Organizational Structure and Policies Governing the COQ Peer Certification Process

1. **Eligibility and Expectations for Certification**

   a. A Board must be a member of OACBHA to be eligible to be certified.

   b. Boards participating in the certification process must agree to redact PHI from documents that may need to be reviewed by surveyors.

   c. Boards participating in the certification process must submit an application packet, which will include standards-related information that will be subject to review prior to the site survey.

   d. Prior to seeking certification, a Board is expected to have completed a thorough self examination to determine that it is, in fact, prepared to meet the COQ certification standards and to have organized materials and prepared staff so as to facilitate the work and activities of the survey team.

   e. All internal OACBHA materials related to the certification process shall be considered confidential and shall not be released without the written permission of the Board to which they pertain. Documents and materials related to the certification process that are developed or received by Boards should be assumed to be public documents and consequently not confidential.

   f. Every Board, upon receiving its certification report, shall prepare a written performance improvement plan setting forth how it intends to address the recommendations which are contained in the report.

      - A copy of this performance improvement plan shall be submitted to OACBHA within 90-days of a Board’s having received its survey report.

      - These plans will be kept on file and used as resource documents in future surveys of the Board to which they pertain.

   g. Certification shall be a voluntary process.

2. **Length of Certification**

   a. Full certification shall be for a three-year period. Boards that are in substantial compliance with the majority of the standards and that demonstrate a serious commitment to meeting the intent of the COQ process, but which have some areas of non-compliance that need to be addressed, shall be eligible for a one-year provisional certification. Such one-year provisional certification may be granted only once, after which three-year certification status must be achieved.
b. If, in the course of a COQ survey for a Board coming from non-certification status, it becomes apparent to the survey team that this Board is unlikely to achieve certification, the survey team shall discuss this situation with Executive Director of the Board and shall afford the Board the opportunity of switching to a consultation (in lieu of completing the survey) and use the expertise of the surveyors to better understand what achieving certification would entail. After discussing this matter with the survey team, the Board may choose to accept or reject this offer. This option of terminating the survey process and switching to a consultation may take place only once and will not be available for subsequent surveys.

c. In the event there is a delay in the scheduling of a survey because of difficulties encountered by OACBHA, a Board’s currently approved certification shall remain in effect until the next certification survey and review can be completed.

d. Certification, once granted, may be revoked before it would automatically expire by a unanimous vote of the Executive Council.

- This shall be done only in extraordinary circumstances and only after an investigation and information-gathering process.
  
  o This investigation and information-gathering process may involve a special survey which is initiated by the Executive Council, with the survey recommendations to go directly to the Executive Council.

  o Before taking final action on such matters, the Executive Council shall afford the Board in question the opportunity for a formal hearing, at which the Board and other relevant and appropriate parties shall be invited to present testimony.

- The Executive Council has full discretion about the legitimacy and significance of such matters and is under no obligation to carry out investigations or take such matters under advisement.

- The action of the Executive Council in such circumstances is final and is not subject to review by the full membership.

3. **Certification Decision-Making Body**

a. There shall be a Culture of Quality Certification Board which shall be comprised of five Board Executive Directors. The OACBHA CEO shall serve as “non-voting”, ex-officio member of the Culture of Quality Certification Board.
The COQ Certification Board shall designate a chair from among its membership. This individual shall be a member of the Surveyor Oversight Group.

The members of the COQ Certification Board shall be elected by the full membership at the annual meeting, along with the officers and members of the Executive Council.

The standard nominating process shall be applicable.

A term shall be for three years, with the terms to be staggered (and with the initial Board to be elected to terms of varying length).

Members of the COQ Certification Board may also be a member or a chair of any other OACBHA committee or work group, except that they may not be:

- A member of the Culture of Quality Committee.
- An officer or member of the Executive Council.
- An active surveyor.

b. The duties of the COQ Certification Board shall be as follows:

- To determine whether a Board is to be granted COQ certification and (when applicable) for what time period, based upon the recommendations and information provided by the survey team (with the understanding that these determinations may, at the option of a Board, be appealed to the Executive Council).

- To review and approve the report document prepared by the surveyors.

- To oversee the operation of the peer certification survey process and address problems which may be encountered.

c. Any member of the COQ Certification Board who has provided substantive survey preparation assistance to another Board which is seeking certification shall recuse himself/herself from the certification decision-making process for that Board.

