

Criteria 1. Non-Discrimination and Staff Training

Resident Non-Discrimination

For more detailed information about this section and specific examples that meet the criteria please see the [Resident Non-Discrimination section of the LEI Resource Guide](#)

Criteria/Best Practice	Question(s) No. & Specific Wording*	Validating Information Required	System Information Accepted
LGBTQ+ inclusive Resident Non-Discrimination Policy Policy must include the terms “sexual orientation” and “gender identity or expression” (or “gender identity”)	Q1a. Does your resident non-discrimination policy explicitly include “sexual orientation” and the term “gender identity or expression” (or “gender identity”)?	Must upload a copy of the resident non-discrimination policy or official policy with the resident bill of rights. The policy must include both terms.	<u>System - Yes</u> – policy should indicate that the policy applies to all communities in the system
Resident Non-Discrimination is communicated to residents, the public, and staff - Policy is shared in 2 ways <i>with residents and the public</i>, typically online and in-print - Policy is shared <i>with staff and volunteers</i> in at least 1 way	Q2. To receive credit for communicating this policy, please check ALL the following ways your organization informs <i>residents and the public</i> of your LGBTQ+ inclusive resident non-discrimination policy (or residents’ bill of rights) Q3. To receive credit for communicating this policy, please check off ALL of the ways your organization informs <i>staff and volunteers</i> of your LGBTQ+ inclusion resident non-discrimination policy (or residents’ bill of rights)	Must provide at least 2 examples of how policy is communicated to residents – typically one is a website example and the other will be a document like a brochure. It could also be a photo of a sign/poster. Must upload at least 1 example of how policy is communicated to staff and volunteers. Must be an internal example, not a public document. May not be the same as the example of how the policy is communicated to residents.	<u>System- Yes</u> – if the example is truly system-wide (i.e. a page on the system website, or a resident guide given to all residents in the system)

*Question-wording and numbering may vary in final LEI survey

Equal Visitation

For more detailed information about this section and specific examples that meet the criteria please see the [Equal Visitation Section of the LEI Resource Guide](#)

Criteria/Best Practice	Question(s) No. & Specific Wording*	Validating Information Required	System Information Accepted
Equal Visitation Policy* Policy must allow the resident's visitor of their choice. <i>*Note: While not all housing communities are federally or state-mandated to have a visitation policy. The LEI requires all participants to put an Equal Visitation Policy in place</i>	Q1. Does your visitation policy grant equal visitation to LGBTQ+ residents and their visitors in at least one of the ways indicated above?	Must upload a copy of the equal visitation policy. *Can be included in the Residents' Rights but must be on the official policy document.	<u>System - Yes</u> – policy should indicate that the policy applies to all communities in the system
Equal Visitation Policy is communicated to residents, the public, and staff - Policy is shared in 2 ways <i>with residents and the public</i>, typically online and in-print. - Policy is shared with <i>staff and volunteers</i> in at least 1 way.	Q2. To receive credit for communicating this policy, please check off ALL of the ways your organization informs residents of your equal visitation policy Q3. To receive credit for communicating this policy, please check off ALL of the ways your organization informs employees and volunteers of your equal visitation policy	Must include at least 2 examples – typically one is a website example and the other will be a document like a brochure. It could also be a poster or photo of sign/poster in waiting area. If included in the Residents' Bill of Rights, the same example(s) from your community's resident non-discrimination may be used. Must include at least 1 example of how policy is communicated to staff. Must be an internal example, not a public document. May not be the same as the example of how the policy is communicated to residents.	<u>System - Yes</u> – if the example is truly system-wide (i.e. a page on the system website, or a resident guide that is given to all residents in the system)

Employment Non-Discrimination

For more detailed information about this section and specific examples that meet the criteria please see the [Employment Non-Discrimination section of the LEI Resource Guide](#)

