

## **Complaint Policy**

# **Scope of This Policy**

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 concerning matters at a COM that may be in non-compliance with the COCA's 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 be in writing and signed by the complainant. All signed complaints must be submitted to the Secretary, COCA, American Osteopathic Association, 142 E. Ontario St., Chicago, IL 60611, or via email to <a href="mailto:predoc@osteopathic.org">predoc@osteopathic.org</a>. Unsigned or anonymous complaints will not be processed. The COCA does not disclose the identity of the complainant to other parties. Names of all individuals identified in the complaint will be redacted prior to submission to the COM for its response.

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.

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 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.

### **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. This decision of the Executive Committee or *ad hoc* subcommittee will be communicated to the complainant and the COM in writing. The complainant will not be informed of the result of any subsequent investigation. This process will be concluded within 15 days.

Adopted by Commission: July 1998 Last Revised: June 2024 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 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.

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 review:

- A 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.

These procedures should be completed, and the COM notified, within 15 days of the COCA decision. Decisions affecting the accreditation status of the COM may be subject to a request for reconsideration by the Commission. 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 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.

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. 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 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.

#### Related Federal Requirements: