



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

# NATIONAL OMBUDSMAN REPORTING SYSTEM (NORS) TRAINING PART II: COMPLAINT CODING

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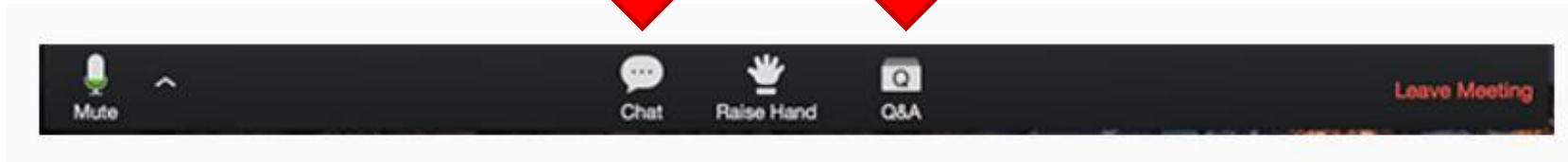
*OPEN DIALOGUE*

November 20, 2019

# Agenda

- Comments from the Administration for Community Living
- Part II Training Materials
  - Complaint Coding Basic Principles
  - NORs Table 2: Complaint Codes and Definitions, Examples and Reporting Tips
- Open Dialogue
- Resources

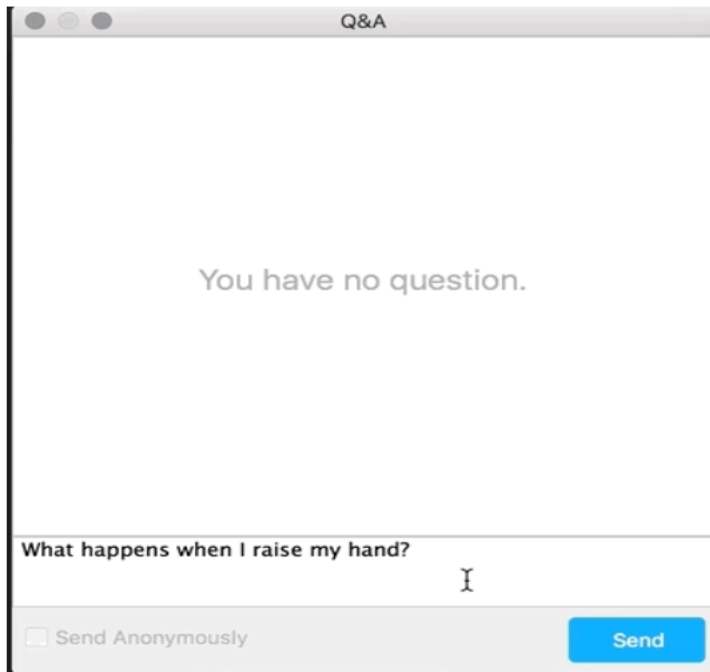
# Have a question? Use the Q&A or Chat box.



## Question & Answer

The Q&A window allows you to ask questions to the host and panelists. They can either reply back to you via text in the Q&A window or answer your question live.

1. Click Q&A to open the Q&A window.
2. Type your question into the Q&A box. Click **Send**.



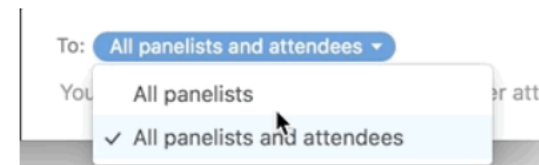
## Chat

The in-meeting chat allows you to send chat messages to and send a message to the host, panelists, and attendees (if permitted).

