	Document No.	HR-0001
	Effective Date	February 1999
	Revision Date	March 2013
	Review Date	March 2013
	Equal Employment Opportunity & Affirmative Action	

1.0 POLICY

Qualis Health is fully committed to the concept and practice of Equal Employment Opportunity (EEO) and Affirmative Action in all aspects of employment. Qualis Health develops and administers employment policies and practices that are based upon individual merit and that are without regard to race, color, sex, age, religion, national origin, sexual orientation, disability, genetic information, gender identity or expression, veteran status, or other legally protected status or characteristics, as required by law (“protected status”). It is also the intent of Qualis Health to actively promote the full realization of EEO and Affirmative Action for all employees throughout the organization, including the assurance of a work environment that is free of illegal discrimination and harassment.

Harassment is a form of discrimination and violates this policy. The harassment of any employee, discrimination against any employee, or the creation of a hostile work environment based upon an individual’s protected status is prohibited (also see policy HR-0002 Harassment).

2.0 GENERAL SCOPE


This Policy applies to:

- | | |
|---|--|
| <input checked="" type="checkbox"/> Corporate - All Qualis Health Employees | <input checked="" type="checkbox"/> Board of Directors |
| <input checked="" type="checkbox"/> Outlook Associates | <input type="checkbox"/> Business Development |
| <input type="checkbox"/> Case Management | <input type="checkbox"/> Communications |
| <input type="checkbox"/> Medical Affairs | <input type="checkbox"/> Finance |
| <input type="checkbox"/> Quality & Safety Initiative | <input type="checkbox"/> Human Resources |
| <input type="checkbox"/> Specialty Review | <input type="checkbox"/> Information Technology Services |
| <input type="checkbox"/> Utilization Management | |

This policy applies to every location in which the company conducts business and to all individuals and organizations as defined in applicable laws and regulations and this policy, including job applicants. These policies and principles also apply to the selection and treatment of independent contractors or agency personnel working on Qualis Health premises or firms doing business for or with the company.

This policy applies to all terms, conditions and privileges of employment as defined according to applicable laws and regulations covered by this policy; including, but not limited to, recruiting,

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hiring, promotions, transfers, training, discipline, discharge, layoffs, compensation, benefits, leaves of absence and general work environment.

The Human Resources department is responsible for ensuring communication of this policy to support overall compliance, including but not limited to advertising and posting job opportunities in accordance with EEO and Affirmative Action, training managers and employees, and displaying required workplace posters.

3.0 DEFINITIONS

Affirmative Action Plan (AAP) | Qualis Health’s policies, procedures and practices which affirm the organization’s commitment to EEO and Affirmative Action in all aspects of employment.

EEO Coordinator | the Vice President, Human Resources, or designee, who is responsible for ensuring compliance with EEO regulations, the Americans with Disabilities Act (ADA) and other applicable discrimination laws, including administration of Qualis Health’s AAP.

4.0 PROCEDURES

4.1 AFFIRMATIVE ACTION PLANS


It is our goal to achieve, consistent with the company’s existing lawful commitments, a workforce in each geographical area where Qualis Health is performing work that reasonably reflects the demographics of that geographic area. Implementing this policy requires proactive steps and measures on our part to identify and attract applicants who are representative of these demographics and who are available and qualified for posted job openings. Additionally, proactive steps and measures are needed in order to assure that all employees have an equal opportunity for promotions and transfers within the organization. To that end, Qualis Health has established an AAP for Minorities and Women, and an AAP for Veterans and Individuals with Disabilities.

The EEO Coordinator is responsible for ensuring regular review and reporting associated with the AAPs. The AAPs are available for employee and applicant review between 8:00 a.m. and 5:00 p.m., Pacific Time, Monday through Friday, in the Human Resources department located in Seattle, Washington.

4.2 EEO COORDINATOR

Qualis Health’s EEO Coordinator (or designee) is accountable to:

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- 4.2.1 **Work to ensure that employment-related personnel actions are administered according to the principles of EEO and Affirmative Action**, based on individual merit and in compliance with applicable EEO and unlawful discrimination laws.
- 4.2.2 **Direct the development and implementation of programs** designed to ensure compliance with applicable local, state and federal unlawful discrimination and Affirmative Action laws and regulations.
- 4.2.3 **Monitor the effectiveness** of Qualis Health’s Affirmative Action and EEO programs, and report to senior staff any need for modification of these programs or other remedial action.
- 4.2.4 **Serve as Qualis Health’s representative** in its dealing with federal, state or local enforcement agencies as well as serving as a liaison with community groups concerned with the employment opportunities of minorities, women, veterans and persons with disabilities.
- 4.2.5 **Investigate or support the investigation of all allegations of unlawful discrimination or harassment**, prepare timely reports of such investigations, and facilitate resolution wherever possible.
- 4.2.6 **Conduct regular training meetings** with managers and supervisors regarding the implementation of EEO, Affirmative Action and ADA programs as well as assisting them in taking action to prevent illegal discrimination or harassment.
- 4.2.7 **Prepare, review and sign applicable reports** (such as EEO-1, VETS100 and VETS100A) and ensure compliance with other related reporting requirements.
- 4.2.8 **Prepare and present reports to management**, regarding the status of EEO, Affirmative Action and ADA programs.
- 4.2.9 **Respond to questions and requests for information about this policy and the AAP**; inquiries will be handled according to EEO standards of reasonable confidentiality. Requests for information about policies, programs or procedures associated with EEO/Affirmative Action that come from agencies or individuals outside of Qualis Health should be immediately referred to the EEO Coordinator.