Criteria/Best Practice	Question(s) No. & Specific Wording*	Validating Information Required	System Information Accepted
LGBTQ+ inclusive Employment Non-Discrimination Policy Policy must include the terms “sexual orientation” and “gender identity or expression” (or “gender identity”)	Q1. Does your employment non-discrimination (equal opportunity) policy explicitly include “sexual orientation” AND the term “gender identity or expression” (or “gender identity”)?	Must upload a copy of the employment non-discrimination policy or equal employment opportunity policy. *Equal employment opportunity policy must explicitly state sexual orientation AND gender identity	<u>System - Yes</u> – policy should indicate that the policy applies to all communities in the system
LGBTQ+ inclusive Employment Non-Discrimination Policy is shared with the public Policy is shared <i>with the public</i> in at least 1 way	Q2. To receive credit for communicating this policy, please check off ALL of the ways your organization informs the public of the employee non-discrimination policy (or equal employment opportunity policy [w sexual orientation and gender identity stated])	Must include at least 1 example of how the policy is publicly communicated. Preference is for website, however, you can also upload job descriptions, etc.	<u>System - Yes</u> – if example is truly system-wide (i.e. on system’s career website which has job listings for all communities)

Training in LGBTQ+ Resident-Centered Care

For more detailed information about this section and specific examples that meet the criteria please see the [Training in LGBTQ+ Resident-Centered Care section of the LEI Resource Guide](#)

Criteria/Best Practice	Question(s) No. & Specific Wording*	Validating Information Required	System Information Accepted
Training in LGBTQ+ Resident-Centered Care - For first-year participants, 80% of key senior executives at the community must complete the LGBTQ+ Long-Term Care Equality Index (LEI): Executive Briefing provided by the LEI. OR - Receive credit if Platinum-Level SAGECare certified	Q1. Has your organization's key senior executives completed training in LGBTQ+ resident-centered care in order to meet your community's specific training requirement?	80% of key senior executives must complete the required Executive Briefing Executive senior leadership such as: CEO, COO, CFO, Corporate Compliance Officer, Nursing Home Administrator, Executive Director, Deputy Executive Director, Medical Director, and, Department Directors (e.g HR, Social Services, Nursing) <i>*Current Platinum-Level SAGECare communities meet criteria and do not need to complete the executive briefing</i>	No - Training hours are facility-specific

Criteria 2. Resident Services and Support

LGBTQ+ Resident Services and Support

For more detailed information about this section and specific examples that meet the criteria please see the [LGBTQ+ Resident Services section of the LEI Resource Guide](#)

Criteria/Best Practice	Question(s) No. & Specific Wording*	Validating Information Required	System Information Accepted
LGBTQ+ Inclusive Intake Forms Intake Form(s) ask for the following: • Sexual orientation • Gender Identity • Chosen Name • Pronouns	Q1. During intake or move-in/registration interviews, does your community have procedures for asking new residents for information about the following and capturing this information in their records?	Must upload a copy of an intake/admission form with all 4 fields. If captured in electronic health records must upload screenshot of “dummy” resident	<u>System - Yes</u> -if entire system uses same document and process
Inclusive Relationship Intake Forms	Q2. Do your community's forms provide gender-neutral options for identifying spouse/partner, emergency contact, and durable power of attorney as applicable?	Must upload a copy of an intake form or related document If captured in electronic health records must upload screenshot of “dummy” resident	<u>System - Yes</u> -if entire system uses same document and process
LGBTQ+ Inclusive Neglect and Abuse Policy • Policy must include the terms “sexual orientation” and “gender identity or expression” (or “gender identity”)	Q3. Does your community have a policy prohibiting/preventing neglect, verbal, mental, sexual, and physical abuse that includes the terms “sexual orientation” and “gender identity or expression” (or “gender identity”)?	Must upload a copy of the neglect and abuse policy	<u>System - Yes</u> – policy should indicate that the policy applies to all communities in the system.
Neglect and Abuse Policy • Policy communicated to staff a least 1 way that LGBTQ+ residents are protected from abuse	Q3c. Do you explicitly communicate to staff that LGBTQ+ residents are to be protected under your policy prohibiting neglect, verbal, mental, sexual, and physical abuse (including attempts to change one's sexual orientation and/or gender identity)?	Describe and attach an example of how you communicate the inclusive policy. This can be through training slides, internal memo, etc.	<u>System - Yes</u> – policy should indicate that the policy applies to all communities in the system.

