



Complaint Policy

Related Federal Requirements: 34 C.F.R. § 602.23(c)

This policy describes how various parties may register complaints to the COCA about a COM it accredits and about the COCA; it specifies how the COCA will respond to those complaints.

Complaints About a COM

The complaint policy protects the integrity of the accreditation review procedures. These procedures provide a mechanism for concerned individuals to bring to COCA's attention information about matters at a COM that may be non-compliant with COCA's standards.

The COCA does not mediate on behalf of a complainant or intervene in decisions made by an accredited program. Its role is limited to verifying that the COM has and follows policies and processes that are compliant with COCA standards.

Complaints about a COM may be submitted by an individual who has knowledge about a matter of potential non-compliance. Complaints must be submitted within two years of the alleged incident that is the basis of the complaint. The complaint must present a concern regarding one or more proposed violations of accreditation standards or procedures and must be based on direct and responsible information.

A citation to the relevant standard or procedure must be included in the complaint. The complainant must provide a narrative of their allegation related to the accreditation standards or procedures and include any accurate documentation that could support the allegation. Supporting documents must be submitted in hard copy, Word, or PDF format (JPG or other file types cannot be accommodated). They must be combined into a single file, clearly labeled and referenced according to how they are cited within the complaint form for each standard referenced (i.e., a separate file for each standard or element referenced). Documents may not be password-protected or otherwise locked for editing (except for redacted information). Only documents that directly serve as evidence of the complaint should be submitted. All supporting documents must be submitted with the complaint. A request to submit additional information will reset the process timeline.

The complainant must provide evidence that an effort has been made to resolve the concern through COM administration (the dean or president), including information about any other actions taken to resolve the concerns before filing the complaint with the COCA.

The complainant may elect to keep their personally identifiable information confidential from the institution or program that is the subject of the complaint by redacting their personally identifiable information from the supporting documentation. The complainant's name and

contact information must be visible on the complaint form. Upon request, COCA staff will redact the information prior to processing the complaint. If the complainant wants personally identifiable information of other parties referenced in the complaint kept confidential, they must redact that information prior to submitting the complaint documentation.

COCA staff will provide guidance to a complainant who does not submit a complaint in accordance with COCA policies, allowing the complaint to be resubmitted prior to the complaint being reviewed, if the timeline for submission will not expire.

Complaints must be submitted within two years of the alleged incident that is the basis of the complaint. The complaint must be in writing and signed by the complainant. Unsigned or anonymous complaints will not be processed. Duplicate complaints submitted by an individual that address the same issues as complaints previously reviewed will not be considered. All signed complaints must be submitted to the Secretary, COCA, American Osteopathic Association, 142 E. Ontario St., Chicago, IL 60611, or via email to predoc@osteopathic.org.

COCA Response to Complaints

Within ten business days of receipt of a signed complaint, copies of the complaint will be sent to the COM's Chief Executive Officer or Chief Academic Officer for response to the complaint. The COM will have 15 business days to respond.

The complaint and the COM's response will be forwarded to the Commission Chair who will ask either the Executive Committee or an appointed an *ad hoc* subcommittee to determine whether the complaint merits further investigation. The determination of the Executive Committee or *ad hoc* subcommittee as to whether the COM is in compliance with COCA standards or if further investigation is required will be communicated to the complainant and the COM in writing. This process will be concluded within 15 days.

If further investigation of the COM is warranted, the COCA Secretary, in cooperation with AOA corporate counsel and the Executive Committee or the *ad hoc* subcommittee will initiate a formal review within 30 days from the decision to initiate an investigation. The COCA Executive Committee or the *ad hoc* subcommittee will decide what mode of investigation is most appropriate for the complaint, which may include a written progress report, on-site visit, or any investigation as appropriate. The investigation of a complaint may be incorporated into a site visit, site visit or progress report previously scheduled for another purpose, even if this causes a delay in granting a final determination of the complaint allegations.

The Executive Committee or the *ad hoc* subcommittee's findings will be forwarded to the Commission. Based upon these findings, the Commission may dismiss the complaint and report that the COM is in compliance with the accreditation standards; or notify the COM that, based on an investigation, the COCA has determined that it fails to meet the accreditation standards. The determination of the Commission as to whether the COM is in compliance with COCA standards or has been asked to provide further demonstration of compliance will be communicated to the complainant in writing.

If the COM has been found to be out of compliance with any accreditation standard, the COCA may require one or more of the following methods of remediation:

- A monitoring report outlining the COM's plans to address the deficiencies;
- A progress report documenting the COM's planning and its implementation of the plans; or
- An on-site visit to determine whether a change in the accreditation status of the COM is warranted.

The determination of the complaint by Executive Committee or the COCA is final. These procedures should be completed, and the COM notified, within 15 days of the Executive Committee or COCA's decision. Decisions affecting the accreditation status of the COM may be subject to a request for reconsideration by the COM per COCA policies.

The timelines outlined in this Policy may be extended by the COCA Secretary when circumstances warrant.

Complaints About the COCA

A complaint about the COCA, including any commissioner or accreditation staff, must be in writing and signed by the complainant and submitted to the Secretary, COCA, American Osteopathic Association, 142 E. Ontario St., Chicago, IL 60611, or via email to predoc@osteopathic.org.

Complaints must be submitted within two years of the alleged incident that is the basis of the complaint.

The Complainant may elect to keep their personally identifiable information confidential from the COCA by redacting their personally identifiable information from the supporting documentation. The complainant's name and contact information must be visible on the complaint form. Upon request, COCA staff will redact the information prior to processing the complaint. If the complainant wants personally identifiable information of other parties referenced in the complaint kept confidential, they must redact that information prior to submitting the complaint documentation.

COCA staff will provide guidance to a complainant who does not submit a complaint in accordance with COCA policies, allowing the complaint to be resubmitted prior to the complaint being reviewed, if the timeline for submission will not expire.

The COCA Secretary, in conjunction with AOA General Counsel, will present the complaint to the Commission Chair, Vice-Chair, and, when applicable, affected staff members. Any staff member or commissioner included in the complaint must recuse themselves from handling the complaint. A subcommittee of the Commission will be appointed by the Chair to formally review the complaint and develop a response. This subcommittee review process and response will be completed and forwarded to the Commission within 30 days of the date the subcommittee is convened.

The Commission will consider the complaint and the subcommittee's response at its next regularly scheduled COCA meeting. The complainant will be given the opportunity to present respective views in writing in the interest of an agreed-upon resolution. The final action of the Commission will be communicated to the complainant within 15 business days of its decision. The timelines outlined in this Policy may be extended by the COCA Secretary when circumstances warrant.

For more information, contact COCA staff at predoc@osteopathic.org or (312) 202-8124