



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



National Ombudsman Reporting System (NORS)  
Consistency and Quality Assurance

July 31, 2024

# Housekeeping

- ▶ Use the **chat feature** to submit comments or respond to questions from speakers or other attendees.
- ▶ **Raise your hand** and we will ask you to unmute if you prefer to use audio.
- ▶ Links to **resources** will be posted in the chat box and will be posted to the NORC website – [ltcombudsman.org](https://ltcombudsman.org).

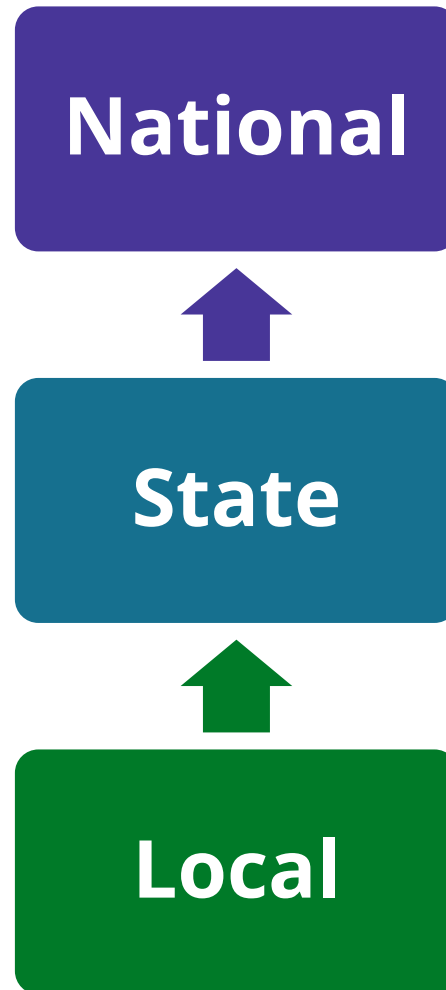


# **NORS Basics, Updates, and Reminders**

# National Ombudsman Reporting System (NORS) *Basics*

- ▶ NORS is the uniform data collection and reporting system required for use by all State Long-Term Care Ombudsman programs.
- ▶ NORS was developed based on reporting requirements in the Older Americans Act and provides a way for programs to capture and report core program activities.
- ▶ NORS brings consistency in data collection and reporting nationally for the work of the Ombudsman Program.

# How is NORS Data Used?



# NORS, NORS, and more NORS



- ▶ Most requested topic for training and technical assistance
- ▶ Consistency is an ongoing process – quality assurance
- ▶ Pandemic effect
  - ▶ New State Ombudsmen and representatives started during the pandemic
  - ▶ Back to basic LTCOP work (e.g., providing in-person LTCOP services as the program was intended)

# NORS Requirements vs State Program Policies & Procedures

## NORS Requirements

- ▶ Defines activities (e.g., case, complaint, complaint codes)
- ▶ Describes how to count activities (e.g., visits, I&A)
- ▶ Goal to standardize reporting across the county (e.g., how to report a complaint, how to count a visit – not conduct a visit)

## State Program Policies & Procedures

- ▶ Establishes state program practices (e.g., what is a “quality” visit)
- ▶ Sets program standards (e.g., requires frequency of visits, establishes timeframes for responding to complaints)

# Question

Have you taken our 4-part NORS training?

- Yes
- No
- What training?





# NORS Training

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

- ▶ **Part I:** Case, Complaint, Complainant, and Information and Assistance
- ▶ **Part II:** Complaint Coding
- ▶ **Part III:** Verification, Disposition, Referral, and Closing Cases
- ▶ **Part IV:** Ombudsman Program Activities
- ▶ **Each Part:**
  - ▶ Basic Principles
  - ▶ Quiz
  - ▶ Quiz Answers
  - ▶ PowerPoints

# NORS Tables

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

- ▶ NORS training materials are based on ACL's NORS Tables
  - ▶ Table 1: Case and complaint codes, values, and definitions
  - ▶ Table 2: Complaint codes and definitions
  - ▶ Table 3: State Program Information

# Part I: Basic Principles

Each 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.

