

<b>POLICY AND PROCEDURE</b>	
<b>SUBJECT/TITLE:</b>	Customer Service Non-Discrimination and Complaint Policy
<b>SCOPE:</b>	All Columbus Public Health (CPH) Staff
<b>CONTACT PERSON &amp; DIVISION:</b>	Laurie Dietsch, Director, Office of Performance and Quality Improvement
<b>ORIGINAL DATE ADOPTED:</b>	6/15/2014
<b>LATEST EFFECTIVE DATE:</b>	Latest effective date is the date the policy was approved by HCO.
<b>HISTORICAL REVIEW/REVISION DATE(S):</b>	6/15/14, 8/2/16, 10/18/17, 6/6/18, 3/15/23
<b>REVIEW FREQUENCY:</b>	Every 5 Years

**PURPOSE**

The intent of this document is to

- Describe CPH customer service standards and expectations of employee conduct;
- Re-emphasize health equity requirements within the [Materials Development and Review Policy](#);
- Establish procedures that a client may follow if they have a concern regarding treatment, CPH printed materials or website content;
- Outline customer complaint procedures; and
- Provide guidance for employees to follow in the event a discrimination complaint is made.

The mission of CPH is to protect health and improve lives in our community. CPH is committed to serving all its stakeholders, including clients and employees with fairness and equity. We strive to deliver our services in a manner that is just and free from bias or prejudice. This policy is written in the spirit of health equity, diversity, and inclusion. This policy is in accordance with the provisions of Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, and Regulations of the U.S. Department of Health and Human Services issued pursuant to these statutes at Title 45 Code of Federal Regulations Parts 80, 84, and 91, the City of Columbus Charter and Code, and City of Columbus and Columbus Public Health policies and rule.

**POLICY**

All staff members shall adhere to the guidelines for customer service and anti-discrimination set forth in this document. CPH staff shall maintain standards of conduct that reflect the CPH mission statement and values, and adhere to City of Columbus Work Rules and policies. Employees shall treat all stakeholders, including clients, in a manner that does not unlawfully discriminate.

CPH employees who feel they have been discriminated against may reference the applicable City of Columbus policy and/or code and file a complaint using [The City of Columbus Discrimination Complaint Form \(2016-03-11\)](#).

1. City of Columbus Charter, Section 238 – Equal Rights
2. City of Columbus Code, Section 161.01 – Discrimination Prohibited
3. City of Columbus Code, Chapter 2331 – Discriminatory Practices; Civil Rights; Disclosure
4. City of Columbus Central Work Rules, Rule #2 – Abusive or Violent Behavior, Rule #7 – Neglect of Duty, and Rule #8 – Failure of Good Behavior
5. City of Columbus Policy Against Discrimination of Persons with Disabilities
6. City of Columbus Policy on Equal Employment Opportunity
7. City of Columbus Policy Regarding Workplace Violence
8. City of Columbus Anti-Harassment and Sexual Harassment Policy

