

**DIGNITY HEALTH
ADMINISTRATIVE POLICY MANUAL
CLINICAL POLICY AND PROCEDURE**

TITLE: Nondiscrimination under ADA, Section 504, Title VI, Title IX, Age Discrimination Act and Section 1557

POLICY NUMBER: 100.8.023 **EFFECTIVE DATE:** October 24, 2018

APPLIES TO: ☒ System Offices **ORIGINAL** 120.7.007
 ☒ Acute Care Entities **EFFECTIVE** March 26, 2008
 ☒ Non-Acute Care Entities **DATE:**

I. POLICY

- A. It is the policy of Dignity Health not to exclude, deny benefits to, or otherwise discriminate against any person, including patients and visitors, on the grounds of race, color, national origin, disability, age, sex, sexual orientation or gender identity and expression, in admission to, participation in, or receipt of the services and benefits of any of its programs or activities. This Policy extends to contractors and other entities with whom Dignity Health arranges to carry out its programs and activities.

II. PURPOSE

- A. Dignity Health is committed to providing equal access to its programs and activities to all individuals in accordance with applicable provisions of the Americans with Disabilities Act (non-discrimination on the basis of disability), Section 504 of the Rehabilitation Act of 1973 (non-discrimination on the basis of disability), Title VI of the Civil Rights Act of 1964 (non-discrimination on the basis of race, color and national origin), Title IX of the Education Amendments of 1972 (non-discrimination on the basis of sex), the Age Discrimination Act of 1975 (non-discrimination on the basis of age), Section 1557 of the Affordable Care Act (non-discrimination on the basis of race, color, national origin, sex, age and disability), and Regulations of the U.S. Department of Health and Human Services issued pursuant to the Acts, Title 45 Code of Federal Regulations parts 80, 84, and 91 and other agency guidance (non-discrimination on the basis of sexual orientation).

III. AFFECTED DEPARTMENTS

- A. All Dignity Health owned or operated sites where care and treatment are provided to patients, including but not limited to hospitals, ambulatory surgery centers, home health agencies and Dignity Health-affiliated clinics, and contracted services.

IV. QUESTIONS AND COMPLAINTS

- A. In case of questions concerning this Policy, or in the event of a desire to file a complaint alleging violations of this Policy, with respect to discrimination in access to services or facilities, please call the Dignity Health Hotline at 1-800-938-0031, see Dignity Health Administrative Policy and Procedure No. 100.8.022, *Patient and Visitor Grievances*, or contact the Facility's Patient Safety Officer.
- B. California Relay Services: 800-855-7100 (Voice); 800-855-7100 (TTY); 800-855-7200 (Spanish V/TTY); or 711
- C. Nevada Relay Services: 800-326-6888 (Voice); 800-326-6868 (TTY); 800-877-1219 (Spanish V/TTY); or 711
- D. Arizona Relay Services: 800-842-4681 (Voice); 800-367-8939 (TTY); 800-842-2088 (Spanish V/TTY); or 711

V. COMMUNICATION OF POLICY; ACCESS TO POLICY; TRAINING

- A. Communication
 - 1. This Policy shall be communicated to individuals seeking access to a Dignity Health Facility in a way that ensures such persons understand that the Facility will provide providing equal access to its programs and activities to all individuals in accordance with the provisions of this Policy.
- B. Alternative Formats
 - 1. Auxiliary Aids
 - a. If an individual seeking access to a Facility has a sensory or communication disability, this Policy shall be communicated in the requested accessible format, such as audio, large print format, sign language, or other appropriate method, in accordance with Dignity Health Administrative Policy and Procedure No. 100.8.021, *Auxiliary Aids and Services for Effective Communication with Persons with Disabilities*, or successor policy.

2. Foreign Language/Limited English Proficiency

- a. If an individual seeking access to a Facility requires foreign language interpretation services, this Policy shall be made available in accordance with Dignity Health Administrative Policy and Procedure No. 100.8.020, *Language Access for Limited English Proficient (LEP) Patients and Companions*, or successor policy.

3. Auxiliary Aids/Foreign Language/Limited English Proficiency

- a. If a Person with Sensory or Communication Disabilities seeking access to a Facility also requires foreign language interpretation services, this Policy shall be made available in accordance with both Dignity Health Administrative Policy and Procedure No. 100.8.021, *Auxiliary Aids and Services for Effective Communication with Persons with Disabilities*, and Dignity Health Administrative Policy and Procedure No. 100.8.020, *Language Access for Limited English Proficient (LEP) Patients and Companions*, or successor policies.

C. Employee Education

- 1. Dignity Health shall instruct all medical personnel and staff, including security personnel and volunteers, on the provisions of this Policy through its normal channels of communicating information to employees, including but not limited to its Intranet site, and at employee orientation. Each Facility shall also conduct periodic employee training to ensure its employees are familiar with this Policy.

VI. REFERENCES:

- A. Dignity Health Administrative Policy and Procedure No. 100.8.020, *Language Access for Limited English Proficient (LEP) Patients and Companions*
- B. Dignity Health Administrative Policy and Procedure No. 100.8.021, *Auxiliary Aids and Services for Effective Communication with Persons with Disabilities*
- C. Dignity Health Administrative Policy and Procedure No. 100.8.022, *Patient and Visitor Grievances*
- D. Dignity Health Administrative Policy and Procedure No. 100.8.024, *Section 504 Notice of Program Accessibility*
- E. Dignity Health Administrative Policy and Procedure No. 100.8.025, *Service Animals for Persons with Disabilities*