



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

NATIONAL OMBUDSMAN REPORTING SYSTEM (NORS) TRAINING PART II:

COMPLAINT CODING

March 19, 2019 *(revised September 2019)*

Agenda

- Administration for Community Living's perspective
- Part II Training Materials
 - Complaint Coding Basic Principles
 - NORS Table 2: Complaint Codes and Definitions, Examples and Reporting Tips
 - Quiz
 - Quiz Answer Sheet
- Quiz
- Questions and Answers
- Resources

ACL's Perspective

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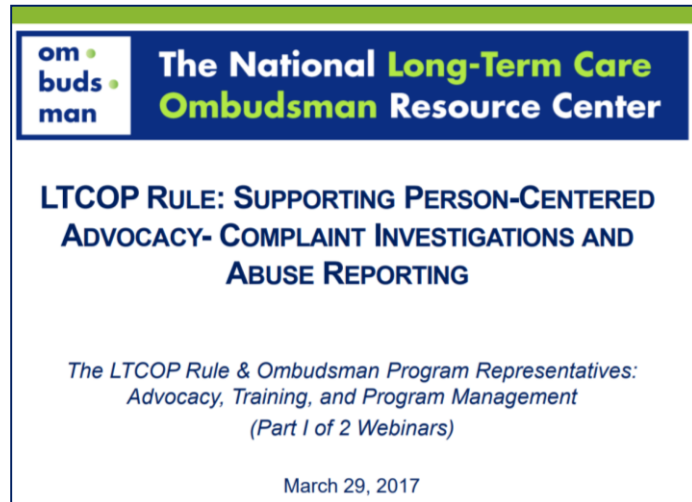
Not documenting = Silencing the Problems

*“The fact that ombudsmen have a more frequent presence in facilities and are authorized to take and record complaints, and advocate for residents, means that their work is essential. When they are not there to handle problems, those problems are likely to persist unabated. When problems are not recorded, there is not even a public record that they happened. Worse than suffering in silence, the **resident’s suffering has been effectively silenced** and there is no way for anyone to know what may be going on in a facility.”*

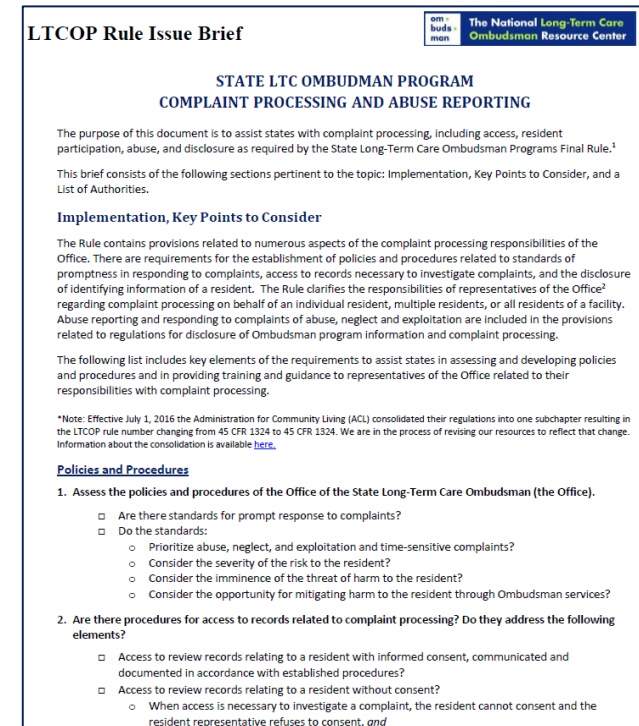
Quote from report: The New York State Ombudsman Program: An Assessment of Current Performance, Issues and Obstacles. By: Richard J. Mollot, Executive Director, The Long Term Care Community Coalition.