# Part I: Basic Principles

A **complainant** is an individual (i.e., resident, resident representative\*/family/friend, facility staff) who requests Ombudsman program complaint investigation services regarding one or more complaints made by, or on behalf of, residents.

*\*resident representative as defined in 45 CFR 1324.1*

# Part I: Basic Principles

- ▶ **Information and Assistance** is providing information to an individual or facility staff about issues impacting residents (e.g., resident rights, care issues, services) and/or sharing information about accessing services without opening a case and working to resolve a complaint.
  - ▶ Information and assistance may be provided through various means (e.g., email, letter, in-person, call).
  - ▶ **It does not involve investigating and working to resolve complaints.**
  - ▶ Directing an individual to contact another agency for assistance does not constitute a case, it would be I&A.

# Basic Principles

## Case & Complaint vs Information & Assistance

### Case and Complaint Versus Information and Assistance

NORS Definition- Case/Complaint	Versus	NORS Definition – Information and Assistance
<p>A <b>case</b> is comprised of a complainant, complaint code(s), a setting, verification, resolution, and information regarding whether a complaint was referred to another agency. Each case must have a minimum of one complaint.</p> <p>A <b>complaint</b> is an expression of dissatisfaction or concern brought to, or initiated by, the Ombudsman program which requires Ombudsman program <u>investigation and resolution</u> on behalf of one or more residents of a long-term care facility.</p>	<p><u>Definition</u></p>	<p><b>Information and assistance</b> is providing information about issues impacting residents (e.g. resident rights, care issues, services) and/or sharing information about accessing services <u>without opening a case</u> and working to resolve a complaint.</p> <p>Information and assistance may be provided through various means including but not limited to telephone, by written correspondence such as e-mail, or in person.</p>
LTCOP Rule §1324.19 (b) Complaint Processing	Versus	Information and Assistance Practice
<p>(1) With respect to identifying, investigating and resolving complaints, and regardless of the source of the complaint (i.e. complainant), the Ombudsman and the representatives of the Office serve the resident of a long-term care facility. The Ombudsman or representative of the Office shall investigate a complaint, including but not limited to a complaint related to abuse, neglect, or exploitation, <u>for the purposes of resolving the complaint to the resident's satisfaction</u> and of protecting the health, welfare, and rights of the resident. The Ombudsman or representative of the Office may identify, investigate and resolve a complaint impacting multiple residents or all residents of a facility.</p>	<p><u>Purpose</u></p>	<p>The purpose of providing information and assistance is to inform the public, residents, facility staff, family of residents, and others. The Ombudsman program provides an answer, resources, and/or suggests other agencies or programs to contact.</p>

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# Basic Principles

## Case & Complaint vs Information & Assistance

LTCOP Rule §1324.19 (b) Complaint Processing	Versus	Information and Assistance Practice
(2) Regardless of the source of the complaint (i.e. the complainant), including when the source is the Ombudsman or representative of the Office, the Ombudsman or representative of the Office must support and maximize resident participation in the process of resolving the complaint as follows:	<b><u>Resident Participation</u></b>	Resident participation is not required when the person making the inquiry is not a resident.
(i) The Ombudsman or representative of Office <u>shall offer privacy</u> to the resident for the purpose of confidentially providing information and hearing, investigating and resolving complaints.	<b><u>Privacy</u></b>	The content of the discussion or other form of communication is confidential and subject to Ombudsman program disclosure requirements. The discussion may be less sensitive and privacy may be less essential to offer. Many times the person making the inquiry may provide information by telephone or an in-person contact in a public area, by email, or from a resident's room.
(ii) The Ombudsman or representative of the Office shall <u>personally discuss</u> the complaint with the resident (and, if the resident is unable to communicate informed consent, the resident's representative) in order to:	<b><u>Discussion with Resident</u></b>	Discussion with the resident is not required when the person making the inquiry is not the resident.
(A) <u>Determine the perspective of the resident</u> (or resident representative, where applicable) of the complaint;	<b><u>Resident Perspective</u></b>	Obtaining the resident's perspective is not required in order to provide information and assistance.
(B) Request the resident (or resident representative, where applicable) to communicate informed consent in order to investigate the complaint;	<b><u>Informed Consent</u></b>	There is no informed consent because there is no request for further action.

