

NON-DISCRIMINATION POLICY & PROCEDURES

POLICY:

Arthritis & Osteoporosis Center of Northern Virginia (AOCNV) does not discriminate, exclude, or treat people differently based on disability, race, color, national origin, sex, or age and maintains processes to address potential discrimination through prompt and equitable resolution of complaints.

PROCEDURES

1. Administrator Responsibilities

The Practice Administrator is responsible to:

- Ensure notice to interested persons that AOCNV does not discriminate, exclude, or treat people differently on the basis of disability, race, color, national origin, sex, or age.
- Distribute, implement, and update as necessary this *Policy, Procedure & Plan*.
- Oversee the grievance process and maintain files and records relating to grievances.

2. Grievance Procedures

- **Filing of a Written Complaint**

Any person who believes they have been subjected to discrimination may file a grievance with AOCNV or registered agent within 35 days of the date they become aware of the alleged discrimination. Complaints must be in writing, and include:

- o The name, address and phone number of the person filing the complaint;
- o A description of problem or action alleged to be discriminatory; and
- o The remedy or relief sought.

- **Investigation and Findings**

The Practice Administrator or their designee shall conduct an investigation, affording interested persons the opportunity to submit evidence relevant to the complaint. A written decision on the grievance will be issued within 45 days after its receipt.

- **Appeal**

A grievant may appeal the decision in writing within 21 days of receiving the decision. AOCNV shall issue a written decision in response to the appeal no later than 35 days after its filing.

3. **Accommodations:** AOCNV will make appropriate arrangements to ensure that necessary accommodations are available to participate in the grievance process (e.g. interpreters, audio material, barrier-free location, etc.).

4. **Rights Not Exclusive.** Availability and use of grievance procedures do not prevent the filing of a complaint with the US Department of Health and Human Services.

5. **Cooperation/Non-Retaliation.** These procedures provide a mechanism for addressing concerns, the success of which depends upon participants. Retaliation against participants is prohibited.