of the Ombudsman program:
  - to investigate and resolve complaints, whether on an individual or systemic level,
  - obtain resident consent for ombudsman action,
  - know when and how to disclose information, and
  - remember that the goal is to resolve complaints to the resident's satisfaction.
- Stay steadfast to the goal of resolving complaints to the resident's satisfaction



# LTC Ombudsman Program Rule: Supporting Person-Centered Advocacy - Complaint Investigations and Abuse Reporting

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ACL/Office of LTC Ombudsman Programs

March 29, 2017



# Administration for Community Living

(includes Administration on Aging)

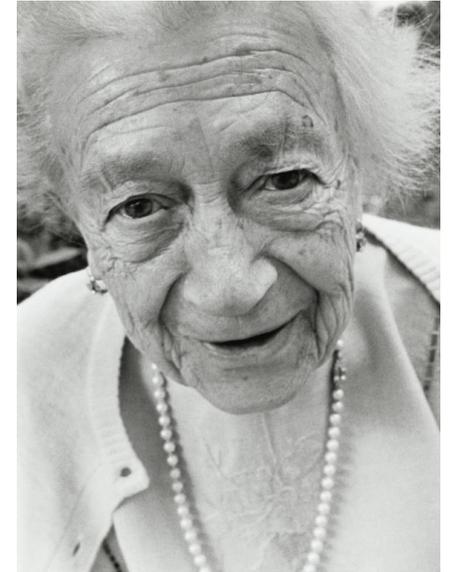


## **Mission:**

Maximize the independence, well-being, and health of older adults, people with disabilities, and their families and caregivers.

“Our nation has been conducting investigations, passing new laws and issuing new regulations relative to nursing homes . . . .

If the laws and regulations are not being applied to [the individual], they might just as well not have been passed or issued.”



- *U.S. Commissioner on Aging Arthur S. Flemming, 1976*

# LTCOP role as complaint investigator

- Trusted, person-centered problem solver
- Confidential in communications and observations
- Credible source of information
- Conflict free
- A resident might say you are a ...
  - A person who helps me; and
  - “As I learned, residents do have rights. Your ombudsman can empower you, so that you can exercise those rights.”
  - “If (the ombudsman) was not there I don’t think I would be here”

Resident/complainant:

“If I have a complaint about \_\_\_\_ agency/service, do I trust the Ombudsman program to investigate and resolve my complaint?”



# Complaint processing

## OAA law requires:

The Ombudsman and/or representatives of the Office:



Identify, investigate, and resolve complaints that –

- Are made by, or on behalf of, residents; and
- Relate to action, inaction, or decisions, that may adversely affect the health, safety, welfare, or rights of the residents, of
  - Providers of LTC services,
  - Public agencies, or
  - Health and social service agencies.

# Complaint processing

## Rule clarifications:

- Purpose of complaint resolution: person-centered problem-solving
- Ombudsman program role related to abuse, neglect or exploitation complaints
- Complaints where residents are unable to communicate informed consent
- Personally witnessing abuse
  - Relevant rule sections: provisions related to representatives of the Office (45 CFR 1324.19)

# Complaint processing: person-centered approach

***Person-centered*** complaint processing approach--the Ombudsman or representative of the Office shall:

- Support and maximize resident participation;
- Offer privacy;
- Discuss the complaint with the resident (and/or resident's representative) in order to:
  - Determine the perspective of the resident;
  - Request informed consent in order to investigate the complaint;
  - Determine the wishes of the resident with respect to resolution of the complaint, including:
    - whether the allegations are to be reported
    - disclosure of information to the facility and/or appropriate agencies.
- Advise the resident of his/her rights;
- Work with the resident to develop a plan of action for resolution of the complaint;
- Investigate to determine whether the complaint can be verified; and
- Determine whether the complaint is resolved to the resident's satisfaction.

# Complaint processing: abuse complaints

Rule clarifies Ombudsman program responsibility with respect to abuse complaints:

- As advocate and problem-solver for abuse survivor, not to substantiate (or, prove whether suspected abuse occurred)

Historically there has been variation among states in handling LTC facility abuse complaints:

- Most common:
  - APS and/or licensing/survey agency are state's official investigator;
  - LTC Ombudsman program serves as resident-centered advocate and problem-resolver
- \*A few states: LTC Ombudsman program is the official investigator of abuse complaints
- \*A few states: LTC Ombudsman program refers all abuse allegations to APS and/or licensing survey

# Complaint processing: serving residents who can't consent

- Ombudsman program can work with appropriate resident representative if resident unable to communicate consent
  - Must ascertain the extent of resident representative's authority (e.g., guardian, power of attorney)
- Ombudsman program's authority to work to resolve complaint (and disclose relevant information) where the resident is unable to communicate informed consent, and has no resident representative available to do so. The representative of the Office:
  - works to resolve the complaint in order to protect the resident's health, safety, welfare and rights
  - determines whether the complaint was resolved to the satisfaction of the complainant.

