

02/12/2021
Nondiscrimination
Investigation and Review
Procedure Guideline

## Interpreter services are provided by:

- Refer to region/ministry VIR and Phone Interpreter Services contacts such as:
  - Language Line Services (formerly Pacific Interpreter Service)
  - California Relay Service (800) 755-2922
  - Medical Emergency Network for the Deaf (MEND) (800) 422-7444
  - Staff with multi-lingual fluency that have been certified by the facility
  - Other assistive resources as applicable to the region/ministry
- Telecommunications Relay Service is a telephone service that allows persons with hearing or speech disabilities to place and receive telephone calls. TRS is available in all 50 states, the District of Columbia, Puerto Rico and the U.S. territories for local and/or long-distance calls. TRS providers – generally telephone companies – are compensated for the costs of providing TRS from either a state or a federal fund. There is no cost to the TRS user.
- **Don't hang up!** Some people hang up on TRS calls because they think the CA is a telemarketer. If you hear, "Hello. This is the relay service..." when you pick up the phone, please don't hang up! You are about to talk, through a TRS provider, to a person who is deaf, hard-of-hearing, or has a speech disability.
- Individuals needing Telecommunications Relay Services to file a discrimination complaint, may call 1-800-833-6384, or 7-1-1.
- Telecommunications Relay Service (TRS) Guide (pdf)

## **Investigation and Review Procedure Guideline:**

Any person who believes that someone accessing a PSJH Program or Activity has been subjected to discrimination in violation of this policy may contact the Civil Rights Coordinator to discuss those concerns. Such persons may also file a complaint with PSJH, as follows:

- Complaints must be submitted to the Civil Rights Coordinator within 60 days of the date the person filing the complaint becomes aware of the alleged discriminatory action.
- A complaint must be documented and must contain the name and address of the person making the complaint. (Sample A - Grievance Intake Form may be used for documentation and can be found in the Nondiscrimination Toolkit in the Grievance Process Materials folder.)
- The complaint must state the problem or action alleged to be discriminatory and the remedy or relief sought.
- The Civil Rights Coordinator (or her/his designee) shall conduct an investigation of the complaint. This investigation may be informal, but it will be thorough, affording all interested person(s) an opportunity to submit evidence relevant to the complaint. To the extent possible, and in accordance with applicable law, the Civil Rights Coordinator will take appropriate steps to preserve the confidentiality of files and records relating to grievances and will share them only with those who have a need to know. Investigation interviews must be documented. (Sample B Grievance Memo of Conversation may be used for documentation and can be found in the Nondiscrimination Toolkit in the Grievance Process Materials folder.)
- The Civil Rights Coordinator (or her/his designee) will issue a written decision on the complaint to the complainant, based on a preponderance of the evidence, no later than 30 days after the Civil Rights Coordinator's receipt of the complaint. The written decision will include notice to the complainant of their right to pursue further administrative or legal remedies. (Sample C Grievance Closing Memo may be used for documentation and can be found in the Nondiscrimination Toolkit in the Grievance Process Materials folder.)

- The complainant may appeal the decision of the Civil Rights Coordinator by writing to the VP/Chief Compliance Officer, or such other designee listed, within 15 days of receiving the Civil Rights Coordinator's decision. A written decision shall be issued by the decision-maker at this second level of review no later than 30 days after his or her receipt of the appeal.
- Providence Regions/Ministries may adopt their own nondiscrimination policies for Health Programs or Activities only to the extent that they are consistent with the PSJH system-wide policy, PSJH-CLIN-1203 Nondiscrimination.
- For Civil Rights complaints or concerns related to access to any of Providence's internet or intranet web sites or applications, please notify the Web Accessibility Coordinator in accordance with the system-wide policy, <u>PSJH-EIS-903 Web</u> Accessibility.