Complaint Processing Resources

- LTCOP Rule: Supporting Person-Centered Advocacy – Complaint Investigations and Abuse Reporting (webinar)
https://ltcombudsman.org/omb_support/training/trainings-and-conference-calls/2017



- Ombudsman Program Complaint Processing and Abuse Reporting (LTCOP Rule Issue Brief)
<https://ltcombudsman.org/uploads/files/library/ltcop-rule-issue-brief-complaint-p-inves-renumbered.pdf>



Responding to Allegations of Abuse

- The Ombudsman program:
 - investigates and resolves complaints on behalf of residents
 - resolves complaints to the “satisfaction of the resident”
 - does not “substantiate” to prove the allegation occurred
- <https://acl.gov/programs/long-term-care-ombudsman/long-term-care-ombudsman-faq>

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LTCOP REFERENCE GUIDE

RESPONDING TO ALLEGATIONS OF ABUSE: ROLE AND
RESPONSIBILITIES OF THE LONG-TERM CARE OMBUDSMAN PROGRAM

OVERVIEW

Provisions in the Older Americans Act (OAA) state that the Long-Term Care Ombudsman Program (LTCOP) 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. ¹ Complaints may include, but are not limited to, allegations of abuse, gross neglect, and exploitation. Long-Term Care Ombudsman programs provide resident-centered advocacy and are directed by resident goals for complaint resolution. Due to strict federal requirements, resident and complainant information shared with or gathered by the LTCOP is confidential unless consent is obtained (as described below in the federal requirements). Therefore, the Ombudsman program role in investigating allegations of abuse is unique and differs from other entities such as, adult protective services and state licensing and certification agencies.

In 2016, the Administration for Community Living (ACL) published the State Long-Term Care Ombudsman Programs Final Rule which provides more specific guidance regarding investigating allegations of abuse, including how Ombudsman program representatives should respond if they witness abuse. ²

The purpose of this guide is to discuss how Ombudsman program representatives 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, LTCOP representatives 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.

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. ³

Administration on Aging Statements

In addition to the program requirements regarding disclosure and complaint investigation outlined in the Older Americans Act and the Rule, the Administration for Community Living/Administration on Aging has responded to questions regarding the role of the Office of the State Ombudsman in investigating allegations of abuse.

LTCOP Role in Investigating Allegations of Abuse, Gross Neglect, and Exploitation

The primary responsibility of the LTCOP is to investigate and resolve complaints on behalf of residents, but the LTCOP program is unique in that its goal is to resolve the complaint to the “satisfaction of the resident or

https://ltcombudsman.org/uploads/files/issues/ane-no-consent-ref-guide-july_2018.pdf

When Do You Select a Complaint Code?



- A complaint is
 - “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.”
- Assign complaint codes at the time the complaint is received based on the problem or problems shared by a complainant.
- You may add complaint codes if other complaints are shared by the complainant while the case is open (or by a resident if the resident wasn't the original complainant).

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

The collage displays five overlapping pages from the National Ombudsman Reporting System (NORS) training materials. The pages are:

- Top Left:** "PART II BASIC PRINCIPLES" page, featuring a table of complaint codes (A, B, C, D, E, F, G, H, I, J, K, L) and their definitions. The table is titled "COMPLAINT CODES" and lists codes A through L with corresponding descriptions of the types of complaints they cover.
- Top Right:** "PART II QUIZ" page, containing the "NATIONAL OMBUDSMAN REPORTING SYSTEM (NORS) TRAINING PART II Complaint Coding Quiz" and "DIRECTIONS" for taking the quiz.
- Middle Left:** "PART II QUIZ ANSWER SHEET" page, containing the "NATIONAL OMBUDSMAN REPORTING SYSTEM (NORS) TRAINING PART II Complaint Coding Quiz Answer Sheet" and a table for recording answers.
- Middle Right:** "NATIONAL OMBUDSMAN REPORTING SYSTEM (NORS) TRAINING PART II" page, featuring a table of complaint codes and definitions, including a section for "Abuse, Gross Neglect, Exploitation".
- Bottom:** "NATIONAL OMBUDSMAN REPORTING SYSTEM (NORS) TRAINING PART II" page, featuring a table of complaint codes and definitions, including a section for "Abuse, Gross Neglect, Exploitation".

