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The National Long-Term Care Ombudsman Resource Center

NORS! New FAQs and Technical Assistance

August 26, 2026

Welcome

- This webinar is being **recorded**.
- Use the **Q&A feature or raise your hand for questions** for the speakers.
- Use the **chat feature to submit comments** or respond to questions from speakers or other attendees.

Agenda

- Review recent NORS TA and FAQs
- Questions?

NEW NORS FAQ: Community Education

- **Q:** I recently represented my program during a county health fair. Our table included informational materials about the program, residents' rights, volunteer opportunities, and more. I shared information about the Long-Term Care Ombudsman program with individuals that visited our table. Do I document this activity as community education or information and assistance or both?

- **A: You would document this activity as one community education outreach session.** In NORS Table 3, the examples and reporting tips for community education states, "use for attendance at health fairs, community events, presentations, etc." You would not count individual instances of information & assistance (I&A).

- As with participation in resident or family councils when you only count the attendance at the council meeting but not individual exchanges with residents or family members during the meeting, in your example, you would only count the instance of community education. The examples and reporting tips for resident and family council participation provide helpful guidance "use S-55 (I&A) to count technical support, consultations and providing resource information, for information and assistance that was not offered during a council meeting."

NEW NORS FAQ: Disposition Code

- **Q:** How do I determine the disposition code for a complaint when, despite multiple follow up attempts, the resident, resident representative, or complainant does not respond to confirm whether the resolution met their satisfaction?

- **A:** The Older Americans Act, LTCOP Final Rule, or NORS tables do not address this exact scenario.

  If the resident can communicate consent:

  - Continue visiting the facility and/or attempting to follow up with the resident via email/phone until you connect with the resident and the resident shares whether they are satisfied or not with the resolution.

  - If the resident has moved from the facility and you cannot communicate with the resident by phone/email and you do not know where the resident went, determine the disposition code based on your investigation findings and what the resident initially wanted as an outcome.

NEW NORS FAQ: Disposition Code Cont'd

If the complainant is a family member or someone other than the resident and the resident cannot communicate consent:

- Try to follow up with the complainant to determine the disposition. If the complainant does not respond after repeated outreach attempts, you can determine the disposition based on your investigation findings and what the complainant initially wanted as an outcome.

- Use this approach only in the rare circumstance when the resident cannot communicate their wishes and the resident representative is not responding to you.

NEW NORS TA: Same Day Visits

- **Q:** If I visit a facility, leave, and return to the same facility later the same day, do I document one or two visits?

- **A:** Representatives should enter all visits (regardless of the purpose), and activities conducted during visits in their data management system. NORS defines activities and describes how to count them, but states establish program practices and requirements (e.g., what is expected during a facility visit, frequency of visits). Refer to your state policies and procedures, as states could document this as one or two visits depending on the situation.

- For additional information regarding documenting visits review the following NORC resources available here (NORS FAQs #27, NORS Part 4, Is it a Visit? Decision Tree)

NEW NORS TA: Same Day Visits Cont'd

- Considerations to assist states in determining how to document include:
  - A representative visits a facility, leaves for lunch, then returns to the same facility. This could be documented as one visit as the representative took a break during the visit.
  - A representative conducts a facility visit then leaves to visit another facility in the county. On the way to the other facility, she receives a call from her office about a complaint from the facility she just left. She returns to the previous facility to follow up on that complaint. This could be documented as two visits as the representative conducted a visit earlier in the day (e.g., spoke with multiple residents, made observations, spoke with staff) then later that same day the representative returned to the facility to address a complaint.
  - A representative visits a facility to handle a complaint in the morning, then returns to the same facility that evening to visit with residents prior to attending a Family Council meeting. This could be documented as two visits as the representative handled a complaint during the first visit and spoke with multiple residents and attended a Family Council meeting during the second visit.

