



Subject: Compliance Program – Grievance Process

Purpose: Establish guidance on due process standards in regards to grievances submitted under Section 504 of Rehabilitation Act of 1973 (29 U.S.C. 794) to Pikes Peak Hospice & Palliative Care, Inc. (PPHPC) to include Pikes Peak Hospice Foundation and Palliative Pharmacy of Pikes Peak.

Policy: PPHPC will not discriminate on the basis of disability and has adopted an internal grievance procedure providing for prompt and equitable resolution of complaints alleging any action prohibited by Section 504 (29 U.S.C. 794).

The Law and Regulations may be examined in the office of the Compliance Officer who has been designated as Section 504 Coordinator for PPHPC.

Any person who believes she or he has been subjected to discrimination on the basis of disability may file a grievance under this procedure. It is against the law for PPHPC to retaliate against anyone who files a grievance or cooperates in the investigation of a grievance.

Procedure:

- Grievances must be submitted to the Section 504 Coordinator within 30 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 504 Coordinator (or designee) shall conduct an investigation of the complaint. This investigation may be informal, but it must be thorough, affording all interested persons an opportunity to submit evidence relevant to the complaint. The Section 504 Coordinator will maintain the files and records of PPHPC relating to such grievances.
- The Section 504 Coordinator will issue a written decision on the grievance no later than 30 days after its filing.
- The person filing the grievance may appeal the decision of the Section 504 Coordinator by writing to PPHPC’s Executive Circle within 15 days of receiving the Section 504 Coordinator’s decision. The Executive Circle 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 filing a complaint of discrimination on the basis of disability with the U. S. Department of Health and Human Services, Office for Civil Rights.

PPHPC will make appropriate arrangements to ensure that disabled persons are provided other accommodations, if needed, to participate in this grievance process. Such arrangements may include, but are not limited to, providing interpreters for the deaf, providing audio format (tape, CD, etc.) of material for the blind, or assuring a barrier-free location for the proceedings. The Section 504 Coordinator will be responsible for such arrangements.

FEDERAL STANDARD: 29 U.S.C. 794

NHPCO STANDARD: EBR 3, IA 4

IMPLEMENTATION DATE: 03/11

REVISED:

REVIEWED: 06/11, 08/12, 05/13, 03/14
03/15, 03/16