## GLOSSARY OF TERMS

1. **Age** is the amount of time which a person has lived.
2. **Ancestry** refers to a person's ancestors, lineage or line of descent.
3. **Certified Interpreter** is an interpreter who has a thorough understanding and use of medical interpretation, medical terminology and maintains confidentiality of medical information. A certified interpreter undergoes a multi-step selection and training process, completes an intensive mandatory training, and participates in continuing education courses.
4. **Color** refers to skin pigment or complexion.
5. **Client** refers to someone who engages the services of CPH.
6. **Client-facing service** refers to CPH programs and services that have consistent direct client interaction.
7. **Cultural and linguistic competency** is a set of behaviors, attributes and policies enabling an agency or person to function effectively and appropriately in diverse and cross-cultural interactions and settings. Creating culturally and linguistically competent materials requires consideration of individual, cultural, and linguistic differences, and includes the use of appropriate language, messages, and images that are relevant to the target audience(s).
8. **Cultural and Linguistically Appropriate Services (CLAS)** mandates are current Federal requirements for all recipients of Federal funds. ([CLAS standards Website](#))
9. **Demeaning** means damaging or lowering the character, status, or reputation of someone or something.
10. **Discrimination** as addressed in this policy includes prejudicial or unjust treatment on the basis of race, ethnicity, sex, sexual orientation, gender identity or expression, color, religion, ancestry, national origin, age, disability, familial status, military status, limited English proficiency, or any other basis prohibited by federal, state, or local law.
11. **Discrimination Complaint** is a client complaint based on discrimination, as defined in this policy and/or City of Columbus applicable policies.
12. **Ethnicity** is the term for the culture of people in a given geographic region, including their language, heritage, religion and customs.
13. **Familial Status** is determined by a person's household type, such as marriage and existing or prospective children.
14. **Gender Expression** refers to all of the external characteristics and behaviors that are socially defined as either masculine or feminine, such as dress, grooming, mannerisms, speech patterns and social interactions. Social or cultural norms can vary widely and some characteristics that may be accepted as masculine, feminine or neutral in one culture may not be assessed similarly in another.
15. **Gender Identity** is distinct from the term "sexual orientation"; refers to a person's innate, deeply felt psychological identification as a man, woman or some other gender, which may or may not correspond to the sex assigned to them at birth (e.g., the sex listed on their birth certificate).
16. **Harassment** is, as defined in the City of Columbus [Anti-harassment and Sexual Harassment Policy](#), any verbal, non-verbal or physical conduct designed to threaten, intimidate or coerce an employee or any person working for or on behalf of the City, or any person from the public when said action occurs in connection to employment with the City of Columbus.
17. **Individual with a disability** is a person who: (1) has a physical or mental impairment that substantially limits one or more major life activities; OR (2) has a record of such an impairment; OR (3) is regarded as having such an impairment. These may not be visible such as diabetes, autism, epilepsy etc. (Click [here](#) for details)
18. **Interpretation** means the oral conversion of a spoken message from one language to another.
19. **Limited English Proficiency (LEP)** refers to a limited ability to speak, read, write, and/or understand the English language at a level that enables a person to interact effectively with CPH staff.
20. **MARTTI (My Accessible Real Time Trusted Interpreter)** is a video interpretation software uploaded to several iPads within CPH.
21. **Military Status** refers to a person's past, current or future membership, service or obligation in a uniformed service.
22. **National Origin** means the country where a person was born, or, more broadly, the country from which his or her ancestors came.

23. **Patronizing** means displaying condescension toward a person in a way that arrogantly implies that it's actually kind or helpful to that person.
24. **Poor Customer Service Complaint** is any complaint of poor attitude from a CPH employee, subpar service delivery, long/unreasonable wait times, etc.
25. **Race** is a self-identified, self-reported social and cultural concept that places an individual into one of many global groups. Race is neither biological nor scientific. Race is a social construct utilized to categorize people based on skin color, ancestry or country of origin.
26. **Religion** is defined as a belief that must be sincerely held, and within the believer's own scheme of things religious.
27. **Retaliation** is to hurt someone or do something harmful to someone because they have done or said something perceived or actually harmful to the person retaliating.
28. **Sex** refers to the biological and physiological characteristics that define men and women.
29. **Sexual Orientation** is the preferred term used when referring to an individual's physical and/or emotional attraction to the same and/or opposite gender. "Heterosexual," "bisexual" and "homosexual" are all examples of sexual orientations. A person's sexual orientation is distinct from a person's gender identity and expression.
30. **Source Language** is the language from which translation or adaptation occurs, e.g., for a Spanish speaking client, English translated Spanish, English is the source language; etc.
31. **Stakeholder** is a person, group, or organization that has interest or concern in an organization. Stakeholders can affect or be affected by the organization's actions, objectives, and policies.
32. **Target Language** is the language to which translation or adaptation occurs, e.g., for a Spanish speaking client, English translated Spanish, Spanish is the target language; etc.
33. **Translation** is the act of converting written communications from one language (source language) to another (target language) while preserving the intent and essential meaning of the original message.
34. **Visitor** is any person who enters Columbus Public Health who is not an employee of Columbus Public Health.

## PROCEDURES & STANDARD OPERATING GUIDELINES

### I. CUSTOMER SERVICE STANDARDS AND EXPECTATIONS OF EMPLOYEE CONDUCT

- A. All CPH employees shall provide services and conduct themselves so as to reflect the mission and values of Columbus Public Health.
  1. In accordance with the [City of Columbus Central Work Rules](#), all employees should at all times conduct themselves in a polite and civil manner toward other City employees and any member of the public with whom they may come in contact in the performance of their duties.
    - a. All staff shall communicate with customers, partners, and other stakeholders in a professional, courteous and respectful manner.
    - b. All encounters should reflect a positive, welcoming, and customer-focused environment. This includes a positive attitude, expression and tone.
  2. All CPH employees shall:
    - a. Serve all clients, partners, and other stakeholders without malice or bias on the basis of race, ethnicity, sex, sexual orientation, gender identity or expression, color, religion, ancestry, national origin, age disability, familial status, or military status;
    - b. Serve all clients with respect and dignity; and
    - c. Serve all clients with equity.
  3. All CPH employees shall respond to inquiries from customers, partners, and other stakeholders in a timely and courteous manner. Timely response for correspondence is considered within three business days of having received a call or email unless out of the office on extended business or on vacation.
    - a. Staff shall contact the Center for Public Health Innovation's language services coordinator (see [Appendix B for Contact List](#)) if language assistance is required for any form or follow-up correspondence.
    - b. All client-facing services shall have a system or arrangement in which a staff person can answer urgent phone calls within one business hour during normal business hours.

