Coding Complaints
Webinar September 29, 2011

NORS TRAINING
PART II
PURPOSE of TRAINING

• Improve consistency in NORS reporting

• Provide clarifying information on Coding Complaints by:
  ▪ Reviewing the Basic Principles,
  ▪ Reviewing the major Complaint Code Categories,
  ▪ Answering the Quiz coding scenarios,
  ▪ Answering questions related to the Quiz scenarios and answers, and
  ▪ Responding to other questions and examples.
Initial Comments on Coding

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Coding Complaints
Basic Principles

• 1 Complaint = 1 Complaint Code
• A – M: complaints against the facility
• N-Q: complaints not against the facility
  • N – O: complaints against Licensing and Certification or Medicaid
  • P: complaints against/involving individuals ≠ facility managers/staff or Medicaid
  • Q: complaints about services in other settings or by outside providers
Coding Complaints: Basic Principles

Coding Abuse and Neglect

- Use categories in Group A [Abuse, Gross Neglect, Exploitation] only for serious complaints of willful mistreatment of residents by facility staff, management, other residents etc.

- Use P.117 and P.121 for complaints of abuse, neglect, exploitation by family members, friends and others whose actions the facility could not reasonably be expected to oversee or regulate.

- For all categories in Part A, use the definitions in the Older Americans Act.
Coding Abuse and Neglect continued

- Use NORS code for allegation of abuse or other complaint if the complaint is made to the LTCO and requires LTCO involvement, action and resolution.

- If the ombudsman and another agency are both actively involved in complaint investigation and resolution, it can be counted an ombudsman case.
Complaint Code Categories

- An overview of each major category
- Your Key Words index
- Ask, What is the primary element of the complaint? to quickly identify the best category.
A: Abuse, Gross Neglect, Exploitation

Previously covered with the Basic Principles.
B. Access to Information by Resident or Resident’s Representative

- Access to information or assistance made by or on behalf of the resident or the resident’s representative.
- Use B.9 if the ombudsman is denied access in response to a complaint.
- Categories B.14, D.29, and M.96 all involve communication/language barriers and yet are different.
  - Use B.14 if information regarding rights, medical condition, benefits, services, etc. is not communicated in an understandable language.
C. Admission, Transfer, Discharge, Eviction

- Complaints involving placement, within or outside of the facility.

- If resident requests assistance in transferring to another facility and there is no stated problem (complaint), record as information and assistance (consultation) to individuals.

- If a resident requests assistance in moving out of the facility but there are no feasible alternative options, record as P.128 “Request for less restrictive placement,” since the problem is a lack of care alternatives within the long-term care system.
D. Autonomy, Choice, Preference, Exercise of Rights, Privacy

- Complaint involving the resident’s right, as stated in the category.
  - If it is a related problem, but not one specific to this heading, use a different category.
    - For example, if the resident is permitted to choose her personal physician but that physician is unavailable, use P.125.

- Note that D.29, B.14 and M.96 all involve communication/language barriers and yet are different.
  - Use D.29 if the resident has a communication or language barrier.
  - Use M.96 if staff have the communication or language barrier.
E. Financial, Property, except Financial Exploitation

- Complaints involving non-criminal mismanagement or careless with residents’ funds and property or billing problems.

- Use A.4 for complaints involving willful financial exploitation, including, but not limited to, criminal activity.
F. Care

- Complaints involving negligence, lack of attention and poor quality in the care of residents.

- If the care situation is so poor that the resident is in a condition of overall neglect which is threatening to health and/or life, use A.5, “gross neglect.”
G. Rehabilitation or Maintenance of Function

- Complaints involving failure to provide needed rehabilitation or services necessary to maintain the expected level of function.
H. Restraints, Chemical and Physical

- Complaint involving the use of physical or chemical restraint.
I. Activities & Social Services

- Complaints involving social services for residents and social interaction of residents.

