

Checks, Balances, and Firewalls in COA's Accreditation System

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Accrediting bodies use a variety of means to ensure and protect the integrity of their accreditation processes. Especially important is protecting the integrity of decision-making processes. While the accreditation systems of the major accreditors of human service providers share a number of common elements, there is no single best way to achieve this end. This article will describe key aspects of COA's accreditation decision-making process and discuss some of the checks, balances, and firewalls that are built into COA's accreditation system.

I. Peer Reviewers

For most agencies, the only face-to-face contact they ever have with COA is with its peer reviewers. As such, they are vital to the integrity of COA's system.

COA uses trained volunteers to assess an organization's implementation of its standards. The use of trained volunteers enables COA to draw on a large pool of experienced organization staff to assemble review teams with the collective expertise to review the more than 60 types of programs and services for which COA has standards. It also allows COA to keep its accreditation fees affordable for agencies of all sizes. Peer reviewers must meet rigorous selection criteria and be nominated by one of the national membership associations that formally endorse COA's accreditation process, by COA staff, or by another peer reviewer.

Within COA's accreditation system peer reviewers primarily function as fact-finders. An organization undergoing accreditation submits a variety of documents (policies, procedures, etc.) to the review team six to eight weeks onths prior to its scheduled site visit. Peer reviewers review this material (typically spending upwards of 30 hours doing so) and assign preliminary implementation ratings, as appropriate. The submission of pre-site visit documentation enables the review team to gain a thorough understanding of the organization and how it functions – at least on paper – prior to its arriving on site, and frees the review team up to focus its on-site activities on reviewing records, interviewing staff, and visiting program facilities. Following the site visit, the Team Leader, who is responsible for managing the site visit and mentoring newer team members, submits a report of the team's findings. This report is then forwarded to COA's Accreditation Commission. The Accreditation Commission is empowered by COA's Board of Trustees to render decisions regarding organization accreditation.

COA has integrated a number of checks and balances regarding its peer reviewers into its accreditation system. I've already discussed the fact that reviewers must meet rigorous eligibility criteria, and receive training on how to assign ratings and generally how to fulfill this vital role. Several other criteria exist:

- Peer reviewers cannot review an organization that operates in the state/province in which the reviewer lives or works. This prohibition serves to minimize possible prejudice or favoritism that may result from competition for funding or other possible conflicts of interest.
- Peer reviews cannot review an organization where they have previously been employed, or served on its board, or if they know someone who is employed by the organization or on its board, unless the peer has not worked at the organization for more than ten years and the executive leadership is no longer there.
- The organization can reject a proposed peer reviewer if it can demonstrate that it has a valid reason for doing so.
- Peer reviewers are prohibited from consulting with an organization s/he is currently reviewing, and the prohibition extends for one year following the decision. Consultation by reviewers is a built-in part of the processes of other accreditors. However, within its own system of volunteer reviewers, COA considers this prohibition an important firewall.
- The review team is mentored by a team leader who has received additional training on performing that role.
- Peer reviewers sign a confidentiality statement and agree to abide by a code of conduct which clarifies COA's expectations regarding their behavior as COA reviewers.

II. Following the Site Visit

Once the peer reviewers have done their work and their report is sent to COA the decision-making process becomes less visible. Because of this, COA has taken a number of steps to ensure that the process is as open and conflict-free as possible.

Following the site visit, COA sends the organization a copy of a report (Preliminary Accreditation Report or PAR) that contains the review team's findings, along with recommendations for remediation. At this point an organization may be "expedited," i.e., COA's President/CEO has the discretion to award accreditation without presenting the organization to the Accreditation Commission if the organization has demonstrated sufficient compliance with COA's standards, including standards designated as mandatory or critical and there is no cause for concern about continued compliance. If an organization is not expedited it is strongly encouraged to provide a written response to the PAR, including providing any recommended evidence. This provides the organization with a crucial opportunity to make its case before the Commission. The PAR and the organization's response are reviewed by the Accreditation Commission which renders a decision regarding the organization's accreditation.

Common reasons that agencies provide a response to a PAR include:

- the organization completed its efforts towards achieving compliance following the site visit;
- the review team was unable to find the necessary information or evidence at the time of the site visit; and
- disagreement with the review team's interpretation of a standard as it applies to the organization's situation.

III. The Accreditation Commission

Most, if not all, accreditors have a mechanism for reviewing the findings of the site review team. This is the case even with those accreditors that empower their review teams to make accreditation decisions. COA uses a decision-making body called the Accreditation Commission to review the peer teams' findings, as well as organizations' response to its findings, and render accreditation decisions.

Like its peer reviewers, COA's accreditation commissioners are volunteers and must be qualified. Commissioners are nominated by COA's chief executive officer and approved by COA's Board of Trustees. They must work at, or be retired from, a COA-accredited organization, with the exception of a number of individuals who represent the public-at-large. Such representatives have no affiliation with any COA-accredited organization or Sponsoring Organization and have a professional background that enables thoughtful and skillful participation in the Commission's deliberations. Commissioners serve for three year terms.

The Accreditation Commission reviews the PAR and the organization's response and then renders a decision as to whether the organization will be accredited. In order to protect against possible conflicts of interest, the PAR, the organization's response to the PAR, and all other documents that the Commissioners review are redacted of all information that could identify the organization. In addition, Commissioners are required to recuse themselves if, during their review of the evidence, they become aware of the organization's identity and/or there is any other perceived or actual conflict of interest.

IV. Grievances and Appeals

Mechanisms for appealing decisions and filing complaints and grievances are also critical to the integrity of any accreditation process.

COA's accreditation system includes a number of formal mechanisms for the filing of grievances as well as for appealing decisions. These include formal mechanisms for:

- appealing a determination of ineligibility to apply for accreditation;

- appealing a decision to deny or revoke accreditation;
- consumers to raise customer service complaints about COA;
- raising complaints or grievances against peers; and
- receiving complaints from clients about accredited agencies.

V. Conclusion

The above article highlights some of the mechanisms that are integrated into COA's accreditation process for ensuring that COA's consumers can have the highest confidence that its decision-making process is open, fair, and free of actual or perceived conflict of interest.