- B. Access to culturally and linguistically appropriate health information and services is a patient right.
  - 1. All CPH employees are required to offer language services to our limited English proficient (LEP) customers.
  - 2. If interpretation or translation services are required for communication with a customer, CPH staff shall contact the Center for Public Health Innovation's language services coordinator for assistance.
    - a. Interpreters can be provided for appointments on and off-site.
    - b. Video and telephone interpretation services are also available to all CPH staff.
    - c. Employees should contact the language service coordinator for more information on the use of video interpretation with MARTTI (My Accessible Real Time Trusted Interpreter), or refer to the language services webpage or policy for further instruction.

## II. STANDARDS FOR CPH PRINTED MATERIALS OR WEBSITE CONTENT

All materials developed by CPH programs for the purpose of education, awareness, promotion and explanation of programs/services, or that include the CPH logo which are intended for the public are reviewed through the Materials Development and Review Process as specified within the [Materials Development and Review Policy](#) with a health equity lens.

## III. CUSTOMER COMPLAINT PROCEDURE

### A. Notification of Customer Complaint Procedures

- 1. CPH *Patient Bill of Rights* (See [Appendix A: Patient Bill of Rights](#)) shall be posted:
  - a. At the reception desk in the customer lobby entrance in the main CPH location and at the reception areas for all satellite locations visited by clients, visitors, and stakeholders;
  - b. At the registration/reception desks for all operations that provide direct, in-person, customer services for clients, visitors, and stakeholders; and
  - c. Prominently, on the CPH Internet page.
- 2. Available in written form for all customers upon request, in various languages.

### B. Types of Complaints

#### 1. Poor Customer Service

A poor customer service complaint is any complaint of poor attitude or treatment from a CPH employee, subpar service delivery, long/unreasonable wait times, etc., that involves no indication that the complaint is based on discrimination as defined in this policy.

#### 2. Discrimination

As addressed in this policy, includes prejudicial or unjust treatment on the basis of race, ethnicity, sex, sexual orientation, gender identity or expression, color, religion, ancestry, national origin, age, disability, familial status, military status, limited English proficiency, or any other basis prohibited by federal, state, or local law.

### C. Filing a Customer Complaint

- 1. Any client, visitor, or stakeholder or their representative has the right to file a complaint of alleged poor customer service or an alleged discriminatory act.
- 2. CPH follows [Health and Human Services Civil Rights Guidelines](#) in that a complaint must be filed within 180 days of when you knew that the act or omission complained of occurred. Complainants are encouraged to file any incident causing rise to complaint as soon as possible in order to provide the best possible investigation and outcomes.
- 3. Customer Complaints may be filed:
  - a. In-person,
    - 1) Filed with a member from the Office of Performance and Quality Improvement (OPQI) (primary);
    - 2) If member of OPQI is not available, with the first available supervisor or manager within the program area from where the complaint initiated;
  - b. By telephone by contacting OPQI directly (see [Appendix B for Contact List](#));
  - c. By completing a [CPH Redcap Customer Complaint Form](#) (Appendix C);
  - d. Through 3-1-1; or
  - e. From a second party source, e.g. a call to a program from a customer, etc.

D. Receiving a Customer Complaint

1. Any CPH employee may be approached by a customer who wishes to file a complaint.
  - a. In such cases, the employee shall:
    - 1) First, attempt to contact a member of the Office of Planning and Quality Improvement (OPQI) to meet with the complainant to gather information (see [Appendix A: Patient Bill of Rights](#) ); or
    - 2) If a member of OPQI is not available to receive the complaint from the complainant, the employee will locate the first available supervisor within the program area to take the complainant's complaint.
  - b. Either the member of OPQI or the first available supervisor will complete the [CPH Customer Complaint Form](#), either electronically or in hardcopy to be transferred into electronic format.
  - c. All complaints must be documented and/ or reported to OPQI within (2) business days.
2. If a customer complaint is received via telephone directly to OPQI, completion of a CPH [CPH Customer Complaint Form](#), from 3-1-1, or from a second party source, a member of OPQI will:
  - a. Within 10 business days, barring extenuating circumstances, contact the complainant to acknowledge receipt of the complaint; and
  - b. Obtain all information needed to fully complete the [CPH Customer Complaint Form](#).