1. Click **Chat** to open the in-meeting chat.



2. The chat will appear on the right side of your Zoom window if you are not in full screen. If you are in full screen, it will appear in a window that you can move around your screen as needed.
3. To change who you are chatting with, click the drop down beside **To:**



4. Type your message and press **Enter**.

# ACL Greetings

**Louise Ryan**

Ombudsman Program Specialist

Administration on Aging /Administration for Community Living

# NORS Training Part II: Complaint Coding

The five documents for the revised Part II NORS training materials are:

- Basic Principles
- Quiz
- Quiz Answer Sheet
- Beyond the Basics Quiz
- Beyond the Basics Quiz Answer Sheet

[https://ltcombudsman.org/omb\\_support/nors/revised-nors-data-collection](https://ltcombudsman.org/omb_support/nors/revised-nors-data-collection)

*NOTE: The answer to 4 in the D. Autonomy, Choice, Rights section was revised in September 2019.*

The collage displays five overlapping pages from the NORS training materials. The top-left page is titled "PART II BASIC PRINCIPLES" and "NATIONAL OMBUDSMAN REPORTING SYSTEM (NORS) TRAINING PART II". It includes a "Complaint Coding Basics" section with a "REMINDER" and a table of codes (A, B, C, D, E, F, G, H, I, J, K, L). The top-right page is titled "PART II QUIZ" and "NATIONAL OMBUDSMAN REPORTING SYSTEM (NORS) TRAINING PART II". It includes "DIRECTIONS" and a table for "The perpetrator is the person(s) who can be multiple perpetrators for each complaint". The middle-right page is titled "PART II QUIZ ANSWER SHEET" and "NATIONAL OMBUDSMAN REPORTING SYSTEM (NORS) TRAINING PART II". It includes "DIRECTIONS" and a table for "The perpetrator is the person(s) who appears to be the cause of the abuse, neglect or exploitation". The bottom-left page shows a table with "Complaint Code" and "Perpetrator" columns. The bottom-right page shows a table with "Complaint Code" and "Perpetrator" columns, including examples like "A04 Family" and "A01 Another resident".

# Basic Principles

- Basic Principles document includes reminders and instructions for coding complaints.
- In these materials, “Ombudsman” is used as a generic term that may mean the state Ombudsman, a representative of the Office, or the Ombudsman program.

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PART II BASIC PRINCIPLES

## NATIONAL OMBUDSMAN REPORTING SYSTEM (NORS) TRAINING PART II

### Complaint Coding Basic Principles

**REMINDER:** Throughout these training materials “Ombudsman” is used as a generic term that may mean the state Ombudsman, a representative of the Office, or the Ombudsman program. Use the NORS tables developed by the Administration for Community Living/Administration with these training materials when indicated (Table 1: NORS Case and complaint codes, values and definitions; Table 2: NORS Complaint codes and definitions; and Table 3 State Program Information, OMB Control Number 0985-0005).

**Coding Complaints**  
There are 59 complaint codes. Choose the one code which best fits the problem. Refer to the NORS, Table 2: Complaint codes and definitions document for all of the complaint codes, examples, and reporting tips.<sup>1</sup> The chart below shows the complaint code categories for complaint types.

CODES	TYPE OF COMPLAINT
A	Abuse, Gross Neglect, Exploitation, is for complaints of <b>willful</b> mistreatment of residents. Indicate who appears to be the cause of the abuse, neglect, or exploitation: (1) facility staff, (2) another resident, (3) resident representative, family, or friend, or (99) other (See Table 1, Part B <sup>2</sup> ).
B, C, D, E, F, G, H, I, J	Complaints <b>against the facility</b> .
K	Not against the facility. Complaints involving decisions, policies, actions or inactions by the programs and agencies listed in the code definitions, including private and public benefits.
L	Not against the facility. Complaints <b>against others</b> , such as an outside provider or family conflict.

**Abuse, Gross Neglect, Exploitation Complaints**  
Use the NORS code A to document Ombudsman program investigation of an allegation of abuse, gross neglect, or exploitation. Identify the suspected perpetrator and the applicable perpetrator code. A perpetrator is the person(s) who appears to have caused the abuse, gross neglect, or exploitation. There may be multiple perpetrators for each complaint. If the Ombudsman program and another agency are both actively involved in complaint investigation and resolution, it still counts as an Ombudsman program case.

