INTRODUCTION TO THE REVISED NATIONAL OMBUDSMAN REPORTING SYSTEM (NORS)

February 5, 2019

Speakers –
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Maria Greene, NORC Consultant
Amity Overall-Laib, NORC Director
Agenda

• NORS background
  • What is NORS?
  • NORS and the Older Americans Act
  • Brief history
• NORS significant changes
• Overview of NORS Tables
• Training outline and dates
• Questions
Poll Question – What is NORS?

Choose the correct answer:

a) Naturally Occurring Retirement System
b) National Ombudsman Resource Service
c) National Ombudsman Reporting System
Poll Question – What is NORS?

The answer is:

a) Naturally Occurring Retirement System
b) National Ombudsman Resource Service
c) National Ombudsman Reporting System
Older Americans Act Requirements*

The State agency shall establish a statewide uniform reporting system to –

• collect and analyze data relating to complaints and conditions in long-term care facilities and to residents for the purpose of identifying and resolving significant problems; and

• submit the data, on a regular basis, to— (A) the agency of the State responsible for licensing or certifying long-term care facilities in the State; (B) other State and Federal entities that the Ombudsman determines to be appropriate; (C) the Assistant Secretary; and (D) the National Ombudsman Resource Center established in section 202(a)(21).

*OAA Section 712 (c) Reporting System
National Ombudsman Reporting System (NORS)

- Data elements that LTC Ombudsmen are required to collect Sec 712(h) (1)-(3)(b)
- Cases, Complaints
- Types of Complaints and outcome (resolution)
- Consultation
- Funds Expended and sources

- Staff FTE
- Numbers of Volunteers and hours
- Activities: Training, non-complaint visits, resident and family councils
- Systems issues & Legal (narrative)
What is Changing?

1. The data collection, NORS, is changing. **NORS is not going away** – it’s just been revised!

2. The data reporting tool (software) that state Ombudsmen use to report their NORS data is changing and with that comes specific technology requirements in order to complete the report.
Why Revise NORS?

To address past criticisms* regarding inconsistencies across states and implement recommendations to:

- increase reliability and accuracy of the data,
- simplify codes and number of data elements,
- streamline reporting by states and
- reduce manual entry to avoid errors in complaint and activity data.

*Assistant Secretary for Planning & Evaluation, Office of Inspector General, State Ombudsman Stakeholder’s via the “Bader Report,” National Association of State Ombudsmen and National Association of Local LTC Ombudsmen.
Revised NORS Goals

Enhance ACL’s ability to understand and report on:

• LTCO program operations,

• experience of long-term care facility residents, and

• changes in long-term supports and services policies, research, and practices.
**Revised NORS Goals**

- **Example:** ACL would be able to analyze resolution by type of complaint:

<table>
<thead>
<tr>
<th>Complaint Category</th>
<th>Complaints</th>
<th>Verified</th>
<th>% Verified</th>
<th>Resolved</th>
<th>% Resolved (verified)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Abuse &amp; Neglect, Exploit</td>
<td>165</td>
<td>57</td>
<td>35%</td>
<td>44</td>
<td>77%</td>
</tr>
<tr>
<td>Transfer/Discharge</td>
<td>373</td>
<td>329</td>
<td>88%</td>
<td>283</td>
<td>86%</td>
</tr>
<tr>
<td>Care</td>
<td>668</td>
<td>564</td>
<td>84%</td>
<td>526</td>
<td>93%</td>
</tr>
</tbody>
</table>
How is NORS Data Used?

- Budget justification
- To inform policy at the federal, state, and local level.
- Respond to media inquiries.

- Consumer Reports – Ombudsman program data show complaints about assisted living have risen 10 percent in recent years (10/2018)
- CNN – sexual assaults in nursing homes cited NORS data (2/2017)
- NPR on inappropriate transfers and evictions (2/2016)
Brief History - Work Involved to Revise NORS

1996 car

NORS Timeline

• 1996 NORS implemented with minor revisions over the years

Recommendations to improve NORS:

• 1999 Office of Inspector General report
• 2002 Bader Foundation report
• 2003 Workgroup to Improve NORS Consistency (WINC)
Brief History – Work Involved to Revise NORS

2019 car

Revised NORS

- “NORS Next” workgroup

- NORC – Revised NORS Training Workgroup

- Pilot testing of Older Americans Act Performance System (OAAPS)
  - AK, CA, KS, LA, MS, MN, OH, SC, NORC and ACL
Poll Question

• Do you provide training to representatives of the Office on using NORS codes and definitions?
  • Yes
  • No
Significant Changes in the Revised NORS
Current and Revised NORS

Instructions and Complaint Codes

Revised NORS Tables

https://ltcombudsman.org/omb_support/nors
https://ltcombudsman.org/omb_support/nors/revised-nors-data-collection
Revised NORS Tables

The revised NORS has three distinct Data Collection Tables.

Table 1 – Case Data Components
Table 2 – Complaint Codes and Definitions
Table 3 – State Program Information
### Table 1 Case Data Components

Each case must contain a complainant, complaint code(s), a setting, verification, resolution, and information regarding whether a complaint was referred to another agency. Case and complaint data reported is only for those cases and complaints which were closed within the fiscal year.

<table>
<thead>
<tr>
<th>Element Number</th>
<th>Data Element</th>
<th>Definition</th>
<th>Quantifier</th>
<th>Type</th>
<th>Codes and Values</th>
<th>Examples and Reporting Tips</th>
</tr>
</thead>
<tbody>
<tr>
<td>CA-01</td>
<td>Case Number</td>
<td>The unique identifier used for each case.</td>
<td>Single</td>
<td>Alpha-numeric</td>
<td>Not Applicable (NA) (not a coded element)</td>
<td>This is auto-created by the state software program.</td>
</tr>
<tr>
<td>CA-02</td>
<td>Date Case Opened</td>
<td>Month, day, and year that the case was opened.</td>
<td>Single</td>
<td>Date</td>
<td>NA (not a coded element)</td>
<td>Each case must have a minimum of one complaint. Each case must have only one case open date. The case opened date must be on or before the case closed date.</td>
</tr>
<tr>
<td>CA-03</td>
<td>Date Case Closed</td>
<td>Month, day, and year that the case was closed.</td>
<td>Single</td>
<td>Date</td>
<td>NA (not a coded element)</td>
<td>The year of case closure must be in the associated reporting period. Each case must have only one case closed date. The case closed date must be on or after the case open date.</td>
</tr>
</tbody>
</table>
Table 1 Highlights

• Case Data Components:
  • Date case & complaint opened and closed
  • Facility or setting
  • Complainant
  • Complaints (one or more)
  • Perpetrator
  • Referral agency
  • Verification
  • Disposition
Table 1 – Case Data Components

Administration for Community Living/Administration on Aging - Office of Long-Term Care Ombudsman Programs

National Ombudsman Reporting System (NORS)  OMB Control Number 0985-0005
Table 1: NORS Parts A, B and C - Case and complaint codes, values and definitions  Expiration Date: 04/30/2021

Table 1: Part A-Case Data Components

Each case must contain a complainant, complaint code (s), a setting, verification, resolution, and information regarding whether a complaint was referred to another agency. Case and complaint data reported is only for those cases and complaints which were closed within the fiscal year.

<table>
<thead>
<tr>
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</tr>
</thead>
<tbody>
<tr>
<td>CA-04</td>
<td>Facility or Setting</td>
<td>Type of facility or setting for the case.</td>
<td>Single</td>
<td>Alpha-numeric Code</td>
<td>01-Nursing Facility 02-Residential Care Community 99-Other setting</td>
<td>Only one setting is allowed for each case. See Part C definitions (Element Number CA-04, Data Elements 01, 02 &amp; 99).</td>
</tr>
<tr>
<td>CA-05</td>
<td>Complainant</td>
<td>Complainant: an individual (i.e., resident, resident representative, family) who requests Ombudsman program complaint investigation services regarding one or more complaints made by, or on behalf of, residents.</td>
<td>Single</td>
<td>Alpha-numeric Code</td>
<td>01. Resident 02. Resident representative, friend, family 03. Ombudsman program 04. Facility staff 05. Representative of other agency or program 06. Concerned person 07. Resident or family council 08. Unknown</td>
<td>Only one complainant per case is allowed. Select the complainant type that best represents the complainant(s) for the case.</td>
</tr>
</tbody>
</table>
Type of Facility or Setting

• Nursing Facility
• Residential Care Community (formerly Board & Care)
• Other Setting (formerly Other)
Referral Agency and Dispositions

• Referral Agency
  • The agency (or agencies) to which a complaint was referred to as part of the Ombudsman program’s plan of action for complaint resolution, i.e. state licensing and certification agency, APS, legal, etc.

