COPE Complaint Investigation Process

COPE has a process for investigating complaints about courses or events that do not comply with COPE’s policies. The following is a summary of the steps involved in COPE’s investigative process.

**Submission of Complaints**
1. Complaints must be submitted in writing to ARBO within 3 months of the activity prompting the complaint.
2. Complaints can refer to a course and/or an event.
3. To trigger investigation, the complaint must claim non-compliance with an active COPE policy.
4. Complaints must include contact information of the person making the complaint; this information will be protected and confidential, except as may be required by legal process.

**Complaint Review**
1. When received, ARBO staff will alert the COPE Committee Leadership.
2. Staff and committee designee will determine whether complaint is worthy of investigation and what additional information is required for review.
3. Follow-up correspondence regarding decision will be sent to person who filed complaint.

**Investigation Due Diligence and Review**
1. Staff will contact the Administrator/Provider requesting copies of all course and event attendee evaluations, and attendee list with contact information.
2. Staff may contact the Administrator/Provider requesting additional information and/or documentation.
3. Staff may contact the Instructor requesting additional information and/or documentation.
4. Staff may contact Course and Event Attendees requesting additional information and/or documentation.
5. Staff may contact Corporate Sponsors requesting additional information and/or documentation.
6. Response from Administrators/Providers and Instructors must be received by ARBO within 30 days of the request.
7. COPE Committee Leadership will review documentation and information submitted.

**Investigation Findings and Notice**
1. The Instructor and/or Administrator/Provider may be found in compliance or not in compliance for the activity reviewed.
2. Notice will be sent to the Instructor and/or Administrator/Provider with an explanation.
3. Should the Administrator/Provider and/or instructor be found not in compliance, COPE may require the Instructor or Administrator/Provider to submit documentation of corrective action within thirty days of receipt of the notice, or rescind the Instructor or Administrator/Provider’s ability to produce COPE courses and events.
4. COPE Committee Leadership will review corrective action documentation to ensure it is adequate to address the issue. If it does not adequately describe or document compliance it will not be accepted.

**Investigation Outcomes**
1. If the Instructor or Administrator/Provider does not respond within the designated timeframe, their ability to present COPE accredited courses and events will be rescinded.
2. Documentation of investigations and findings will be maintained in the ARBO office and made available to the COPE Committee and considered should there be additional complaints or future
investigations.
3. Notice will be sent to the Instructor or Provider within 10 days of any decision to be made at any time during this process to rescind their ability to present COPE-Accredited activities.
4. ARBO reserves the right to provide some information about the COPE Investigation Process to State/Jurisdiction Licensing Boards which may include, but is not limited to, the facts and circumstances involved in the complaint and investigation, the name of the Instructor and/or Administrator/Provider involved the names of the commercial supporters and the findings.

Repeated Investigations
After three complaints/investigations, COPE may suspend the privileges of a Provider or Instructor to present COPE-Accredited activities.

1. First Infraction: COPE will ask the Administrator/Provider and/or Instructor to submit written documentation of corrective action to remediate the issue. COPE informs them that an On-Site Reviewer will be sent to the next activity at COPE’s expense to verify compliance. The reviewer will report back one of three decisions: no violation, minor violation, or significant violation.
2. Second Infraction: COPE will ask the Administrator/Provider and/or Instructor to submit written documentation of corrective action to remediate the issue. COPE informs them that an On-Site Reviewer will be sent to the next activity at the Administrator/Provider’s expense to verify compliance. The reviewer will report back one of three decisions: no violation, minor violation, or significant violation.
3. Third Infraction: Possible suspension of privileges by COPE.

Appeal Process
1. If you disagree with the findings of the COPE Committee’s investigation, you may, in writing, appeal the decision and request a review of the information by the COPE Peer Review Committee. You should include information on why you feel you should be able to continue as a COPE Instructor or Administrator/Provider.
2. If you disagree with the findings of the Peer Review Committee, you may, in writing, appeal the decision to the ARBO Board of Directors. You should include information on why you feel you should be able to continue as a COPE Instructor or Administrator/provider.