# Basic Principles

## Case & Complaint vs Information & Assistance

LTCOP Rule §1324.19 (b) Complaint Processing	Versus	Information and Assistance Practice
(D) Advise the resident (and resident representative, where applicable) of the resident's rights;	<u>Rights</u>	Provide information on applicable rights, laws, etc. if appropriate.
(E) Work with the resident (or resident representative, where applicable) <u>to develop a plan of action for resolution of the complaint;</u>	<u>Plan of Action</u>	No action for complaint resolution is requested. Therefore, the Ombudsman program does not develop a plan of action.
(F) <u>Investigate</u> the complaint to determine whether the complaint can be verified; and	<u>Investigation</u>	No investigation occurs by the Ombudsman program.
(G) <u>Determine whether the complaint is resolved</u> to the satisfaction of the resident (or resident representative, where applicable).	<u>Follow-up</u>	Follow-up may not be required, depending on the nature of the inquiry, and there is no requirement to determine level of satisfaction.
Case notes are documented within the case, not as an information and assistance activity. If information and assistance is offered related to the complaint during the complaint process, these actions are documented in the case notes.	<u>Documentation</u>	Information and assistance are documented as Ombudsman program activities. Document each instance according to the type of person who made the request (individual or facility staff — nursing facility or residential care community).  Note: NORS no longer requires an information and assistance topic.



*How do you document information and assistance provided during a facility visit?*

# Part I: Basic Principles

## Case & Complaint vs Information & Assistance

### Case and Complaint Versus Information and Assistance

NORS Definition- Case/Complaint	Versus	NORS Definition – Information and Assistance
<p>A <b>case</b> is comprised of a complainant, complaint code(s), a setting, verification, resolution, and information regarding whether a complaint was referred to another agency. Each case must have a minimum of one complaint.</p> <p>A <b>complaint</b> is an expression of dissatisfaction or concern brought to, or initiated by, the Ombudsman program which requires Ombudsman program <u>investigation and resolution</u> on behalf of one or more residents of a long-term care facility.</p>	<p><u>Definition</u></p>	<p><b>Information and assistance</b> is providing information about issues impacting residents (e.g. resident rights, care issues, services) and/or sharing information about accessing services <u>without opening a case</u> and working to resolve a complaint.</p> <p>Information and assistance may be provided through various means including but not limited to telephone, by written correspondence such as e-mail, or in person.</p>
LTCOP Rule §1324.19 (b) Complaint Processing	Versus	Information and Assistance Practice
<p>(1) With respect to identifying, investigating and resolving complaints, and regardless of the source of the complaint (i.e. complainant), the Ombudsman and the representatives of the Office serve the resident of a long-term care facility. The Ombudsman or representative of the Office shall investigate a complaint, including but not limited to a complaint related to abuse, neglect, or exploitation, <u>for the purposes of resolving the complaint to the resident's satisfaction</u> and of protecting the health, welfare, and rights of the resident. The Ombudsman or representative of the Office may identify, investigate and resolve a complaint impacting multiple residents or all residents of a facility.</p>	<p><u>Purpose</u></p>	<p>The purpose of providing information and assistance is to inform the public, residents, facility staff, family of residents, and others. The Ombudsman program provides an answer, resources, and/or suggests other agencies or programs to contact.</p>

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*During the investigation of a complaint regarding dining, you provide information to facility staff about culture change practices related to dining.*