• 3 disposition codes:
  • Fully or partially resolved
  • Withdrawn
  • Not resolved
Poll Question

I have opened a new case. The resident is in a board and care facility. Which facility code should be used? Choose the correct answer.

a) 01 Nursing Facility
b) 02 Residential Care Community
c) 03 Other Setting
Poll Question - Answer

I have opened a new case. The resident is in a board and care facility. Which facility code should be used? Choose the correct answer.

a) 01 Nursing Facility
b) 02 Residential Care Community

c) 03 Other Setting
Table 2 – Complaint Codes and Definitions

<table>
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<th>Label</th>
<th>Code</th>
<th>Definition</th>
<th>Examples and Reporting Tips</th>
</tr>
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<tbody>
<tr>
<td>Abuse: physical</td>
<td>A01</td>
<td>The intentional use of physical force that results in acute or chronic illness, bodily injury, physical pain, functional impairment, distress, or death.</td>
<td>Includes hitting, slapping, and pinching, kicking, etc. and/or controlling behavior through corporal punishment.</td>
</tr>
<tr>
<td>Abuse: sexual</td>
<td>A02</td>
<td>Forced and/or unwanted sexual interaction (touching and non-touching acts) of any kind.</td>
<td>Includes, but not limited to unwanted or inappropriate touching, sexual coercion, sexually explicit photographing, and sexual harassment. Sexual harassment includes any form of unwanted sexual attention (e.g., sexual advances, suggestions, requests or threats) that is deemed inappropriate, offensive, intimidating or humiliating. Harassment includes contact and non-contact acts.</td>
</tr>
</tbody>
</table>
Table 2 Highlights

• **59** complaint codes

• Complaint Code Categories A-L
  • Category A: complaints about abuse and you must select a perpetrator
  • Categories B – J: complaints against the facility
  • Category K: complaints against other programs and agencies
  • Category L: complaints against others not associated with the facility

• Crosswalk B: Complaint Codes – Old NORS to Revised NORS
# Table 2 – Complaint Codes and Definitions

**Complaint**: an expression of dissatisfaction or concern brought to, or initiated by, the Ombudsman program which requires Ombudsman program investigation and resolution on behalf of one or more residents of a long-term care facility.

**Abuse, Gross Neglect, Exploitation (Code A)**

Use this section for serious complaints of willful mistreatment of residents by facility staff, resident representative/family/friend, other residents or an outside individual. Indicate who appears to be the cause of the abuse, neglect or exploitation: (1) Facility staff, (2) another resident (3) resident representative, family, friend or (4) other.

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<td></td>
<td></td>
<td>illness, bodily injury, physical pain, functional impairment, distress, or death.</td>
<td>corporal punishment.</td>
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Table 2 – Complaint Codes and Definitions

Complaint: an expression of dissatisfaction or concern brought to, or initiated by, the Ombudsman program which requires Ombudsman program investigation and resolution on behalf of one or more residents of a long-term care facility.

Abuse, Gross Neglect, Exploitation (Code A)

Use this section for serious complaints of willful mistreatment of residents by facility staff, resident representative/family/friend, other residents or an outside individual. Indicate who appears to be the cause of the abuse, neglect or exploitation: (1) Facility staff, (2) another resident (3) resident representative, family, friend or (4) other.

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<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Table 2 – Complaint Data Example

Abuse, Gross Neglect, Exploitation (Code A) – Revised NORS

A01 Physical Abuse
A02 Sexual Abuse
A03 Psychological Abuse
A04 Financial Exploitation
A05 Gross Neglect

A6 and A7 no longer exist in the revised NORS

A6 Resident-to-resident physical or sexual abuse. (Identify the type of resident to resident abuse by selecting appropriate code(s) A01-A04 with resident as suspected perpetrator.)

A7 Not Used
Why has perpetrator been added?

- In the current NORS, there is sometimes confusion and miscoding because there are duplicate codes that describe abuse.

- This addition will:
  - provide ACL with a better understanding of the types of abuse, neglect, and exploitation and the perpetrator;
  - increase the information available about abuse; and
  - improve the ability to analyze the data.
Poll Question

A resident who lives in a nursing facility told a representative of the Office that a staff person hit her while in the shower.

Choose the correct answer for the perpetrator.

a) 01 Facility Staff
b) 02 Another Resident
c) 03 Family, Resident Representative, Friend
d) 04 Other
Poll Question

A resident who lives in a nursing facility told a representative of the Office that a staff person hit her while in the shower.