Criteria/Best Practice	Question(s) No. & Specific Wording*	Validating Information Required	System Information Accepted
Grievance Process - Process is shared in 1 way with residents - Grievance process includes 2 different ways for a resident to communicate their complaint	Q4. Does your community have a clear process through which residents may report discrimination or other complaints or grievances?] Q4a. How is your complaint/grievance process communicated to residents? [check all that apply) Q4b. Which of the following are included in your complaint/grievance process? (please check all that apply):	Must provide at least 1 example of how policy is communicated to residents –e.g. a printed document provided at admissions, It could also be a poster, photo of sign/poster. Must indicate 2 different ways for communication such as a phone number to the facility’s Ombudsman, an online form, elder abuse hotline	<u>System- Yes</u> – if example is truly system-wide (i.e. a page on the system website, or a resident guide that is given to all residents in the system)
SOGI Inclusive Confidentiality Policy Community’s confidentiality policy includes sexual orientation and gender identity	Q5. Does your community's confidentiality policy have provisions to ensure the following personal information is kept confidential and not shared with other residents, visitors, or staff (unless necessary for staff to perform duties)? Sexual orientation? Gender Identity?	Upload confidentiality policy	<u>System - Yes</u>-if policy applies to the entire system
Sexual Expression Policy Policy ensures right to consensual sexual relations regardless of sexual orientation or gender identity.	Q6. Does your community have a policy that ensures residents the right to consensual sexual relations? Q6a. Does your above policy ensure residents the right to consensual sexual relations regardless of sexual orientation and/or gender identity?	Must upload a copy of a sexual expression policy or like document that addresses resident rights to sexual expression	<u>System - Yes</u> – policy should indicate that the policy applies to all communities in the system.

Criteria/Best Practice	Question(s) No. & Specific Wording*	Validating Information Required	System Information Accepted
Roommate Policy Policy ensures same-sex partners/spouses are able to share a room	Q7. Does your community have a policy that ensures the right of each resident to share a room with whomever they choose as long as both residents agree (including same-sex married couples or domestic partners)?	Must upload a copy of rooming policy	<u>System - Yes</u> – policy should indicate that the policy applies to all communities in the system.
Commemorate an LGBTQ+ “holiday” or “day of remembrance” at the community	Q8. Does your community commemorate at least one LGBTQ+ day of significance as part of its annual activities for residents? (e.g. Pride Month celebration, Transgender Day of Visibility, National Coming Out Day)	Must describe this commemoration and/or upload any relevant items in the attachment spaces below Must have occurred since 01/01/2021	<u>System - No, needs to be facility specific.</u> Could be part of system-wide events, but must be available on-site for residents.
Provide a list of LGBTQ+ affirming resources for your residents (e.g. LGBTQ+ affirming physicians, LGBTQ+ affirming houses of worship)	Q9. Does your community maintain a list of LGBTQ+ affirming resources for LGBTQ+ residents? (e.g. LGBTQ+ affirming physicians, LGBTQ+ social groups, LGBTQ+ affirming houses of worship)	Must share either a weblink or upload a document showing where and how residents will find LGBTQ+ affirming resources provided by the community	<u>System - Yes</u> – as long as it is clearly systemwide and the LGBTQ+ friendly providers (or facilities) are geographically accessible to residents of the community.

Gender-Affirming Services and Support

For more detailed information about this section and specific examples that meet the criteria please see the [Gender-Affirming Services and Support section of the LEI Resource Guide](#)