NEW NORS TA: Counting Visits During Facility Closure

- **Q:** Do I count every visit to a facility during a facility closure?
- **A:** Yes. Record each visit to the facility and document activities conducted during each visit.
- The following resources apply: Ombudsman Visits Decision Tree; Documenting I&A During Visits; NORS Training Part 4: Ombudsman Program Activities Basic Principles (on private side for SLTCO)

NEW NORS TA: Requesting an Appeal Hearing

- **Q:** When assisting a resident with requesting an appeal hearing for a discharge, who do we select as the referral agency as we are referring the complaint?
- **A:** When referring cases to other entities, LTCOPs expect/assume the agency they are referring to will investigate/address the complaint, as the referral to an outside entity is part of the "Ombudsman program's plan of action for complaint resolution."
- For discharge appeals, the agency for the fair hearing is not investigating the case; rather an administrative law judge would hear both sides of the case and make a decision. Recommending that a resident file for an appeal (and/or assisting them with the appeal) is part of the LTCOP advocacy plan as the next step in the resolution process, so that would not be a referral, and you would choose "no referral made."
- However, if a resident filed for an appeal and (with their permission) the LTCOP referred their case to legal services so an attorney could represent them in the hearing, then that would be a referral for "legal services."
- A related example is #14 of the NORS Training Part 3 quiz.

NEW NORS TA: Documenting Training

- **Q:** I provided training about residents' rights and the Ombudsman program to a group in a nursing facility. Most of the attendees were facility staff, but some residents and a few family members also attended. How do I count this training (e.g., training for facility staff, or resident or family council participation)?

- **A:** Determine how to count this activity based on the affiliation of most of the attendees in the training. Since most attendees were facility staff, this activity would be documented as training for facility staff.

- See *NORS Part 4 Basic Principles and Quiz* for more information.

NORS TA: When to Assign Complaint Codes REVISED

- **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, it did not act on it.

- **This guidance is intended to give states flexibility. In the absence of state policies, procedures, or training that specify when a complaint should be coded, programs can open another case and code complaints accordingly. This guidance does not require states to open another case in this specific situation.*

Counting Visits TA

In addition to our NORS FAQs and decision trees on this page and guidance for State Ombudsmen. Keep in mind:

- There are only two types of visits in NORS, complaint or non-complaint.
- Routine access is defined as the "total number of facilities visited, not in response to a complaint, in all four quarters by representatives of the Office."
- Therefore, any visit that is **not a complaint-only visit** counts as a visit potentially towards routine access (one visit per quarter).
- NORS does not provide requirements for what happens during a non-complaint visit. NORS does not have a "routine access visit." **“Routine access" is a count of quarterly visits, not a type of visit.**
- States can establish program practices and requirements (e.g., what is expected during a facility visit, frequency of visits, requiring a quarterly visit that includes specific activities).
- In short, *count all visits.* If they are in a facility, that is a visit, then they document the type of visit (complaint or non-complaint) and document activities conducted during the visit.

Resources

Resources

- **NORS (public website)**
  - ACL NORS Tables 1 – 3 and NORS Revisions Chart
  - Complaint Codes lists
  - Part 1 – 4 Training Materials
  - Link to Online NORS Training Course
  - NORS FAQs
  - NORS Data
- **State Ombudsman (private side of the website)**
  - Part 4 Ombudsman Program Activities Basic Principles – SLTCO
  - NORS Data Management Guide
  - Documenting I&A Provided During Visits
  - Older Americans Act Performance System (OAAPS) Training Materials

Decision Trees

Is it a Visit?

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Use this decision tree to help you determine if your work counts as a visit and how to document your activities. This is based on National Ombudsman Reporting System (NORS) definitions. Follow your state policies and procedures for additional guidance for conducting and reporting visits.

Are you in a long-term care facility?

Yes

IS IT A VISIT?

It's a visit regardless of the purpose.

Determine the type of visit (complaint or non-complaint related) as required by your state policies and procedures.

WHAT TO REPORT

Activities are defined in NORS. Follow state requirements for entering activities conducted during the visit.

- Information and Assistance (I&A) to individuals
- I&A to facility staff
- Resident council participation
- Family council participation
- Training session for facility staff
- Survey participation
- Visit (complaint or non-complaint related)

No

IS IT A VISIT?

It's not a visit.

Many activities can be conducted by phone, email, or online training.

WHAT TO REPORT

Activities are defined in NORS. Follow state requirements for entering activities conducted.

- Information and Assistance (I&A) to individuals
- I&A to facility staff
- Resident council participation
- Family council participation
- Training session for facility staff
- Survey participation

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Is It a Complaint or Information & Assistance (I&A)?

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Use this decision tree to help you determine if your work counts as a complaint or information & assistance. This is based on National Ombudsman Reporting System (NORS) definitions. Follow your state policies and procedures for additional guidance.