The availability and use of the foregoing nondiscrimination investigation and review procedure does not prevent a person from pursuing other legal or administrative remedies, including filing a complaint of discrimination on the basis of race, color, religion, sex (including pregnancy, childbirth and related medical conditions, sexual orientation, sex stereotyping, or gender identity), national origin, disability, age (40 or older) or genetic information (including family medical history), in court or with the U.S. Department of Health and Human Services, Office for Civil Rights. A person can file a complaint of discrimination electronically through the Office for Civil Rights Complaint Portal, which is available at: <a href="https://ocrportal.hhs.gov/ocr/portal/lobby.jsf">https://ocrportal.hhs.gov/ocr/portal/lobby.jsf</a>, or by mail or phone at: U.S. Department of Health and Human Services, 200 Independence Avenue SW., Room 509F, HHH Building, Washington, DC 20201. Complaint forms are available at: <a href="http://www.hhs.gov/ocr/office/file/index.html">http://www.hhs.gov/ocr/office/file/index.html</a>. Such complaints must be filed within 180 days of the date of the alleged discrimination. PSJH will provide notices to the public regarding the foregoing complaint process and the right to appeal on PSJH's website(s) and in other

If an individual has any questions or needs help filing a civil rights, conscience or religious freedom, or health information privacy complaint, they may email OCR at <a href="https://ocr.nr.nih.gov">OCRMail@hhs.gov</a> or call the U.S. Department of Health and Human Services, Office for Civil Rights toll-free at: 1-800-368-1019, TDD: 1-800-537-7697.

significant publications.

PSJH will make appropriate arrangements to ensure that individuals with Disabilities, Limited English Proficiency, or are non-English speaking are provided auxiliary aid and services or language assistance services, respectively, if needed to participate in this grievance process. Such arrangements may include, but are not limited to, providing Qualified Interpreters, providing audio files of material for individuals with low vision, or assuring an accessible location for the proceedings. The Civil Rights Coordinator, acting directly or through a designee, will be responsible for such arrangements, and dedicated phone lines will be provided to assist individuals in obtaining communication assistance services.

State/Service	Civil Rights Accessibility Coordinator
Ambulatory Care	Civil Rights Coordinator, 800 Fifth Ave, Seattle, WA 98104
Network	Tel: 1-844-469-1775; Interpreter Line: 1-888-311-9127
	Email: Nondiscrimination.ACN@providence.org
Alaska	Civil Rights Coordinator, 3200 Providence Dr., Anchorage, AK 99508
	Tel: 1-844-469-1775; Interpreter Line: 1-888-311-9127