<sup>1</sup> NORS Table 2: Complaint codes and definitions, OMB Control Number 0985-0005. Expiration April 30, 2021. Administration for Community Living/Administration on Aging. [https://ltcumbudsman.org/uploads/files/support/NORS\\_Table\\_2\\_Complaint\\_Code\\_04-30-2021-1.pdf](https://ltcumbudsman.org/uploads/files/support/NORS_Table_2_Complaint_Code_04-30-2021-1.pdf)

<sup>2</sup> NORS Table 1: NORS Parts A, B, and C - Case and complaint codes, values, and definitions, OMB Control Number 0985-0005. Expiration April 30, 2021. Administration for Community Living/Administration on Aging. [https://ltcumbudsman.org/uploads/files/support/NORS\\_Table\\_1\\_Case\\_Level\\_04-30-2021-1.pdf](https://ltcumbudsman.org/uploads/files/support/NORS_Table_1_Case_Level_04-30-2021-1.pdf)

This project was supported, in part, by grant number 90OMRC0001-01-00, from the U.S. Administration for Community Living, Department of Health and Human Services, Washington, D.C. 20204. Grantees undertaking projects under government sponsorship are encouraged to express freely their findings and conclusions. Points of view or opinions do not, therefore, necessarily represent official Administration for Community Living policy.

# Basic Principles

- There are 59 complaint codes.
- Choose the one code which best fits the problem.
- Use the **NORS, Table 2: Complaint codes and definitions** document for all of the complaint codes, examples, and reporting tips.

# Basic Principles

## Abuse, Gross Neglect, Exploitation Complaints – Code A

- Use the applicable perpetrator code.
  - (1) facility staff, (2) another resident, (3) resident representative, family, or friend, or (99) other (See Table 1, Part B).
- A perpetrator is the person(s) who appears to have caused the abuse, gross neglect, or exploitation.
- There may be multiple perpetrators for each complaint.
- If the Ombudsman program and another agency (i.e. state survey agency, APS) are both actively involved in complaint investigation and resolution, it still counts as an Ombudsman program case.



# NORS Table 2: Complaint Codes and Definitions

- ACL Table 2 has complaint codes, definitions, examples & reporting tips  
[https://ltcombudsman.org/uploads/files/support/NORS Table 2 Complaint Code 04-30-2021-1.pdf](https://ltcombudsman.org/uploads/files/support/NORS_Table_2_Complaint_Code_04-30-2021-1.pdf)
- Crosswalk B: Complaint Codes – Old NORS to Revised NORS  
[https://acl.gov/sites/default/files/programs/2018-05/NORS%20Crosswalk%20B%2004\\_30\\_2021.pdf](https://acl.gov/sites/default/files/programs/2018-05/NORS%20Crosswalk%20B%2004_30_2021.pdf)

# Table 2 – Complaint Codes and Definitions

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



National Ombudsman Reporting System (NORS)

Table 2: Complaint codes and definitions


OMB Control Number 0985-0005

Expiration Date: 04/30/2021

**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.



Label	Code	Definition	Examples and Reporting Tips
Abuse: physical	A01	The intentional use of physical force that results in acute or chronic illness, bodily injury, physical pain, functional impairment, distress, or death.	Includes hitting, slapping, and pinching, kicking, etc. and/or controlling behavior through corporal punishment.

# NEW – Complaint Code Resources

## NORS Codes

**National Ombudsman Reporting System (NORS) Complaint Codes**  
Effective October 1, 2019

The complaint codes in this document are from the Administration for Community Living (ACL)/Administration on Aging (AoA) – Office of Long-Term Care Ombudsman Programs, National Ombudsman Reporting System (NORS) Table 2: Complaint codes and definitions. Refer to [Table 2](#) for complaint code definitions, examples, and reporting tips.<sup>1</sup>

**RESIDENTS' RIGHTS**

**A. Abuse, Gross Neglect, Exploitation**

Ao1. Abuse: physical  
Ao2. Abuse: sexual (touching and non-touching acts)  
Ao3. Abuse: psychological  
Ao4. Financial exploitation  
Ao5. Gross neglect (Use categories F or J when gross neglect is not clearly indicated.)