Part II – Complaint Coding Beyond the Basics

NATIONAL OMBUDSMAN REPORTING SYSTEM (NORS) TRAINING PART II

Complaint Coding Beyond the Basics Quiz

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).

DIRECTIONS: Each person taking the quiz needs to have a copy of the NORS, Table 1: NORS Case and complaint codes, values, definitions, and NORS, Table 2: Complaint codes and definitions. For each scenario below, give the number of cases, number of complaints, complainant, perpetrator if applicable, and the primary complaint code for each complaint. Use only one complainant per case and only one complaint code for each complaint. For purposes of this training, assume that the resident gives consent to investigate if not otherwise indicated.

When reviewing each scenario below, remember:

- A case must have a minimum of one complaint.
- A complaint is 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.
- A complainant is an individual (i.e., resident, resident representative, family, staff) who requests Ombudsman program complaint investigation services regarding one or more complaints made by, or on behalf of, residents.

1. A nursing home staff person tells you that Mrs. Wright’s son, who has power of attorney for his mother, is using her income for his own purposes and has not paid her bill for three months. The staff person requests your involvement in resolving the nonpayment issue. Mrs. Wright tells you that she is worried that her bill is not getting paid and she hopes you can do something about it.

Number of cases: _____
Number of complaints in each case: _____
Complainant for each case: _____
Complaint code for each complaint: _____
Perpetrator: _____

Case #1: _____	Case #2: _____
Case #1: _____	Case #2: _____
Case #1: _____	Case #2: _____

NATIONAL OMBUDSMAN REPORTING SYSTEM (NORS) TRAINING PART II

Complaint Coding Beyond the Basics Quiz Answer Sheet

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).

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Number of cases: 1
Number of complaints in each case: _____
Complainant for each case: _____
Complaint code for each complaint: _____
Perpetrator: _____

Case #1: <u>Staff</u>	Case #2: _____
Case #1: <u>A04</u>	Case #2: _____
Case #1: <u>Family</u>	Case #2: _____

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.

The National Long-Term Care Ombudsman Resource Center

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.¹ The chart below shows the complaint code categories for complaint types.

CODES	TYPE OF COMPLAINT
A	Abuse, Gross Neglect, Exploitation, is for complaints of willful 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 ²).
B, C, D, E, F, G, H, I, J	Complaints against the facility .
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 against others , 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.

¹ NORS Table 2: Complaint codes and definitions, OMB Control Number 0985-0005. Expiration April 30, 2021. Administration for Community Living/Administration on Aging. https://ltombudsman.org/uploads/files/support/NORS_Table_2_Complaint_Code_04-30-2021-1.pdf

² 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://ltombudsman.org/uploads/files/support/NORS_Table_1_Case_Level_04-30-2021-1.pdf

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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 and Table 2).
- 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.

Perpetrator Code for Code A Complaints

- Selection of a perpetrator code will:
 - provide ACL and state Ombudsman programs with a better understanding of the types of abuse, neglect, and exploitation in the context of who is the suspected perpetrator.
- Reminder:
 - NORS does not ask for any personally identifiable information, i.e. the names of any perpetrator.

Complaint Codes

CODES	TYPE OF COMPLAINT
A	Abuse, Gross Neglect, Exploitation , is for complaints of <i>willful</i> 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 ²).
B, C, D, E, F, G, H, I, J	Complaints <i>against the facility</i> .
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 <i>against others</i> , such as an outside provider or family conflict.

NORS Table 2: Complaint Codes and Definitions

- 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)
- Use Table 2 for coding complaints and the Part II and Beyond the Basics Quizzes
- 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

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.

Table 2 – Complaint Codes and Definitions

Label	Code	Definition	Examples and Reporting Tips
Abuse: psychological	A03	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.	<p>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.</p> <p>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.</p> <p>Use D03 (Dignity and respect) for less severe forms of staff rudeness or insensitivity.</p> <p>Use F02 (Response to requests for assistance) if staff is unavailable, unresponsive to residents.</p>

COMPLAINT CODE CATEGORIES

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.