Criteria/Best Practice	Question(s) No. & Specific Wording*	Validating Information Required	System Information Accepted
Have a written policy (or policies) that specifically outline procedures and practices aimed at eliminating bias and insensitivity, and ensuring appropriate, welcoming interactions with transgender residents	Q1. Does your organization have a policy or policies that specifically outline procedures and practices aimed at eliminating bias and insensitivity, and ensuring appropriate, welcoming interactions with transgender patients related to any of the following areas? Check all that apply.	Must provide an official written official policy (or policies) or procedure(s) which cover at least 3 of the areas listed in the survey. See examples. This is different than the resident non-discrimination policy	<u>System - Yes</u> – policy should indicate that the policy applies to all communities in the system.
Offer all-gender restrooms in public areas for residents and visitors and/or have clear posted signage indicating a policy that allows individuals to use the restroom that aligns with their gender identity	Q2. Does your community offer all-gender restrooms in public areas and/or have clear posted signage indicating a policy that allows individuals to use the restroom that aligns with their gender identity?	Must provide number of gender neutral bathrooms in public areas. Must upload a sample of the signage for one of the bathrooms.	<u>System - No</u> – bathrooms must be at that specific location.

Medical Decision Making

For more detailed information about this section and specific examples that meet the criteria please see the [Medical Decision Making section of the LEI Resource Guide](#)

Criteria/Best Practice	Question(s) No. & Specific Wording*	Validating Information Required	System Information Accepted
Organization explicitly informs residents of their right to designate a person of their choice, including a domestic partner, as medical decision-maker.	Q1. Does your community inform residents of their right to designate a person of their choice, including a domestic partner or friend, as a medical or financial decision-maker?	Must describe how your organization informs residents of these rights and upload supporting documentation.	<u>System - Yes</u> – should indicate that the procedure applies to all communities in the system.
Organization offers employee training related to medical decision making that includes LGBTQ+ specific information	Q2. Does your organization provide employees with training related to medical decision-making? Q2a. Is your medical decision-making training explicitly LGBTQ+ inclusive?	Must provide written description of how the training is LGBTQ+ inclusive and upload supporting documentation (slides from training, etc.).	<u>System - Yes</u> -if entire system received the same training
Organization communicates residents' advance directives/end-of-life wishes to staff	Q3. Does your community keep a copy of residents' medical decision-making documents and communicate them with staff?	Must describe how staff are informed of a resident's end-of-life choices and decision making and upload supporting documentation	<u>System - No</u> - each community must describe how they make info accessible to staff

Criteria 3. Employee Benefits and Policies

For more detailed information about this section and specific examples that meet the criteria please see the [Employee Benefits and Policies section of the LEI Resource Guide](#)

Equal Benefits

Criteria/Best Practice	Question(s) No. & Specific Wording*	Validating Information Required	System Information Accepted
Healthcare benefits are provided to domestic partners of benefits-eligible employees.	Q1. Do you offer health insurance to your benefits-eligible employees AND their dependents? Q1e. Does your insurance require proof of relationship documentation to enroll an eligible dependent?	Must upload 2022 health insurance coverage summary plan documentation with the eligibility and definitions section(s) that define who is eligible for benefits. If documentation is required to prove relationship status to enroll a domestic partner, must upload document	<u>System - Yes</u> – documents should indicate that the benefits information applies to employees throughout the system
FMLA-equivalent benefit allows employees to take <u>unpaid, job-protected, family and medical leave</u> to care for domestic partners as well as the children of a domestic partner, regardless of biological or adoptive status	Q2. Does your organization offer a FMLA-equivalent benefit that allows employees to take unpaid, job-protected, family and medical leave to care for domestic partners as well as the children of a domestic partner, regardless of biological or adoptive status?	Must upload a copy of a family and medical leave (FMLA)-equivalent policy.	<u>System - Yes</u> – policy should indicate that the benefits information applies to employees throughout the system
Provides LGBTQ+ inclusive paid family medical leave policy that <u>allows paid time off to care</u> for domestic partners as well as the children of a domestic partner, regardless of biological or adoptive status and parental leave policies that do not exclude non-birth parents and do not discriminate in access to benefits based on sex, sexual orientation, gender identity and marital status	Q3. Does your organization offer LGBTQ+ inclusive paid family leave policy that allows paid time off to care for domestic partners as well as the children of a domestic partner, regardless of biological or adoptive status and parental leave policies that do not exclude non-birth parents and do not discriminate in access to benefits based on sex, sexual orientation, gender identity and marital status?	Must upload a copy of a family and medical leave (FMLA) policy.	<u>System - Yes</u> – policy should indicate that the benefits information applies to employees throughout the system

