

## A. Introduction

Founded in 1977, the Council on Accreditation for Children and Family Services (COA) is one of the three leading accreditors of behavioral health care organizations and the leading accreditor of the full continuum of community-based social service organizations in the United States and Canada. Over 1400 organizations -- public, not-for-profit, for-profit, large and small -- have either successfully achieved COA accreditation or are currently engaged in COA's accreditation process.

Though COA is best known for its accreditation of private social service agencies that work with families and children, over the past several years COA has expanded its services to include accreditation of public systems, financial management and debt counseling programs, and most recently, through a partnership with the Employee Assistance Society of North America (EASNA), employee assistance programs (EAPs). Through this partnership, EASNA and COA have developed landmark standards in the EAP industry that will help ensure the highest quality EAP services.

The EASNA EAP Accreditation Program, as administered by COA (EAP Accreditation Program), is the culmination of an extensive and comprehensive review of existing best practices in the employee assistance field. The EASNA/COA EAP Accreditation Standards (EAP accreditation standards), which draw heavily upon existing COA and EASNA standards, have the benefit of an extensive literature search followed by rigorous beta testing at five EAPs representing a cross-section of the EAP industry. The results of this testing were embodied in a draft standards document which was then circulated among the foremost industry leaders through a notice and comment period. Like all of COA's accreditation products, the EAP Accreditation Program relied on extensive consensus-building processes and ensured that all relevant stakeholders had an opportunity to impart their comments in these evolving EAP accreditation standards.

While the new EAP accreditation standards (1<sup>st</sup> Edition, Version 1.0) are comprehensive in scope, COA is conscious of the need to continue refining, revising, and updating the current standards as the EAP industry changes and as new best practices emerge. Using its many years of experience in obtaining feedback to update and revise standards, and utilizing its partnership with EASNA and the expertise of its members, COA is developing systems, which will be used to continue to create best practice standards that ensure quality services in the EAP industry.

Given the varied nature of the EAP industry and the existence of other types of EAP service delivery models, COA is also beginning to open discussions with EAP experts and explore the development of standards that address the integration of EAPs with other related models and systems. Occupational health and other EAP consortium models, and union and other member assistance programs, are two such models that COA is planning to address in the coming year.

Though the accreditation process gives EAPs an opportunity to analyze their existing



practices and begin to engage in a process of continuous quality improvement, accreditation also provides a unique opportunity to gather information and data that can then be used to derive benchmarks, performance measures, and quality improvement models for use by EAPs. COA is engaged in the process of developing a plan to provide this type of valuable feedback to the EAP industry. Through the creation of tools for data collection, the development of measurement systems, and the analysis of this information and data, COA will begin the process of identifying benchmarks and performance measurements that can then be beta-tested for reliability at EAPs of various types and sizes.

Consistent with the success of these initiatives is the continuous open communication, technical assistance, training, and consultation with the EAP field itself. Relying heavily upon EAP specialists and the expertise of EASNA and its members, COA plans to continue the marketing of its existing standards and those in development as well as training for peer reviewers, team leaders, and EAP stakeholders in the COA accreditation process. COA will also continue to seek feedback from, educate, and inform the EAP community regarding new initiatives related to benchmarking and performance measurement.

As data become available from the project itself, developing systems for reporting will be especially important. In addition to the relationships COA will establish in relation to marketing the EASNA/COA products and services, and educating the EAP industry, COA will also develop a plan to report information regarding successful, innovative, and exemplary EAP services to additional EAP stakeholders.

Through this Statement of Work, COA will address how it intends to meet the challenges addressed. In the information that follows, COA's current processes for incorporating new standards and collecting data from the field are described in detail. COA's scoring methodology and current data collection tools are also explained for the purpose of understanding how COA will go about developing benchmarks and performance measurements. Additionally, the Statement of Work outlines anticipated needs as a part of this project for database infrastructure, research and analyses, and technical assistance and training. A timeline and workplan for this entire process is included in Attachment 1. As the EAP industry continues to evolve, COA is dedicated to the goal of ensuring quality services for all employees and their children and families.