45 CFR 1324.19(b)(2)

# Complaint Processing: disclosure/sharing information with other agencies

- Ombudsman program may provide information to other agency if adhere to disclosure requirements.
- If resident (or resident representative) communicates goal:
  - for regulatory, protective services, or law enforcement action – then the Ombudsman program shall assist the resident in contacting the appropriate agency and/or disclosing information.
  - that can be served by disclosing information to a facility representative or referral to other entity, then the Ombudsman program may assist the resident with contact, provide information regarding contact and/or disclose information.
- Ombudsman program shall not report suspected abuse when a resident (or resident representative) has not communicated informed consent (exceptions in (b)(5)-(7))

# Complaint Processing: disclosure/sharing information with other agencies

The exceptions to no disclosure:

Ombudsman program MAY disclose resident-identifying information under some circumstances:

- No one available to communicate consent
    - or resident representative has taken action to harm resident;
  - Reasonable cause to believe that an action may adversely affect the resident's health, safety, welfare, or rights;
  - No evidence that resident would not wish a referral;
  - Reasonable cause to believe a referral is in residents' best interest;
- AND
- Ombudsman approval (or otherwise follows Office policies)

# Complaint processing: personally witnessing abuse

Ombudsman program representatives shall report abuse under some circumstances:

- Ombudsman or representative of the Office “personally witnesses” suspected abuse;
  - No one available to communicate consent
    - or resident representative has taken action to harm resident;
  - No evidence that resident would not wish disclosure;
  - Reasonable cause to believe disclosure is in residents’ best interest;
- AND
- Ombudsman approval (or otherwise follows Office policies).

45 CFR 1324.19(b)(8)

# Some Key Distinctions between APS and LTCO

	LTC Ombudsman	Adult Protective Services
<b>Mission</b>	<ul style="list-style-type: none"> <li>-Resolve complaints to satisfaction of the resident</li> <li>-Improve the quality of care and quality of life of residents</li> </ul>	<ul style="list-style-type: none"> <li>-Stop abuse, neglect and exploitation;</li> <li>-Protect the victim</li> </ul>
<b>Role of individual self-determination</b>	Resident-directed advocate; represents resident interests	Stress victim self-determination, but protect victim even if not consistent with individual wishes
<b>Abuse, neglect, exploitation</b>	<ul style="list-style-type: none"> <li>-Respond to any resident-related complaint (ACL provides 119 complaint types)</li> <li>-8% abuse/neglect/exploitation, 2014</li> </ul>	Respond to reports of abuse, neglect, exploitation (and self-neglect in some states)
<b>Purpose of “investigation”</b>	<p>RESOLVE:</p> <ul style="list-style-type: none"> <li>-<u>Not</u> the official finder of fact; do not “substantiate” abuse</li> <li>-“Verify” to determine whether sufficient information to continue toward resolution</li> <li>-Gather information in order to resolve the problem, not for any legal proceeding</li> </ul>	<p>DETERMINE:</p> <ul style="list-style-type: none"> <li>-Official finder of fact</li> <li>-Determine whether reported allegation occurred</li> <li>-Many states use the term “substantiate”</li> <li>-If determined, case often referred to law enforcement for prosecution</li> </ul>
<b>Systems-level advocacy</b>	Older Americans Act requires.	Not a responsibility (may be prohibited by state law)

# ACL's Frequently Asked Questions (FAQ's)

**Question:** Does the Rule *prohibit* an Ombudsman or representatives of the Office from being mandated reporters under state abuse reporting laws?

**Answer:** Yes. Both the Older Americans Act and the Rule prohibit reporting of resident-identifying information without the resident's consent. By logical extension, this precludes mandated reporting of suspected abuse which discloses such information. Through the strict disclosure limitations within the Act, Congress has indicated its intent for the Ombudsman program to be a safe, person-centered place for residents to bring their concerns. Residents can be assured that their information will not be disclosed without their consent, the consent of the resident representative, or court order. (OAA Section 712(d)(2)(B)). Despite numerous Congressional reauthorizations of the Act, Congress has never provided an exception for abuse reporting in the Act.

