**PURPOSE**

To prevent Ohio Living personnel from discriminating against other personnel, patients, or other organizations on the basis of race, color, religion, age, gender, sexual orientation, disability (mental or physical), communicable disease, or place of national origin.

**POLICY**

Ohio Living Home Health and Hospice will, directly or through contractual or other arrangement, admit and treat all persons without regard to race, color, or place of national origin in its provision of services and benefits, including assignments or transfers within facilities.

In accordance with Section 504 of the Rehabilitation Act of 1973 and its implementing regulations, Ohio Living Home Health and Hospice will not, directly or through contractual or other arrangements, discriminate on the basis of disability (mental or physical) in admissions, access, treatment or employment.

In accordance with the Age Discrimination Act of 1975 and its implementing regulation, Ohio Living Home Health and Hospice will not, directly or through contractual or other arrangements, discriminate on the basis of age in the provision of services unless age is a factor necessary to the normal operation or the achievement of any statutory objective.

Ohio Living Home Health and Hospice will not, on the basis of disability, exclude or deny a qualified individual with a disability from participation in, or benefits of, the services, programs or activities of the organization.

In accordance with other regulations, the organization will not discriminate in admissions, access, treatment, or employment on the basis of gender, sexual orientation, religion, or communicable disease.

**PROCEDURE**

1. The Section 504/ADA Coordinator designated to coordinate the efforts of Ohio Living Home Health and Hospice to comply with the regulations is the Executive Director/ Administrator or designee.
2. Any person who believes she, he, or they has been subjected to discrimination or who believes he, she, or they has witnessed discrimination, in contradiction of the policy stated above, may file a grievance under this procedure. It is against the law for Ohio Living Home Health and Hospice to retaliate against anyone who files a grievance or cooperates in the investigation of a grievance.
3. Grievances must be submitted to the Executive Director /Administrator or designee within 30 days of the date the person filing the grievance becomes aware of the alleged discriminatory action.
4. A complaint may be filed in writing, or verbally, containing the name and address of the person filing it (“the grievant”). The complaint must state the problem or action alleged to be discriminatory and the remedy or relief sought by the grievant.
5. The Executive Director/Administrator, or designee, will conduct an investigation of the complaint to determine its validity. This investigation may be informal, but it must be thorough, affording all interested persons an opportunity to submit evidence relevant to the complaint.
6. The Executive Director/Administrator, or designee will issue a written decision on the grievance no later than 30 days after its filing.
7. The grievant may appeal the decision of the Executive Director/Administrator, or designee by filing an appeal in writing to Ohio Living Home Health and Hospice within 15 days of receiving the Executive Director/Administrator’s or designee’s decision.
8. Ohio Living Home Health and Hospice will issue a written decision in response to the appeal no later than 30 days after its filing.
9. The Executive Director/Administrator will maintain the files and records of Ohio Living Home Health and Hospice relating to such grievances.
10. Ohio Living Home Health and Hospice will make appropriate arrangements to assure that persons with disabilities can participate in or make use of this grievance process on the same basis as the nondisabled. Such arrangements may include, but will not be limited to, providing interpreters for the deaf, providing audio material for the blind, or assuring a barrier-free location for the proceedings. The Executive Director or Administrator will be responsible for providing such.