

# Crosswalk B: Complaint Codes – Old NORS to Revised NORS

This Crosswalk lists all the National Ombudsman Reporting System (NORS) complaint codes. It maps these codes to the proposed NORS codes to be used in Older Americans Act Performance System (OAAPS). It also:

- Highlights **in red** complaint categories that have been discontinued.
- Maps the codes within the discontinued categories to the revised NORS complaint codes;

See Table 2 for definitions of the new codes, examples and reporting tips.

Current NORS Code	Revised NORS Code
<b>A. Abuse, Gross Neglect, Exploitation</b>	A-Abuse, Gross Neglect, Exploitation
1. Abuse, physical (including corporal punishment)	A01- Abuse: physical
2. Abuse, sexual	A02- Abuse: sexual
3. Abuse, verbal/psychological (including punishment, exclusion)	A03-Abuse: psychological
4. Financial exploitation (use categories in section E for less severe financial complaints)	A04-Financial exploitation
5. Gross neglect (use categories under Care, sections F&G for non-willful forms of neglect)	A05-Gross neglect
<b>6. Resident-to-resident physical or sexual abuse</b>	Identify the type of resident to resident abuse by selecting appropriate code(s) A01-A04 with resident as suspected perpetrator.
7. Not used	N/A

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Current NORS Code	Revised NORS Code
<b>B. Access to Information by Resident or Resident’s Representative</b>	B-Access to Information
8. Access to own records	B01-Access to information and records
9. Access by or to ombudsman/visitors	B03-Willful interference (Ombudsman program) D07-Visitors
10. Access to facility survey/staffing reports/license	B01-Access to information and records
11. Information regarding advance directive	B01-Access to information and records
12. Information regarding medical condition, treatment and any changes	B01-Access to information and records
13. Information regarding rights, benefits, services, the resident’s right to complain	B01-Access to information and records
14. Information communicated in understandable language	B02- Language and communication barriers
15. Not used	N/A
<b>C. Admission, Transfer, Discharge, Eviction</b>	C-Admission, Transfer, Discharge, Eviction
16. Admission contract and/or procedure	C01-Admission
17. Appeal Process - absent, not followed	C02-Appeal process
18. Bed hold - written notice, refusal to admit	C03-Discharge or eviction
19. Discharge/eviction - planning, notice, procedure, implementation, abandonment	C03-Discharge or eviction

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Current NORS Code	Revised NORS Code
20. Discrimination in admission due to condition, disability	C01-Admission
21. Discrimination in admission due to Medicaid status	C01-Admission
22. Room assignment/room change/interfacility transfer	C04-Room issues
23. Not used	N/A
<b>D. Autonomy, Choice, Preference, Exercise of Rights, Privacy</b>	D-Autonomy, Choice, Rights
24. Choose personal physician, pharmacy/hospice/other health care provider	D01- Choice in health care
25. Confinement in facility against will	D09- Other rights and preferences
26. Dignity, respect - staff attitudes	D03- Dignity and respect
27. Exercise preference/choice and/or civil/religious rights, individual's right to smoke	D09- Other rights and preferences
28. Exercise right to refuse care/treatment	D01- Choice in health care
29. Language barrier in daily routine	B02- Language and communication barriers
30. Participate in care planning by resident and/or designated surrogate	D01- Choice in health care
31. Privacy - telephone, visitors, couples, mail	D04-Privacy
32. Privacy in treatment, confidentiality	D04-Privacy
33. Response to complaints	D05-Response to complaints

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Current NORS Code	Revised NORS Code
34. Reprisal, retaliation	D06- Retaliation
35. Not used	N/A
<b>E. Financial, Property (Except for Financial Exploitation)</b>	E-Financial, Property
36. Billing/charges – notice, approval, questionable, accounting wrong or denied	E01-Billing and charges
37. Personal funds - mismanaged, access/ information denied, deposits or other money not returned	E02-Personal property
38. Personal property lost, stolen, used by others, destroyed, with-held from resident	E02-Personal property
39. Not used	N/A
<b>F. Care</b>	F-Care
40. Accidental or injury of unknown origin, falls, improper handling	F01- Accidents and falls
41. Failure to respond to requests for assistance	F02- Respond to requests for assistance
42. Care plan/resident assessment - inadequate, failure to follow plan or physician orders	F03-Care Planning
43. Contracture	F10- Rehabilitation services
44. Medications - administration, organization	F04-Medications