## **B. Standards Development/Integration/Coordination of EAPs with Other Health Systems**

COA's standards development process is dynamic and continuous. Using a perpetual flow of information obtained from myriad industry sources, the Standards and Evaluation Division within COA remains apprised of seminal changes in the fields it accredits and incorporates best practices, as they evolve, into its accreditation standards. Upon publication of the *Employee Assistance Program (EAP) Standards and Self-Study Manual* in June of 2001, COA had already established a beginning



plan for the refinement and supplementation of the newly produced document. Further elaboration of this plan is provided in Attachment 1. The document includes the Standards and Evaluation Division's steps to incorporate new modules on member assistance programs, unions, consortia, and international EAPs. The workplan also addresses COA's schedule for making changes to the EAP accreditation standards, including tools and glossary. What follows is a description of COA's standards development process by which the incorporation of these new standards/modules will occur.

## **1. COA's Standards Development Process**

The standards development process follows a series of discrete steps that emphasize checks and balances to arrive at a valid and legitimate set of standards. Because each step in the process is rigorous and comprehensive, the data derived are of the highest quality. Such steps result in the eventual publication of a comprehensive set of standards that pair an objective methodology with an articulation of an industry's roadmap for success. Set forth below are the generic steps to be followed in the development of new standards.

- a. On a continual basis, COA collects information from a variety of data sources. Such sources include academic literature, trade publications, industry conferences, and topical articles from the Internet and marketing material. Moreover, COA aggregates information from COA-designed data collection tools provided to organizations and peer reviewers as they use COA's products. Such tools ask about the strengths and weaknesses of COA's process and standards, while also soliciting new ideas for standards. Lastly, COA uses focus groups, its annual conference, and other regularly meeting working groups, such as the Mental Health and EAP Industry Joint Initiative and the EASNA Standards Committee, to provide ongoing recommendations on standards. COA also logs any informal recommendations taken from stakeholders who call or write with suggestions.
- b. COA validates the information gathered from the sources above through establishing standards advisory panels and task forces that assist COA in identifying concepts suitable for best practice standards. With consensus-building as its overriding objective, COA polls all interested and knowledgeable industry stakeholders when developing and refining accreditation standards. COA works with colleague organizations, such as EASNA, the Mental Health and EAP Industry Joint Initiative, and the EAP Roundtable, to recommend persons whose professional background and experience are appropriate for participation in such work groups. Standards advisory panels often meet early in the development process to brainstorm about ideas for new standards.
- c. Organizations that have exhibited exemplary or unique practices are site visited. COA uses its findings to ensure that draft standards reflect real-life challenges and successes.



- d. Recommendations from standards advisory panels are applied to COA's existing standards methodology. Ideas are operationalized and evidence of compliance for such ideas is developed. A working draft of new standards is created.
- e. The draft of new standards is circulated among standards advisory panel members who provide their feedback. This can occur in person or via teleconference.
- f. Recommendations are woven into the draft and outstanding questions are researched.
- g. Accreditation data collection tools are developed. Such tools aid peer reviewers in assigning an appropriate score to standards that require a more structured format for data collection. Such data collection tools are discussed more extensively in Section C.1 under Accreditation Scoring Methodology. Standardized rating indicators are applied to each standard. Additionally a legend, which explicates these rating indicators through real-life examples, is developed.
- h. The self-study manual is circulated during a notice and comment, or field review, process. In advance of this field review period, COA publicizes this event in advance through its multiple publications (e.g., its newsletter or its monthly periodical) to increase stakeholder participation among several sectors, including policymaking bodies, regulators, and industry groups. COA uses its website as a medium for disseminating standards and typically provides three to five weeks for comment on its material. When specific issues exist where COA seeks targeted feedback, a list of questions accompanies the COA standards content. Participants in field review are asked to email or mail their responses to COA.
- i. Results of field review are analyzed for trends. Such trends are again researched for their validity; relevant standards advisory panel members are frequently re-pollled.
- j. The standards and methodology are beta tested with a representative sample of organizations. COA seeks to ensure that all significant variations among organizations (e.g., size, internal/external, types of services offered) are represented in the sample.
- k. With the standards, rating indicators, evidence of compliance, and associated tools near completion, COA begins work on collateral self-study materials-- accreditation guidelines that explain both the assignment of scores and how to prepare a self-study document, a glossary of terms, training modifications, policy and procedure modifications, and development of an index.



- l. The self-study manual (the document which combines standards and all related forms) is presented to COA's board of trustees for review.
- m. The final document is designed and reproduced for publication.