PART II QUIZ

Part II – Complaint Coding Quiz Directions

- Get out your copy of ***NORS, Table 2: Complaint codes and definitions.***
- Review the ***Examples and Reporting Tips*** column of ***Table 2, Complaint codes and definitions*** for additional clarification about the codes.
- Select the one complaint code that best describes the scenario.
- For purposes of this training, assume that the resident gives consent to investigate if not otherwise indicated.

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).
- There are 5 A codes, A01 – A05

Part II Quiz – (A) Codes

5) A resident cries as she tells you that staff took her photo when she was in the bathroom and said they would post it online if she doesn't quit pushing her call bell.

Part II Quiz – (A) Codes

Choose the complaint code:

1. A01 Abuse: Physical
2. A02 Abuse: Sexual
3. A03 Abuse: Psychological
4. A04 Financial Exploitation
5. A05 Gross Neglect

Part II Quiz – (A) Codes

Choose the complaint code:

1. A01 Abuse: Physical
2. A02 Abuse: Sexual
3. A03 Abuse: Psychological
4. A04 Financial Exploitation
5. A05 Gross Neglect

Part II Quiz – (A) Codes

Who is the suspected perpetrator?

Choose the perpetrator code:

- 1 01 Facility Staff
- 2 02 Another Resident
- 3 03 Family, Resident Representative, Friend
- 4 99 Other

Part II Quiz – (A) Codes

Who is the suspected perpetrator?

Choose the perpetrator code:

- 1 01 Facility Staff
- 2 02 Another Resident
- 3 03 Family, Resident Representative, Friend
- 4 99 Other

Code A Quiz Section Answers

1. A04 Family, resident representative, friend
2. A01 Another resident
3. A05 Facility staff
4. A02 Facility staff
5. A03 Facility staff

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.
- There are 3 B codes, B01 – B03

Part II Quiz – (B) Codes

2) The resident's representative and daughter says that the facility keeps putting off her request to see her mother's medical records.


Part II Quiz – (B) Codes

Choose the complaint code:

1. B01 Access to information and records
2. B02 Language and communication barriers
3. B03 Willful interference

Part II Quiz – (B) Codes

Choose the complaint code:

- 
1. B01 Access to information and records
 2. B02 Language and communication barriers
 3. B03 Willful interference

Part II Quiz – (B) Codes

3) The residential care facility did not give the resident information on residents' rights when he moved into the residence.

Part II Quiz – (B) Codes

Choose the complaint code:

1. B01 Access to information and records
2. B02 Language and communication barriers
3. B03 Willful interference

Part II Quiz – (B) Codes

Choose the complaint code:

1. B01 Access to information and records
2. B02 Language and communication barriers
3. B03 Willful interference

Code B Quiz Section Answers

1. B03 Willful interference
2. B01 Access to information and records
3. B01 Access to information and records
4. B02 Language and communication barriers

C Codes – Admission, Transfer, Discharge, Eviction

- Use this category for complaints against the facility involving issues regarding admission, transfer, discharge, and/or eviction.
- There are 4 C codes, C01 – C04.

Part II Quiz – (C) Codes

4) When a resident moved into the residential care community, the home required her to sign a document stating that she would have to move out immediately if she is not approved for the State's home and community based services program. The state has a 30 day discharge notice requirement regardless of payment source or length of time in the facility.

Part II Quiz – (C) Codes

Choose the complaint code:

1. C01 Admission
2. C02 Appeal process
3. C03 Discharge or eviction
4. C04 Room issues

Part II Quiz – (C) Codes

Choose the complaint code:

1. C01 Admission
2. C02 Appeal process
3. C03 Discharge or eviction
4. C04 Room issues

Code C Quiz Section Answers

1. C04 Room Issues
2. C03 Discharge or eviction
3. C02 Appeal process
4. C01 Admission

D Codes – Autonomy, Choice, Rights

- Use this category for complaints involving facility staff failure to honor and promote a resident's right or preferences.
- There are 9 D codes, D01 – D09.

Part II Quiz – (D) Codes

6) Residents have made several reports to the nursing home administrator that there are ants in residents' bedrooms, but nothing appears to have been done about it. They are unhappy that the administrator is unresponsive.