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Current NORS Code	Revised NORS Code
45. Personal hygiene (includes nail care & oral hygiene) and adequacy of dressing & grooming	F05-Personal hygiene
46. Physician services, including podiatrist	F06- Access to health related services
47. Pressure sores, not turned	F07-Symptoms unattended
48. Symptoms unattended, including pain, pain not managed, no notice to others of changes in condition	F07-Symptoms unattended
49. Toileting, incontinent care	F08- Incontinence care
50. Tubes - neglect of catheter, gastric, NG tube	F07-Symptoms unattended
51. Wandering, failure to accommodate/monitor exit seeking behavior	F03-Care planning
52. Not used	N/A
<b>G. Rehabilitation or Maintenance of Function</b>	Category G is discontinued. Complaints in this category are subsumed into category F-Care
53. Assistive devices or equipment	F09- Assistive devices or equipment
54. Bowel and bladder training	F08- Incontinence care
55. Dental services	F06- Access to health related services
56. Mental health, psychosocial services	F06- Access to health related services
57. Range of motion/ambulation	F10- Rehabilitation services
58. Therapies - physical, occupational, speech	F10- Rehabilitation services

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59. Vision and hearing	F06- Access to health related services
60. Not used	N/A
<b>H. Restraints - Chemical and Physical</b>	Category H is discontinued. Complaints in this category are subsumed into category F-Care
61. Physical restraint - assessment, use, monitoring	F11- Physical restraint
62. Psychoactive drugs - assessment, use, evaluation	F12-Chemical restraint
63. Not used	N/A
<b>I. Activities and Social Services</b>	This category is expanded and renamed. It becomes category G-Activities, Community Integration and Social Services. Complaints in category I are subsumed into the new category G.
64. Activities - choice and appropriateness	G01- Activities
65. Community interaction, transportation	G02-Transportation or G01 Activities if specific to interaction in the community.
66. Resident conflict, including roommates	G03-Conflict resolution
67. Social services - availability/appropriateness	G04-Social services
68. Not used	N/A

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Current NORS Code	Revised NORS Code
<b>J. Dietary</b>	This category becomes H-Dietary
69. Assistance in eating or assistive devices	H02-Dining and hydration
70. Fluid availability/hydration	H02-Dining and hydration
71. Food service - quantity, quality, variation, choice, condiments, utensils, menu	H01-Food Services
72. Snacks, time span between meals, late/missed meals	H01-Food Services
73. Temperature	H01-Food Services
74. Therapeutic diet	H03- Therapeutic or special diet
75. Weight loss due to inadequate nutrition	F07-Symptoms unattended
76. Not used	N/A
<b>K. Environment/safety</b>	This category becomes I-Environment
77. Air/environment: temperature and quality (heating, cooling, ventilation, water, noise)	I01-Environment
78. Cleanliness, pests, general housekeeping	I05-Housekeeping, laundry and pest abatement
79. Equipment/building - disrepair, hazard, poor lighting, fire safety, not secure	I02-Building structure
80. Furnishings, storage for residents	I03- Supplies, storage, and furnishings
81. Infection control	I05-Housekeeping, laundry and pest abatement

