



**EAGLEVILLE FOUNDATION
EAGLEVILLE HOSPITAL.**

STATEMENT OF ORGANIZATIONAL ETHICS

Eagleville Foundation and its affiliate Eagleville Hospital ("Eagleville") establishes this Statement of Organizational Ethics in recognition of its responsibility to the patients, staff and community it serves. It is the responsibility of every member of Eagleville's Board, administration, staff and volunteers to act in a manner that is consistent with this Statement and its supporting policies. To ensure the consistent and rigorous application of the highest standards of ethical conduct reflected in this Statement, as well as all related Eagleville policies, procedures and guidelines, Eagleville maintains a Corporate Compliance Program to assist in this commitment.

Eagleville embraces the following guiding principles:

Strive for Excellence in Patient Care and Treatment. We are committed to providing only the highest quality patient care. In our pursuit of excellence in patient care and treatment, we recognize the patient as central to our mission and work. Therefore, we will treat all of our patients with dignity, respect and courtesy. To achieve this goal, we will establish and faithfully uphold a Patient's Bill of Rights. Through this document, all Board members, employees, volunteers and patients will be made aware of the fundamental Rights of our patients, and the commitment of our organization to protect those Rights.

Comply with All Applicable Laws and Regulations. It is the duty of Eagleville and all of its Board members and employees to uphold all applicable laws and regulations. We shall strive to promote compliance with such laws and regulations. All employees shall be aware of all legal requirements and restrictions applicable to their respective positions and duties. We will conform with all governmental statutes and regulations relating to campaigning, lobbying, and political practices. Any questions regarding the legality or propriety of any actions undertaken by or on behalf of Eagleville will be immediately investigated and remedied, as required. There shall be no retaliation for reports made in good faith and such a commitment shall be communicated to all Eagleville employees.

Admissions and Care Decisions. We protect the integrity of clinical decision-making, including admissions and care decisions. In considering individuals for admission, Eagleville will not be bound by any contract or other obligation to accept for treatment any person who is inappropriate by virtue of medical or psychiatric diagnosis, motivation, demonstrated lack of responsiveness, or patterns of substance abuse which do not require treatment services at the level we provided. To avoid compromising the quality of care, clinical decisions, including tests, treatments, and other interventions, are based on patients' identified health care needs. Information about the relationship between the use of services and financial incentives are available on request to all patients, employees and the public.

Maintain Confidentiality of Patients under Treatment. We recognize the extreme need to maintain patient and other personal information about patients in a confidential manner. As such, patient information will not be shared in an unauthorized manner.

Maintain Confidentiality of Eagleville Information and Property. Sensitive information concerning strategic, financial, personnel and management issues will be maintained in the strictest confidence and utilized only by those individuals authorized to review and act upon such information. The members of Eagleville's Board or its employees, may not utilize information or property belonging to Eagleville for personal gain, for a use adverse to the interests of Eagleville or for competitive purposes.

Avoid Potential Conflicts of Interest. We recognize that the potential for conflict of interest exists for decision-makers at all levels, including members of the Board, senior management and employees. It is our policy to request the disclosure of potential conflicts of interest so that appropriate action may be taken to ensure that such conflict does not inappropriately influence important decisions. Board members, senior managers and employees are required to sign Conflict of Interest statements and disclose potential conflicts related to decisions that may arise. The Board of each entity or a delegated committee of the Board, and/or senior management where applicable, shall review all potential conflicts and take appropriate action.

Encourage Cultural Competence and Diversity. We will strive to meet and ultimately exceed basic standards of cultural competence by promoting cultural understanding and celebrating cultural diversity. We recognize that cultural factors can play an important role in promoting and sustaining recovery. We agree to comply with the provisions of the Civil Rights Act of 1964 and the Pennsylvania Human Relations Act and all requirements imposed pursuant thereto, to the end that no person shall on the grounds of race, creed, color, national origin, religion, age, sex, sexual preference, marital status, handicap or socioeconomic status be excluded from participation in, be denied benefits of, or otherwise be subjected to discrimination in the provision of any care or service. We are an Equal Opportunity and Affirmative Action Employer and are committed to the provisions of the aforementioned Acts in all areas of employment including, but not limited to, hiring, promotions, transfers, benefits and terminations. We will not only refrain from deliberate discrimination, but will take positive steps to assure nondiscriminatory practices and policies and remedy continuing effects of past discrimination.