*How do you document the information you provided?*

# Basic Principles

## Case & Complaint vs Information & Assistance

LTCOP Rule §1324.19 (b) Complaint Processing	Versus	Information and Assistance Practice
(D) Advise the resident (and resident representative, where applicable) of the resident's rights;	<u>Rights</u>	Provide information on applicable rights, laws, etc. if appropriate.
(E) Work with the resident (or resident representative, where applicable) <u>to develop a plan of action for resolution of the complaint;</u>	<u>Plan of Action</u>	No action for complaint resolution is requested. Therefore, the Ombudsman program does not develop a plan of action.
(F) <u>Investigate</u> the complaint to determine whether the complaint can be verified; and	<u>Investigation</u>	No investigation occurs by the Ombudsman program.
(G) <u>Determine whether the complaint is resolved</u> to the satisfaction of the resident (or resident representative, where applicable).	<u>Follow-up</u>	Follow-up may not be required, depending on the nature of the inquiry, and there is no requirement to determine level of satisfaction.
Case notes are documented within the case, not as an information and assistance activity. If information and assistance is offered related to the complaint during the complaint process, these actions are documented in the case notes.	<u>Documentation</u>	Information and assistance are documented as Ombudsman program activities. Document each instance according to the type of person who made the request (individual or facility staff — nursing facility or residential care community).  Note: NORS no longer requires an information and assistance topic.





# **NORS Frequently Asked Questions (FAQs)**



# **Cases and Coding Complaints**



*When do you assign a complaint code?*

*For example, if a family member contacts your office with a concern and requests action*

*Or do you code it after you have spoken with the resident and received their consent to investigate the issue?*

# NORS FAQ

**Q** - When do you assign complaint codes? For example, if a family member contacts your office with a concern and requests action or do you code it after you have spoken with the resident and received their consent to investigate the issue?

**A - Assign complaint code(s) upon receipt of the complaint based on the problem or problems identified by the complainant.**

NORS does not provide specific guidance and states may have policies and procedures in place that direct the representatives of the Office as to when to code complaints. However, it is important to take the information from the complainant and identify both the initial complainant, their complaint and any direction to resolve the problem. If the complainant is not the resident, the direction may change based on the perspective of the resident.

For example, if a family member contacts your office with a complaint, the family member is the complainant and you would assign complaint codes immediately based on the concerns shared by the family member. When you visit the resident for consent to take further action, if the resident agrees with those concerns, gives you consent, and shares additional concerns then you can open another case with the resident as the complainant and include complaint codes for the resident's additional concerns.

Conversely, if the resident does not agree with the family member and asks you not to proceed, you would close the case as withdrawn or no action needed. The program still had a complaint, and it might be legitimate, but to honor the resident's direction did not act.



“

**When a complainant has two complaints that would fall under the same code, do I only record the code once?**

# NORS FAQ

**Q** - When a complainant has two complaints/issues that would fall under the same code do I only record the code once?

**A - Record one complaint and work to resolve all issues raised.** If a complainant has two complaints that are under one code, such as code I05 Housekeeping, Laundry and Pest Abatement, the Ombudsman will open the with one complaint code (I05 in this example). Refer to [\*\*NORS Training Part II, Beyond the Basics Quiz and Answer Sheet\*\*](#) directions that states “use only one complainant per case and only one complaint code for each complaint.”



# **Community Education**



*My program frequently posts information on our website and social media platforms. We also email a monthly e-newsletter to our listserv which includes residents, family members, and our volunteers. Do these activities count as community education or information and assistance?*

# NORS FAQ

**Q** - My program frequently posts information on our website and social media platforms. We also email a monthly e-newsletter to our listserv which includes residents, family members, and our volunteers. Do these activities count as community education or information and assistance?