Criteria/Best Practice	Question(s) No. & Specific Wording*	Validating Information Required	System Information Accepted
Provides bereavement leave in the event of the death of a partner or their immediate family.	Q4. Does your organization offer bereavement leave that allows employees to take time off following the death of an unmarried same-sex domestic partner or their immediate family?	Must upload a copy of your bereavement leave policy.	<u>System - Yes</u> – policy should indicate that the benefits information applies to employees throughout the system
Provide at least one health plan to all employees that explicitly covers medically necessary health services for transgender people, including gender transition-related treatment.	Q5. Does your community provide at least one health plan to all employees that affirmatively and explicitly covers medically necessary health services for transgender people, including gender transition-related treatment such as hormone replacement therapy and gender affirmation surgery? <u>Basic coverage MUST include:</u> - o Mental health benefits - o Pharmaceutical coverage (hormone replacement therapies, puberty blockers for youth) - o Coverage for medical visits or lab services - o Coverage for reconstructive surgical procedures related to gender reassignment (including reconstructive chest, breast, and genital procedures and related medically necessary procedures such as hair removal prior to genital procedures and revisions) - o Short-term medical leave - o No exclusions	Must upload 3 different documents • The Summary Plan Documentation (or summary material modification documentation) • A Summary of Benefits and Coverage (employee-facing document shared with all employees both prior to selecting and after enrolled in the plan that explicitly indicates that coverage is available) • Clinical Plan Bulletin (for examples visit: https://transhealthproject.org/resources/health-insurance-medical-policies/views/gender-dysphoria-gender-reassignment) Vist this link for additional criteria info and support for this questions in the LEI Resource Guide	<u>System -Yes</u> – documents should indicate that the benefits information applies to employees throughout the system

Additional Support for LGBTQ+ Employees

Criteria/Best Practice	Question(s) No. & Specific Wording*	Validating Information Required	System Information Accepted
LGBTQ+ Inclusive Employee Anti-Harassment Policy Policy must include the terms “sexual orientation” and “gender identity or expression” (or “gender identity”)	Q1. Does your community's employee anti-harassment policy “sexual orientation” and “gender identity or expression” (or “gender identity”)?	Must upload a copy of the anti-harassment policy.	<u>System - Yes</u> – policy should indicate that the policy applies to all communities in the system
Organization has written gender transition guidelines documenting at least 3 supportive policies and practices on issues pertinent to a workplace gender transition.	Q2. Does your community have written gender transition guidelines documenting supportive policies and practices on issues pertinent to employee gender transition?	Must upload a copy of the gender transition guidelines.	<u>System - Yes</u> – policy should indicate that the information applies to employees throughout the system
Anonymous employee engagement or climate surveys allow employees to identify as LGBTQ+.	Q3a. Does your climate survey include a way for employees to voluntarily disclose their sexual orientation and/or gender identity along with other demographic questions such as race and gender?	Must upload a copy of the survey and/or the results demonstrating the inclusion of LGBTQ+ demographic measures. Since 1/01/2021	<u>System - Yes</u> – provided that it is clear that the survey was system-wide.
Anonymous employee engagement or climate surveys include question(s) related to LGBTQ+ concerns.	Q3b. Does your climate survey include one or more questions related to LGBTQ+ concerns?	Must upload a copy of the survey and/or the results demonstrating the inclusion of LGBTQ+ specific questions. Since 1/01/2021	<u>System - Yes</u> – provided that it is clear that the survey was system-wide.

