

**Patient Non Discrimination**

Civil Rights Division-ACA

POLICY:

It is the policy of Willapa Harbor Hospital to ensure that all patients and visitors are treated with equality, consistent with applicable Federal civil rights law. This policy applies to all members of the Willapa Harbor Hospital's workforce; including employees, medical staff members, contracted service providers, vendors, representatives and any other individual providing service to or on behalf of Willapa Harbor Hospital.

Willapa Harbor Hospital complies with Section 1557 Non-Discrimination of the Affordable Care Act. Willapa Harbor Hospital does not discriminate on the basis of race, color, national origin, (including immigration status and English language proficiency), age, disability, religion, sex, sexual orientation, gender identity or expression, or ability to pay for medical care. Willapa Harbor Hospital does not exclude people or treat them differently because of race, color nation origin, age disability, religion, sex, sexual orientation, gender identity or expression, or ability to pay for medical care.

Willapa Harbor Hospital is dedicated to providing services to patients and welcoming visitors in a manner that respects, protects, and promotes patient rights.

1. All Hospital personnel will treat all patients and visitors receiving services from or participating in other programs of Willapa Harbor Hospital and its affiliated clinics with equality. Doing so in a welcoming manner that is free from discrimination based on age, race color, creed, ethnicity, religion, nation origin, marital status, sex, sexual orientation, gender identity or expression, disability, veteran or military status, or any other basis prohibited by federal, state and local law.
2. Willapa Harbor Hospital provides free aids and services to people with disabilities to communicate effectively with us, such as:
 - i. Qualified sign language interpreters
 - ii. Written information in other formats (large print, audio, accessible electronic formats, other formats)
3. Hospital personnel will inform patients of the availability of and make reasonable accommodations for patients consistent with federal and state requirements as set forth from SECTION 1557, as follows:
 - a. Ensuring Meaningful Access for Individuals with Limited English Proficiency
 It is the policy of the hospital to provide access to qualified translation services to patients needing assistance.
 - Mobile I-pad Language Line Solutions Interpretive services are readily available. Please see (Limited English Proficiency-Language Line Solutions P&P)
 - Children and Adult family members are not recommended as qualified medical interpreters and only in emergency situations where imminent threat to safety or welfare of an individual can family members be allowed.
 - However, patients can refuse our qualified interpretive services and this should be documented in the patient record. However, Section 1557 ruling states providers are not relieved of their legal duty to provide qualified medical interpreters, even if the patient elects to use an adult family member, and the provider must deem this appropriate under the circumstances.
 - Provide translation of written materials, for diagnosis, communication of discharge instructions, information written in other languages.

b. Sensory Impaired Persons

Visually impaired persons seeking care will be provided with private assistance from a staff member who will verbally explain the services offered and practice policies. The patient will be given printed materials with assistance from a staff member. Staff members will assist these patients with completion of any forms. This

assistance will be provided in a manner that insures the patient's privacy, such as completion of forms in an exam room instead of the waiting area.

c. Hearing impaired persons

Hearing impaired persons seeking care will be provided with private assistance from a staff member who will provide written copies of the services offered and practice policies. All our services are accessible to and usable to this population, including deaf, hard of hearing, and other sensory impairments.

Access Features include:

1. Convenient off-street parking designated for disabled persons.
2. Curb cuts and ramps between parking areas and buildings.
3. Level access into first floor.
4. Fully accessible bathroom, patient treatment areas, including exam rooms.
5. A full range of assistive and communication aids provided to the persons who are deaf, hard of hearing or blind, or with other sensory impairments. There is no additional charge for such aids.
 - a. A twenty-four (24) hour telecommunications device (TTY/TDD) which can connect the caller to all extension within the facility and/ or portable (TTY/TDD) units, for use by persons who are deaf, hard of hearing, or speech impaired.
 - b. If you, any customer, require any of the aids listed above, please let the receptionist or nurse know.
 - c. Staff will communicate with pad and pencil to respond to any questions to provide further instructions.
6. Patients requesting appointments for non-emergent care will be instructed to contact the hospital with assistance from a friend or family member or to write the clinic offices with their request. A response is to be returned the day of receipt. Patients needing emergency care will be instructed to contact 911 or local emergency services. The staff will notify the hospital and local emergency services that a patient is enrolled for a planned care treatment and may need assistance. This notification will consist of the patient's name, address, nature of the illness, and the name of an individual who is usually available to assist the patient.

1. By dialing 7 you get an outside line

- a. 7-1-877-833-6399 (Spanish TTY)
 - b. 7-1-800-833-6385 (Telebraille)
 - c. 7-1-877-833-6341 (STS)
 - d. 7-1-800-833-6386 (VCO)
 - e. 7-1-800-833-6384 (Voice)
 - f. 7-1-800-833-6388 (TTY)
 - g. 7-7-1-1 (In State)
2. Hospital Personnel will afford visitation rights to patients free from discrimination based on age, race, color, creed, ethnicity, religion, national origin, marital status, sex, sexual orientation, gender identity or expression, disability, 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.
 3. Any person who believes that he, she, or another person has been subjected to discrimination which is not permitted by this Policy, may file a complaint using Willapa Harbor Hospital's complaint and grievance procedure.
 4. Hospital 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.

PROCEDURE:

A notice of Non-discrimination and Grievance Procedure will be posted in the hospital identifying the contact for discrimination complaints.

1. Willapa Harbor Hospital's Corporate Compliance Officer is responsible for coordinating compliance with this Policy, including giving notice to and training all Hospital Personnel on this Policy.