**A - None of these activities count as community education or information and assistance.** There is not a way to verify that recipients received and reviewed the information, so newsletters, blogs, and other forms of media do not count as community education. NORS defines information and assistance as providing individual instances of information to individuals or facility staff, so emailing an e-newsletter and posting information would not be documented as information and assistance. Review [NORS Training](#) Parts I and IV and NORS Tables [1](#) and [3](#) for additional information about information and assistance and community education.



# **Information & Assistance (I&A)**

**“ How do I count information and assistance (I&A) if I meet with facility staff and a resident at the same time to provide information. For example, I recently provided information about Resident Council leadership to a resident and nursing facility staff member at the same time. If one activity meets the definition of an information and assistance to nursing facility staff and the other is information and assistance to individual, should I document this as two instances of I&A?**

# NORS FAQs

**A: If you have an Information and Assistance (I&A) conversation with both a resident and a nursing facility staff member at the same time, record the conversation as one I&A activity with whichever person (resident or staff) requested the I&A.**

If you have I&A conversations separately even if it's the same topic, one with a resident and one with a nursing facility staff person, record the activities as one instance of I&A with a resident and one instance of I&A with nursing facility staff.





# **Resident Council**



*How do I document when I provide training about Residents' Rights (or another topic) to a group of residents in a nursing facility that is not during an official Resident Council meeting?*

# NORS FAQs

**Q** – How do I document when I provide training about Residents’ Rights (or another topic) to a group of residents in a nursing facility that is not during an official Resident Council meeting?

**A** – Not all residents participate in resident council meetings. However, **all residents are automatically considered part of a resident council [or “resident group” per federal nursing facility requirements, §483.10(f)(5)] just by residing in the long-term care facility.**

Since all residents of a long-term care facility are automatically considered Resident Council members and you provided training to a group of residents, not “information and assistance” to an individual resident, **you would document this training as “resident council participation: nursing facility” (S-64).**

“Resident council participation” in nursing facilities (S-64) and residential care communities (S-65) is defined in [NORS Table 3](#) as “total number of instances of attendance, at resident councils, including meeting with council leadership, and training of resident councils at [nursing facilities/residential care communities] by representatives of the Office.”



# Visits

“ If I go to a facility to visit a resident in response to a complaint I received, but after speaking with the resident, the resident does not want my assistance with the complaint, do I document that visit as a complaint-related visit?

# NORS FAQs

**Q** - If I go to a facility to visit a resident in response to a complaint I received, but after speaking with the resident, the resident does not want my assistance with the complaint, do I document that visit as a complaint-related visit?

**A** - You would select complaint disposition code “02 – no action needed or withdrawn by the resident, resident representative, or complainant” since the resident did not want your assistance with the complaint. Then you would document the visit according to what you did during the visit.

# NORS FAQ – continued

**To determine whether to report your visit as a complaint visit or routine access visit focus on the activities you conducted during the visit rather than the initial reason for the visit and any program requirements.**

Although the original reason for visiting the facility was to follow-up on a complaint, **if you conduct activities that constitute a routine access visit (e.g., visit with multiple residents, share information about the Ombudsman program, walk around and observe activities in the facility)** you may document this as a routine visit.

If you visited the facility in response to the complaint and **only conducted activities related to the complaint investigation**, then you would document the visit as a complaint visit.

**Most importantly, document all your visits.**

For additional information refer to the NORS Training Part IV – Ombudsman Program Activities and ACL Table 3 State Program Information for the definition of “routine access” and state reporting requirements for visits, available [here](#).



*If I visit a facility and handle a complaint during that visit, do I count that as a routine access visit and a complaint visit?*



# Answer

- ▶ Q - If I visit a facility and handle a complaint during that visit, do I count that as a routine access visit *and* a complaint visit?
- ▶ A - No, it only counts as one visit. Document what you did during the visit (e.g., update case/complaint information, I&A if provided).