Perpetrator: Person(s) who appears to have caused the abuse or neglect or exploitation.

o1. Facility staff  
o2. Another resident  
o3. Family, resident representative, friend  
o9. Other

**B. Access to Information**

Bo1. Access to information and records  
Bo2. Language and communication barriers  
Bo3. Willful interference

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

Co1. Admission  
Co2. Appeal process  
Co3. Discharge or eviction  
Co4. Room issues: includes room change

**D. Autonomy, Choice, Rights**

Do1. Choice in health care  
Do2. Live in less restrictive setting  
Do3. Dignity and respect  
Do4. Privacy  
Do5. Response to complaints  
Do6. Retaliation  
Do7. Visitors  
Do8. Resident or family council  
Do9. Other rights and preferences

**E. Financial, Property (except for exploitation and involving facility staff)**

Eo1. Billing and charges  
Eo2. Personal property: includes loss or mismanagement including resident's money or trust fund

**RESIDENT CARE**

**F. Care**

Fo1. Accidents and falls  
Fo2. Response to requests for assistance includes call lights  
Fo3. Care planning  
Fo4. Medications

Fo5. Personal hygiene: includes bathing, soiled clothing, hands & face washing, teeth or dentures not cleaned  
Fo6. Access to health-related services  
Fo7. Symptoms unattended  
Fo8. Incontinence care  
Fo9. Assistive devices or equipment  
Fo10. Rehabilitation services  
Fo11. Physical restraint  
Fo12. Chemical restraint

**G. Activities, Community Integration and Social Services**

Go1. Activities  
Go2. Transportation  
Go3. Conflict resolution: includes disagreement between residents where assistance from Ombudsman is requested  
Go4. Social services

**H. Dietary**

Ho1. Food service  
Ho2. Dining and hydration  
Ho3. Therapeutic or special diet

**FACILITY ENVIRONMENT, ADMINISTRATION**

**I. Environment**

Io1. Environment: includes room or water temperature and ventilation  
Io2. Building structure  
Io3. Supplies, storage and furnishings  
Io4. Accessibility: includes building & grounds  
Io5. Housekeeping, laundry and pest abatement

**J. Facility policies, procedures and practices**

Jo1. Administrative oversight  
Jo2. Fiscal management  
Jo3. Staffing

**NON-FACILITY**

**K. Complaints about an outside agency (non-facility)**

Ko1. Regulatory system  
Ko2. Medicaid  
Ko3. Managed care  
Ko4. Medicare  
Ko5. Veterans Affairs  
Ko6. Private insurance

**L. System: Others (non-facility)**

Lo1. Resident representative or family conflict  
Lo2. Services from an outside provider  
Lo3. Request to transition to community setting

<sup>1</sup> [https://ltombudsman.org/uploads/files/support/NORS\\_Table\\_2\\_Complaint\\_Code\\_04-30-2021-1.pdf](https://ltombudsman.org/uploads/files/support/NORS_Table_2_Complaint_Code_04-30-2021-1.pdf)  
This project was supported, in part, by grant number 900MRC0001-01-00, from the U.S. Administration for Community Living, Department of Health and Human Services, Washington, D.C. 20201. Grantees undertaking projects under government sponsorship are encouraged to express freely their findings and conclusions. Points of view or opinions do not, therefore, necessarily represent official Administration for Community Living policy.

[https://ltombudsman.org/uploads/files/support/NORS\\_Updated\\_Complaint\\_Codes\\_List.pdf](https://ltombudsman.org/uploads/files/support/NORS_Updated_Complaint_Codes_List.pdf)

## NORS Codes, Definitions, Examples, and Reporting Tips

**National Ombudsman Reporting System (NORS) Complaint Codes and Definitions**  
Effective October 1, 2019

The complaint codes in this document are from the Administration for Community Living (ACL)/Administration on Aging (AoA) – Office of Long-Term Care Ombudsman Programs, National Ombudsman Reporting System (NORS) Table 2: Complaint codes and definitions. Refer to [Table 2](#) for complaint code definitions, examples, and reporting tips.<sup>1</sup>

**A. Abuse, Gross Neglect, Exploitation**

**Ao1- Abuse: physical:** The intentional use of physical force that results in acute or chronic illness, bodily injury, physical pain, functional impairment, distress, or death.

*Examples and Reporting Tips:* Includes hitting, slapping, and pinching, kicking, etc. and/or controlling behavior through corporal punishment.

**Ao2- Abuse: sexual:** Forced and/or unwanted sexual interaction (touching and non-touching acts) of any kind.

*Examples and Reporting Tips:* 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.