# ACL's Frequently Asked Questions

**Question:** Does the Rule prohibit Ombudsman programs from investigating abuse complaints?

**Answer:** No. Both the Older Americans Act and the Rule require the Ombudsman program to “identify, investigate, and resolve complaints that ... relate to action, inaction or decisions that may adversely affect the health, safety, welfare, or rights of the residents.” Abuse, neglect and exploitation of residents are among the complaints that fall within this purview.

However, Ombudsman programs are not the official entity to substantiate (or, finder of fact) for abuse complaints on behalf of the state or other governmental entity. Ombudsman programs represent the interests of residents, rather than the interests of the state or other governmental entity. (See OAA Section 712(a)(3)(E), (a)(5)(B)(iv); 45 CFR 1324.13(a)(5), 1324.19(a)(4)).

Resident/complainant:

“If I have a complaint about \_\_\_\_ agency/service, do I trust the Ombudsman program to investigate and resolve my complaint?”



# Resources

- Long-Term Care Ombudsman Rule:
  - [http://www.ecfr.gov/cgi-bin/text-idx?SID=c548b510671902a6a8b4fa7497999c67&mc=true&tpl=/ecfrbrowse/TITLE45/45cfr1324\\_main\\_02.tpl](http://www.ecfr.gov/cgi-bin/text-idx?SID=c548b510671902a6a8b4fa7497999c67&mc=true&tpl=/ecfrbrowse/TITLE45/45cfr1324_main_02.tpl)
- ACL's Frequently Asked Questions:
  - [https://aoa.acl.gov/AoA\\_Programs/OAA/resources/Faqs.aspx#Ombudsman](https://aoa.acl.gov/AoA_Programs/OAA/resources/Faqs.aspx#Ombudsman)



# LTCOP Rule requirements regarding complaint investigations

1. Establishment of policies and procedures related to standards of promptness in responding to complaints
2. Access to records necessary to investigate complaints
3. Disclosure of identifying information of a resident



# Rule Issue Brief

## *Complaint Processing and Abuse Reporting*

### Implementation, Key Points to Consider

### Policies and Procedures

### Complaint Processing – Representatives of the Office

[http://ltcombudsman.org/uploads/files/library/LTCOP\\_Rule\\_Issue\\_Brief\\_Complaint\\_P\\_and\\_Inves\\_Abuse\\_FINAL\\_\(1\)\\_renumbered.pdf](http://ltcombudsman.org/uploads/files/library/LTCOP_Rule_Issue_Brief_Complaint_P_and_Inves_Abuse_FINAL_(1)_renumbered.pdf)

## LTCOP Rule Issue Brief



### STATE LTC OMBUDMAN PROGRAM COMPLAINT PROCESSING AND ABUSE REPORTING

The purpose of this document is to assist states with complaint processing, including access, resident participation, abuse, and disclosure as required by the State Long-Term Care Ombudsman Programs Final Rule.<sup>1</sup>

This brief consists of the following sections pertinent to the topic: Implementation, Key Points to Consider, and a List of Authorities.

#### Implementation, Key Points to Consider

The Rule contains provisions related to numerous aspects of the complaint processing responsibilities of the Office. There are requirements for the establishment of policies and procedures related to standards of promptness in responding to complaints, access to records necessary to investigate complaints, and the disclosure of identifying information of a resident. The Rule clarifies the responsibilities of representatives of the Office<sup>2</sup> regarding complaint processing on behalf of an individual resident, multiple residents, or all residents of a facility. Abuse reporting and responding to complaints of abuse, neglect and exploitation are included in the provisions related to regulations for disclosure of Ombudsman program information and complaint processing.

The following list includes key elements of the requirements to assist states in assessing and developing policies and procedures and in providing training and guidance to representatives of the Office related to their responsibilities with complaint processing.

\*Note: Effective July 1, 2016 the Administration for Community Living (ACL) consolidated their regulations into one subchapter resulting in the LTCOP rule number changing from 45 CFR 1327 to 45 CFR 1324. We are in the process of revising our resources to reflect that change. Information about the consolidation is available [here](#).

#### Policies and Procedures

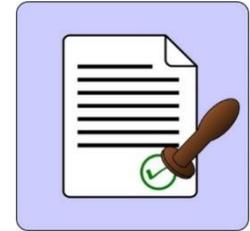
#### 1. Assess the policies and procedures of the Office of the State Long-Term Care Ombudsman (the Office).