## **2. COA's EAP Standards Development Progress**

COA became aware of the need to create standards on the integration of consortia, unions, and member assistance programs in the beginning of 2001. However, the absence of a readily available framework of colleague organizations and research on these topics, as well as the need to produce a beginning set of standards for the field, moved COA to delay the development of these topics until after Version 1.0 of the EAP standards were released. The Standards and Evaluation Division slated such topics as the first areas to address after publication. Please see the attached workplan for specific timeframes attached to these activities (Attachment 1).

There are several industry and colleague groups that can assist COA in its forthcoming work. EASNA is the co-author of the EAP accreditation standards and, as an industry leader, provides invaluable ongoing standards development support. EASNA has a standards committee comprised of a representative group of EASNA-member EAPs. This committee liaises with COA every three months to share information about industry practices that should be considered for standards. COA has its next information-sharing call scheduled with EASNA on September 10, 2001.

Furthermore, COA participates in several trade/research groups that provide continuous input on standards. The EAP Roundtable, the Mental Health and EAP Industry Joint Initiative, the Carter Center Forums, the National Business Coalition on Health's V8 workgroup, and the American College of Mental Health Administration (ACMHA) are some such groups, which keep COA abreast of important industry considerations. The Mental Health and EAP Industry Joint Initiative and ACMHA are particularly fruitful in exploring the intersection of behavioral healthcare and EAPs.

COA has a strong partnership with the University of Maryland School of Social Work's Employee Assistance Program Department, chaired by Dr. Dale Masi. Dr. Masi has served as a consultant to COA since the inception of the EAP Manual. The cutting-edge research conducted by Dr. Masi in her private consultation work, as well as in her capacity as professor with a leading university, continues to advance COA's standards development process.

Also serving as important data sources are several industry representatives that have made recommendations to COA regarding standards for consortia, unions, and member assistance programs. For example, COA has scheduled a meeting



with a representative of the US Department of Health and Human Services in September 2001, to address issues related to consortium models and related government needs. Participation with industry groups listed above will give COA forums to explore standards for unions and members assistance programs.

COA will use the above groups to circulate ideas about revising existing standards and glossary materials, as well as to address new standards ideas.

Given the rigor with which COA pursues the development of its accreditation products, improvements made within the course of 12 months must be limited. As such, COA will not be able to address the more time-consuming process required to develop standards and guidance for integration of EAPs with managed behavioral healthcare organizations (MBHOs) and managed care organizations (MCOs), primary health providers, and human resource departments within the timeframes of this contract. As noted in the attached workplan (Attachment 1), COA will begin collecting information on these topics in the final months of 2002. It is COA's intent to then focus on drafting standards related to these topics in 2003.

## **C. EAP Performance Measurement & Quality Improvement**

### **1. Accreditation Information Collected from EAPs**

COA uses a comprehensive system of data collection. Data are collected and submitted to COA in a variety of forms, which include: the organization's self-study; specific data collection tools; and on-site record reviews, observations, and interviews. Together these elements provide essential information in making accreditation decisions.

The EAP's self-study document is a pre-site submission of specific documents and materials. Its compilation of organization documents and practices forms the basis for the review team to evaluate the EAP's compliance with the standards before the on-site review. The self-study requires organizations to collect several types of data including: policies and procedures, descriptive narratives, long and short-term plans, meeting minutes, quality improvement reports, and grievance reports.

In addition to organizational data generated through the self-study process, COA requires EAPs to complete specific tools that are provided as part of the self-study manual in order to provide additional information on their operations. These tools are used as structured feedback mechanisms to help peers grasp information essential to determine the rating for particular standards. Included within the *EAP Standards and Self-Study Manual, Version 1.0* are five tools:

- The Client Questionnaire – This survey (see Attachment 2), along with a letter (see Attachment 3) describing the purpose of the survey and instructions, is



given to randomly selected clients of the EAP and is returned directly to COA. The survey seeks to measure client satisfaction with the EAP.

- The Personnel Questionnaire – Similar to the Client Questionnaire, this survey attempts to assess the level of satisfaction of employees of the EAP (see Attachment 4 and 5).
- The Stakeholder Questionnaire – This survey is sent to customer organizations, host organizations, subcontractors, and other stakeholders to gather information from the community based on experiences with applicant EAPs (see Attachment 6 and 7).
- The List of Personnel – This form is completed by the EAP and submitted with the self-study document. It includes information about the staff including the CEO, senior management, middle management, and all support staff not assigned to a specific service (see Attachment 8).
- The Aggregate Job Category Form – This form is also completed by the EAP and submitted with the self-study document. The form collects demographic information related to job categories, including turnover rate, racial/ethnic composition, number of budgeted positions, and number of positions filled (see Attachment 9).

