



GRIEVANCE POLICY

It is the policy of Starling Physicians not to discriminate on the basis of age, race, color, national origin, disability, sex (gender) or religion. Starling Physicians has adopted an internal grievance procedure providing for prompt and equitable resolution of complaints alleging any action prohibited by Section 1557 of the Patient Protection and Affordable Care Act ([42 U.S.C. 18116 - PDF](#)), 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. - PDF](#) (race, color, national origin), Title IX of the Education Amendments of 1972, [20 U.S.C. 1681 et seq. - PDF](#) (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 - PDF](#) (disability), 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.

Any person who believes she or he has been subjected to discrimination on the basis of age, race, color, national origin, disability, sex (gender) or religion may file a grievance under this procedure. It is against the law for Starling Physicians to retaliate against anyone who files a grievance or cooperates in the investigation of a grievance.

Cindy Kisselburgh, Director of Compliance, has been designated as the Coordinator and will facilitate the efforts of Starling Physicians to comply with all of the statutes and regulations referenced above. The Coordinator may be reached by telephone at (860) 258-3470.

Procedure:

- Grievances must be submitted to the Coordinator within 30 days of the date the person filing the grievance becomes aware of the alleged discriminatory action.
- A complaint must be in writing, containing the name and address of the person filing it. The complaint must state the problem or action alleged to be discriminatory and the remedy or relief sought.
- The Coordinator (or her/his designee) shall conduct an investigation of the complaint. This investigation may be informal, but it must be thorough, affording all interested persons an opportunity to submit evidence relevant to the complaint. The Coordinator will maintain the files and records of Starling Physicians relating to such grievances.
- The Coordinator will issue a written decision on the grievance no later than 60 days after its filing.
- The person filing the grievance may appeal the decision of the Coordinator by writing to the Chief Medical Officer, Michael Posner, MD, within 15 days of receiving the Coordinator's decision. The Chief Medical Officer shall issue a written decision in response to the appeal no later than 30 days after its filing.
- The availability and use of this grievance procedure does not prevent a person from filing a complaint of discrimination with the U. S. Department of Health and Human Services, Office for Civil Rights.

Starling Physicians will make appropriate arrangements to ensure that disabled persons are provided other accommodations, if needed, to participate in this grievance process. Such arrangements may include, but are not limited to, providing interpreters for the deaf, providing taped cassettes of material for the blind, or assuring a barrier-free location for the proceedings.