- Are there standards for prompt response to complaints?
- Do the standards:
  - Prioritize abuse, neglect, and exploitation and time-sensitive complaints?
  - Consider the severity of the risk to the resident?
  - Consider the imminence of the threat of harm to the resident?
  - Consider the opportunity for mitigating harm to the resident through Ombudsman services?

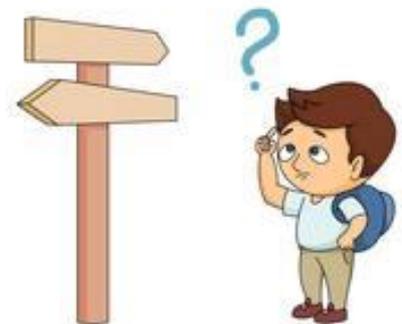
#### 2. Are there procedures for access to records related to complaint processing? Do they address the following elements?

- Access to review records relating to a resident with informed consent, communicated and documented in accordance with established procedures?

# Policies and Procedures

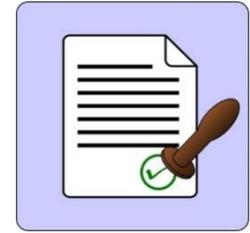


Do the policies/procedures, training, and actions of representatives of the Office clearly reflect that the Ombudsman program serves the residents of a long-term care facility?





- Is resident participation maximized regardless of the source of the complaint, including when the source is the Ombudsman program representative? [1324.19(b)(2)]
- Determine the perspective of the resident;
  - Request the resident to communicate informed consent for the LTCO to investigate,
  - Determine the wishes of the resident regarding resolution of the complaint including
    - Whether the allegations are to be reported and
    - If so, whether the LTCO may disclose resident identifying information or other relevant information to the facility and/or appropriate agencies. [1324.19(b)(2)(ii)]



- Resident satisfaction and protecting the health, welfare, and rights of the resident are the purposes of the investigation and resolution. [1324.19(b)(1)]
- When the resident is unable to communicate informed consent or perspective on the extent to which the matter has been satisfactorily resolved, the LTCOP relies on the communication of informed consent and/or perspective regarding the resolution of the complaint of a resident representative so long as the LTCOP has no reasonable cause to believe that the resident representative is not acting in the best interests of the residents.\* [1324.19(b)(5)]

*\*For brevity in this presentation we use “LTCOP” to mean Ombudsman or representative of the Office.*

# Poll Question

- Has your program changed any practices related to the complaint handling process in response to the LTCOP Rule?
  - Yes
  - No

# COMPLAINT PROCESSING TRAINING TOOLKIT

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# Sample Training Agenda

45 minutes:

Resident-Directed Advocacy  
Authority and Guidelines

20 minutes:

Case Application and Discussion

15 minutes:

Abuse Reporting

20 minutes:

Case Study

5 minutes:

Wrap up

# Case Study

You receive a call from Ginger Smart whose mother, Mrs. Wilder lives in Hometown Facility. Ginger says her mother never has enough to eat and wears several layers of clothes because her room is freezing cold. Ginger wants you to intervene because her mother thinks Ginger is too pushy and is trying to run her life. When you visit Mrs. Wilder, she says things are fine. She has never eaten large meals—she’s a “grazer,” eating snacks during the day.

Her roommate joins in the conversation, supporting what Mrs. Wilder tells you. Mrs. Wilder looks healthy to you. The room is a little cool but Mrs. Wilder says she likes wearing a sweater.

When you follow-up with Ms. Smart, she gets angry and accuses you of being duped by “an old lady with Alzheimer’s.” After all, Ginger is the power of attorney for her mother and the responsible party! How do you respond? Choose one of the following.

- A. Say you’ll make another visit and apologize for not getting the whole story.
- B. Ask Ginger to sign a consent form for you to intervene on behalf of Mrs. Wilder.
- C. Inform Ginger about residents’ ability to choose, suggest ways for her to document her observations to resolve the problems, and leave the door open for her to call you at another time.
- D. Tell Ginger that you work on behalf of residents and that Mrs. Wilder has directed you not to act.

**QUESTIONS?**

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# RESOURCES

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# Technical Assistance Guide

## *Responding to Allegations of Abuse: Role and Responsibilities of LTCO*

Overview

Key Points

AoA Statements

What Can An Ombudsman

Do?

