

**NON-DISCRIMINATION POLICY****PURPOSE**

To prevent Hospice staff from discriminating against other staff members, patients or other customers based on race, color, age, ethnicity, religion, national origin, pregnancy, sexual orientation, gender identity, genetic information, sex, marital status, disability, or status as a U.S. Veteran.

**POLICY**

In accordance with Title VI of the Civil Rights Act of 1964 and its implementing regulations, Commonwealth Hospice, LLC will, directly or through contractual or other arrangement, admit and treat all persons without regard to race, color, religion, sex, sexual orientation, disability or national origin in its provision of services and benefits, including assignments or transfers within facilities.

According to Section 504 of the 1973 Rehabilitation Act and its implementing regulations, Hospice will not, directly or through contractual or other arrangements, discriminate based on disability (mental or physical) in admissions, access, treatment or employment.

According to the Age Discrimination Act of 1975 and its implementing regulation, Hospice will not, directly or through contractual or other arrangements, discriminate based on age in the provision of services unless age is a factor necessary to the normal operation or the achievement of any statutory objective.

According to Title II of the American with Disabilities Act of 1990, Hospice will not, based on disability, exclude or deny a qualified individual with a disability from participation in, or benefits of, the services, programs or activities of Hospice.

**PROCEDURE**

The Executive Director has been designated as the Section 504 Coordinator. The Executive Director has been designated as the Section 501 Coordinator.

Hospice will identify an organization or person in this service area who can translate for persons with limited English proficiency and who can disseminate information to sensory-impaired persons.

Hospice will post information regarding these federal regulations in the office.

Hospice provides patient services without regard to race, color, age, ethnicity, religion, national origin, pregnancy, sexual orientation, gender identity, genetic information, sex, marital status, disability, or status as a U.S. Veteran.

Hospice provides reasonable accommodation for qualified employees or applicants with disabilities, unless to do so would cause undue hardship.

Any person who believes she or he has been subjected to discrimination or who believes he or she has witnessed discrimination based on disability, in contradiction of the policy stated above, may file a grievance under this procedure. It is against the law for the hospice to retaliate against anyone who files a grievance or cooperates in the investigation of a grievance, and no retaliation will be tolerated.

Grievances must be submitted to the Executive Director within 30 days of the date the person filing the grievance becomes aware of the alleged discriminatory action.

A complaint may be filed in writing, or verbally, containing the name and address for the person filing it (“the grievance”). The complaint must state the problem or action alleged to be discriminatory and the remedy or relief sought by the grievant.

The Executive Director (or her/his representative), will investigate the complaint to decide its validity. This investigation may be informal, but it must be thorough, allowing all interested persons to submit evidence about the complaint.

The Executive Director will issue a written decision on the grievance within 30 days of it being filed.

The grievance may appeal the decision of the Executive Director by filing an appeal in writing to the Administrator or the Corporate Compliance Officer within 15 days of receiving the Executive Director’s decision.

The Administrator or the Corporate Compliance Officer will issue a written decision in response to the appeal within 30 days of it being filed.

The Executive Director will maintain the files and records relating to such grievances.

The availability and use of this grievance procedure do not preclude a person from filing a complaint of discrimination based on disability with the regional office for Civil Rights of the US Department of Health and Human Services at:

Office for Civil Rights  
US Department of Health and Human Services  
150 S. Independence Mall West  
Suite 372, Public Ledger Building  
Philadelphia, PA 19106  
Main Line: (215) 861-4431  
Hotline: (800) 368-1019  
Fax (215) 861-4431