Choose the correct answer for the perpetrator.

a) 01 Facility Staff
b) 02 Another Resident
c) 03 Family, Resident Representative, Friend
d) 04 Other
## Table 3 – State Program Information

**State Program Data Elements**

States will submit a wide range of elements describing their statewide Ombudsman program grouped into a range of categories. Each of these sets of elements is presented in the subsections below.

**Part A: Complaint Example**

States will submit complaint example data that provide narrative description and disposition information regarding two to three closed complaints during the reporting period.

<table>
<thead>
<tr>
<th>Composite Data Element</th>
<th>Element Description</th>
<th>Quantifier</th>
<th>Type</th>
<th>Codes and Values</th>
<th>Examples and Reporting Tips</th>
</tr>
</thead>
<tbody>
<tr>
<td>Complaint Example</td>
<td>Provides information regarding two to three complaints during the reporting period.</td>
<td>Multiple</td>
<td>Composite data element subsuming element numbers S01-S06</td>
<td>Not Applicable (NA) (not a coded element)</td>
<td>Selection of complaint examples is at the State Ombudsman’s discretion.</td>
</tr>
</tbody>
</table>

Elements included for each case example:

<table>
<thead>
<tr>
<th>Element Number</th>
<th>Data Element</th>
<th>Element Definition</th>
<th>Quantifier</th>
<th>Type</th>
<th>Codes and Values</th>
<th>Examples and Reporting Tips</th>
</tr>
</thead>
<tbody>
<tr>
<td>S-01</td>
<td>Facility or Setting</td>
<td>Type of facility or setting for the complaint.</td>
<td>Single per complaint example</td>
<td>Alphanumeric</td>
<td>See Table 1, CA-04</td>
<td>Select one example from a nursing facility, and one from a residential care community facility. A third example is optional.</td>
</tr>
<tr>
<td>S-02</td>
<td>Description</td>
<td>Narrative of the problem.</td>
<td>Single per complaint example</td>
<td>Alphanumeric</td>
<td>NA (not a coded element)</td>
<td>Maximum length of 3,400 characters (about 500 words).</td>
</tr>
<tr>
<td>S-03</td>
<td>Complaint code</td>
<td>See Table 1, CD 03 for complaint definition.</td>
<td>Single per complaint example</td>
<td>Alphanumeric</td>
<td>See Table 1, CD 04 and Table 2</td>
<td>Select the complaint code associated with each complaint example.</td>
</tr>
</tbody>
</table>
Table 3 Highlights

A. Complaint Example
B. Systems Issues
C. Organizational Structure
D. Staff and volunteers
E. Conflicts of Interest
F. Funds expended
G. Facilities and beds
H. Ombudsman program activities
Table 3 – State Program Information

Administration for Community Living/Administration on Aging- Office of Long-Term Care Ombudsman Programs

National Ombudsman Reporting System (NORS)  
Table 3: State Program Information  
OMB Control Number 0985-0005  
Expiration Date: 04/30/2021

State Program Data Elements

States will submit a wide range of elements describing their statewide Ombudsman program grouped into a range of categories. Each of these sets of elements is presented in the subsections below.

Part A-Complaint Example
States will submit complaint example data that provide narrative description and disposition information regarding two to three closed complaints during the reporting period.

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[End of Table 3 – State Program Information]
H - Ombudsman program activities

- Ombudsman Program Training
- Training of Facility Staff (NF and RCC)
- Information and Assistance (facility and individuals)
- Visits
- Survey Participation
- Resident Council Participation
- Family Council Participation
- Community Education
Changes in Ombudsman Program Activities

• Ombudsman program training
  • Simplified - though your State Ombudsman may want you to continue to report training.

• Activities
  • Reported by facility type (SN or RCC), i.e. facility staff training, survey, work with resident or family councils, information and assistance, etc.