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Onlife mais North	Email: Nondiscrimination.AK@providence.org
California, Northern	Civil Rights Coordinator, 1165 Montgomery Drive, Santa Rosa, CA
	95405
	Tel: 1-707-321-9381; Interpreter Line: 1-888-311-9127
Opliformia Op. (Inc.)	Email: Nondiscrimination.NCAL@stjoe.org
California, Southern	Civil Rights Coordinator, 501 S. Buena Vista St., Burbank, CA 91505
	Tel: 1-844-469-1775; Interpreter Line: 1-888-311-9127
ļ. <u>.</u>	Email: Nondiscrimination.SCAL@providence.org
Hoag Memorial	Civil Rights Coordinator, One Hoag Drive, Newport Beach, CA 92663
	Tel: 1-949-764-4427; Interpreter Line: 1-888-311-9127
	Email: CorporateCompliance@hoag.org
Home & Community Care	Civil Rights Coordinator, 2811 S. 102nd St, Suite 220, Tukwila, WA
	98168
	Tel: 1-844-469-1775 Interpreter Line: 1-888-311-9127
Madia Madia C	Email: Nondiscrimination.HCC@providence.org
Kadlec Medical Center	Civil Rights Coordinator, 888 Swift Blvd, Richland, WA 99352
	Tel: 1-844-469-1775; Interpreter Line: 1-888-311-9127
	Email: Nondiscrimination.KMC@providence.org
Montana	Civil Rights Coordinator, 1801 Lind Avenue SW, Renton, WA 98057
	Tel: 1-844-469-1775; Interpreter Line: 1-888-311-9127
	Email: Nondiscrimination.MT@providence.org
Oregon	Civil Rights Coordinator, 4706 NE Glisan St. Portland, OR 97213
	Tel: 1-844-469-1775; Interpreter Line: 1-888-311-9127
D 16: 14 II	Email: Nondiscrimination.OR@providence.org
Pacific Medical	Civil Rights Coordinator, 1200 12 <sup>th</sup> Avenue S. Seattle, WA 98144
	Tel: 1-844-469-1775; Interpreter Line: 1-888-311-9127
Curedish (and Curedish	Email: Nondiscrimination.PM@providence.org
Swedish (and Swedish	Civil Rights Coordinator, 747 Broadway, Seattle, WA 98122
Edmonds)	Tel: (206) 215-2613; Interpreter Line: 1-888-311-9127 Email:
Texas/New Mexico	Compliance@swedish.org
Texas/New Mexico	Civil Rights Coordinator, 3615 19 <sup>th</sup> St. Box 337, Lubbock, TX 79410
	Tel: 1-844-469-1775; Interpreter Line: 1-888-311-9127
Washington Fastorn	Email: Nondiscrimination.TXNM@providence.org
Washington - Eastern	Civil Rights Coordinator, 101 West 8th Ave, Spokane, WA 99204
(Providence Health Care)	Tel: 1-844-469-1775; Interpreter Line: 1-888-311-9127 Email: Nondiscrimination.PHC@providence.org
Washington Northwest	Civil Rights Coordinator, 1321 Colby Avenue, Everett, WA 98201
Washington - Northwest	Tel: 1-844-469-1775; Interpreter Line: 1-888-311-9127
	Email: Nondiscrimination.NWR@providence.org
Washington - Southeast	Civil Rights Coordinator, 401 W Poplar St, Walla Walla, WA 99362
wasiiiigtoii - Soutileast	Tel: 1-844-469-1775; Interpreter Line: 1-888-311-9127
	Email: Nondiscrimination.SER@providence.org
Washington - Southwest	Civil Rights Coordinator, 413 Lilly Road NE, Olympia, WA 98506
washington - Southwest	Tel: 1-844-469-1775; Interpreter Line: 1-888-311-9127
	Email: Nondiscrimination.SWR@providence.org
2 <sup>nd</sup> Level of Appeal for	PSJH – Nondiscrimination Appeals, Risk and Claims Division
All Regions	1801 Lind Avenue SW, Renton, WA 98057
All Negions	Tel: 1-844-469-1775; Interpreter Line: 1-888-311-9127
	Email: Nondiscrimination.PSJH@providence.org
Web Accessibility	PSJH-Web Accessibility, Enterprise Information Services
Coordinator	4400 NE Halsey St., Portland, OR 97213
Coordinator	TTOO INE Haisey Ot., I Orlianu, Or 3/213

(971) 337-3201

1. 'Auxiliary aids and services include:(1) Qualified interpreters on-site or through video remote interpreting (VRI) services, as defined in 28 CFR 35.104 and 36.303(b); note takers; real-time computer-aided transcription services; written materials; exchange of written notes; telephone handset amplifiers; assistive listening devices; assistive listening systems; telephones compatible with hearing aids; closed caption decoders; open and closed captioning, including real-time captioning; voice, text, and video-based telecommunication products and systems, text telephones (TTYs), videophones, and captioned telephones, or equally effective telecommunications devices; videotext displays; accessible electronic and information technology; or other effective methods of making aurally delivered information available to individuals who are deaf or hard of hearing;(2) Qualified readers; taped texts; audio recordings; Braille materials and displays; screen reader software; magnification software; optical readers; secondary auditory programs (SAP); large print materials; accessible electronic and information technology; or other effective methods of making visually delivered materials available to individuals who are blind or have low vision;(3) Acquisition or modification of equipment and devices; and(4) Other similar services and actions.