LONG-TERM CARE OMBUDSMAN PROGRAMS
Reporting Requirements for CARES Act funding

May 4, 2020

To support data consistency and minimize burden of meeting the programmatic reporting requirements of the CARES Act, ACL instructs state Ombudsman programs to continue to use the National Ombudsman Reporting System (NORS) codes, OMB Control Number 0985-0005, Tables 1-3 and to report in the Older Americans Act Performance System (OAAPS) as required in January 2021.

ACL's Office of LTC Ombudsman Programs and the National Ombudsman Resource Center (NORC) will provide state Ombudsmen with additional training on how to provide COVID-19-specific narratives and other data within OAAPS. We do not anticipate any major modifications to the OAAPS.

In light of restrictions on visits, it is very important that Ombudsman programs translate their remote work into NORS codes. The following provides examples of how to document Ombudsman program activities that may now be virtual.

Cases and Complaints:

- Continue to document cases and complaints in accordance with NORS Tables 1 and 2. The Ombudsman program may be the complainant and seek to resolve complaints regarding COVID-19-specific problems such as: access to residents or their representative; contact information; care; transfers of residents; and similar problems. Please refer to Frequently Asked Questions of March 10 https://acl.gov/sites/default/files/COVID19/C19FAQ-LTCOP_2020-03-10.pdf for more information on complaint handling.

Program Activities:

- Resident & Family Councils, Community Education:
  - Holding weekly Facebook Live meetings or other virtual meetings with residents, their families, or the community is an example of participation in resident/family councils or community education. Document this in the appropriate category of resident or family council participation or community education. Count each meeting as one instance.

- Facility survey participation:
  - Document communication with surveyors, if it is about a survey or complaint inspection at a specific facility. Count each communication as one instance.
    - **Do not count** routine meetings and communications about general COVID-19 response as a facility survey activity.

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ACL Administration for Community Living

- Information & Assistance:
    - o Document phone calls to introduce yourself and the program and responses to questions through e-mail or other virtual methods as information and assistance. Document in the appropriate category of either individual or facility staff. Document each communication as one instance.

Frequently asked questions about COVID-19-Specific Activities:

- How will the Ombudsman program report information on COVID-19 activities?
    - o States will report COVID-19-specific activities and case examples in the Complaint Examples and Systems Issues narratives (Table 3, Parts A & B).
    - o State Ombudsman programs will provide data analysis that describes the impact of COVID-19 in their program's variance report. ACL also will analyze and have questions about states' variance reports and complaint trends, including trends about COVID-19.

- How do I document all of the interagency meetings that I attend?
    - o ACL does not collect numeric data on the number of meetings that Ombudsman programs participate. You will have an opportunity to provide COVID-19-specific narratives where you can describe these types of meetings and any outcomes.

- Can I document a "virtual visit" as a visit in NORS?
    - o No. There is no substitute for an in-person visit, and in-person visits with residents are a core part of Ombudsman program outreach and advocacy and NORS reinforces this by requesting that Ombudsman programs report all visits. **It is important that Ombudsman programs accurately reflect this decrease to show the impact of the pandemic experienced by residents and the program.** ACL anticipates that there will be a sharp decrease in visits, and that is appropriate, given the circumstances.
    - o However, it is important to document your instances of information and assistance, virtual resident meetings, cases and complaints. Review the [NORS Frequently Asked Questions (FAQs)](#) for more instruction on documenting activities related to COVID-19.

- Funds-Expended Reporting
    - o State Ombudsman programs will report CARES Act funds expended in Table H, Part F, funds expended other federal sources.

Resources:

- For more FAQs on NORS reporting and COVID-19 see https://ltcombudsman.org/omb_support/nors/nors-faqs#documenting
- Training on NORS coding is at https://ltcombudsman.org/omb_support/nors
- Training on the reporting tool, OAAPS is at https://oaaps.acl.gov/app/welcome
- State Ombudsman Data Management Training https://ltcombudsman.org/omb_support/nors/state-ombudsman-nors-training

ACL FAQs

- https://acl.gov/COVID-19
- https://acl.gov/sites/default/files/COVID19/C19FAQ-LTCOP_2020-03-10.pdf
- https://acl.gov/sites/default/files/COVID19/C19FAQ-LTCOP_2020-03-16.pdf