



## Patient Non-Discrimination Grievance Policy

### **SCOPE :**

This policy applies to all Fred Hutchinson Cancer Center ("Fred Hutch") workforce members engaged in patient care in all clinical facilities.

### **POLICY:**

Fred Hutch provides services to patients and welcoming visitors in a manner that respects, protects, and promotes patient rights.

1. Fred Hutch Personnel will treat all patients and visitors receiving services from or participating in other programs of Fred Hutch and its affiliated clinics with equality in a welcoming manner that is free from discrimination based on age, race, ethnicity, color, creed, geography, national origin, immigration status, religion, beliefs, income, education, language, disability, sexual orientation, marital status, sex, gender identification or expression, veteran or military status, or any other basis prohibited by federal, state or local law. (See Fred Hutch APOP- Patient Rights & Responsibilities policy).
2. Fred Hutch Personnel will inform patients of the availability of and make reasonable accommodations for patients consistent with federal and state requirements. For example, language interpretation services will be made available for non-English speaking patients and sign language interpretation will be made available for hearing impaired patients.
3. Fred Hutch Personnel will afford visitation rights to patients free from discrimination based on age, race, ethnicity, color, creed, national origin, immigration status, religion, income, education, language, disability, sexual orientation, marital status, sex, gender identification or expression, veteran or military status, or any other basis prohibited by federal, state or local law, and will ensure that visitors receive equal visitation privileges consistent with patient preferences.

Fred Hutch Personnel are prohibited from retaliating against any person who opposes, complains about, or reports discrimination, files a complaint, or cooperates in an investigation of discrimination or other proceeding under federal, state, or local anti-discrimination law.

## Section 1557

It is the policy of Fred Hutch not to discriminate against any patient on the basis of race, color, national origin, sex, age or disability. Fred Hutch has adopted an internal grievance procedure providing for prompt and equitable resolution of grievances alleging any action prohibited by Section 1557 of the Affordable Care Act and its implementing regulations.

Section 1557 and its implementing regulations may be examined by:

- Contacting the Civil Rights Coordinator (Coordinator), Fred Hutch Corporate Integrity,
    - [Integrity@seattlecca.org](mailto:Integrity@seattlecca.org); or
    - Calling 206-606-6380, 206-606-7154 or 1-866-353-6098
  - Faxing 206-606-4335
- Any person who believes a patient has been subjected to discrimination on the basis of race, color, national origin, sex, age or disability may file a grievance under this procedure. It is against the law for Fred Hutch to retaliate against anyone who voices a legitimate concern regarding discrimination, files a grievance, or participates in the investigation of a grievance.

## Procedure

- Grievances must be submitted to the Coordinator within sixty days after the date the alleged discrimination occurred.
- Staff who witness or are notified by others of alleged discrimination are required to notify the Coordinator as soon as possible and no later than sixty days after being notified.
- A grievance must be in writing, containing the name and address of the person filing it.

The grievance must state the problem or action alleged to be discriminatory and the remedy or relief sought.

- The Coordinator or designee shall conduct an investigation of the grievance. This investigation may be informal, but it will be thorough, affording all interested persons an opportunity to submit evidence relevant to the grievance. The Coordinator will maintain the files and record of Fred Hutch relating to such grievances. To the extent possible, and in accordance with applicable law, the 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.
- The Coordinator will issue a written decision on the grievance, based on a preponderance of the evidence, no later than 30 days after its filing, including a notice to the complainant of their right to pursue further administrative or legal remedies.

- The person filing the grievance may appeal the decision of the Coordinator by writing the or administrative remedies, including filing a grievance of discrimination on the basis of race, color, Corporate Integrity Officer within 15 days of receiving the Coordinator's decision. The Corporate Integrity Officer shall issue a written decision in response to the appeal no later than 30 days after its filing.

The availability and use of this grievance procedure does not prevent a person from pursuing other legal national origin, sex, age or disability in court or with the U.S. Department of Health and Human Services, Office for Civil Rights. A person can file a grievance of discrimination electronically through the Office of Civil Rights Grievance Portal which is available at:

- <https://ocrportal.hhs.gov/ocr/portal/lobby.jsf>, or by mail at:
  - U.S. Department of Health and Human Services
  - 200 Independence Avenue SW
  - Room 509F, HHH Building
  - Washington, DC 20201

Grievance forms are available at <http://www.hhhs.gov/ocr/office/file/index.html>. Grievances must be filed with the OCR within 180 days of the date of the alleged discrimination.

Fred Hutch will make appropriate arrangements to ensure that individuals with disabilities and individuals with limited English proficiency are provided auxiliary aids 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 taped cassettes of material for individuals with low vision, or assuring a barrier-free location for the proceedings. The Coordinator will be responsible for such arrangements.