E. Complaint Investigation

1. Any complaints involving employee conduct and/or potential discrimination must be referred immediately to CPH Human Resources for investigation.
  - a. CPH Human Resources will investigate and appropriately process all such complaints per established City of Columbus Policies and Procedures, terms of any applicable collective bargaining agreements, and/or any applicable local, state, or federal law requirements.
  - b. If required by City of Columbus policies and procedures or otherwise appropriate, CPH Human Resources may partner with or designate another office or agency, e.g., City Human Resources Equal Employment Office, etc., to conduct the investigation of potential employee misconduct or potential unlawful discrimination.
2. All other complaints shall be evaluated and/or investigated by OPQI personnel for quality improvement purposes and, if applicable, referral to the appropriate program for remediation.
3. The evaluation process of the complaint is to begin as soon as practicable upon, but not to exceed 10 business days, of receiving the complaint form.
4. Barring extenuating circumstances, the investigation will be completed as soon as practicable and within required timeframes established by the terms of governing bargaining agreements, rules or law.

**IV. COMMUNICATIONS AND REPORTING**

A. Communication with Complainant

If contact information is provided, OPQI staff will contact and provide feedback to complainants of any corrections in service, processes, materials, etc., outcomes from the evaluation/investigation of a complaint within five days of the conclusion of the investigation.

- B. On a regular basis, OPQI will provide de-identified information to fulfill [CPH CLAS Plan](#) requirements.

**REFERENCES**

1. U.S. Equal Employment Opportunity Commission (n.d.) *Title VI of the Civil Rights Act of 1964*. Retrieved February 1, 2018, from <https://www.dol.gov/agencies/oasam/regulatory/statutes/title-vi-civil-rights-act-of-1964#:~:text=No%20person%20in%20the%20United,activity%20receiving%20Federal%20financial%20assistanc e.>
2. Section 504 of the *Rehabilitation Act of 1973*. Retrieved March 26, 2018, from <https://www2.ed.gov/about/offices/list/ocr/docs/edlite-FAPE504.html>
3. US Code Title 42, 6103, Chapter 76, *The Age Discrimination Act of 1975*, Retrieved March 26, 2018 from [http://uscode.house.gov/view.xhtml?req=\(title:42%20section:6103%20edition:prelim\)%20OR%20\(granuleid:US-C-prelim-title42-section6103\)&f=treesort&edition=prelim&num=0&jumpTo=true](http://uscode.house.gov/view.xhtml?req=(title:42%20section:6103%20edition:prelim)%20OR%20(granuleid:US-C-prelim-title42-section6103)&f=treesort&edition=prelim&num=0&jumpTo=true).

4. The United States Department of Health and Human Services, Title 45 Code of Federal Regulations Parts 80, 84, and 91. <https://www.ecfr.gov/current/title-45/subtitle-A/subchapter-A>
5. City of Columbus. (2014) Code of Ordinance, Charter, Section 238 – *Equal Rights*. Retrieved from [https://library.municode.com/oh/columbus/codes/code\\_of\\_ordinances?nodeId=CHTR\\_THECICOOH\\_MIPR\\_S238\\_EQRI](https://library.municode.com/oh/columbus/codes/code_of_ordinances?nodeId=CHTR_THECICOOH_MIPR_S238_EQRI)
6. City of Columbus. (2009) Code of Ordinance, Charter, Section 161.01 – *Discrimination Prohibited*. [https://library.municode.com/oh/columbus/codes/code\\_of\\_ordinances?nodeId=TIT1ADCO\\_CH161EMPRGE\\_161.01DIPR](https://library.municode.com/oh/columbus/codes/code_of_ordinances?nodeId=TIT1ADCO_CH161EMPRGE_161.01DIPR)
7. City of Columbus. (2008) Code of Ordinance, Charter, Section 2331 – *Discriminatory Practices; Civil Rights; Disclosure*. [https://library.municode.com/oh/columbus/codes/code\\_of\\_ordinances?nodeId=TIT23GEOFCO\\_CH2331DIPRCIR\\_IDI\\_2331.03UNEMPR](https://library.municode.com/oh/columbus/codes/code_of_ordinances?nodeId=TIT23GEOFCO_CH2331DIPRCIR_IDI_2331.03UNEMPR)
8. City of Columbus. Central Work Rules, Rule #2 – *Abusive or Violent Behavior*, Rule #7 – *Neglect of Duty*, and Rule #8 – *Failure of Good Behavior*. Retrieved from <http://cbus/sites/HumanResources/Pages/EOPPF.aspx>
9. City of Columbus. *Policy Against Discrimination of Persons with Disabilities* Retrieved from <http://cbus/sites/HumanResources/Pages/EOPPF.aspx>
10. City of Columbus. *Policy on Equal Employment Opportunity*. Retrieved from <http://cbus/sites/HumanResources/Pages/EOPPF.aspx>
11. City of Columbus. *Policy Regarding Workplace Violence* Retrieved from <http://cbus/sites/HumanResources/Pages/EOPPF.aspx>
12. City of Columbus. *Anti-Harassment and Sexual Harassment Policy*. Retrieved from <http://cbus/sites/HumanResources/Pages/EOPPF.aspx>
13. Health and Human Services. Civil Rights. Retrieved from <https://www.hhs.gov/civil-rights/filing-a-complaint/complaint-process/index.html>.