**Ao3- Abuse: psychological:** The infliction of anguish, pain, or distress through verbal or nonverbal acts. This includes but is not limited to verbal assaults, insults, threats, intimidation, humiliation, and harassment.

*Examples and Reporting Tips:* Includes, but is not limited to: oral, written or gestured language that willfully includes disparaging and derogatory terms used against residents regardless of their ability to comprehend; humiliation; bullying; harassment; threats of punishment or deprivation; and involuntary seclusion, which is the separation of a resident from other residents or from his/her room against the resident's will. It also includes abuse that is facilitated or caused by the taking or using photographs or recordings in any manner that would demean or humiliate a resident; posting these photos on social media networks, or sending these photos through multimedia messages. Use Do3 (Dignity and respect) for less severe forms of staff rudeness or insensitivity. Use Fo2 (Response to requests for assistance) if staff is unavailable, unresponsive to residents.

**Ao4- Financial exploitation:** The illegal or improper use of an individual's funds, property, or assets for another person's profit or advantage.

*Examples and Reporting Tips:* Includes, but is not limited to, depriving a resident of rightful access to, information about, or use of personal benefits, resources, personal needs allowance, belongings, or assets.

**Ao5- Gross neglect:** Failure to protect a resident from harm or the failure to meet needs for essential medical care, nutrition, hydration, hygiene, clothing, basic activities of daily living or shelter, which results in a serious risk of compromised health and/or safety, relative to age, health status, and cultural norms.

*Examples and Reporting Tips:* Use the appropriate categories under Resident Care (F) or, in some cases, Facility Policies, Practices and Procedures (J) and for similar complaints but gross neglect is not clearly indicated.

Perpetrator: Person(s) who appears to have caused the abuse or neglect or exploitation.

<sup>1</sup> [https://ltombudsman.org/uploads/files/support/NORS\\_Table\\_2\\_Complaint\\_Code\\_04-30-2021-1.pdf](https://ltombudsman.org/uploads/files/support/NORS_Table_2_Complaint_Code_04-30-2021-1.pdf)

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[https://ltombudsman.org/uploads/files/support/NORS\\_Codes\\_and\\_Definitions.pdf](https://ltombudsman.org/uploads/files/support/NORS_Codes_and_Definitions.pdf)

# COMPLAINT CATEGORIES

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# A Codes – Abuse, Gross Neglect, Exploitation

- Use the A codes for complaints of abuse, gross neglect, and exploitation.
- Identify a perpetrator for each of the A code complaints.
  - (1) facility staff, (2) another resident, (3) resident representative, family, or friend, or (99) other (See Table 1, Part B).
- Five A codes, A01 – A05

## **B Codes – Access to Information**

- Use this category for complaints against the facility regarding access to information made by or on behalf of the resident.
- Use for willful interference with Ombudsman duties.
- Three B codes, B01 – B03

# C Codes – Admission, Transfer, Discharge, Eviction

- Use this category for complaints against the facility involving issues regarding admission, transfer, discharge, and/or eviction.
- Four C codes, C01 – C04.

# D Codes – Autonomy, Choice, Rights

- Use this category for complaints involving facility staff failure to honor and promote a resident's right or preferences.
- Nine D codes, D01 – D09.



## **E Codes – Financial, Property**

- Use this category for complaints involving facility staff mismanagement of residents' funds and property or billing problems.
- Two E codes, E01 – E02.

## **F Codes - Care**

- Use this category for any complaint involving facility staff failure to provide care including poor quality care, planning and delivery.
- Twelve F codes, F01 – F12.

# **G Codes – Activities, Community Integration, and Social Services**

- Use this category for any complaint involving activities, community integration or social services.
- Four G codes, G01 – G04.

## H Codes - Dietary

- Use this category for complaints regarding food service, assistance.
- Three H codes, H01 – H03.

# I Codes - Environmental

- Use this category for complaints involving the physical environment of the facility, including the resident's space.
- Five I codes, I01 – I05.

# J Codes – Facility Policies, Procedures, and Practices

- Use this category for acts of commission or omission by facility leadership/owners including administrators, resident managers, etc.
- Three J codes, J01 – J03.