Part II Quiz – (D) Codes

Choose the complaint code:

1. D01 Choice in health care
2. D02 Live in less restrictive setting
3. D03 Dignity and respect
4. D04 Privacy
5. D05 Response to complaints

Part II Quiz – (D) Codes

Choose the complaint code:

1. D01 Choice in health care
2. D02 Live in less restrictive setting
3. D03 Dignity and respect
4. D04 Privacy
5. D05 Response to complaints

Part II Quiz – (D) Codes

9) A resident says she wants to move out of the nursing home into an apartment. The facility staff tells her that she is not ready to do that and will not tell the resident who can help her with such a move. The resident has been asking to talk with someone about moving for six months.

Part II Quiz – (D) Codes

Choose the complaint code:

1. D01 Choice in health care
2. D02 Live in less restrictive setting
3. D03 Dignity and respect
4. D04 Privacy
5. D05 Response to complaints

Part II Quiz – (D) Codes

Choose the complaint code:

1. D01 Choice in health care
2. D02 Live in less restrictive setting
3. D03 Dignity and respect
4. D04 Privacy
5. D05 Response to complaints

Code D Quiz Section Answers

1. D06 Retaliation
2. D04 Privacy
3. D03 Dignity and respect
4. D09 Other rights and preferences
5. D09 Other rights and preferences
6. D05 Response to complaints
7. D07 Visitors
8. D08 Resident or family council
9. D02 Live in less restrictive setting

E Codes – Financial, Property

- Use this category for complaints involving facility staff mismanagement of residents' funds and property or billing problems.
- There are 2 E codes, E01 – E02.

Part II Quiz – (E) Codes

1) The home will not give a resident his personal needs allowance when he wants some money because they say he spends it all in the first week of the month.

Part II Quiz – (E) Codes

Choose the complaint code:

1. E01 Billing and Charges
2. E02 Personal Property

Part II Quiz – (E) Codes

Choose the complaint code:

1. E01 Billing and Charges

2. E02 Personal Property

Code E Quiz Section Answers

1. E02 Personal property
2. E01 Billing and charges

F Codes - Care

- Use this category for any complaint involving facility staff failure to provide care including poor quality care, planning and delivery.
- There are 12 F codes, F01 – F12.

Part II Quiz – (F) Codes

7) A resident has not been able to straighten out his legs ever since the nursing home staff stopped assisting him into his wheelchair each day.

Part II Quiz – (F) Codes

Choose the complaint code:

1. F08 Incontinence care
2. F09 Assistive devices or equipment
3. F10 Rehabilitation services
4. F11 Physical restraint
5. F12 Chemical restraint

Part II Quiz – (F) Codes

Choose the complaint code:

1. F08 Incontinence care
2. F09 Assistive devices or equipment
3. F10 Rehabilitation services
4. F11 Physical restraint
5. F12 Chemical restraint

Part II Quiz – (F) Codes

9) A resident was not sent to the hospital for x-rays after falling in the dining room, although she complained several times that her wrist was hurting and asked the nurse to send her to the emergency room.

Part II Quiz – (F) Codes

Choose the complaint code:

1. F03 Care planning
2. F04 Medications
3. F05 Personal hygiene
4. F06 Access to health related services
5. F07 Symptoms unattended

Part II Quiz – (F) Codes

Choose the complaint code:

1. F03 Care planning
2. F04 Medications
3. F05 Personal hygiene
4. F06 Access to health related services
5. F07 Symptoms unattended

Code F Quiz Section Answers

1. F05 Personal hygiene
2. F03 Care planning
3. F01 Accidents and Falls
4. F02 Response to requests for assistance
5. F04 Medications
6. F08 Incontinence care
7. F10 Rehabilitation services
8. F09 Assistive devices or equipment
9. F06 Access to health related services
10. F11 Physical restraint
11. F12 Chemical restraint
12. F07 Symptoms unattended

G Codes – Activities, Community Integration, and Social Services

- Use this category for any complaint involving activities, community integration or social services.
- There are 4 G codes, G01 – G04.