LTCO Advocacy Strategies

Resources

[http://ltcombudsman.org/uploads/files/issues/responding-to-allegations-of-abuse\\_0.pdf](http://ltcombudsman.org/uploads/files/issues/responding-to-allegations-of-abuse_0.pdf)

**TA GUIDE:**  
TECHNICAL ASSISTANCE FOR LTCO PRACTICE

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The National Long-Term Care Ombudsman Resource Center

**RESPONDING TO ALLEGATIONS OF ABUSE:  
ROLE AND RESPONSIBILITIES OF LONG-TERM CARE OMBUDSMEN**

**OVERVIEW**

Provisions in the Older Americans Act (OAA) state that Long-Term Care Ombudsmen (LTCO) shall "identify, investigate and resolve complaints" regarding "action, inaction, or decisions that may adversely affect the health, safety, welfare or rights of the residents" made by, or on behalf of, residents.<sup>1</sup> Complaints may include, but are not limited to, allegations of abuse, gross neglect and exploitation. Long-Term Care Ombudsmen are resident-centered advocates, directed by resident goals for complaint resolution and federal disclosure requirements; therefore, the LTCO role in investigating allegations of abuse is unique and differs from other entities such as, adult protective services and state licensing and certification agencies. These disclosure requirements mean that information shared with or gathered by the LTCO is confidential unless consent is obtained as described below in the OAA provisions. Furthermore, LTCO programs receive complaints from a variety of individuals (e.g. residents, family members, facility staff, representatives of other agencies), but due to strict requirements in the OAA, LTCO may not disclose the identity of the resident or complainant without receiving permission from the resident or complainant (or their legal representative).

The purpose of this guide is to discuss how Ombudsmen can respond to allegations and observations of abuse, neglect and exploitation when the resident does not or cannot give consent to pursue the complaint. In the absence of resident consent, ombudsmen can take other actions to adhere to disclosure requirements and work to ensure the resident receives quality care and is protected from harm. This guide reviews the federal requirements regarding complaint investigations and disclosure, highlights statements from the Administration on Aging, and provides advocacy strategies and additional resources.<sup>2</sup>

Note: A few State Long-Term Care Ombudsman Programs (LTCOPs) receive allegations of abuse and investigate to substantiate the complaint (gather evidence to prove abuse occurred), but the primary focus of this resource is to discuss the role of the LTCOP in response to complaints according to the Older Americans Act and Administration on Aging technical assistance to states, not compare individual state LTCOP responsibilities.

**KEY POINTS**

What is abuse?  
Since states have different definitions for abuse, neglect and exploitation, this guide will use the definitions provided in the National Ombudsman Reporting System (NORS) definitions of complaint codes and unless otherwise stated, we use the term "abuse" to include any willful act of "abuse, gross neglect and exploitation" throughout this resource.<sup>3</sup>

Older Americans Act Provisions  
Under federal law, "the files and records" of the long-term care ombudsman program "may be disclosed only at the discretion of the [State] Ombudsman (or the person designated by the Ombudsman to disclose files and records)."<sup>4</sup>

<sup>1</sup> Older Americans Act of 1965, Section 712 (a)(2)(B)  
<sup>2</sup> Examples for statewide LTCOPs are available in a supplemental resource titled, "Responding to Allegations of Abuse: Role and Responsibilities for Long-Term Care Ombudsmen- State Long-Term Care Ombudsman Program Policies, Procedures and Practices."  
<sup>3</sup> Administration on Aging, Administration for Community Living, Long-Term Care Ombudsman Program Complaint Codes, OMB, NO. 0895-0005, Expiration Date: 03/31/2015. [http://www.aos.gov/about/act/Programs/Title\\_Right/Ombudsmen/AboutComplaint\\_Codes/0895-0005](http://www.aos.gov/about/act/Programs/Title_Right/Ombudsmen/AboutComplaint_Codes/0895-0005)  
<sup>4</sup>

- **Older Americans Act**

- Section 712 State Long-Term Care Ombudsman Program. (a) (3)
- (5)(b) PROCEDURES FOR ACCESS

- **LTCOP Rule**

- Final Rule in Federal Register  
<http://ltcombudsman.org/uploads/files/library/2015-01914.pdf>
- LTCOP Final Rule NORC webpage-  
[http://ltcombudsman.org/library/fed\\_laws/ltcop-final-rule](http://ltcombudsman.org/library/fed_laws/ltcop-final-rule)
- LTCOP Rule Issue Brief: Complaint Processing and Abuse Reporting  
[http://ltcombudsman.org/uploads/files/library/LTCOP\\_Rule\\_Issue\\_Brief\\_Complaint\\_P\\_and\\_Inves\\_Abuse\\_FINAL\\_\(1\)\\_renumbered.pdf](http://ltcombudsman.org/uploads/files/library/LTCOP_Rule_Issue_Brief_Complaint_P_and_Inves_Abuse_FINAL_(1)_renumbered.pdf)