- Note that transportation is included in category I.65 because community interaction is sometimes (not always) dependent upon transportation.
J. Dietary

- Complaints involving food and fluid intake.
- Use the appropriate category under A (A.1 or A.5) for willful cases of food deprivation.
K. Environment/Safety

- Complaints involving the physical environment of the facility and resident’s space.
L. Policies, Procedures, Attitudes, Resources

Acts of commission or omission by facility managers, operators or owners in areas other than staffing or specific problems included in previous sections.
M. Staffing

- Complaints involving staff unavailability, training, turnover, and supervision.
Complaints Not Against Facility

Complaints involving decisions, policies, actions or inactions by the state agencies which license facilities and certify them for participation in Medicaid and Medicare.

- N. Certification/Licensing Agency
- O. State Medicaid Agency
- P. System/Others
  - Complaints against or involving individuals who are not managers/staff of facilities or of the State’s licensing and certification or Medicaid agency.
Q. Services in settings Other Than LTC Facilities or by Outside Provider

- Complaints accepted and acted upon by the ombudsman involving individuals living in private residences, hospitals or in hospice care, and congregate and/or shared housing not providing personal care. Also use for services in a facility provided by an outside provider.
QUIZ Section A

Question #, Answer

1  A 4
2  A 1
3  A 6
4  A 5
5  A 3
6  A 2
QUIZ Section B

• Question #, Answer
  1. B 9
  2. B 14
  3. B 11
  4. B 8
  5. B 13
  6. B 10
  7. B 12
QUIZ Section C

Question #, Answer
1. C 22
2. C 21
3. C 18
4. C 17
5. C 20
6. C 19
7. C 16
QUIZ Section D

- Question #, Answer
  1. D 29
  2. D 34
  3. D 32
  4. D 26
  5. D 28
  6. D 25
  7. D 30
  8. D 31
  9. D 27
 10. D 33
 11. D 24
QUIZ Section E

- Question #, Answer
  1. E 37
  2. E 38
  3. E 36
QUIZ Section F

- Question #, Answer
  1. F 47
  2. F 45
  3. F 42
  4. F 40
  5. F 41
  6. F 48
  7. F 44
  8. F 50
  9. F 46
  10. F 43
  11. F 51
  12. F 49
QUIZ Section G

- Question #, Answer
  1. G 59
  2. G 55
  3. G 57
  4. G 58
  5. G 56
  6. G 53
  7. G 54
QUIZ Section H

- Question #, Answer
  1. H 62
  2. H 61
QUIZ Section I

Question #, Answer
1. I 65
2. I 64
3. I 67
4. I 66
QUIZ Section J

• Question #, Answer
  1. J 69
  2. J 73
  3. J 71
  4. J 75
  5. J 70
  6. J 74
  7. J 72
QUIZ Section K

- Question #, Answer
  1. K 84
  2. K 82
  3. K 80
  4. K 79
  5. K 81
  6. K 77
  7. K 85
  8. K 86
  9. K 78
  10. K 83
QUIZ Section L

- Question #, Answer
  1. L 92
  2. L 87
  3. L 90
  4. L 89
  5. L 93
  6. L 91
  7. L 94
  8. L 88
QUIZ Section M

• Question #, Answer
  1. M 97
  2. M 96
  3. M 99
  4. M 102
  5. M 100
  6. M 98
  7. M 101
QUIZ Section N

• Question #, Answer
  1.  N 107
  2.  N 103
  3.  N 109
  4.  N 105
  5.  N 106
  6.  N 104
  7.  N 108
QUIZ Section 0

- Question #, Answer
  1. O 115
  2. O 112
  3. O 111
  4. O 114
  5. O 113
QUIZ Section P

- Question #, Answer
  1. P 122
  2. P 119
  3. P 117
  4. P 121
  5. P 118
  6. P 120
  7. P 127
  8. P 123
  9. P 124
  10. P 128
  11. P 126
  12. P 125
QUIZ Section Q

- Question #, Answer
  1. Q 130
  2. Q 132
  3. Q 129
  4. Q 131
QUESTIONS?
1 Complaint = 1 Code

Consider:
- Is the complaint against the facility?
- What code best fits the problem?

Need more clarity related to coding?
- Contact WINC, Shelley Hitt, Chair
  (303) 722-0300 ext.508 or 1-800-288-1376
  skhitt@thelegalcenter.org
NORS Training Parts III & IV

Part III: November 10, 2011

Part IV: January 2012

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

The National Consumer Voice for Quality Long-Term Care (formerly NCCNHR)
http://www.theconsumervoice.org/

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