Part II Quiz – (G) Codes

3) A resident's daughter has died. The resident asked the social worker for assistance to arrange a time and a room to meet with her family, but nothing was arranged.


Part II Quiz – (G) Codes

Choose the complaint code:

1. G01 Activities
2. G02 Transportation
3. G03 Conflict resolution
4. G04 Social services

Part II Quiz – (G) Codes

Choose the complaint code:

1. G01 Activities
 2. G02 Transportation
 3. G03 Conflict resolution
 4. G04 Social services
- 

Code G Quiz Section Answers

1. G02 Transportation
2. G01 Activities
3. G04 Social services
4. G03 Conflict resolution

H Codes - Dietary

- Use this category for complaints regarding food service, assistance.
- There are 3 H codes, H01 – H03.

Part II Quiz – (H) Codes

1) Several residents are observed in the dining room not being assisted with opening their food packaging, cutting their food, and seasoning their food.

Part II Quiz – (H) Codes

Choose the complaint code:

1. H01 Food service
2. H02 Dining and hydration
3. H03 Therapeutic or special diet

Part II Quiz – (H) Codes

Choose the complaint code:

1. H01 Food service
2. H02 Dining and hydration
3. H03 Therapeutic or special diet

Code H Quiz Section Answers

1. H02 Dining and hydration
2. H01 Food services
3. H03 Therapeutic or special diet

I Codes - Environmental

- Use this category for complaints involving the physical environment of the facility, including the resident's space.
- There are 5 I codes, I01 – I05.

Part II Quiz – (I) Codes

3) The main entrance has steps up to the porch and does not have a wheelchair ramp.

Part II Quiz – (I) Codes

Choose the complaint code:

1. I01 Environment
2. I02 Building structure
3. I03 Supplies, storage and furnishings
4. I04 Accessibility
5. I05 Housekeeping, laundry and pest abatement

Part II Quiz – (I) Codes

Choose the complaint code:

1. I01 Environment
2. I02 Building structure
3. I03 Supplies, storage and furnishings
4. I04 Accessibility
5. I05 Housekeeping, laundry and pest abatement

Part II Quiz – (I) Codes

5) The Ombudsman observed the caregiver going from room to room to provide personal care without washing her hands in between care and not changing her gloves.


Part II Quiz – (I) Codes

Choose the complaint code:

1. I01 Environment
2. I02 Building structure
3. I03 Supplies, storage and furnishings
4. I04 Accessibility
5. I05 Housekeeping, laundry and pest abatement

Part II Quiz – (I) Codes

Choose the complaint code:

1. I01 Environment
 2. I02 Building structure
 3. I03 Supplies, storage and furnishings
 4. I04 Accessibility
 5. I05 Housekeeping, laundry and pest abatement
- 

Code I Quiz Section Answers

1. I01 Environment
2. I05 Housekeeping, laundry and pest abatement
3. I04 Accessibility
4. I02 Building structure
5. I05 Housekeeping, laundry and pest abatement
6. I03 Supplies, storage and furnishings

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.
- There are 3 J codes, J01 – J03.

Part II Quiz – (J) Codes

1) Staff did not report suspected abuse because they did not want to lose their jobs.

Part II Quiz – (J) Codes

Choose the complaint code:

1. J01 Administrative oversight
2. J02 Fiscal management
3. J03 Staffing

Part II Quiz – (J) Codes

Choose the complaint code:

1. J01 Administrative oversight
2. J02 Fiscal management
3. J03 Staffing

Part II Quiz – (J) Codes

3) Residents cannot go to bed when requested because the staff is busy assisting other residents.

Part II Quiz – (J) Codes

Choose the complaint code:

1. J01 Administrative oversight
2. J02 Fiscal management
3. J03 Staffing

Part II Quiz – (J) Codes

Choose the complaint code:

1. J01 Administrative oversight
2. J02 Fiscal management
3. J03 Staffing

Code J Quiz Section Answers

1. J01 Administrative oversight
2. J02 Fiscal management
3. J03 Staffing

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.
- There are 6 K codes, K01 – K06.