Treat All Employees with Respect and Fairness. We will create and maintain a work environment in which employees are treated with respect, fairness, and value. Harassment or abuse of any kind is prohibited. Eagleville maintains numerous policies and procedures relating to personnel and human resources to ensure a consistent application of both employment benefits and disciplinary actions. We also maintain an employee grievance procedure to ensure that any employee who perceives inequitable or unfair conduct in the workplace may pursue his/her concerns through a formal mechanism to resolution.

Adhere to Fair Billing Practices. We invoice patients or third parties only for services actually provided to patients. Full information is available to our patients on the source of our reimbursement and any limitations placed on their duration of services. Patients seeking to understand the costs related to their care will be provided assistance by us. In all cases, we will attempt to resolve questions and objections to the satisfaction of the patient while considering Eagleville's best interest as well. Substantiating medical records documentation must be provided for all services rendered. We will always bill on the principle that if the appropriate documentation has not been provided, the service has not been rendered. Medical records documentation may be amended to correct an error or complete documentation only in accordance with established medical records procedures, not for the purpose of covering up errors or obtaining any payment for which we are not entitled.

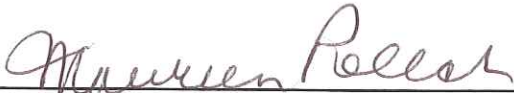
Fairly and Accurately Represent Ourselves and Our Capabilities. We will strive to create and maintain an environment which promotes integrity, honesty, fairness and objectivity, and which fosters mutual respect and trust with our patients, payers, vendors, fellow healthcare providers and the community-at-large. We will never misrepresent our capabilities to any person or organization. In advertising our services, we strive to conduct our marketing practices in an ethical manner. Marketing materials reflect only the services available at Eagleville. The level of Eagleville's licensure and accreditation are never misconstrued.

Adhere to Fair and Honest Business Practices. We pledge to adhere to fair and honest business practices under all circumstances and in all cases, including payers, suppliers and competitors. To uphold our pledge, we have developed policies designed to guide decision-making relating to issues of purchasing, bidding and contracting. These policies are based on the principles and standards of procurement adopted by various professional associations for purchasing and materials management, the "Prudent Buyer Concept" and sound business practices. Purchasing is at all times conducted with due diligence. Bid buying will be implemented in all cases where the minimum unit cost set by us has been surpassed. Bid buying procedures will ensure that each bidder is treated equally, as well as equitably. Contract buying is conducted through various purchasing groups and when to our advantage. These agreements result in additional cost saving to not only Eagleville, but also the vendor. Finally, it is our policy that no employee or his/her family is to accept gifts or entertainment from any current or potential vendor which is intended to influence future contract negotiations. Since we are Medicare and Medicaid providers, we also will adhere to all current pronouncements on the receipt of incentives, inducements or gifts in relation to Medicare or Medicaid patients. Further, since Eagleville is a non-profit charitable organization, we shall strive to comply at all times with the requirements of IRS pronouncements to maintain our 501(c)(3) status, including "excess benefit transactions."

Related Policies. The following related policies and procedures provide further and specific guidelines for ethical conduct at Eagleville:

- Access to Medical Records
- Admission/Readmission Criteria
- Billing Compliance Plan
- Civil Rights
- Confidentiality
- Conflict of Interest
- Discharge Planning
- Informed Consent
- Internal Reporting Processes/Confidential Disclosure Program
- Mission Statement
- Patient Complaints
- Patient's Bill of Rights
- Problem Solving Procedure
- Research Involving Patients
- Safeguarding Foundation Assets
- Special Treatment Procedures
- Staff Guidelines Regarding Patient Rights
- Standards of Conduct
- Strategic Plan
- Treatment Planning

Approval Mechanism. The above Statement of Organizational Ethics is effective when approved by the Chief Executive Officer, Medical Staff Organization and Boards of Eagleville Foundation and Eagleville Hospital. When approved, this Statement of Organizational Ethics shall be posted on Eagleville's website.



Maureen Pollock
Chief Executive Officer
Eagleville Foundation and Eagleville Hospital

11/18/10


Date



Julia Lawson
Chief Compliance Officer
Eagleville Foundation and Eagleville Hospital

November 17, 2010


Date



Robert Wilson, D.O., Chairman
Medical Staff
Eagleville Hospital

11/17/10

Date



David W. Menard, Chairman
Eagleville Foundation

11/17/10

Date



Susan E. McNamara, Chairman
Eagleville Hospital

November 17th, 2010

Date