4. **Appeals of Adverse Certification Decisions**

a. Boards who disagree with a decision issued by the COQ Certification Board shall be afforded the opportunity to appeal this decision.
b. This process shall be initiated by the Board’s Executive Director by sending a written request to the CEO of OACBHA within 60-days of its receipt of the accreditation decision letter.

c. The CEO shall present this appeal to the Executive Council at its next regular meeting or within 30 days, whichever is sooner.

d. The Executive Council shall initiate an information-gathering process, which shall consist of securing information from the survey team, the Board which is appealing, the COQ Certification Board and other parties as appropriate.

e. The Executive Council may initiate a re-survey of the Board by a different survey team, with the survey recommendations to go directly to the Executive Council.

f. This information-gathering process and/or re-survey process shall be completed within 60 days of the meeting at which the Executive Council first considered the appeal.

g. Upon completion of the information-gathering process and no more than 90 days following the meeting at which the Executive Council first considered the appeal, the Executive Council shall meet to make a final decision on the appeal, at which through formal action the Executive Council shall either uphold the original decision of the COQ Certification Board or shall approve a different level of certification. The Executive Council may not, however, reduce the level of certification from that which was initially achieved.

h. These timelines may be extended by mutual agreement.

i. The decision of the Executive Council in the matter of such appeals shall be final and is not subject to review by the full membership.

j. Any member of the Executive Council who has provided substantive survey preparation assistance to another Board which is appealing a certification decision shall recuse himself/herself from involvement in the appeal process for that Board.

5. **Composition of Survey Teams**
a. Survey teams shall consist of a minimum of two persons, at least one of whom is to be a peer surveyor (i.e., an Executive Director or senior staff person at a Board).

b. The OACBHA CEO shall designate certain OACBHA staff who shall also function as surveyors, with these individuals to carry additional special responsibilities involving coordination, administrative support and procedural matters.

c. It is anticipated that a typical survey team will be comprised of two persons: a peer surveyor and a designated OACBHA staff person surveyor. The Surveyor Oversight Group, however, shall have authority to make other arrangements, as long as there is at least one peer surveyor.

6. **Approval and Oversight of Peer Surveyors**

   a. The OACBHA CEO, the chair of the COQ Certification Board and the chair of the COQ Committee shall comprise a Surveyor Oversight Group.

   b. This Surveyor Oversight Group shall have authority and responsibility for the following:

      ▪ Approving persons to serve as surveyors.
      ▪ Determine how the intent of the “Guidelines to be a COQ peer surveyor” is to be interpreted and applied in specific situations.
      ▪ Overseeing the assignment of surveyors to surveys and ruling when questions of conflict of interest or propriety may arise.
      ▪ Overseeing and evaluating the performance of surveyors, including reviewing feedback about surveyor performance from Boards who have been certified.
      ▪ Removing from the list of approved surveyors those persons whose performance may be unsatisfactory.

7. **Guidelines to be a COQ Peer Surveyor**

   a. Must currently be an Executive Director or hold a senior management position at a Board.

   b. Must have been an employee (or equivalent) with a Board for a minimum of three years.
c. Must be knowledgeable about a broad range of Board responsibilities and operations.

d. Must work at a Board which has been certified (after the initial phase-in period).

e. Must have the approval and permission of the Board where employed (with this to include a willingness to allow the individual to participate in training, and to conduct surveys on Board time).

f. Must be willing to participate in required training (both initial and ongoing) and to travel.

g. Must have integrity and be detail-oriented, a good communicator and committed to the Board system.

h. Must participate as an observer in a survey prior to becoming a surveyor.

i. Must successfully complete the survey training (which is to be both an educational and screening process).

j. Must complete an application.

k. Must sign a code of ethics for surveyors and complete a confidentiality agreement for each survey.

l. Must be formally approved by the COQ Surveyor Oversight Group.

m. May not simultaneously be an OACBHA officer, a member of the Executive Council or a member of the COQ Certification Board.

8. Approval and Revision of the COQ Standards

a. COQ standards and any substantive revision must be approved by the full membership of OACBHA.

b. The COQ Committee shall be responsible for conducting a review of the complete standards no less than annually and recommending changes which may need to be considered by the full membership.

c. The Executive Council shall have the authority to make interim technical modifications when circumstances may make this necessary. Any member of OACBHA may request that any such technical modifications to be subject to a vote of the full membership.

9. Critical Standards
a. Certain Standards have been determined to be mission critical to the overall Culture of Quality Program. In order for a Board to obtain any level of Culture of Quality Certification, they must obtain full conformance to all identified critical standards.

b. The sample period utilized to measure conformance to a critical standard will include the 356 days prior to a Board’s site survey.

c. During the course of a Board’s site survey, if surveyors become aware that a Board has not met conformance with a critical standard, surveyors must immediately notify the Board’s Executive Director of these findings.
   i. If this finding is made during the course of a Board’s initial survey, the Board has the option of terminating the site survey process, switching to a consultation and rescheduling its site survey until after they are in full conformance to the standard.
   ii. The option of terminating the site survey process and switching to a consultation may take place only once and will not be available for subsequent surveys.