4.3 EEO COORDINATOR IS INITIAL CONTACT

The EEO Coordinator (or designee) is generally the initial contact for all concerns or complaints that may be based upon possible violations of EEO principles.

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If You Become Aware of Discrimination or Harassment: If an employee or job applicant feels that he or she has been the victim of discrimination or harassment under our policies, or if an employee witnesses or becomes aware of what he or she believes to be an act of discrimination or harassment, he or she has the responsibility to immediately notify the EEO Coordinator.

- ◆ If the EEO Coordinator is involved in the discrimination or harassment, is unavailable, or an alternative contact is appropriate, the complainant should immediately notify a Qualis Health manager (if at all possible, a member of the Senior Management Group, or SMG).

4.4 MANAGERS' RESPONSIBILITIES

Each manager is responsible for ensuring that all employment practices within his or her area(s) of responsibility are accomplished in a non-discriminatory manner. Managers will receive periodic training related to their responsibilities related to EEO and non-discrimination. Managers are responsible to immediately contact the EEO Coordinator or, if appropriate, a member of the SMG for consultation regarding specific or general situations that may constitute discrimination or harassment under Qualis Health policies.


4.5 INVESTIGATION OF COMPLAINTS

Upon notification of an alleged violation of this policy, the EEO Coordinator (or designee) will take immediate steps to appropriately investigate the matter. Such investigation will involve obtaining information, which may include written statements, where possible, from individual(s) involved, including the complainant(s), witnesses and the individual(s) accused of the violations. The EEO Coordinator will be responsible to determine whether a violation has occurred with consideration to Qualis Health policies, including HR-0029 Workplace Standards of Conduct, and applicable regulations. The EEO Coordinator is responsible to communicate with senior management and the CEO as necessary to authorize appropriate action(s) in response to the complaint, and to inform the involved parties.

4.6 CONFIDENTIALITY

All investigations and hearings surrounding EEO non-compliance will be conducted in a manner that protects the privacy of the accused as well as the complainant as fully as possible under the circumstances. Only those persons responsible for investigating and enforcing compliance with this policy and associated regulations, or with a specific business necessity, will have access to confidential information resulting from the receipt and investigation of a complaint.

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Violation of the necessary confidentiality requirements related to an EEO complaint or investigation will result in disciplinary action, up to and including possible termination of employment.

4.7 RETALIATION IS ILLEGAL

By law, any form of retaliatory action, directed against an individual who makes a charge of unlawful discrimination, who assists in an investigation of a claim of unlawful discrimination, who participates in any other activity related to implementation and enforcement of federal, state or local EEO laws (including laws protecting veterans and persons with disabilities), or who exercises any other right protected under federal, state or local EEO laws is illegal and strictly forbidden, and will result in disciplinary action up to and including termination of employment. Employees should immediately report any retaliatory action that occurs to the EEO Coordinator.

4.8 CORRECTIVE ACTION

The EEO Coordinator will recommend appropriate corrective action based upon the established facts and circumstances of the situation, taken as a whole and with consideration of the rights of both the accused and the accuser.

If it appears that there is insufficient proof of the allegation or that the allegation was made as the result of a misunderstanding, affected parties will be informed.

If it appears that the allegations may have some merit, reasonable efforts will be made to provide appropriate relief for the employee(s) against whom the proven discrimination or harassment was directed. Additionally, appropriate corrective action, up to and including termination of employment, will be taken towards those who may have been responsible for any alleged discriminatory actions.

Anyone who makes false or misleading statements during an investigation, or refuses to reasonably cooperate with an investigation, will be subject to corrective action.

5.0 ADDITIONAL DOCUMENTATION

Policy HR-0002 Harassment

Policy HR-0029 Workplace Standards of Conduct


Qualis Health Affirmative Action Plan for Minorities & Women

Qualis Health Affirmative Action Plan for Veterans and Individuals with Disabilities

6.0 REGULATIONS

Executive Order 11246

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Maintained By: Vice President, Human Resources
Approved By: Signature on File **Date:** 03/29/2013
Name and Title: Jonathan Sugarman, MD, MPH | President and CEO | Qualis Health

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