



CORPORATE POLICY & PROCEDURE

	Policy Name: MS2 - Nondiscrimination of Members
Department: Customer Care	Policy Number: MS2
Version: 6	Creation Date: 05/31/2017
Revised Date: 6/03/19, 9/21/20, 6/28/22, 4/04/23	
Line of Business: <input type="checkbox"/> All	
<input checked="" type="checkbox"/> Umpqua Health Alliance	<input type="checkbox"/> Umpqua Health Management
<input type="checkbox"/> Umpqua Health - Newton Creek	<input checked="" type="checkbox"/> Umpqua Health Network
Approved By: Nancy Rickenbach (Chief Operating Officer) Date: 04/18/2023	

POLICY STATEMENT

All Umpqua Health Alliance (UHA) internal and external personnel will comply with federal and State laws including Title VI of the Civil Rights Act, ACA Section 1557, and ORS Chapter 659A pertaining to non-discrimination requirements with regards to its members (42 CFR §§438.100 (b)(2)(3) and (d), OAR 410-414-3585, OAR 410-141-3590).

PURPOSE

To ensure that UHA employees and providers treat each member fairly and without judgement or prejudice.

RESPONSIBILITY

Customer Care
Clinical Engagement
Provider Relations

DEFINITIONS

Discrimination: 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.

Internal Personnel: All Umpqua Health employees, providers, and volunteers.

External Personnel: Individual contractors, subcontractors, network providers, agents, first tier, downstream, and related entities and their workforce.

Member: A Medicaid beneficiary who is currently enrolled in UHA or who may potentially enroll.

TDD/TTY: Telecommunication Device for the Deaf, Text Telephone / Teletype Terminal / Tele Typewriter



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PROCEDURES

1. CCO and its providers comply with applicable state and federal civil rights laws. It cannot treat people unfairly in any of its programs or activities because of a person's:
 - a. Age
 - b. Color
 - c. Disability
 - d. Gender identity
 - e. Marital status
 - f. National origin
 - g. Race
 - h. Religion
 - i. Sex;
 - j. Sexual orientation;
 - k. Basis of health status or need for health care services.

How Members are Notified of Rights

1. UHA's members are entitled to be treated fairly under the state and federal civil rights laws. UHA informs its members of this right by providing this information on UHA's website and in writing through the UHA Member Handbook which is mailed to each member when they first become eligible on the health plan. This information can be provided in English and translated into all other prevalent languages upon request.
2. Members who wish to receive an additional handbook may do so by calling UHA Customer Care Department and request another handbook to be mailed which will be sent out within 5 business days of request at no charge to the member. They may also come into the office and pick it up in person.
3. Nondiscrimination policy statement is included with each Grievance and Appeals System notice.

How Providers are Notified of Member Rights

1. UHA through Umpqua Health Network (UHN) notifies providers of member rights through its Provider Handbook, provider contracts, and through training provided at onboarding and annually. The Provider Handbook and trainings are made available to providers on UHA's website.

How Discrimination is Reported

1. Members who feel they were treated unfairly for the reasons above, wish to report discrimination, if they need assistance filing a grievance or to get more information may contact UHA's Customer Care Department:

Phone: 541-229-4842; Toll Free: 866-672-1551; TTY: 541-440-6304 or 711
Hours: Monday to Friday, 8 a.m.-5 p.m.



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Fax: 541-677-5881
 Mail: Umpqua Health Alliance, 3031 NE Stephens St, Roseburg, OR 97470

- To report member concerns or get more information, members can also contact our diversity, inclusion and civil right executive manager (non-discrimination coordinator):

Phone: 541-229-4842; Toll Free: 866-672-1551; TTY: 541-440-6304 or 711
 Fax: 541-677-5881
 Email: UHAGrievance@umpquahealth.com
 Mail: Umpqua Health Alliance, 3031 NE Stephens St. Roseburg, OR 97470
 Website and Complaint Form: <https://www.umpquahealth.com/appeals-and-grievances/>

- An individual also has the right to file a civil rights complaint with the U.S. Department of Health and Human Services Office for Civil Rights (OCR). Contact that office one of these ways:

Oregon Health Authority (OHA) Civil Rights
 Web: www.oregon.gov/OHA/OEI | Email: OHA.PublicCivilRights@state.or.us
 Phone: (844) 882-7889, 711 TTY
 Mail: Office of Equity and Inclusion Division
 421 SW Oak St., Suite 750,
 Portland, OR 97204

Bureau of Labor and Industries Civil Rights Division
 Phone: (971) 673-0764
 Email: crdemail@boli.state.or.us
 Mail: Bureau of Labor and Industries Civil Rights Division
 800 NE Oregon St., Suite 1045
 Portland, OR 97232

U.S. Department of Health and Human Services Office for Civil Rights (OCR)
 Web: <https://ocrportal.hhs.gov/ocr/smartscreen/main.jsf>
 Phone: (800) 368-1019, (800) 537-7697 (TDD)
 Email: OCRComplaint@hhs.gov
 Mail: Office for Civil Rights
 200 Independence Ave. SW,
 Room 509F, HHH Bldg.
 Washington, DC 20201



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Non-Discrimination Training

1. All internal personnel are expected to complete non-discrimination training assigned by the Human Resources Department within their first two (2) weeks of onboarding.
 - a. Exceptions can be made with prior approval from the Human Resources Department.
2. All external personnel are expected to complete the new provider onboarding training provided by UHN at onboarding and annually (PN6 - Provider Orientation and Training).
3. Annually, employees with member interactions will be expected to complete refresher trainings.
 - a. These trainings should be completed by the end of second quarter each year.
 - b. Notification will be sent out via email at the beginning of the quarter to all internal personnel who will need to take this refresher training.
 - c. Exceptions will be made on a limited basis, as required by law (e.g. medical leave).
4. Failure to complete trainings on time may result in disciplinary actions (CO19 - Disciplinary Process for Compliance Infractions). Potential actions include:
 - a. Verbal warning.
 - b. Written warning.
 - c. Suspension.
 - d. Termination.

Department	Standard Operating Procedure Title	SOP Number	Effective Date	Version Number
Customer Care	N/A	N/A	N/A	N/A