



RESIDENT NONDISCRIMINATION POLICY AND PROCEDURE

PURPOSE

To ensure that Cadbury at Cherry Hill (the "Facility") and any and all owners, directors, officers, clinical staff, employees, independent contractors, consultants, and others working for the Facility ("Associates"), do not exclude, deny benefits to, or otherwise discriminate against any resident on the basis of race, color, national origin, sex, disability, or age in relation to admission, participation in, or receipt of the services and benefits under any of its programs and activities, whether carried out by the Facility directly or through a contractor or any other entity with which the Facility arranges to carry out its programs and activities.

POLICY

The Facility and its Associates serve a diverse population and respect the rights of all residents to culturally competent care. The Facility and its Associates recognize that each resident is an individual with personal dignity and unique healthcare needs, and strives to provide care focused upon the resident's needs.

It is the policy of the Facility to not exclude, deny benefits to, or otherwise discriminate against persons who are clients or desiring to be admitted to the Facility, 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, 91 and 92. No resident shall be denied admission or appropriate care and placement following admission because of race, creed, color, national origin, ancestry, age, sex, sexual orientation, sexual preference, gender identity or expression, marital status, military status, pregnancy, citizenship, handicap, disability, or any other category prohibited by applicable federal, state, or local laws and regulations.

PROCEDURE

- I. Under no circumstances will the Facility or its Associates exclude, deny benefits to, or otherwise discriminate against residents based upon race, creed, color, national origin, ancestry, age, sex, sexual orientation, sexual preference, gender identity or expression, marital status, military status, pregnancy, citizenship, handicap, disability, or any other category prohibited by applicable federal, state, or local laws and regulations.
- II. Non-Retaliation
The Facility will not retaliate against any Associate who reports concerns about discrimination, files a discrimination complaint, or cooperates in an investigation of discrimination on behalf of a resident or applicant.

- III. The Facility staff will determine eligibility for and provide services, financial aid, and other benefits to all patients in a similar manner, without subjecting any individual to separate or different treatment on the basis of race, creed, color, national origin, ancestry, age, sex, handicap, disability, or any other category prohibited by applicable federal, state, or local laws and regulations.
- IV. The Facility will take appropriate steps to provide public notice of its nondiscriminatory and related policies.
 - a. A full nondiscriminatory notice will be included in significant publications, in conspicuous physical locations, and on the web site. The full notice will include taglines identifying specific policies as well as the following information:
 - i. the Facility does not discriminate on the basis of race, color, national origin, sex, age, or disability; the availability of appropriate auxiliary aids and services and how to obtain these aids or services (see Policy CCG 00505);
 - ii. the provision of language assistance services and how to request them (see Policy CCG 00509);
 - iii. identification or contact information for the individual responsible for coordinating nondiscrimination policies;
 - iv. the availability of a grievance process and how to initiate it (see Policy CCG 00506); and
 - v. how to file a complaint with the United States Office of Civil Rights.
 - b. A brief nondiscrimination notice may be substituted for the full notice in certain small publications such as postcards or tri-fold brochures. This brief notice must include taglines in two languages and information on the availability of auxiliary aids and services for individuals with disabilities.
- V. The Facility's Compliance and Ethics Officer shall be responsible for coordinating compliance with this Policy, including giving notice to and training all Associates on this Policy, and, when applicable, conducting investigations, keeping records and submitting compliance and ethics reports to the Office of Civil Rights.