2. Hospital Personnel will determine eligibility for and provide services, financial aid, and other benefits to all patients in a similar manner, without subjecting any individual to separate or different treatment on the basis of age, race, color, creed, ethnicity, religion, national origin, marital status, sex, sexual orientation, gender identity or expression, disability, veteran or military status, or any other basis prohibited by federal, state, or local law.
3. Hospital Personnel will provide notices to patients regarding this Nondiscrimination Policy and Willapa Harbor Hospital's commitment to providing access to and the provision of services in a welcoming, nondiscriminatory manner.
4. At the time patients are notified of their patient rights, Hospital Personnel will also inform each patient, or the patient's support person, including the patient's attorney in fact, when appropriate, of the patient's visitation rights, including any clinical restriction on those rights, and the patient's right, subject to the patient's consent, to receive visitors whom the patient designates, free of discrimination based upon age, race, color, creed, ethnicity, religion, national origin, marital status, sex, sexual orientation, gender identity or expression, disability, veteran or military status, or any other basis prohibited by federal, state, or local law. Such visitors include a spouse, state registered domestic partner (including same-sex state registered domestic partner), another family member, friend, or a legal representative of the patient, such as an attorney-in-fact. Hospital Personnel will also notify patients of their right to withdraw or deny such consent at any time. Hospital Personnel will afford such visitors equal visitation privileges consistent with the patient's preferences.
5. Any Hospital Personnel receiving a patient or visitor discrimination complaint will advise the complaining individual that he or she may report the problem to Willapa Harbor Hospital's Corporate Compliance Officer at 360-875-4566 and file a complaint without fear of retaliation.

References

| Reference Type | Title | Notes |
|--|--|---------------------------------------|
| Documents referenced by this document | | |
| Referenced Documents | Civil Rights Division-ACA | |
| Applicable Documents | Notice of Non-Discrimination | 15 Languages |
| Signed by |  Krisy Funkhouser, Director, Human Resources (05/13/2019 01:17PM PST) | |
| |  Emmett Schuster, CEO (05/13/2019 05:34PM PST) | |
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| Reviewed | [03/25/2015 Rev. 0], [07/28/2016 Rev. 0] | |

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<https://www.lucidoc.com/cgi/doc-gw.pl?ref=whh:11585>.



Willapa Harbor Hospital

Administration

11899

Policy/Procedure

Section 1557 Grievance Procedure

Official (Rev: 0)

POLICY:

It is the policy of Willapa Harbor Hospital not to discriminate on the basis of race, color, national origin (including immigration status and English language proficiency), age, disability, religion, sex, sexual orientation, gender identity or expression, or ability to pay for medical care. Willapa Harbor Hospital has adopted an internal grievance procedure providing for prompt and equitable resolution of complaints alleging any action prohibited by Section 1557 of the Affordable Care Act (42 U.S.C. § 18116) and its implementing regulations at 45 C.F.R. pt. 92, issued by the U.S. Department of Health and Human Services. Section 1557 prohibits discrimination on the basis of race, color, national origin, age, disability, religion, sex, sexual orientation, gender identity or expression or ability to pay for medical care in certain health programs and activities. Section 1557 and its implementing regulations may be examined in the office of Terry Stone, who has been designated to coordinate the efforts of Willapa Harbor Hospital to comply with Section 1557:

Renee Clements Compliance Officer,
P.O. Box 438 / 800 Alder St. South Bend, WA. 98586
(360) 875-4566, Fax (360) 875-6336
Email: rclements@willapa.net

Any person who believes someone has been subjected to discrimination on the basis of race, color, national origin, age, disability, sex, sexual orientation, gender identity or expression, or ability to pay for medical care may file a grievance under this procedure. It is against the law for Willapa Harbor Hospital to retaliate against anyone who opposes discrimination, files a grievance, or participates in the investigation of a grievance.

PROCEDURE:

- Grievances must be submitted to the Section 1557 Coordinator within (60 days) of the date the person filing the grievance becomes aware of the alleged discriminatory action.
- A complaint must be in writing, containing the name and address of the person filing it. The complaint must state the problem or action alleged to be discriminatory and the remedy or relief sought.
- The Section 1557 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 persons an opportunity to submit evidence relevant to the complaint. The Section 1557 Coordinator will maintain the files and records of Willapa Harbor Hospital relating to such grievances. To the extent possible, and in accordance with applicable law, the Section 1557 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 Section 1557 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 Section 1557 Coordinator by writing to the (Administrator/Chief Executive Officer/Board of Commissioners/etc.) within 15 days of receiving the Section 1557 Coordinator's decision. The (Administrator/Chief Executive Officer/Board of Commissioners/etc.) shall issue a written decision in response to the appeal no later than 30 days after its filing.

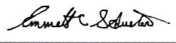
The availability and use of this grievance procedure does not prevent a person from pursuing other legal or administrative remedies, including filing a complaint of discrimination on the basis of race, color, national origin, age, disability, sex, sexual orientation, gender identity or expression or ability to pay for medical care 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: <https://ocrportal.hhs.gov/ocr/portal/lobby.jsf>, or by mail or phone at:

U.S. Department of Health and Human Services
200 Independence Avenue, SW
Room 509F, HHH Building
Washington, D.C. 20201

Complaint forms are available at:<http://www.hhs.gov/ocr/office/file/index.html>. Such complaints must be filed within 180 days of the date of the alleged discrimination.

Willapa Harbor Hospital 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 Section 1557 Coordinator will be responsible for such arrangements.

References

| Reference Type | Title | Notes |
|--|---|---------------------------------------|
| Documents referenced by this document | | |
| Referenced Documents | http://www.hhs.gov/ocr/office/file/index.html | |
| Referenced Documents | https://ocrportal.hhs.gov/ocr/portal/lobby.jsf | |
| Signed by |  Emmett Schuster, CEO (05/10/2019 10:54AM PST) | |
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