## CONTRIBUTORS

The following staff contributed to the authorship of this document:

1. Laurie Dietsch, MPH – Director of Office of Planning and Quality Improvement (OPQI)
2. Kevin Williams – Director of Human Resources
3. Meagan Jones – Center for Public Health Innovation
4. Jalisa Dawkins – Center for Public Health Innovation

## APPENDICES

Appendix A: [Patient Bill of Rights](#)

Appendix B: [Contact List](#)

Appendix C: [CPH Customer Complaint Form](#) <https://redcap.columbus.gov/surveys/?s=JDMHW83THT343C3C>

Appendix D: The City of Columbus Discrimination Complaint Form

<http://intranet/HumanResources/Forms/Discrimination%20Complaint%20Form.pdf>

Appendix E: Columbus Public Health Incident Report

[http://intranet/Health2/employee-safety/Shared%20Documents/CPH\\_Incident\\_Report7FORM.pdf](http://intranet/Health2/employee-safety/Shared%20Documents/CPH_Incident_Report7FORM.pdf)

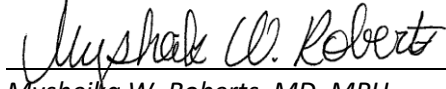
Appendix F: The City of Columbus Incident/Occurrence of Workplace Violence

<http://intranet/Health2/employee-safety/Shared%20Documents/Incident-OccurrenceofWorkplaceViolenceForm-04.pdf>

Appendix G: [CPH Customer Service Staff Report](#)

**SIGNATURES**

I have reviewed this document and endorse it as an official CPH Policy:



Mysheika W. Roberts, MD, MPH  
Health Commissioner

4 / 25 / 23  
Date



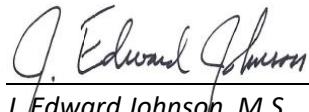
Tiffany S. Krauss, RN, MSN  
Assistant Health Commissioner/Chief Nursing Officer

4 / 18 / 23  
Date



Anita Clark, MS, LSW  
Assistant Health Commissioner/Administration

4 / 14 / 23  
Date



J. Edward Johnson, M.S.  
Assistant Health Commissioner/External Affairs

4 / 18 / 23  
Date

## APPENDIX B: Contact List

### Primary Contacts

CPH Customer Service Email – [CPHCustomerService@columbus.gov](mailto:CPHCustomerService@columbus.gov)

Customer Service Phone Line – 614-645-6972

RedCap Customer Service Link –

<https://redcap.columbus.gov/surveys/?s=JDMHW83THT343C3C>

### Office of Planning and Quality Improvement Primary Contacts

LAURIE DIETSCH, MPH

DIRECTOR OFFICE OF PLANNING AND QUALITY

614.645.5139 / 614.769.0367 (cell)

[LaDietsch@columbus.gov](mailto:LaDietsch@columbus.gov)



TOSKI R. FLEMISTER, M.Ed

PERFORMANCE MANAGEMENT COORDINATOR

OFFICE OF PLANNING AND QUALITY IMPROVEMENT

614.645.2114

[Trflemister@columbus.gov](mailto:Trflemister@columbus.gov)

*Backup contacts are the staff in OPQI*

### Human Resources (for a discrimination complaint involving an employee)

KEVIN G. WILLIAMS

HUMAN RESOURCES OFFICER

CPH HUMAN RESOURCES

614.645.6570

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### CPH Language Services Coordinator

Phone Line - 614-645-3173

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