# NORS Definitions – Visits

## 1. Number of facilities visited regardless of the purpose (complaint or non-complaint).

- ▶ **Definition:** Total number of nursing facilities or residential care community facilities that received at least one visit by a representative of the Office during the reporting year, regardless of the purpose of the visit.
- ▶ **Example:** This is a count of the number of facilities that received a visit (e.g., 350 of the 350 nursing facilities in State A had at least one visit, regardless of purpose)

## 2. The total number of all visits.

- ▶ **Definition:** Total number of nursing facility and residential care community facility visits no matter the purpose of visit (complaint or non-complaint related) by representatives of the Office.
- ▶ **Example:** This is a count of the total number of visits (e.g., there were 1400 visits made to the 700 residential care communities in State B [both complaint and non-complaint])

## 3. Number of facilities that had routine access.

- ▶ **Definition:** Total number of nursing facilities and residential care community facilities visited, not in response to a complaint, in all four quarters by representatives of the Office.
- ▶ **Example:** This count demonstrates routine access (e.g., Of the 350 nursing facilities in State A, 150 had a visit each quarter, not in response to a complaint)

# Visits

- ▶ Did you visit in-person?
  - ▶ Yes, document the visit.
- ▶ Document the activities conducted during the visit
  - ▶ I&A?
  - ▶ Complaint investigation, resolution, and/or follow-up?
  - ▶ Resident Council attendance?
- ▶ Follow your state policies & procedures for additional requirements.
- ▶ Your data management system will sort for NORS.



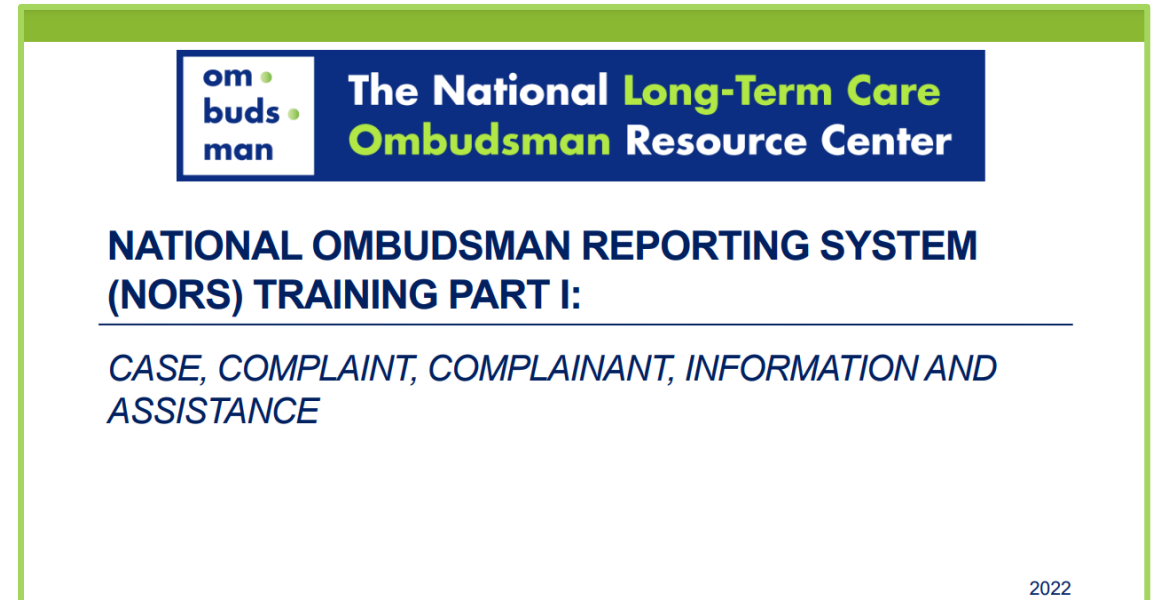
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# Resources

# ▶ Training PowerPoints

- ▶ PowerPoint for each Part
- ▶ Use for initial and on-going training
- ▶ Use with other training materials (Basic Principals, Quiz, Quiz Answers, etc.)
- ▶ [https://ltcombudsman.org/omb\\_support/nors/nors-training](https://ltcombudsman.org/omb_support/nors/nors-training)