- ***Equipping Long-Term Care Ombudsmen for Effective Advocacy: A Basic Curriculum***

[http://ltcombudsman.org/omb\\_support/training/norc-curriculum](http://ltcombudsman.org/omb_support/training/norc-curriculum)

- Residents' Rights Module: pages 5-8
- The Problem-Solving Process: Investigation- *Teaching Notes* (begin on pages 17 - 20; 33 -36 Mary's Analysis; and Appendix, Principles for Decision-Making, A14 – 16)  
<http://ltcombudsman.org/uploads/files/support/Local-Investigation-Teaching-Notes.pdf>
- The Problem-Solving Process: Investigation Curriculum Resource Material (focus on pages 6 - 9, 28 – 32)  
<http://ltcombudsman.org/uploads/files/support/Local-Investigation-Curri-cResource-Material.pdf>

- **Long-Term Care Ombudsman Casework: Advocacy and Communication Skills** (Video and Training Materials)

- [http://ltcombudsman.org/omb\\_support/training/training-programs#videos](http://ltcombudsman.org/omb_support/training/training-programs#videos)
  - [Long-Term Care Ombudsman Casework: Advocacy and Communication Skills video](#) (YouTube)
  - [Trainer Guide](#)
  - [Trainee Guide](#)
  - [Trainer Guide](#) - with answers

- Hand in Hand video and the tip sheet

- Video link: <http://www.cms-handinhandtoolkit.info/Index.aspx>
- Tip Sheet link: <http://ltcombudsman.org/uploads/files/issues/hand-in-hand-tips-for-ombudsmen.pdf>
- Link to Quick Tips article:  
[http://wfc2.wiredforchange.com/o/8641/t/0/blastContent.jsp?email\\_blast\\_KEY=45479#quick\\_tips](http://wfc2.wiredforchange.com/o/8641/t/0/blastContent.jsp?email_blast_KEY=45479#quick_tips)

PENNSYLVANIA DEPARTMENT OF AGING



AGING.PA.GOV

*Consumer Voice The new LTCOP Final Rule  
March 29, 2017*

# Things to Consider...

- What was your previous process for abuse reporting or case investigation?
- Why is the Federal Final Rule insisting we handle abuse this way?
- How to develop materials/Who is our audience?
- Challenges and obstacles
- Volunteer implications

# Our previous process...

- In Pennsylvania we have both Adult Protective Services and Older Adult Protective Services that handle abuse.
- We were always consumer directed but if the situation could impact safety and the consumer refused, the ombudsman could become the complainant.

# Why no mandatory reporting?

- Maintain Confidentiality
- Build Rapport
- Enhanced Trust
- Enhanced Credibility

# Abuse Investigation

- When an Ombudsman program receives any complaint (including, but not limited to, an abuse-related complaint), it investigates solely for the purpose of gathering necessary information to resolve the complaint to the resident's satisfaction. It does not investigate in order to officially determine whether any law or regulation has been violated or for purposes of taking official protective, regulatory, or enforcement action. The goal of the investigation is to resolve the complaint to the resident's satisfaction, but not to substantiate whether the abuse or other allegation occurred.

# True False Speed Quiz

- Contestants will use True False Signs to answer
- This is a speed test so go with your first thought
- Clarifications will be provided throughout the presentation
- Let's see how you do...

# Abuse Reporting Basics

- Ombudsman are not mandated reporters
- Review of the Abuse Reporting tip sheet
- Review of the 5 step process to abuse reporting
- Review of the consumer directed approach
- What does all this mean to our day to day practice as ombudsmen?

# 5 Steps to Reporting Abuse

- Receive
- Support
- Empower
- Permission
- Report

# Small Group Exercise

- You will work in small groups to work on the scenarios for abuse reporting
- What obstacles will we face in abuse reporting?
- What strategies might you use to reduce or eliminate obstacles?

# Thank You

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# The LTCOP Rule & Ombudsman Program Representatives: Advocacy, Training, and Program Management

***Reminder***

***Second webinar in this series:***

**April 25, 2017**

**3:00 - 4:15 pm ET**

"LTCOP Rule: Identifying and Addressing  
Individual Conflicts of Interest"

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# The National Long-Term Care Ombudsman Resource Center

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

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

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