Part II Quiz – (K) Codes

1) Families are upset because the Medicaid agency deemed residents ineligible for Medicaid after incorrectly calculating part of their Veteran's pension in their monthly income.

Part II Quiz – (K) Codes

Choose the complaint code:

1. K01 Regulatory system
2. K02 Medicaid
3. K03 Managed care
4. K04 Medicare
5. K05 Veterans Affairs

Part II Quiz – (K) Codes

Choose the complaint code:

1. K01 Regulatory system
2. K02 Medicaid
3. K03 Managed care
4. K04 Medicare
5. K05 Veterans Affairs

Part II Quiz – (K) Codes

2) The Ombudsman program referred a discharge complaint to the survey agency and requested that it have a high priority, fast response. The state survey agency was not able to conduct a timely investigation, stating that they did not have staff capacity.

Part II Quiz – (K) Codes

Choose the complaint code:

1. K01 Regulatory system
2. K02 Medicaid
3. K03 Managed care
4. K04 Medicare
5. K05 Veterans Affairs

Part II Quiz – (K) Codes

Choose the complaint code:

1. K01 Regulatory system
2. K02 Medicaid
3. K03 Managed care
4. K04 Medicare
5. K05 Veterans Affairs

Code K Quiz Section Answers

1. K02 Medicaid
2. K01 Regulatory system
3. K06 Private insurance
4. K05 Veterans Affairs
5. K03 Managed care
6. K04 Medicare

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.
- There are 3 L codes, L01 – L03.

Part II Quiz – (L) Codes

1) A nursing home resident would like to revoke the guardianship ordered during his illness.

Part II Quiz – (L) Codes

Choose the complaint code:

1. L01 Resident representative or family conflict
2. L02 Services from outside provider
3. L03 Request to transition to community setting

Part II Quiz – (L) Codes

Choose the complaint code:

1. L01 Resident representative or family conflict
2. L02 Services from outside provider
3. L03 Request to transition to community setting

Part II Quiz – (L) Codes

2) A nursing home resident wants to move into his own apartment. He complains that the agency worker who met with him said that the services he needs would not be available. There is a long waiting list for those services.


Part II Quiz – (L) Codes

Choose the complaint code:

1. L01 Resident representative or family conflict
2. L02 Services from outside provider
3. L03 Request to transition to community setting

Part II Quiz – (L) Codes

Choose the complaint code:

1. L01 Resident representative or family conflict
 2. L02 Services from outside provider
 3. L03 Request to transition to community setting
- 

Code L Quiz Section Answers

1. L01 Resident representative or family conflict
2. L03 Request to transition to community setting
3. L02 Services from outside provider

QUESTIONS?

Summary

- Administration for Community Living's perspective
- Part II Training Materials
 - Complaint Coding Basic Principles
 - NORS Table 2: Complaint Codes and Definitions, Examples and Reporting Tips
 - Quiz and Quiz Answer Sheet
 - Beyond the Basics Quiz and Quiz Answer Sheet
- Quiz
- Questions and Answers
- Resources



NORS Instructions, Training, and Materials

https://ltcombudsman.org/omb_support/nors


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Specialized Information for:

Nursing Homes

Assisted Living/Board & Care

Home and Community Based Services

NORC Conference Calls/Webinars

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National Ombudsman Reporting System - (NORS)

► NORC Data

► NORC FAQs

► NORC Training

► Revised NORC Data Collection

Program Management

Program Promotion

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


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

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Program Management

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Ombudsman Program Examples

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: 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)**
- **Revised NORS Training Materials**
- **Revised NORS Training Webinar Series**

Revised NORS Training Materials

Part I Revised NORS Training Materials

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.
- Webinar recordings and materials available here - https://ltcombudsman.org/omb_support/nors/revised-nors-data-collection
- NORS Webinars 2019 – 3:00 – 4:30 p.m. ET
 - Part II: Coding Complaints – March 19
 - Part III: Closing the Case - April 30
 - Part IV: Activities – May 29



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