



JEFFERSON COUNTY PUBLIC HEALTH <i>Originator:</i> Administrative Services Division <i>Applies to:</i> All JCPH Workforce Members excluding WIC	TITLE: Non-discrimination Policy and Procedure
SUBJECT: This policy defines discrimination and describes the steps JCPH has implemented to prevent discrimination and respond to discrimination complaints.	ADOPTION / REVISION DATES: 1/4/2017 EFFECTIVE DATE: 1/4/2017

PURPOSE

Jefferson County Public Health does not discriminate against any individual on the basis of race, color, ethnic or national origin, ancestry, age, sex, gender, sexual orientation, gender identity and expression, religion, creed, political beliefs, or disability in employment, admission or access to, treatment or participation in, or receipt of the services and benefits under any of its programs, services and activities. The purpose of this policy and procedure is to describe the steps JCPH implements to prevent discrimination against clients while seeking health care services and respond to discrimination complaints in compliance with the Affordable Care Act Section 1557.

SCOPE

This policy applies to all JCPH workforce members excluding WIC. WIC follows the [Colorado WIC Program Rights and Responsibilities Policies and Procedures](#).

POLICY

Exclusionary Criteria of Funding Sources

While JCPH does not discriminate based on any of the characteristics outlined below, it is important to note that due to the eligibility criteria of funding sources and grants, certain services provided by JCPH are only available to certain individuals.

Discrimination on the Basis of Sex, Sexual Orientation and Gender Identity

Sex discrimination includes, but is not limited to, discrimination based on an individual’s sex, including pregnancy, related medical conditions, termination of pregnancy, gender identity and gender identity stereotypes. JCPH workforce members must treat individuals consistent with their gender identity, including with respect to access to facilities, such as bathrooms and patient rooms. Workforce members must not deny or limit sex-specific health services based solely on the fact that the gender identity or gender recorded for an individual does not align with the sex of those who usually receive those types of sex-specific services (e.g., denying a transgender male a pap smear or denying a transgender woman a prostate exam).

Discrimination on the Basis of Race, Color, National Origin

JCPH may not segregate, delay or deny services or benefits based on an individual’s race, color or national origin. For example:

- JCPH workforce members may not assign patients to patient rooms based on race.
- JCPH entity may not require a mother to disclose her citizenship or immigration status when she applies for health services for her eligible child.
- JCPH may not delay or deny effective language assistance services to individuals with limited English proficiency (LEP). Please refer to the Limited English Language Proficiency Policy to serve clients with these needs.

Discrimination on the Basis of Age

JCPH may not discriminate based on age. However, a covered entity may provide different treatment based on age when the treatment is justified by scientific or medical evidence or based on specialty guidelines. For example:

- A physician may decide to deny a mammogram to a woman under a certain age because recent medical studies have suggested that mammograms may be more harmful than helpful to young women.

Discrimination on the Basis of Disability

JCPH may not discriminate on the basis of disability. JCPH ensures certain provisions for individuals with disabilities, including, but not limited to, the following examples:

- JCPH allows marked service dogs to be present on JCPH premises.
- JCPH premises are accessible by wheelchair.
- If a client expresses anxiety and has trouble waiting for services in a waiting room, JCPH will either:
 - Make efforts to diminish their wait if JCPH is informed in advance of this need
 - And/or provide a separate, quiet room for the client to await services.

Notice of Non-discrimination

JCPH will post the Notice of Non-Discrimination in all waiting rooms (except the WIC waiting rooms) and on the JCPH [website](#).

Civil Rights Coordinator

The Directors will forward requests for disability services to the appropriate program supervisor within their division. They will follow the [Complaints Procedure](#) to process civil rights complaints.

Civil Rights Complaints

Please refer to the [Complaints Procedure](#) to process civil rights complaints.

Notice of Nondiscrimination:

Jefferson County Public Health (JCPH) complies with applicable Federal civil rights laws and does not discriminate on the basis of race, color, national origin, age, disability, or sex. JCPH does not exclude people or treat them differently because of race, color, national origin, age, disability, or sex.

JCPH:

- Provides free aids and services to people with disabilities to communicate effectively with us, such as:
 - Qualified sign language interpreters
 - Written information in other formats (large print, audio, accessible electronic formats, other formats)
- Provides free language services to people whose primary language is not English, such as:
 - Qualified interpreters
 - Information written in other languages

If you need these services, contact the Jefferson County Public Health Directors.

If you believe that Jefferson County Public Health has failed to provide these services or discriminated in another way on the basis of race, color, national origin, age, disability, or sex, you can file a grievance with:

Jefferson County Public Health Directors,
645 Parfet Street, Lakewood, CO 80215,
303-271-5788,
or email, jcphcomplaints@jeffco.us

You can file a grievance in person or by mail, fax, or email. If you need help filing a grievance, the Directors are available to help you.

You can also file a civil rights complaint with the U.S. Department of Health and Human Services, Office for Civil Rights, electronically through the Office for Civil Rights Complaint Portal, 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, D.C. 20201
1-800-368-1019, 800-537-7697 (TDD)
Complaint forms are available at <http://www.hhs.gov/ocr/office/file/index.html>.