

# PRINCETON MEMORIAL COMPANY

## PHILOSOPHY STATEMENT

The laws governing the conduct of health care providers are constantly evolving and have become increasingly complex. To ensure the provision of quality health care in compliance with those laws, **Princeton Memorial Company** has developed a compliance program, of which this corporate compliance manual is an integral part. The compliance manual establishes **Princeton Memorial Company's** standards, policies, and procedures regarding compliance with applicable law governing financial relationships among health care providers or other potential sources of referrals, and is designed to ensure that the business and billing practices of **Princeton Memorial Company** comply with applicable laws. This compliance manual is intended to apply to all relationships between **Princeton Memorial Company** and other institutional health providers and/or physicians, and between **Princeton Memorial Company** and its vendors and suppliers. This compliance manual also reaffirms **Princeton Memorial Company's** commitment to delivery of quality health care consistent with applicable state and federal health and safety standards.

**Princeton Memorial Company** is dedicated to the provision of quality health care and living accommodations for its residents, and to accomplishing its mission by:

- Responding to the needs of residents, healthy and ill;
- Providing excellent care through multiple levels of service;
- Providing an environment that enhances each resident's awareness of his or her medical condition, treatment and prognosis, dignity, security, comfort, and peace of mind;
- Ensuring that services are provided and that facilities are maintained in a fiscally responsible manner; and
- Providing through people, facilities, and programs, a balance between security and independence for residents which assists in achieving and maintaining the residents' highest practicable physical, mental, and psychosocial well-being, in accordance with residents' comprehensive assessment and plan of care.

**Princeton Memorial Company** and its employees shall act in accordance with the following goals:

- To serve the needs of residents in health and illness in a committed and caring environment;
- To further a commitment to integrity, quality, excellence, and continuous improvement in all areas of service to residents;
- To manage human and material resources ethically, with creativity and vision, always mindful of changing needs and environments and the capacity to serve;
- To esteem all personnel, including volunteers, as the providers of service, encouraging their professional development, caring for them, and nurturing their growth as capable and compassionate people; and
- To serve through providing multiple levels of care, and to facilitate resident transfers based on a consistently applied resident assessment process that considers the physical, mental, and emotional well-being in providing the highest quality of life for residents.

To achieve these goals, **Princeton Memorial Company** is committed to conducting all of its business activities in compliance with ethical standards and all applicable laws, rules, and regulations. Employees must recognize their duty to act in accordance with this essential directive.

**The following code of conduct and corporate compliance manual do not represent any change from the prior practices of the provider but are a recordation and compilation of those practices.**

All questions regarding the application of this compliance philosophy should be directed to supervisors. If an employee's immediate supervisor cannot or does not answer the questions or resolve the concerns, the employee should address the issue with **Princeton Memorial Company's** compliance officer. Employees should be familiar with the laws governing the matters set forth in this compliance manual. Demonstrated familiarity shall be part of every employee's job performance and a regular part of each employee's review.

Any action taken in violation of this compliance philosophy is beyond the scope of employment and will subject the employee to sanctions by **Princeton Memorial Company** including, but not limited to, termination of employment.

This compliance philosophy does not address every aspect of **Princeton Memorial Company's** compliance activities and their applicable legal issues. As such, employees should consult **Princeton Memorial Company's** established policies and procedures and seek the guidance of their supervisor with respect to any other compliance issues that may arise.

Employees shall receive education regarding the compliance program. A compliance hotline, has been established to provide employees and others with a confidential method for raising concerns about violations or suspected violations of the compliance program. The compliance hotline number is \_\_\_\_-\_\_\_\_.

All violations, suspected violations, questionable conduct, or questionable practices shall be reported by employees to **Princeton Memorial Company** by:

- Reporting to the employee's immediate supervisor;
- Filing a report through the compliance hotline;
- Reporting to the compliance officer; or
- Issuing a verbal or written report to any of the officers designated to receive such report.

The caller or author may report all information anonymously, and **Princeton Memorial Company** will attempt to preserve the confidentiality of the matter and anonymity of the author or caller to the fullest extent permitted by law. However, confidentiality and anonymity cannot be guaranteed in all situations.

Any documents, reports, or other products of **Princeton Memorial Company's** compliance program shall be protected to the extent allowed by law under the copyright, self-evaluative, ombudsman, attorney-client, work-product, and any other applicable privileges.