



	Effective Date: February 1, 2015	Policy No.
	Revision Dates: January 21, 2015, March 24, 2016	
	Last Reviewed: January 21, 2015, March 24, 2016	
	Functional Area(s): All SYHC, Inc. Facilities	

DEPARTMENT: HEALTHY STEPS DEPARTMENT

SUBJECT: Title VI Plan Transportation Services

San Ysidro Health Center, Inc.'s (SYHC's) Discrimination Complaint Policy and Procedure applies to all SYHC facilities and departments, including the Healthy Steps Department. SYHC's Complaint Forms and Procedures are available to SYHC patients at the Healthy Steps office, as well as all of Healthy Steps' transit vehicles used for patient transportation services. All Healthy Steps staff members, including drivers and transportation coordinators, have access to the Complaint Forms and Procedures.

Complaint Forms and Procedures	
Healthy Steps Department Office	1275 30th Street, San Diego, CA 92154
Shuttle A	905 Hollister Street, San Diego, CA 92154*
Shuttle B	905 Hollister Street, San Diego, CA 92154*
Van A	905 Hollister Street, San Diego, CA 92154*
Van B	905 Hollister Street, San Diego, CA 92154*

***Vehicles are parked in this location, but travel to various locations within San Diego County**

POLICY:

San Ysidro Health Center, Inc. (SYHC) operates its programs without regard to age, gender, disability, income status, race, color, and national origin in accordance with Title VI of the Civil Rights Act and other applicable federal and state laws prohibiting discrimination on publicly funded projects.

PURPOSE:

To establish a process for addressing the concerns of any person who believes she or he has been aggrieved by any unlawful discriminatory practice may file a complaint with SYHC with reasonable certainty that the alleged issues will be investigated.

PROCEDURES:

1. **APPLICABILITY.** The following complaint procedures are applicable to all persons who believe that they have been subject to "discrimination" by SYHC. In general, it is designed to address disputes, including but not limited to the following:

- 1.1.1 Disagreements regarding a requested service, accommodation, or modification of a SYHC practice or requirement.
 - 1.1.2 Inaccessibility of a program, publication, or activity.
 - 1.1.3 Harassment or discrimination prohibited by California or federal law.
2. **PRELIMINARY REVIEW PROCESS.** The following two-step process must be completed prior to filing a formal complaint.
- 2.1.1 Informal Resolution - Prior to submitting a formal complaint, the complaining party shall contact the Risk and Patient Experience Analyst in the Risk Management Department for assistance in resolving the matter informally as soon as is reasonable practicable, generally within fifteen calendar (15) days of the time from when the subject of the complaint occurred or the grievant became aware of SYHC's non-compliance.

SYHC's Risk and Patient Experience Analyst can be reached at San Ysidro Health Center, Inc., 1275 30th Street, San Diego, CA. 92154; (619) 600-3029.

If the Risk and Patient Experience Analyst and/or the Risk Manager are not successful in providing a quick resolution (within thirty (30) calendar days) the issue raised will be reviewed by a review panel.

- 2.1.2 Review Panel – SYHC's Risk Management Department will convene a review panel that will consist of the Risk and Patient Experience Analyst, a member of the management staff, the Total Quality Management Director and/or Supervisor, and the Corporate Compliance Manager and (depending on the issues) other personnel as may be appropriate. This panel will review the request, investigate, and attempt to resolve the issues within thirty (30) calendar days of the request for or initiation of a second review. The panel will document the outcome of its review in a letter to the complaining party. If the complaining party is still not satisfied with the panel's disposition of the matter, the complaining party may file a formal complaint following the procedure described below.
3. **FORMAL COMPLAINT.** If the procedure for preliminary review does not yield a successful resolution, then the complaining party may file a formal complaint in the following manner:
- 3.1.1 Complaints must be filed within ten (10) calendar days of the complaining party's receipt of notice of the end of the preliminary review process described above.
 - 3.1.2 Complaints must be in writing and must include an attached copy of the letter from the Patient's Relations Committee.
 - 3.1.3 Complaints must be filed with SYHC's Quality Management Department at 1275 30th Street, San Diego, CA 92154, or
 - 3.1.4 Complaints may also be filed directly with the Corporate Compliance Department via the Compliance Hotline at : 1 (844) 668-4100
 - 3.1.5 Investigation – Depending how the formal complaint is filed, the Quality Management Department and/or the Corporate Compliance Department will initiate an investigation, which may include interviewing, consulting with, and/or requesting a written response to the issues raised in the complaint filed with the Risk Management Department, or from any individual the Corporate Compliance Department and Quality Management Department believes to have relevant information, including staff and members of the public. The Corporate Compliance Department and Quality Management Department may also hold an informal hearing.