# **K Codes – Complaints about an Outside Agency (non-facility)**

- Use this category for complaints involving decisions, policies, actions or inactions by the programs and agencies, including private and public benefits.
- Six K codes, K01 – K06.

## **L Codes – System: Others (non-facility)**

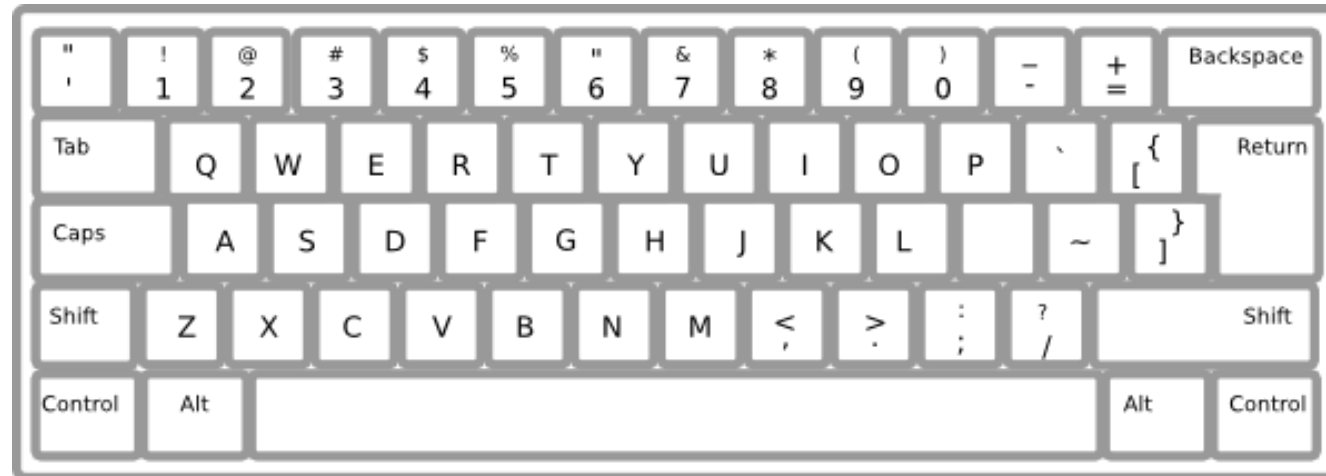
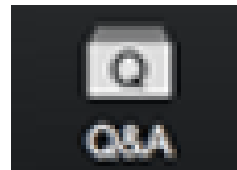
- Use this category for complaints involving decisions, policies, actions or inactions by systems other than the facility or the programs or agencies included in code K.
- Three L codes, L01 – L03.



# OPEN DIALOGUE

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**Please type your questions into the Question and Answer box by clicking on the Q&A icon at the bottom of your screen.**



# NORS Instructions, Training, and Materials

[https://ltcombudsman.org/omb\\_support/nors](https://ltcombudsman.org/omb_support/nors)

- NORC Webinars
- NORC Notes
- National Ombudsman Reporting System - (NORS)**
  - ▶ NORS Data
  - ▶ NORS FAQs
  - ▶ NORS Training
  - ▶ NORS Frequently Asked Questions Webinar
- Program Management
- Program Promotion
- Ombudsman Program Examples
- Systems Advocacy
- Technical Assistance FAQs
- Training
- Volunteer Management

 **Are You A New Ombudsman?**

Access resources to

## National Ombudsman Reporting System (NORS)

Ombudsman programs report their activities such as facility visits, complaints received and investigated, information and assistance provided, and community education to the Administration for Community Living (ACL)/Administration on Aging (AoA) to be summarized in the National Ombudsman Reporting System (NORS). NORS data is available on the ACL website [here](#) and [here](#) and on the NORC [website](#).

The NORS data collection was revised effective October 1, 2019. The goal of revising NORS is to enhance ACL's ability to understand and report on Ombudsman program operations, experience of long-term care facility residents, and changes in long-term supports and services policies, research, and practices.

NORC updated the four-part NORS training materials to reflect the updated codes, definitions, and activities and instruct programs on how to record the work they do. The ACL NORS data collection tables are below and available on the ACL [website](#).

