

*Please note: pursuant to decisions by various district courts regarding the 2024 Final Rule implementing Section 1557, entitled Nondiscrimination in Health Programs and Activities, 89 Fed. Reg. 37,522 (May 6, 2024) (“2024 Final Rule”), certain provisions regarding gender identity are stayed nationwide. Other provisions are stayed or enjoined as indicated at [www.hhs.gov/1557](http://www.hhs.gov/1557).*

## **NONDISCRIMINATION POLICY**

The Children’s Clinic complies with all applicable federal civil rights laws, including Section 1557 of the Affordable Care Act (Section 1557). The Children’s Clinic does not discriminate on the basis of race, color, national origin (including limited English proficiency and primary language), age, disability, or sex (consistent with the scope of sex discrimination described at 45 CFR § 92.101(a)(2)) (or sex, including sex characteristics, including intersex traits; pregnancy or related conditions; sexual orientation; gender identity, and sex stereotypes).

In compliance with Section 1557 and other federal civil rights laws, we provide individuals the following in a timely manner and free of charge:

- **Language assistance services.** The Children’s Clinic will provide language assistance services for individuals with limited English proficiency (including individuals’ companions with limited English proficiency) to ensure meaningful access to our programs, activities, services, and other benefits. Language assistance services may include:
  - Electronic and written translated documents
  - Qualified interpreters
  - If applicable: Qualified bilingual/multilingual staff
- **Appropriate auxiliary aids and services.** The Children’s Clinic will provide appropriate auxiliary aids and services for individuals with disabilities (including individuals’ companions with disabilities) to ensure effective communication. Appropriate auxiliary aids and services may include:
  - Qualified interpreters, including American Sign Language interpreters
  - Video remote interpreting
  - Information in alternate formats (including but not limited to large print, recorded audio, and accessible electronic formats)
- **Reasonable modifications.** The Children’s Clinic will provide reasonable modifications for qualified individuals with disabilities, when necessary to ensure accessibility and equal opportunity to participate in our programs, activities, services, or other benefits.

To access our language assistance services, auxiliary aids and services, and for assistance in getting a reasonable modification, please refer to The Children’s Clinic Procedure forms: Effective Communications, Language Access, Reasonable Modifications-Procedures.



For additional assistance, you may also contact Jenifer Alioth, Safety & Compliance Officer at 503-691-9777 Ext 1425 or via email at [JAlioth@childrens-clinic.com](mailto:JAlioth@childrens-clinic.com)

Entities may add additional information related to their nondiscrimination processes for: service animals, public health emergencies, telehealth, accessible diagnostic equipment, value assessment methods, patient care decision support tools (including, but not limited to crisis standards of care), etc.).

If you believe The Children's Clinic has failed to provide these services or has discriminated in another way on the basis of race, color, national origin, sex, age, or disability, you can:

1. AS APPLICABLE: File a grievance with The Children's Clinic.

Procedure:

- Grievances must be submitted to the Section 1557 Coordinator, Jenifer Alioth, within 60 days of the date the person filing the grievance becomes aware of the alleged discriminatory action.
- A grievance should generally be in writing, containing the name and contact information of the person filing it as well as the alleged discriminatory action and alleged basis (or bases) of discrimination, the date the grievance was filed, and any other pertinent information.
- When a grievance includes allegations that would violate Section 1557, the Section 1557 Coordinator, Jenifer Alioth, (or their designee) shall investigate the grievance. This investigation may be informal, but it will be thorough, affording all interested persons an opportunity to submit evidence relevant to the grievance.
- The Children's Clinic shall inform an individual that they have a right to reasonable modifications in the grievance procedure if they need them.
- The Section 1557 Coordinator, Jenifer Alioth, must keep confidential the identity of an individual who has filed a grievance under this part except as required by law or to carry out the purposes of this part, including the conduct on any investigation, including to investigate the grievance.
- The Children's Clinic will issue the person who filed the grievance a written decision on the grievance no later than 30 days after its filing. The decision shall include the resolution date and a notice to the complainant of their right to pursue further administrative or legal remedies.
- The Children's Clinic will maintain the files and records relating to such grievances for at least three years from the date The Children's Clinic resolves the grievance.



The person filing the grievance may appeal the written decision by writing to the Section 1557 Coordinator within 15 days of receiving the decision. The Administrator/Chief Executive Officer/Board of Directors shall issue a written decision in response to the appeal no later than 30 days after its filing.

The Children's Clinic, through the Section 1557 Coordinator, Jenifer Alioth, will make appropriate arrangements to ensure that individuals with disabilities and individuals with limited English proficiency are provided reasonable modifications, appropriate 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 these services in a timely manner and without cost to individuals being served to ensure that individuals have an equal opportunity to participate in the grievance process.

2. File a complaint with the U.S. Department of Health and Human Services, Office for Civil Rights:

*Electronically:* <https://ocrportal.hhs.gov/ocr/smartscreen/main.jsf>

*Via mail:* U.S. Department of Health & Human Services  
200 Independence Avenue, S.W. – 509F  
Washington, D.C. 20201