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Current NORS Code	Revised NORS Code
82. Laundry - lost, condition	E02-Personal property
83. Odors	I01-Environment
84. Space for activities, dining	I04- Accessibility
85. Supplies and linens	I05-Housekeeping, laundry and pest abatement
86. Americans with Disabilities Act (ADA) accessibility	I04- Accessibility
<b>L. Policies, Procedures, Attitudes, Resources</b>	This category becomes J-Facility Policies, Procedures and Practices.
87. Abuse investigation/reporting, including failure to report	J01-Administrative oversight
88. Administrator(s) unresponsive, unavailable	J01-Administrative oversight
89. Grievance procedure	D05-Response to complaints
90. Inappropriate or illegal policies, practices, record-keeping	J01-Administrative oversight
91. Insufficient funds to operate	J02-Fiscal management
92. Operator inadequately trained	J01-Administrative oversight
93. Offering inappropriate level of care	J01-Administrative oversight
94. Resident or family council/committee interfered with, not supported	D08- Resident or family council
95. Not used	N/A



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<b>M. Staffing</b>	This category is discontinued. Complaints in this category are subsumed into J-Facility Policies, Procedures and Practices.
96. Communication, language barrier	B02- Language and communication barriers
97. Shortage of staff	J03-Staffing
98. Staff training	J03-Staffing
99. Staff turn-over, over-use of nursing pools	J03-Staffing
100. Staff unresponsive, unavailable	J03-Staffing
101. Supervision	J03-Staffing
102. Eating Assistants	J03-Staffing
<b>N. Certification/Licensing Agency</b>	This category is discontinued. Complaints in this category are subsumed into K- Complaints about an Outside Agency.
103. Access to information	K01- Regulatory system
104. Complaint, response to	K01- Regulatory system
105. Decertification/closure	K01- Regulatory system
106. Sanction, including Intermediate	K01- Regulatory system

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Current NORS Code	Revised NORS Code
107. Survey process	K01- Regulatory system
108. Survey process - Ombudsman participation	K01- Regulatory system
109. Transfer or eviction hearing	K01- Regulatory system
110. Not used	N/A
<b>O. State Medicaid Agency</b>	This category is discontinued. Complaints in this category are-subsumed into K- Complaints about an Outside Agency.
111. Access to information, application	K02-Medicaid
112. Denial of eligibility	K02-Medicaid
113. Non-covered services	K02-Medicaid
114. Personal Needs Allowance	K02-Medicaid
115. Services	K02-Medicaid
New code in category K- Complaints about an Outside agency	K03-Managed care
New code in category K-Complaints about an Outside Agency.	K06-Private insurance
116. Not used	N/A

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<b>P. System/Others</b>	This category is renamed and becomes category L- System: Others (non-facility).
117. Abuse/neglect/abandonment by family member/friend/guardian or, while on visit out of facility, any other person	Use Abuse codes A01-A05 and identify the suspected perpetrator(s.)
118. Bed shortage - placement	If related to Medicaid code K02
119. Facilities operating without a license	J01-Administrative oversight
120. Family conflict; interference	L01- Resident representative or family conflict
121. Financial exploitation or neglect by family or other not affiliated with facility	A04- Financial exploitation. Ombudsman programs must identify the suspected perpetrator (s) (Family, Resident Representative, Friend, or Other).
122. Legal - guardianship, conservatorship, power of attorney, wills	L01- Resident representative or family conflict
123. Medicare	K04-Medicare
124. Mental health, developmental disabilities, including PASRR	L02-Services from outside provider
125. Problems with resident's physician/assistant	L02-Services from outside provider
126. Protective Service Agency	L02-Services from outside provider
127. SSA, SSI, VA, Other Benefits/Agencies	K05- Veteran's Administration
128. Request for less restrictive placement	L03- Request to transition to community setting

## Crosswalk B: Complaint Codes – Old NORS to Revised NORS

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<b>Q Other Settings</b>	This category was used to describe Ombudsman services involving individuals in private residences, hospitals, hospice care, etc. In the revised NORS, Ombudsman programs select “Other Setting” for the facility type and then choose the appropriate complaint code.
129. Home Care	Select “Other Setting” for the facility type and then choose the appropriate code for the complaint
130. Hospital or Hospice	See above.
131. Public or congregate housing	See above.
132. Services from outside provider	L02-Services from outside provider
133. Not used	N/A