- **Introduction: NORS Revisions**
- **Table 1: NORS Parts A, B and C - Case and complaint codes, values, and definitions**
- **Table 2: Complaint codes and definitions**
- **Table 3: State Program Information**
- **Crosswalk A: NORS Overview**
- **Crosswalk B: Complaint Codes (Old NORS to Revised NORS)**
- **NORS Complaint Codes and Definitions (NEW!)**
- **NORS Complaint Codes (NEW!)**
- **NORS Training Materials (REVISED!)**
- **NORS FAQs (NEW!)**
- **NORS Data**
- **NORS Frequently Asked Questions Webinar**

# Frequently Asked Questions

[https://ltcombudsman.org/omb\\_support/nors/nors-faqs#complaint-coding](https://ltcombudsman.org/omb_support/nors/nors-faqs#complaint-coding)

<b>NORC Webinars</b>	<h2>NORS Frequently Asked Questions (FAQs)</h2> <p>This page contains answers to frequently asked questions regarding the revised National Ombudsman Reporting System (NORS) - effective October 1, 2019. The answers were developed with input from members of the Workgroup to Improve NORS Consistency (WINC) and in coordination with the Administration on Aging/Administration for Community Living (click on “Answer” to read the answer to the question). View these FAQs in a <a href="#">PDF here</a>. View the <i>Asked and Answered: Frequently Asked Questions (FAQs) about the Revised NORS webinar recording</i> which is based on the first round of FAQs.</p> <p>Throughout these frequently asked questions, (FAQs) “Ombudsman” is used as a generic term that may mean the state Ombudsman, a representative of the Office, or the Ombudsman program.</p> <p>If you have questions to suggest for additional FAQs, please email <a href="mailto:ombudcenter@theconsumervoice.org">ombudcenter@theconsumervoice.org</a>.</p> <ul style="list-style-type: none"><li>• Abuse, Neglect, and Exploitation</li><li>• Complainant</li><li>• <b>Complaint Coding</b></li><li>• Disposition</li><li>• Information and Assistance</li><li>• Opening and Closing a Case</li><li>• Referral</li><li>• Survey Participation</li><li>• Verification</li><li>• Visits</li></ul>
<b>NORC Notes</b>	
<b>National Ombudsman Reporting System - (NORS)</b>	
▶ NORC Data	
▶ NORC FAQs	
▶ NORC Training	
▶ NORC FAQ and TA Open Dialogue Webinars	
<b>Program Management</b>	
<b>Program Promotion</b>	
<b>Ombudsman Program Examples</b>	
<b>Systems Advocacy</b>	
<b>Technical Assistance FAQs</b>	
<b>Training</b>	
<b>Volunteer Management</b>	

# NORS Open Dialogue Webinars



- Register for one webinar you are registered for the entire series.
  - **December 17, 3 – 4 ET:** Part III and IV Closing the Case and Activities – Open Dialogue
- Prior to joining the webinars, please do the following:
  - Review the [Administration for Community Living \(ACL\) NORS Tables 1 – 3](#).
  - Review the [NORS Training Materials](#) and listen to the [NORS Training Webinar series](#).
  - Read the [NORS Frequently Asked Questions \(FAQs\)](#) and listen to the [FAQ webinar](#).
  - Keep print and/or digital copies of the ACL Tables and other NORS resources available as a reference during the technical assistance open webinars.
  - Write down your questions so you are ready to share.

# Contact Information

Amity Overall-Laib, NORC Director  
[aoverallaib@theconsumervoice.org](mailto:aoverallaib@theconsumervoice.org)  
(202) 332 2275 ext. 207

Louise Ryan, Ombudsman Program Specialist, AoA/ACL  
[louise.ryan@acl.hhs.gov](mailto:louise.ryan@acl.hhs.gov)  
(202) 795-7355

Maria Greene  
NORC Consultant  
[mgreene@theconsumervoice.org](mailto:mgreene@theconsumervoice.org)  
(770) 668 6366



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

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[ombudcenter@theconsumervoice.org](mailto:ombudcenter@theconsumervoice.org)



The National LTC Ombudsman Resource Center



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