Criteria/Best Practice	Question(s) No. & Specific Wording*	Validating Information Required	System Information Accepted
Have explicitly LGBTQ+ Inclusive hiring efforts.	Q4. Have your community's hiring/recruitment efforts been explicitly LGBTQ+ inclusive in any of the following ways? [check all that apply]	Must describe how hiring efforts are proactively LGBTQ+ inclusive and upload any related materials.	<u>System - Yes</u> – provided that it is system-wide recruitment.
Organization has openly LGBTQ+ people serving in high-level visible leadership position(s).	Q5. Does your community have an openly LGBTQ+ person(s) serving in high-level visible leadership positions?	Must provide the name of the person and their position. This must be a senior/executive-level administrator at your organization.	<u>System - Possibly</u> – a high level person in a system-wide role could count in a regional system.
Organization has a diversity & inclusion office, diversity council or working group focused on employee diversity that specifically includes LGBTQ+ diversity as part of its mission.	Q6. Does your community have a diversity & inclusion office, diversity council or working group focused on employee diversity that specifically includes LGBTQ+ diversity as part of its mission?	Must either provide a link to a website describing the work of this office or council or upload a document demonstrating that LGBTQ+ diversity is part of its mission.	<u>System -Yes</u> – provided that it is clear that the work of the office or council is system-wide.

LGBTQ+ Resident & Community Engagement

For more detailed information about this section and specific examples that meet the criteria please see the [LGBTQ+ Resident and Community Engagement section of the LEI Resource Guide](#)

Understanding the Needs of LGBTQ+ Residents and Community

Criteria/Best Practice	Question(s) No. & Specific Wording*	Validating Information Required	System Information Accepted
Resident satisfaction surveys allow residents the option to identify as LGBTQ+.	Q1. Does your organization regularly survey residents' satisfaction? Q1a. Does your resident survey include a way for residents to voluntarily disclose their sexual orientation and/or gender identity along with other demographic questions such as race and gender?	Must upload a copy of the survey and/or the results demonstrating the inclusion of LGBTQ+ demographic measures	<u>Yes, if system-wide</u>
Resident satisfaction survey includes question(s) related to LGBTQ+ concerns	Q1b. Do your resident surveys include one or more questions related to LGBTQ+ concerns?	Must upload a copy of the survey and/or the results demonstrating the inclusion of LGBTQ+ climate measures.	<u>Yes, if system-wide</u>
Organization works with external LGBTQ+ organizations or community members to assess LGBTQ+ needs or address LGBTQ+ related concerns.	Q2. In what ways does your community make efforts to gather information about the needs and concerns of LGBTQ+ people? [check all that apply]	Must describe these efforts and the results of your engagement with the community and upload any documents related to your organization's engagement with the community (i.e. results from a focus group, meeting minutes, examples from community needs assessment, etc.) Since 1/01/2021	<u>System - Possibly</u> , if system has a very limited geographic reach.

Criteria/Best Practice	Question(s) No. & Specific Wording*	Validating Information Required	System Information Accepted
Organization connects residents to LGBTQ+ organizations if desired.	Q3. Does your community connect residents to local LGBTQ+ community organizations if they so wish?	Must describe these efforts and upload documentation to demonstrate the community's relationship with local LGBTQ+ orgs	<u>System - Possibly</u> , if system has a very limited geographic reach.
Support one or more LGBTQ+ related events or initiatives in the facility's service area.	Q4. Has your community participated in or supported one or more of the following external LGBTQ+ related events or initiatives in your service area? [check all that apply]	Must describe the external community event(s) and upload any relevant documentation. Since 01/01/21	<u>System - Possibly</u> - particularly for systems with communities in a limited geographic area.
Engage in LGBTQ+ inclusive marketing or advertising to the LGBTQ+ community.	Q5. Does your community engage in marketing or advertising to the LGBTQ+ community? Q5a. In what ways has your community marketed to the broader LGBTQ+ community (other than sponsorship of events)? [check all that apply]	Must describe marketing efforts and upload a sample of the creative content used to market or advertise to the LGBTQ+ community. Since 01/01/21	<u>System - Possibly</u> – if marketing efforts target the LGBTQ+ community in the area served by the facility.
Organization has publicly supported LGBTQ+ equality under the law through local, state, or federal legislation or initiatives.	Q6. Has your community publicly supported LGBTQ+ equality under the law by advocating for or against legislation or regulations at the local, state, or federal level that impact LGBTQ+ equality?	Must describe the legislation or initiative and how your organization publicly engaged in support of LGBTQ+ equality and upload any documents related to your engagement on this legislation or initiative. Since 01/01/2021	<u>System – Yes</u> (unless example specifies that it is from a specific community)