New Britain EMS Policy and Procedure Manual
Policy # 100-136
Title: *Diversity, Inclusion, Non-Discrimination*
CAAS #: 106.05.03
Effective Date: October 1, 2023

Scope:

Board of Directors
All Employees
Patients and families
Contractors
Customers
Students and Interns

Purpose:

New Britain Emergency Medical Services, Inc. (NBEMSI) is committed to its core values of **caring, excellence, service, teamwork, and community**. These values are the foundation of our philosophy and are integral to every aspect of our agency. At the most fundamental level these values are representative of our commitment to managing equality, diversity, and inclusion effectively in all aspects of our business in a diverse community and organization.

Policy/Procedure:

It is the policy of New Britain Emergency Medical Services, Inc. to treat all people equitably; and not exclude, deny benefits to or otherwise discriminate against any person on the ground of race, color, gender, religion, national origin, disability, age, genetic information, gender identity, sexual orientation, veteran's status or any other basis protected by applicable federal, state or local law in admission to, participation in, or receipt of the services and benefits under any of its programs and activities, and in staff and employee assignments to patients. This policy includes but is not limited to staff, contractors, customers, students, and patients.

Any breach or alleged breach of this policy will be taken seriously, investigated fully and may result in corrective action. In serious cases, such behavior may constitute gross misconduct and result in termination.

The NBEMSI Board of Directors will monitor and review the effectiveness of this policy and associated procedures. NBEMSI and its Board of Directors is committed to enhance the organization's ability to help meet the needs of an increasingly diverse workforce and patient population.

<u>Protection against Sex Discrimination</u>

- Individuals will not be denied health care based on their sex, including their gender identity and sex stereotyping.
- Women will be treated equally with men in the health care they receive and the insurance they obtain.
- Individuals will be treated consistent with their gender identity.
- NBEMSI will not deny or limit treatment for any health services that are ordinarily or exclusively available to individuals of one gender based on the fact that a person seeking such services identifies as belonging to another gender.

Protections for individuals with Limited English Proficiency

NBEMSI will take reasonable steps to provide meaningful access to each individual with limited English proficiency.

- NBEMSI will provide language assistance service, when oral language assistance or written translation is not available.
- NBEMSI will utilize language translation options on our website for the top languages spoken in the city.

Protections for individuals with Disabilities

- NBEMSI will take steps to ensure communications with individuals with disabilities are appropriate and will provide necessary auxiliary aides and services in the form of alternative formats, sign language or interpreters.
- Any community program NBEMSI offers, when applicable, will provide it in electronic and information technology to be accessible to individuals with a disability.

Non-Discrimination Notice:

For the purposes of complying with the rules and regulations set forth and enforced by the Office for Civil Rights, NBEMSI will inform the public, patients, and employees that the agency does not discriminate on the basis of race, color, gender, religion, national origin, disability, age, genetic information, gender identity, sexual orientation, veteran's status or any other basis protected by applicable federal, state or local law.

- NBEMSI will post a notice of nondiscrimination on their website at http://www.nbems.org as well as http://www.nbemsa.org of individuals' rights providing information about communication assistance with individuals with limited English proficiency, and regarding available information for individuals with a disability needing communication assistance.
- The notice will provide information regarding filing a grievance with NBEMSI and with the Office for Civil Rights.
- A copy of the notice will be left with the patient at the time of transport.
- A copy of the notice is available upon request.
- The notice will be included in the employee handbook and distributed during orientation; and;
- The notice will be posted in employee area and general public service areas.

Grievance Procedures

1. Any person who believes someone has been subjected to discrimination on the basis of race, color, gender, religion, national origin, disability, age, genetic information, gender identity, sexual orientation, veteran's status or any other basis protected by applicable federal, state or local law may file a grievance. It is against the law for NBEMSI to retaliate against anyone who opposes discrimination, files a grievance or participates in the investigation of a grievance.

A. Grievances must be submitted to NBEMSI Compliance Officer or designee, and should be submitted in a timely manner from the date the person filing the grievance becomes aware of the alleged discriminatory action.

B. A complaint must be in writing, containing the name and address of the person filing it.

C. The complaint must state the problem or action alleged to be discriminatory and the remedy or relief sought.

D. NBEMSI Compliance Officer or designee shall investigate of the complaint. This investigation may be informal, but it will be thorough, affording all interested persons an opportunity to submit evidence relevant to the complaint.

E. NBEMSI Compliance Officer or designee will maintain the files and records of NBEMSI relating to such grievances.

F. To the extent possible, and in accordance with applicable law, NBEMSI Compliance Officer or designee will take appropriate steps to preserve the confidentiality of files and records relating to grievances and will share them only with those who have a need to know.

G. NBEMSI Compliance Officer or designee will issue a written decision on the grievance, based on a preponderance of the evidence, no later than thirty (30) days after its filing, including a notice to the complainant of their right to pursue further administrative or legal remedies.

H. The person filing the grievance may appeal the decision of NBEMSI Compliance Officer or designee by writing to the Board of Directors within fifteen (15) days of receiving the decision NBEMSI Compliance Officer or designee.

I. The Board of Directors shall issue a written decision in response to the appeal no later than thirty (30) days after its filing.

2. The availability and use of this grievance procedure does not prevent a person from pursuing other legal or administrative remedies, including filing a complaint of discrimination on the basis of race, color, national origin, sex, age or disability in court or with the U.S. Department of Health and Human Services, Office for Civil Rights.

3. A person can file a complaint of discrimination electronically through the Office for Civil Rights Complaint Portal, which is available at: *https://ocrportal.hhs.gov/ocr/portal/lobby.jsf,* or by mail or phone at:

   U.S. Department of Health and Human Services,
   200 Independence Avenue SW., Room 509F, HHH Building,
   Washington, DC 20201.

4. Complaint forms are available at: *http://www.hhs.gov/ocr/office/file/index.html.* Such complaints must be filed within 180 days of the date of the alleged discrimination.

5. NBEMSI Compliance Officer or designee will make appropriate arrangements to ensure that individuals with disabilities and individuals with limited English proficiency are provided auxiliary aids and services or language assistance services, respectively, if needed to participate in this grievance process. Such arrangements may include, but are not limited to, providing qualified interpreters, providing taped cassettes of material for individuals with low vision, or assuring a barrier-free location for the proceedings.

This policy is in accordance with Section 1557 of the Patient Protection and Affordable Care Act (42 U.S.C. 18116), which provides that an individual shall not be excluded from participation in, be denied the benefits of, or be subjected to discrimination on the grounds:

- Prohibited under Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq. (race, color, national origin);
- Title IX of the Education Amendments of 1972, 20 U.S.C. 1681 et seq. (sex);
- The Age Discrimination Act of 1975, 42 U.S.C. 6101 et seq.(age); or
- Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. 794 (disability); or
- Under any health program or activity, any part of which is receiving federal financial assistance, or under any program or activity that is administered by an Executive Agency or any entity established under Title I of the Affordable Care Act or its amendments.

NBEMS extends the coverage of this policy beyond employees and patients, to its contractors, students, board of directors, and customers.

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CAAS Standard #106.05.03

Issued By: **NBEMSI**

Authorized By: **Bruce Baxter, CEO**

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