

<b>POLICY TITLE:</b> <b>ADA Accessibility</b>		<b>IDENTIFICATION NUMBER:</b> <b>RI101</b>	
<b>POLICY LEVEL:</b>	System Wide	<b>ORIGINATION/EFFECTIVE DATE</b>	10/25/2024
<b>FACILITY:</b>	All Family Hospital Facilities	<b>REVIEW CYCLE:</b>	Two Years
<b>DEPARTMENT(S):</b>	All departments	<b>LAST REVIEW DATE:</b>	N/A
		<b>LAST REVISION DATE:</b>	N/A
<b>REVISION:</b>	New		

**POLICY STATEMENT**

In accordance with the Rehabilitation Act of 1973 and the Americans with Disability Act (ADA) as amended, Family Hospital and its employees promote and maintain an environment that is accessible to patients with disabilities and that allows for effective communication regarding their health care. This consideration is provided to all types of disabilities inclusive of but not limited to physical, hearing, speech, and visual impairment. Whenever possible, the disabled patient’s preferred method of communication shall be given primary consideration.

**PURPOSE**

Family Hospital respects the diverse cultural needs, preferences, and expectations of the patients and families it serves and to the extent reasonably possible, will provide the available resources without compromising the quality of health care delivered.

**SCOPE**

- Applies to all Family Hospital owned or managed healthcare facilities

**RESPONSIBILITIES**

- The Compliance and Risk Management Committee monitors and maintains compliance with this policy
- All staff and contractor workers are expected to comply with this policy

**POLICY**

1. All Family Hospital affiliated facilities are required to comply with any applicable public access provisions of the ADA including changes made by the ADA Amendments Act of 2008 (P.L. 110-325), the Rehabilitation Act of 1973 and Section 1557 of the Patient Protection and Affordable Care Act (ACA 2010).
2. Family Hospital affiliated facilities may not discriminate on the basis of disability or national origin in employment, public accommodations, commercial facilities, transportation, telecommunications, or web access.
3. Family Hospital affiliated facilities are required to provide the same level of service and access to persons with disabilities as for all others.
4. All employees, contractors, and vendors must carry out their roles and responsibilities in a manner that is in compliance with the ADA and related nondiscrimination laws.
5. Family Hospital affiliated facilities are required to follow this and related policies, including:
  - a. RI102 - Accommodating Persons Who are Deaf or Hard-of-Hearing
  - b. RI103 - Accommodating Persons with Service Animals
  - c. RI104 - Accommodating Persons Who are Blind or Have Low Vision
  - d. RI105 - Accommodating Persons with Limited English Proficiency (LEP)
  - e. LD106 – Disability Discrimination Grievances
6. Concerns about or violations of these policies should be reported to one’s supervisor, the facility’s Equity Compliance Coordinator (ECC), and the Compliance and Risk Management Committee (CRMC).
  - a. The ECC and CRMC can be reached by email at [compliance@FHSMC.com](mailto:compliance@FHSMC.com)
  - b. Refer to policy LD106 concerning Disability Discrimination Grievances.

**PROCEDURES**

1. The Governing Body of Family Hospital Management Company shall appoint an Equity Compliance Coordinator (ECC) whose responsibilities shall include overseeing compliance with the ADA as it relates to access to

- services, Section 504, ACA 2010, and the policies listed above.
2. The Operations Administrator is responsible for overseeing compliance with the ADA as it relates to physical barriers to access.
  3. The ECC and Operations Administrator shall routinely report to the CRMC regarding ADA compliance.
  4. The ECC and the Operations Administrator, respectively, are responsible for developing and implementing facility ADA compliance procedures. The facility ADA procedures must be consistent with Family Hospital ADA policies and must include any additional state or local procedures or requirements.
  5. The ECC and Operations Administrator, respectively, will ensure that appropriate education is available and has been completed by appropriate audiences.
  6. ECC and Operations Administrator, respectively, must report all ADA complaints, problems or incidents, whether informal or formal to the CRMC and the Governing Body. Additional reporting will be completed as per policy LD106.
  7. No changes will be made to Family Hospital ADA policies without the consultation and approval of the ECC and the Governing Body.

**REFERENCES**

- The Americans with Disabilities Act of 1990 (42 U.S.C. 12181), known as the ADA, including changes made by the ADA Amendments Act of 2008 (P.L. 110-325).
- 28 CFR Part 36, revised as of July 1, 1994 entitled “Non Discrimination on the Basis of Disability by Public Accommodations and in Commercial Facilities” ([http://www.ada.gov/regs2010/titleIII\\_2010/titleIII\\_2010\\_regulations.htm](http://www.ada.gov/regs2010/titleIII_2010/titleIII_2010_regulations.htm))
- Rehabilitation Act of 1973, Section 504
- Americans with Disabilities Act, Access To Medical Care For Individuals with Mobility Disabilities, published by the U.S. Department of Justice, dated July 2010 ([http://www.ada.gov/medicare\\_mobility\\_ta/medicare\\_ta.htm](http://www.ada.gov/medicare_mobility_ta/medicare_ta.htm))

**APPROVAL**

<b>POLICY OWNER</b>	Matt Alewine Chief Nursing Officer
<b>COMMITTEE</b>	Compliance and Risk Management Committee
<b>MEDICAL EXECUTIVE COMMITTEE</b>	Nathaniel Greenwood, DO. Chief Medical Officer
<b>GOVERNING BODY</b>	Family Hospital Management Company Governing Body

<b>REVISION</b>	<b>CHANGES</b>	<b>DEPARTMENT APPROVAL</b>	<b>COMMITTEE APPROVAL</b>	<b>MEC APPROVAL</b>	<b>GB APPROVAL</b>
New	Initial Release	10/25/2024	10/25/2024	10/25/2024	10/25/2024