During the on-site review process the peer review team has the opportunity to collect additional information that serves as evidence of compliance with the remainder of the standards. Data sources used in this process include: case record reviews; observation of the facility and programs in operation; license inspection; and interviews with the client/stakeholder, staff, and boards of directors.

## 2. Accreditation Scoring Methodology

As a result of its findings following the review and collection of the above information, the review team will prepare a report in which it rates the EAP's compliance with each applicable standard against COA's 4-point rating scale. The four-level series of indicators COA uses to guide the review team in determining the EAP's compliance with the standard are as follows:

1	Full Compliance
2	Substantial Compliance
3	Partial Compliance
4	Non-Compliance
NA	A rating of not applicable is also possible, where permitted

Ratings of (1) and (2) are considered “passing.”

The review team assesses compliance by starting with the third order standards. See attached sample of 1<sup>st</sup>, 2<sup>nd</sup>, and 3<sup>rd</sup> order standards (Attachment 10). These are the



most measurable, specific standards. The peer reviewers use their professional judgment and expertise based on the information and data they have reviewed as they assign ratings for each third order standard. Peers also undergo a structured 2-day training which addresses scoring procedures.

Once every third order standard under a given second order standard has been assigned a rating, the peers rate the second order standard. Peer reviewers do not rely on a mathematical average or mean of the associated third order ratings to assign the second order rating. There may be cases when the second order rating deviates significantly from an average of the third order ratings. It is significant to note that particularly important third order standards may be more heavily weighted in the assignment of the second order score. As such, a rating of (3) on one third order among several ratings of (2) may very well result in a second order score of (3). These situations often occur when a critical health or safety third order standard exists among other standards.

Ratings for all the second order standards must precede the assignment of a rating to the first order standard. The first order standard's score is equivalent to the assignment for the entire section. The rating assignment process parallels that used for arriving at the score for a second order, with one significant difference. At the first order level, COA provides direction regarding the relative weights to be assigned to the second order standards by designating certain second order standards as more critical.

*The most important factor used by COA in reaching an accreditation decision is the EAP's level of compliance with the mandatory and critical standards. Together, these comprise COA's system of weighted standards.*

The mandatory and critical standards describe a core set of the essential elements that are indicative of quality organizational practice. All standards are important for the operation of a well-functioning EAP and EAPs must strive to comply with them. However, some standards are more important than others, and an EAP's failure to comply with a mandatory or critical standard reflects a fundamental weakness in its operations.

The EAP must be in full or substantial compliance with all mandatory standards. The EAP must comply with 85% of all critical standards. Furthermore, it cannot receive a rating of (3) or (4) on more than one critical second order in any one section. The EAP must also comply with 85% of all applicable third order standards.

### **3. Continuous Development of Accreditation Standards and Tools**

Standards development is a continuous process, fueled largely by the comments and feedback COA receives from the field. Such feedback is often based upon the experience of organizations that have undergone the accreditation process. Given the newness of the *EAP Standards and Self-Study Manual, Version 1.0* as a





separate product, COA expects to receive many comments and suggestions on how to enhance the product. Further development will include refinement and revision of the standards, creation of new standards topics, modification of the current tools, and creation of new tools to enhance the data collection process, as well as the quality of the data being collected. Such activities are addressed in Section B.1. COA's continuous development of EAP standards and tools will be guided by quantitative data supported by COA's management information system as well as by evaluation data from panels and workgroups.

#### **4. Performance Measures/Data Analyses**

COA has begun the accreditation of EAPs using Version 1.0 of the *EAP Standards and Self-Study Manual*. This process includes the use of the established tools mentioned above. Typically it takes an organization between 12 and 14 months to complete the accreditation process. Due to the small number of EAPs that will have completed the accreditation process in the next year, the volume of information, feedback, and data collected will be small. It would be irresponsible to develop performance measures or benchmarks with this limited amount of preliminary data. COA does, however, expect to be able to analyze and report on this first set of data obtained. This will include an analysis of the second and third order standard scores, as well as the information drawn from the tools. Again the analyses will be limited due to the small volume of data projected for submission in that time period, but COA does intend to conduct summary analyses. In addition, through the use of satisfaction surveys, COA will analyze and report on the feedback and perceptions of peer reviewers and EAPs who have completed the EAP accreditation process.