• Visits
  • Report both complaint related visits and routine (or non-complaint) visits.
<table>
<thead>
<tr>
<th>Element Number</th>
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<th>Examples and Reporting Tips</th>
</tr>
</thead>
<tbody>
<tr>
<td>S-56</td>
<td>Facilities</td>
<td>Total number of nursing facilities that received at least one visit by a representative of the Office during the reporting year, regardless of the purpose of the visit.</td>
<td>Single</td>
<td>Numeric</td>
<td>NA (not a coded element)</td>
<td>This is a count of the number of facilities that received a visit. For example, 350 of the 350 nursing facilities in State A had at least one visit, regardless of purpose. It must be a whole number.</td>
</tr>
<tr>
<td>S-57</td>
<td>Number of visits; nursing facility</td>
<td>Total number of visits made to the 350 nursing facilities in State A (both complaint and non-compliant)</td>
<td>Single</td>
<td>Numeric</td>
<td>NA (not a coded element)</td>
<td>This is a count of the total number of visits; for example, there were 1500 visits made to the 350 nursing facilities in State A (both complaint and non-compliant). It must be a whole number.</td>
</tr>
<tr>
<td>S-58</td>
<td>Routine access; nursing facility</td>
<td>Total number of nursing facilities visited, not in response to a complaint, in all four quarters by representatives of the Office.</td>
<td>Single</td>
<td>Numeric</td>
<td>NA (not a coded element)</td>
<td>This count demonstrates routine access. For example, of the 350 nursing facilities in State A, 150 had a visit each quarter, not in response to a complaint. It must be a whole number.</td>
</tr>
</tbody>
</table>

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</tr>
</thead>
<tbody>
<tr>
<td>S-59</td>
<td>Facilities</td>
<td>Total number of residential care communities that received at least one visit by a representative of the Office during the reporting year, regardless of the purpose of the visit.</td>
<td>Single</td>
<td>Numeric</td>
<td>NA (not a coded element)</td>
<td>This is a count of the number of facilities that received at least one visit. For example, 700 of the 2000 residential care communities in State B had at least one visit during the reporting year, regardless of purpose. It must be a whole number.</td>
</tr>
<tr>
<td>S-60</td>
<td>Number of visits; residential care community</td>
<td>Total number of visits made to the 2000 residential care communities in State B (both complaint and non-complaint)</td>
<td>Single</td>
<td>Numeric</td>
<td>NA (not a coded element)</td>
<td>This is a count of the total number of visits; for example, there were 1400 visits made to the 700 residential care communities in State B (both complaint and non-complaint). It must be a whole number.</td>
</tr>
<tr>
<td>S-61</td>
<td>Routine access; residential care community</td>
<td>Total number of visits made to the 2000 residential care communities in State B, 200 had a visit each quarter, not in response to a complaint.</td>
<td>Single</td>
<td>Numeric</td>
<td>NA (not a coded element)</td>
<td>This count demonstrates routine access. For example, of the 2000 residential care communities in State B, 200 had a visit each quarter, not in response to a complaint. It must be a whole number.</td>
</tr>
</tbody>
</table>
Start Using Revised NORS – October 1, 2019
NORS Training by NORC

- Webinars will review the data elements with specific case examples to discuss. *Training modules will be released prior to each webinar.*

- Register for one webinar you are registered for the entire series.

- NORS Webinars 2019 – 3:00 – 4:30 p.m. ET
  - Part I: Case, Complaint, Complainant, Information and Assistance – February 27
  - Part II: Coding Complaints – March 19
  - Part III: Closing the Case - April 30
  - Part IV: Activities – May 29

*Image Shutterstock 184663112*
QUESTIONS?
National Ombudsman Reporting System (NORS)

Each State Long-Term Care Ombudsman Program (SLTCOP) is required by the Older Americans Act to advocate for residents of nursing homes, board and care homes, assisted living facilities and similar adult care facilities. The SLTCOPs use information systems to record the facilities they visit, log complaints they receive and investigate, and track other program activities. Each state reports this data to the United States Administration for Community Living (ACL)/Administration on Aging (AoA), to be summarized in the National Ombudsman Reporting Systems (NORS) and is available on the ACL website. The data has been collected since 1996.

- Instructions for Completing the NORS Form
- Complaint Codes
- NORS Data
- NORS FAQs
- NORS Training
- Revised NORS Data Collection – effective October 1, 2019
Revised NORS Data Collection effective October 1, 2019

These are the final revised NORS data collection tables that State Ombudsman programs will use to report data starting on October 1, 2019. NORC is in the process of creating new training materials for the revised NORS data codes and activities. The following information is also available on the ACL website.

- Introduction: NORS Revisions
- Table 1: Case Levels
- Table 2: Complaint Codes
- Table 3: Program Information
- Crosswalk A: NORS Overview
- Crosswalk B: Complaint Codes (Old NORS to Revised NORS)
Contact Information

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The National Long-Term Care Ombudsman Resource Center (NORC)
www.ltcombudsman.org

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