NORS Definitions and Reminders

- A **complaint** is an expression of dissatisfaction or concern brought to, or initiated by, the Long-Term Care Ombudsman program (LTCOP) which requires Ombudsman program investigation and resolution on behalf of one or more residents of a long-term care facility.
- An instance of **information & assistance (I&A)** is providing information to an individual or facility staff about issues impacting residents and/or sharing information about accessing services without opening a case and working to resolve a complaint.
- A **complainant** is an individual who requests Ombudsman program complaint investigation services regarding one or more complaints made by, or on behalf of, residents.
- A **case** is comprised of a complainant, complaint code(s), a perpetrator for A-Abuse/Neglect and Exploitation codes, a setting, verification, resolution, and information regarding whether a complaint was referred to another agency.
- **Information & assistance** may be provided in a variety of ways, including by **phone**, **email**, or **in-person**.

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Is It a Complaint or Information & Assistance (I&A)?

Does the individual have a concern?

Yes

Does the individual want your assistance in addressing their concern?

YES

Since the individual wants your assistance, they are the **complainant** and this is a **complaint**.

WHAT NEXT?

A **complainant** shared a **complaint** that requires Ombudsman program investigation. Open a **case** and proceed with the **complaint** investigation process. Document the complaint and case notes in your data base.

NO

The individual has a concern but doesn't want your assistance. However, you provide information regarding their concern so they can address it on their own and do not need to open a case.

WHAT NEXT?

Document this activity as an **instance of I&A**.

No

The individual is seeking information about long-term care services and supports. You respond to their questions and provide relevant information.

WHAT NEXT?

Document this activity as an **instance of I&A**.

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TECHNICAL ASSISTANCE

Documenting Information & Assistance (I&A) Provided During Visits

The purpose of this technical assistance resource is to clarify when and how to document instances of I&A provided during facility visits. This resource is based on National Ombudsman Reporting Systems (NORS) requirements, conversations with State Ombudsmen, and Administration for Community Living (ACL) approval.

NORS Definition, Example and Reporting Tips for Information & Assistance

An instance of **information & assistance (I&A)** is providing information to an individual or facility staff "about issues impacting residents (e.g., resident rights, care issues, services) and/or providing assistance to access services without opening a case and working to resolve a complaint."

Information & assistance "may be provided through various means, including but not limited to **telephone**, by written correspondence such as **e-mail**, or **in person**."

Source: NORS Table 3

Does providing Information & Assistance (not related to a complaint) during a visit count as an instance of I&A?

Yes, instances of I&A may be provided in person, which includes during facility visits.

Isn't providing information during a visit just part of a visit?

Yes, speaking with residents and facility staff and providing information is part of a visiting a facility, **and** you should count all activities conducted during the visit, including instances of I&A provided in person. Visits are critical to ensuring regular and timely resident access to Ombudsman program services and introducing yourself and sharing information about the program during the visits is an important part of ensuring access.

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Case Notes Checklist[1]

Use this checklist or your state-specific form when determining if all pertinent information is documented in the case notes.

Documenting intake information, did I include...	
The description of the problem as presented by the complainant?	
Steps the complainant has already taken to resolve the problem?	
A statement about the complainant's opinion of the resident's ability to communicate informed consent (if the complainant is not the resident)? NOTE: The complainant's opinion may or may not be accurate, but it is important to document their opinion. In later entries, you may need to include your own observations on this matter.	
A statement about permission to reveal the complainant's identity?	
Documenting the remainder of the investigation, did I include...	
The resident's perception of the problem(s)?	
The resident's desired outcome?	
The initial plan of action, including all involved parties?	
Each step taken in the investigation process, including interviews, observations, and record reviews?	
All actions taken to resolve the complaint(s)?	
A statement about the resident's satisfaction with the resolution?	
Follow-up communication with the resident or other relevant parties?	
In general, did I...	
Record all events in chronological order by date and approximate time?	
Use quotes, when possible, especially to capture the speaker's attitude, opinions, or observations?	
Limit the use of abbreviations to those that all representatives would understand, or initially define an abbreviation when questionable?	
Use names and titles of individuals and not "he," "she," "they"?	
Use objective language?	
Attach all required documents?	

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Next Steps…

- Create a resource about documenting Community Education.
- Send your questions about documenting Community Education to ombudcenter@theconsumervoice.org.

Questions?

September Office Hour – CANCELLED

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Connect with us!

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