



NON-DISCRIMINATION POLICY AND PROCEDURE

In this document, CCC is referenced in place of CCC and CHA.

CONTENTS

1	PURPOSE.....	1
2	SCOPE.....	1
3	POLICY STATEMENT	1
4	PROCEDURE	1
5	RESPONSIBILITIES	2
	Compliance, Monitoring and Review	3
	Reporting.....	3
	Records Management.....	3
6	DEFINITIONS	3
7	RELATED LEGISLATION AND DOCUMENTS	3
8	FEEDBACK.....	4
9	APPROVAL AND REVIEW DETAILS.....	4

Printed copies are for reference only. Please refer to the electronic copy for the latest version.

Terms not defined in the DEFINITIONS section of this document may be found in the Glossary.

1 PURPOSE

- 1.1 To ensure members and providers have access to all benefits and services to which they are entitled without discrimination.

2 SCOPE

- 2.1 This policy applies to all CHA employees, members, providers, and sub-contractors.

3 POLICY STATEMENT

- 3.1 Members and providers have access to all benefits and services to which they are entitled without discrimination. CHA will not discriminate against providers that serve high-risk populations or specialize in conditions that require costly treatment.
- 3.2 Members will not be discriminated against based on their race, ethnicity, color, National origin, citizenship, religion, sex, sexual orientation, gender, gender identity, age, physical or mental disability, or veteran status.
- 3.3 All CHA staff will conduct their daily duties in accordance with this policy.

4 PROCEDURE

- 4.1 CHA maintains an internal grievance procedure for equitable resolution of complaints alleging any action as discriminatory.
- 4.2 Complaints and/or grievances must be submitted in accordance with CHA’s Grievance System PP02003 and Grievance Procedure PP02003.01.

Confidentiality Statement

This Non-Discrimination Policy and Procedure along with all attachments hereto shall be considered Cascade Comprehensive Care’s (CCC) Proprietary/Confidential Information



Cascade Health Alliance, LLC



cascade comprehensive care, inc.

5 RESPONSIBILITIES

5.1 The CO or designee will:

5.1.1 Process and investigate complaints of discrimination in accordance with CHA's Grievance System PP02003 and Grievance Procedure PP02003.01.

5.2 The Director of Quality Management is responsible to ensure this policy is distributed to all new providers and subcontractors at the time they enter into a contract with CHA, including any revisions to this policy as they are made.

Compliance, Monitoring and Review

5.3 The Compliance Department will conduct monthly monitoring of the Grievance, Appeal, and Hearing Log for completeness, accuracy, timeliness of the documentation and compliance with receipt, disposition and documentation of all grievances, hearings, and appeals.

5.4 The Executive Approval Committee will review this policy and procedure for compliance with OHA contract and guidelines at least once a year, or as applicable.

Reporting

5.5 No additional reporting is required.

Records Management

5.6 The CO shall maintain all electronic and/or hard copy records relating to all complaints and/or grievances filed.

6 DEFINITIONS

6.1 **Discrimination:** The denial of services to individual(s) or group(s) because the individual(s) or group(s) is/are part of a protected class. Discrimination also includes policy or treatment resulting in unequal access to programs and services to providers that serve high-risk populations or specialize in conditions that require costly treatment.

6.2 **Provider:** For the purpose of this document, "provider" refers to all behavioral health, dental, and physical health care providers.

7 RELATED LEGISLATION AND DOCUMENTS

7.1 42 CFR 438.214, 42 CFR 438.12

7.2 The U.S. Federal Age Discrimination Act of 1975

7.3 Oregon Administrative Rule 943-005-0005

7.4 Title VI, VII of the Civil Rights Act of 1964

7.5 Section 504 of the Rehabilitation Act of 1973 (29 USC 794)

7.6 Title II of the Americans with Disabilities Act of 1990, as amended in 2008

7.7 Uniformed Services Employment and Reemployment Rights Act of 1994

Confidentiality Statement

This Non-Discrimination Policy and Procedure along with all attachments hereto shall be considered Cascade Comprehensive Care's (CCC) Proprietary/Confidential Information



- 7.8 Vietnam Era Veterans Readjustment Assistance Act of 1974
- 7.9 Title 45 Code of Federal Regulations (CFR) Parts 80, 84, 86 and 91; and 28 CFR 35
- 7.10 ORS 659A, ORS 659A.082, ORS 399.065
- 7.11 Oregon Military Family Leave Act
- 7.12 Family and Medical Leave Act of 1993
- 7.13 Oregon Equality Act
- 7.14 [Health Insurance Portability and Accountability Act \(HIPAA\)](#)
- 7.15 [Oregon Health Authority \(OHA\): Coordinated Care Organizations \(CCO\)](#)
- 7.16 [CHA's Grievance System PP02003](#)
- 7.17 [CHA's Grievance Procedure PP02003.01](#)
- 7.18 [CHA's Compliance Plan PP02001](#)

8 FEEDBACK

- 8.1 Team Members may provide feedback about this document by emailing policyfeedback@cascaedcomp.com.

9 APPROVAL AND REVIEW DETAILS

Approval and Review	Details
Advisory Committee to Approval	Executive Approval Committee
Committee Review Dates	10/09/2018, 10/8/2019
Approval Dates	10/15/2018, 10/8/2019

Confidentiality Statement

This Non-Discrimination Policy and Procedure along with all attachments hereto shall be considered Cascade Comprehensive Care's (CCC) Proprietary/Confidential Information