

NONDISCRIMINATION POLICY

Dated: 8-19-2022

As a recipient of Federal financial assistance, **WINGATE SENIOR LIVING, LLC**, on behalf of its assisted living, independent living and skilled nursing facilities (the “Company”), does not exclude, deny benefits to, or otherwise discriminate against any person on the ground of race, color, national origin, disability, or age in admission to, participation in, or receipt of the services and benefits under any of its programs and activities, and in staff and employee assignments to patients, whether carried out by the Company directly or through a contractor or any other entity with which the Company arranges to carry out its programs and activities.

This statement is in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (nondiscrimination on the basis of race, color, national origin), Section 504 of the Rehabilitation Act of 1973 (nondiscrimination on the basis of disability), the Age Discrimination Act of 1975 (nondiscrimination on the basis of age), regulations of the U.S. Department of Health and Human Services issued pursuant to these three statutes at Title 45 Code of Federal Regulations Parts 80, 84, and 91.

Additionally, in accordance with Section 1557 of the Patient Protection and Affordable Care Act of 2010, 42 U.S.C. §18116, does not exclude, deny benefits to, or otherwise discriminate against any person on the ground of sex (including gender identity) in admission to, participation in, or receipt of the services and benefits under any of its health programs and activities, and in staff and employee assignments, whether carried out by the Company directly or through a contractor or any other entity with which the Company arranges to carry out its programs and activities.

Additionally, in accordance with Title III of the ADA, 42 U.S.C. Sec. 12182, and its implementing regulation, 28 C.F.R. Part 36, the Company does not discriminate in the provision of services to persons with disabilities on the basis of Opioid Use Disorder (OUD) and who have been prescribed medication for opioid use disorder (MOUD). The Company will make individualized assessments as to whether an individual’s current use of drugs poses a threat to the health or safety of others. Prospective patients with OUD or MOUD will be screened for admission in the same manner and consistent with the screening applied to all prospective patients.

In case of questions, concerns or complaints, please contact the Facility Administrator or Wingate Healthcare’s Chief Compliance Officer at (781) 707-9085 regarding your issues.

**DESCRIPTION OF METHODS USED
TO DISSEMINATE NONDISCRIMINATION NOTICE(S)
AND REQUIRED DOCUMENTATION**

The Company will disseminate its Nondiscrimination Policy in the following manner:

- 1) It is conspicuously posted in the reception area of each skilled nursing facility, on each employee bulletin board and as a link on the Company's website, as well as on the website of any current or future skilled nursing facility managed by the Company.
- 2) Printed copies given to all new employees, applicants for employment, resident's/patients, applicant for admissions and general public are notified of the Company's policy by way of posting the policy at the facility. Additional notification will be provided by periodic mailing to resident's/patients and their families, community groups, professional organizations and referral sources. The policy of nondiscrimination will be printed in the resident and employee handbook.
- 3) Hearing Impaired – Staff will utilize written material and pencil and paper to disseminate information to hearing impaired individuals. The Company will provide TDD/TTY services by participating in the State Relay Services. We will communicate this and the state number (800) 439-2370 through postings and mailings.
- 4) Visually impaired- Staff and volunteers will read information to disseminate information to the visually impaired.
- 5) Special Needs – Some members of our staff who are bilingual can be of assistance with individuals who speak a foreign language. A current listing is posted in the receptionist office.
- 6) These services and auxiliary aids are provided without cost to those needing them.