



Mike Braun, Governor
State of Indiana

Office of the State Long-Term Care Ombudsman

402 W. WASHINGTON ST., ROOM W451, MS27
INDIANAPOLIS, IN 46207-7083

UPDATED: February 6, 2025

Dear Health Facilities Administrator:

As you know, CMS requires nursing facilities* to notify the Long-Term Care (LTC) Ombudsman of the majority of residents' transfers and discharges. Sending copies of notices to the State Long-Term Care Ombudsman (SLTCO) provides added protection to residents from being inappropriately transferred or discharged, provides residents with access to an advocate who can inform them of their options and rights, and ensures the SLTCO is aware of facility practices and activities related to transfers and discharges (CMS, 2024, F627/F628).

Report the following to both the State LTC Ombudsman (SLTCO) and your local LTC Ombudsman Representative:

- **Acute Emergency Transfer**

When a resident is transferred on an emergency basis to an acute care facility and expected to return, the SLTCO must be notified. Information from facilities regarding emergency transfers should be provided in a **monthly** list to the SLTCO, which should include residents' names, dates of transfer, facilities to which residents were transferred, and reasons for the transfers. Please make sure your facility's name is included on the monthly list.

**The above requirement does NOT apply to licensed assisted living facilities.*

- **Involuntary Transfer or Discharge**

An involuntary transfer or discharge is a transfer or discharge, 1) to which the resident objects, 2) that did not originate through a resident's verbal or written request, and/or 3) is not in alignment with the resident's stated goals for care and preferences.

If your facility initiates an involuntary transfer or discharge of a resident, you must provide a written notice of discharge to the resident, his or her representative, with copies to the Local Ombudsman Representative [410 IAC 16.2-3.1-12(6)(A)(iv)] and the SLTCO at least thirty (30) days prior to the discharge, or as soon as practicable. These copies of all transfer/discharge paperwork must be provided at the same time you notify the resident and the resident representative. *You will need to alert the local ombudsman representative by phone or email to inform them you've issued an involuntary transfer or discharge. They don't have access to the portal until the State office processes the information you've submitted, which is much more quickly through the portal.



Notice to the SLTCO must occur before or as close as possible to the actual time of a facility-initiated transfer or discharge, and the medical record must contain evidence the notice was sent to the Ombudsman.

If a resident is sent out temporarily on an emergency basis to an acute care facility, and you elect not to accept that resident back in your facility, a copy of the written discharge notice must be sent to the SLTCO and the local Ombudsman Representative at the same time the resident or his/her representative is notified. In this case, the discharge notice must be provided thirty (30) days in advance or as soon as practicable.

- An initial emergency transfer should be added to the monthly list when it occurs, but once a facility decides not to readmit the resident, a copy of the transfer or discharge notice must be sent to the Ombudsman at the same time it is provided to the resident/resident representative.
- The following transfers or discharges are NOT required to be reported to the Ombudsman:
 - Resident-initiated transfers or discharges, including AMA (against medical advice); and
 - The death of a resident.
 - Timely notification to the SLTCO and local Ombudsman Representative:

Notices must be sent to the SLTCO through the LTCOP's secure, encrypted web-based portal at <https://in-ombudsman-pff.peerplace.com/>. (See instructions on next page)

Please note: We have added a secure, encrypted web-based portal for submission of transfers and discharges. This method allows for a more secure way to submit the information and allows State office staff to process these quickly and efficiently. A quick step guide for submitting your reports through the portal is on the next page. DO NOT send notices to the SLTCO or local Ombudsman Representative via fax, email, US mail, FedEx, or other mail delivery as these options can result in a delay of promptly notifying the Ombudsman.

Please share this information with your staff. If you have any questions, please contact us at (317) 232-7134 or you may contact ISDH at LTCRulesandRegulations@health.in.gov.

Sincerely,

Lynn Clough, MA, State Long-Term Care Ombudsman
Mary Swinford, BSW, Deputy Director, Indiana State Long-Term Care Ombudsman Program

Quick Step Guide to Uploading Documents to the LTC Ombudsman Program

- Open a web browser and navigate to the following URL: <https://in-ombudsman-pff.peerplace.com/>
- Complete the web page, entering data into the applicable fields.
- Make sure to check the box if you are facility staff submitting a monthly report or a Notice of Transfer/Discharge. This ensures your uploaded documents are “attached” to the appropriate facility in the Ombudsman database and can be accessed by the local LTC Ombudsman.
- If you are uploading one document pertaining to a specific resident, please make sure you include the name of your facility and contact information on the attachment.
- If you are uploading numerous documents (you can upload up to ten documents at one time), you need only complete the facility name and contact information one time.
- Once you have uploaded all documents, click on “Process Request” at the bottom left of the page.
- You will receive a pop-up confirmation message that your files have been successfully uploaded along with a unique 32-character identifier. For ease of use, we recommend facilities **create dated folders/files of submitted documents along with a screenshot file of the submission message/#identifier. When asked to produce proof of submission, it should be easily accessible to you according to date.**

IMPORTANT: Please make sure to:

- Use the correct portal URL: <https://in-ombudsman-pff.peerplace.com/>. The pre-production or “practice” URL was different, and some facilities are still using that one.
- Include your facility’s name in the document you submit.
- Do not send notices to the LTC Ombudsman using fax, email, or USPS
- Please do not include resident face sheets, nurses’ notes, or progress notes in your submission to the SLTCO.

CC: Suzanne Williams, Director, Division of Long-Term Care, IDOH
Tammy Alley, Deputy Director, Division of Long-Term Care, IDOH
Lori Davenport, Director of Regulatory Clinical Affairs, Indiana Health Care Association

Original: June 28, 2019

Update: April 8, 2021

Update: August 22, 2023

Update: October 30, 2024

Update: February 6, 2025