**om • buds • man** **The National Long-Term Care Ombudsman Resource Center**

**NATIONAL OMBUDSMAN REPORTING SYSTEM (NORS) TRAINING PART I:**

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*CASE, COMPLAINT, COMPLAINANT, INFORMATION AND ASSISTANCE*

2022

# NORS

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

The screenshot shows the website's navigation menu with 'Support' highlighted. Below the menu is the organization's logo and a 'Specialized Information for:' section with buttons for 'Nursing Homes', 'Assisted Living/Board & Care', and 'Home and Community Based Services'. A left sidebar contains a menu with 'National Ombudsman Reporting System - (NORS)' selected. The main content area features the title 'National Ombudsman Reporting System (NORS)', a descriptive paragraph, a red 'NOTE' about updated materials, and a section titled 'The Basics – What You Must Know' with a bullet point for 'Table 1: NORS Parts A, B and C - Case and complaint codes, values, and definitions - UPDATED'.

Home News About ▾ New ombudsman? Library ▾ Events ▾ **Support ▾** Issues

**om buds man** The National Long-Term Care Ombudsman Resource Center

Specialized Information for:

Nursing Homes Assisted Living/Board & Care Home and Community Based Services

COVID-19

NORC Webinars

NORC Notes

**National Ombudsman Reporting System - (NORS)**

- ▶ NORS Data
- ▶ NORS FAQs
- ▶ NORS Training
- ▶ NORS FAQ and TA Open Dialogue Webinars

## 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 AGing, Independence, and Disability (AGID) Program Data Portal [here](#) and on the NORC [website](#).

**NOTE: The materials with UPDATED next to them were revised in December 2021. Use these versions for training, the links have changed.**

### The Basics – What You Must Know

- **Table 1: NORS Parts A, B and C - Case and complaint codes, values, and definitions - UPDATED**

# NORS FAQs

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

## NORS Frequently Asked Questions (FAQs)

This page contains answers to frequently asked questions regarding the National Ombudsman Reporting System (NORS). 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 [PDF here](#).

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.

If you have questions to suggest for additional FAQs, please email [ombudcenter@theconsumervoice.org](mailto:ombudcenter@theconsumervoice.org).

- **Abuse, Neglect, and Exploitation**
- **Community Education**
- **Complainant**
- **Complaint Coding**
- **Disposition**
- **Information and Assistance**
- **Opening and Closing a Case**
- **Referral**
- **Resident and Family Councils**
- **Survey Participation**
- **Verification**
- **Visits**
- **Volunteers**

# NORC – Next Steps

- ▶ Create decision trees/infographics (e.g., I&A or case, counting visits)
- ▶ Review and revise other NORC materials
- ▶ Provide NORS training series (future online course)
- ▶ Create more FAQs and communicate regularly regarding NORS
- ▶ Coordinate with NASOP and NALLTCO
- ▶ Let us know what you need – [ombudcenter@theconsumervoice.org](mailto:ombudcenter@theconsumervoice.org)





# Questions?



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- ▶ Review NORS Training materials  
[https://ltcombudsman.org/omb\\_support/nors/nors-training](https://ltcombudsman.org/omb_support/nors/nors-training)
- ▶ Review NORS FAQs  
[https://ltcombudsman.org/omb\\_support/nors/nors-faqs](https://ltcombudsman.org/omb_support/nors/nors-faqs)
- ▶ Refer to your state program policies and procedures
- ▶ Ask your supervisor
- ▶ Ask your State Ombudsman
- ▶ Ask Us!  
[ombudcenter@theconsumervoice.org](mailto:ombudcenter@theconsumervoice.org)



# Join NORC's Email List



Join NORC's email list to receive information about **training opportunities, resources, and more.**

Visit [ltcombudsman.org/sign-up](https://ltcombudsman.org/sign-up).



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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