COA will begin to conduct more sophisticated analyses once our data pool has expanded. For example, COA will examine the relationship between EAP access and referral processes, employee outcomes, and employee/employer satisfaction, which should be related to the observed performance of EAPs on the dimensions of quality assessed by the EAP accreditation standards. In addition, COA will begin to develop hypotheses, which it will refine with the help of its standards panel, and test such assumptions against Version 1.0 data. As outlined in the Standards and Evaluation workplan, COA anticipates the publication of Version 2.0 to occur towards the end of year 2002. At that time COA will have developed more sophisticated data collections tools necessary to build on accreditation and develop the complementary process of performance measurement and benchmarking.

COA intends for the modifications of the data collection instruments and processes to support performance measurement and benchmarks to be in line with the work of several workgroups currently addressing this important initiative from the field wide perspective. To help establish a field consensus COA will consult the work of the American College of Mental Health Administration and the Accreditation Organization Workgroup, the Mental Health and EAP Joint



Industry Initiative, the Summit Planning Workgroup, and the Carter Center Forum.

## 5. Information System Augmentation

COA maintains a secure and sophisticated information system to support the management of the accreditation process and the data derived from the self-study and site visit process. This information system includes: a computer network comprised of four secure, protected and back-up NT servers, a sophisticated relational database programmed in a fourth generation language, two high-power network scanners used to scan machine-readable forms, an interactive web site, internet access, e-mail, and a variety of software including Teleform software to support the creation of machine-readable documents and SPSS to analyze all data. This system allows COA to effectively and efficiently manage information for the accreditation of public and private organizations.

With the development and implementation of EAP Accreditation standards, COA must now further develop its database to receive and report on the variety of rich data provided through the accreditation process described above. With the support of DHHS, COA will add a module for the EAP accreditation program to its existing database. This component will mirror COA's existing module for the accreditation of public and private organizations and will allow COA to track the accreditation process, all organizational demographics, the scores for each of the standards at the level of most detail, the information provided in each of the five accreditation tools and any additional data collected as part of performance measurement and the benchmarking process.

In addition to building a database module for EAP Accreditation, COA will convert the accreditation application, all tools, and any additional documents developed, into machine-readable forms using Teleform software. In doing so, COA will easily and reliably accommodate the transfer of data from the self-study and site visit process to the database. This method of managing the EAP data will promote the timely analysis and reporting of data as it become available. All database files will be easily managed using either SPSS or Crystal Reports.

## D. Reporting

Establishing continuous feedback systems and creating open channels of communication has always been an important part of COA's standards development and accreditation process. COA frequently solicits accredited organizations to share best practice examples with the field. For example at COA's 2001 National Conference on Best Practice, organizations had the opportunity to showcase their ideas and experiences in relation to quality improvement and performance indicators. As COA begins to obtain data that will inform the EAP industry, establishing these same types of feedback systems will be especially important to the ongoing development and enhancement of EAP services.



In addition to informing the industry of EAP benchmarks and performance measurements (as they become available), COA will establish a process to report aggregate data – both descriptive and inferential – derived from accreditation data such as qualitative and quantitative information obtained during on-site reviews and interviews, through observation, and through analysis of secondary data. COA will also develop a plan to report information regarding successful, innovative, and exemplary EAP services to additional EAP stakeholders.

One of the ways in which COA will report this information to the EAP field is through various workplace/mental health conferences including the EASNA conference in the spring of 2002, the Employee Assistance Professional Association (EAPA) conference in the fall of 2002, and the Carter Center Forums. Additionally, COA will also explore opportunities to present information to other workforce planning groups and individuals and groups interested in workplace mental health/drug and alcohol issues.

Creating a yearly report entitled *Ensuring Quality EAP Services* (EQES) will also be a reporting goal. EQES will highlight notable quality improvement efforts from EASNA/COA accredited EAPs, effective coordination efforts between EAPs and other systems, as well as successful efforts to target, develop, and track EAP activities. A goal of this report will be to include details from successful EAPs regarding:

- Selection of innovative initiatives and plan details;
- Implementation of the initiative;
- Use of resources, timelines and staffing; and
- Insights, special challenges, and tips on replicating the initiative.

