

National Ombudsman Reporting System (NORS) Training: Part 3

Verification, Disposition, Referral, and Closing Cases Basic Principles

REMINDER: Use the [NORS tables](#) developed by the Administration for Community Living/Administration on Aging with these training materials when indicated. The NORS codes and definitions used in these materials are taken from ACL tables 1-3 and are not to be modified.

Verification

1. Verification is confirmation that most or all facts alleged by the complainant are likely to be true.
2. Each complaint must have a verification status, *verified* or *not verified*.
3. Always attempt to determine the facts of complaints as part of the complaint investigation process. The Ombudsman investigates and seeks to resolve complaints on behalf of one or more residents, with the goal of addressing the concern to the resident's satisfaction while protecting their health, welfare, and rights. Ombudsmen are required to support and encourage resident involvement throughout the resolution process and must follow the resident's direction.

Disposition

1. Disposition is the final resolution or outcome of a complaint. You may perform many activities when resolving and investigating a complaint, but there is only one outcome.
2. Each complaint must have a disposition code, whether the complaint is verified or not.
3. When choosing a disposition code (*partially or fully resolved, no action needed or withdrawn, not resolved*), always follow the direction of the resident. If the resident cannot communicate his/her satisfaction, you may look to the resident's representative or to the complainant to determine if the resolution is consistent with the rights and interests of the resident.
4. Select "no action needed or withdrawn" as the disposition code if the resident dies before a final outcome is obtained and there is no resident representative to determine resolution. See the *Verification, Disposition, Referral, and Closing Cases* document for more complete instructions.

Referral Agency

1. A referral agency is the agency or agencies to which a complaint was referred to as part of the Ombudsman program's plan of action for complaint resolution.
2. Every complaint must have a referral code, if there was no referral; use code "no referral was made." See *Table 1 CD-06 for the list of referral codes*.
3. You may have more than one referral agency for a complaint.

Closure of Complaints and Cases

1. Each case can only have one case closed date.
2. Each complaint can only have one complaint closed date.
3. If a case has multiple complaints, there may be separate dates for when those complaints were closed. A case will remain open until each complaint has a code for referral, verification, and disposition, and a closure date.

Closing the Case

Close the case when the following complaint information is complete:

- ✓ **Verification – A confirmation that most or all facts alleged by the complainant are likely to be true.** Select: Verified or Not verified
- ✓ **Referral Agency¹: The agency or agencies to which a complaint was referred to as part of the Ombudsman program's plan of action for complaint resolution.** There can be multiple referrals to agencies in one complaint. You must have a referral code, if the complaint was not referred select "no referral was made." Referral code options are:

01 Licensing, regulatory, or certification agency

02 Adult protective services

03 Law enforcement or prosecutor

04 Protection and advocacy

05 Legal services

06 No referral was made

99 Other (include type of agency, e.g. domestic violence center)

- ✓ **Disposition: The final resolution or outcome of the complaint.**

Each complaint can have only one disposition. Select:

1. **Partially or fully resolved** to the satisfaction of the resident, resident representative, or complainant.
2. **No action needed or withdrawn** by the resident, resident representative, or complainant.
3. **Not Resolved** to the satisfaction of the resident, resident representative, or complainant. The complaint was not addressed to the resident's satisfaction.

Determining the disposition when the resident cannot communicate their perspective or when the resident dies before determining their perspective:

- When a resident is unable to communicate his or her perspective on the extent to which the complaint has been satisfactorily resolved, you may rely on the perspective of a resident representative if there is no reason to believe that the resident representative is not acting in the best interests of the resident.²

¹ Refer to NORS Table 1, Part C – Case and Complaint Definitions, for definitions of each of the five agencies. [NORS](#)

² See 1324.19(b)(2)(G)(5) of the [LTCOP Rule](#).

- When the resident is unable to communicate his or her perspective and does not have a resident representative, you shall determine whether the complaint was resolved to the satisfaction of the complainant.³
- If a resident dies before the investigation is complete, you may look to the resident representative, if available, or the complainant to determine the complaint disposition. If the Ombudsman program was the complainant and there is no representative, then you would select “no action needed or withdrawn” as the disposition code.

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³ See 1324.19(b)(2)(G)(iii)(B) of the [LTCOP Rule](#).