- 3.1.6 Representation - The complaining party and any party against whom the grievance is directed have the right to have a representative.
- 3.1.7 Findings And Notification - SYHC's Corporate Compliance Department and/or the Quality Management Department in collaboration with the Risk Management Department's designee will prepare and provide the complaining party, and all other parties involved, a final report containing a summary of the investigation, written findings and a proposed disposition. This report will be provided within forty-five (45) calendar days of the filing of the formal complaint. SYHC may extend the timeline to assure proper resolution.
- 3.1.8 Final Disposition - The disposition proposed by SYHC's Corporate Compliance Department and/or the Quality Management Department will be put into effect promptly. The complaining party or any party against whom the complaint or the proposed disposition is directed may appeal. The appeal to SYHC's Corporate Compliance Department and/or the Quality Management Department (as set forth below) will not suspend the implementation of the disposition proposed by the Corporate Compliance Department and/or the Quality Management Department except in those circumstances where the Director of Quality Management decides that good cause exists making the suspension of implementation appropriate.

4. **APPEAL**

- 4.1.1 Within ten (10) calendar days of the issuance of the final report, the complaining party or any party against whom the complaint is directed may appeal to SYHC's Corporate Compliance Manager and/or the Director of the Quality Management Department.
- 4.1.2 An appeal is taken by filing a written request for review with the SYHC's Corporate Compliance Department and/or the Quality Management Department, at 1275 30th Street, San Diego, CA 92154.
- 4.1.3 The written request for review must specify the particular substantive and or procedural basis for the appeal, and must be made on grounds other than general dissatisfaction with the proposed disposition. Furthermore, the appeal must be directed only to issues raised in the formal complaint was filed or to procedural errors in the conduct of the complaint procedure itself, and not to new issues.
- 4.1.4 The review by the SYHC's Corporate Compliance, and/or the Quality Management Leadership Team normally shall be limited to the following considerations: Were the proper facts and criteria brought to bear on the decision? Were improper or extraneous facts or criteria brought to bear on the decision that substantially affected the decision to the detriment of the complaining party? Were there any procedural irregularities that substantially affected the outcome of the matter to the detriment of the complaining party? Given proper facts, criteria, and procedure, were the decision one that a person in the position of the decision-maker might reasonably have made?
- 4.1.5 A copy of the written decision will be expected within thirty (30) calendar days of the filing of the appeal and shall be sent to complainant, the SYHC Department's involved in the complaint, and, if appropriate, to persons whose authority will be needed to carry out the disposition. The deadline may be extended by the Chief Compliance Officer to assure proper resolution. The decision of the Chief Compliance Officer on the appeal is final.

Discrimination Complaint Form

Instructions: If you believe San Ysidro Health Center, Inc. (SYHC) has engaged in discrimination against one or more persons based on a basis other than medical condition or disability, please fill out this form completely, in black ink or type. Sign and return to the address on page 2. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint will be made available for persons with disabilities upon request.

Complainant:

Address:

City: _____ State: _____ Zip Code: _____

Telephone: Home: _____ Business: _____

Describe the acts of discrimination providing the name(s) where possible of the individuals who were responsible for the discriminatory acts. (Attach additional pages if necessary):

Return to:
Risk Management Department
C/o Risk and Patient Experience Analyst
San Ysidro Health Center, Inc.
1275 30th Street
San Diego, CA 92154
Phone: (619) 600-3029; Fax: (619) 428-5417
OR
Corporate Compliance Hotline:
1(844) 668-4100