EAPs will be able to use the information to guide and enhance their own quality improvement projects. EAP customer organizations will also be able to utilize the information to investigate and explore the types of EAPs with which they would like to contract for services. Future editions of EQES will provide more detailed quality improvement initiatives for specific EAP service functions (i.e., intake, assessment and referral, and critical incident stress management).

COA will also post EQES and other reports on its website ([www.coanet.org](http://www.coanet.org)). COA will direct consumers, customer organizations, and EAPs to go to this site to obtain basic information on accredited EAPs and to obtain a full composite of information concerning the accreditation process itself. COA is also in the process of developing a mechanism for reporting agency second order standard scores to the public in a report card format via the COA website. Consequently, the COA website will serve as an EAP information clearinghouse and will grow more rich over the next year as data become available.

## **E. Prevention and EAPs**



Because the primary work of an EA professional is to provide a range of services that promote a healthy and productive workforce, prevention has always been a key component of the EAP. The emergence of EAP services for employees, to a large extent, is the result of the recognition that improved health in the workplace reduces absenteeism and sick time and gives managers and employees an opportunity to seek assistance for a problem before a crisis ensues.

Though COA recognizes the importance of EAP prevention efforts in the workplace and currently has standards that focus on prevention-based efforts, under the terms of this contract COA will be unable to provide information to determine (1) the characteristics of preventive EAPs; (2) the relationship of preventive EAPs to evidence-based prevention interventions; and (3) the impact that preventive EAPs have on employee health and productivity. As mentioned above in Section C.4, COA will not collect sufficient data in just one year to support this work. With appropriate data and information in the second and third year of EAP accreditation and beyond, COA will work with EAP specialists to identify, test, and later report those prevention-based interventions that make the greatest impact on improved employee health and wellness.

## **F. Technical Assistance and Training**

Because the quality work of COA is relatively new to the EAP field, COA has relied heavily upon the assistance of EASNA and many other EAP specialists to introduce COA to the field and to provide technical assistance, training, and marketing, and to communicate the importance of accreditation and the value of the EAP accreditation standards to the EAP industry. COA welcomes open communication and feedback and has created mechanisms to obtain information from its constituents and stakeholders. However, the EAP accreditation standards gain the greatest value when EAP specialists themselves begin advocating for and promoting the value of accreditation with their own colleagues. This has been COA's experience across a range of industries. To that extent, COA believes it is crucial to continue its long-standing efforts at marketing and obtaining technical assistance and feedback from the field through the use of private independent contractors and consultants as well as trained volunteers.

COA envisions continuing to work with EAP consultants and also working with the EAP Specialty at the University of Maryland around specific issues related to:

- Recruitment of beta site participants for the integration of new groups into the EAP accreditation standards;
- Review and technical assistance in the development of subsequent versions of the EAP standards and in the creation of various tools for measurement and the analysis of benchmarks and performance measurements for the EAP industry;
- Marketing and communicating current EASNA/COA accreditation efforts around benchmarking and performance measurement; and
- Reporting data and information to the EAP field at conferences and



presentations in collaboration with COA.

COA will also seek technical assistance from a database developer/computer programmer to establish an EAP module for the current COA database to collect, measure, and report EAP information gathered from accreditation. COA plans to retain a research/statistical expert for the analysis of relevant data from the field.

COA will continue to conduct trainings for peer volunteers and team leaders around the accreditation process and the importance of site reviews. These individuals are an essential component of COA accreditation and the reliability of COA data because they gather the qualitative and quantitative accreditation information.

## **G. Monthly, Interim, and Final Reporting**

To facilitate this project, COA will engage in the process of creating interim and final reports that will present information (as it becomes available) on:

- EAP performance across standards domains and in relation to EAP demographics and other variables;
- Early analysis of appropriate performance measures and benchmarks; and
- Consumer and stakeholder satisfaction.

*Confidentiality is extremely important in this process so all information that COA presents in these reports will be in aggregate and will be non-identifiable. If initially the number of accredited organizations from which COA is obtaining data is small in number, COA reserves the right to withhold this information so as to protect client confidentiality until the population of accredited organizations grows in size.*

COA will supply monthly reports on this project that will occur by the 10<sup>th</sup> day of each month and will provide information regarding:

- Specification of monthly and cumulative expenditures and obligations;
- Problems encountered and how they were (or will be) resolved;
- Planned activities for upcoming reporting periods; and
- Statement that the project will be (or will not be) completed within the time frames specified in the delivery schedule and will be (or will not be) completed within the budgeted amount.

