

ACADIA

H E A L T H C A R E



CODE OF CONDUCT

Where to Look

OUR MISSION, PRINCIPLES, & LEADERSHIP

Acadia's Mission, Principles, & Leadership	1
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OUR CULTURE ... OF INTEGRITY

Code of Conduct	2
What Is Integrity?	2
How Should I Use the Code?	2
What Should You Do If You Have Questions or Concerns?	2
Related Words of Wisdom	2
A Just Culture.....	3

ELEMENTS OF THE ACADIA COMPLIANCE PROGRAM

What Is the Acadia Compliance Program?	4
Confidential Disclosure Program	5

A CULTURE OF INTEGRITY IN THE WORKPLACE

Discrimination, Harassment, & Disruptive Behavior	6
Substance Use & Controlled Substances	7
A Healthy & Safe Environment.....	8
Professional Licenses, Certifications, & Credentials.....	9
Gifts & Personal Fundraising	10
Complaint Resolution	11
Appropriate Use of Our Electronic Tools	12

A CULTURE OF INTEGRITY & OUR PATIENTS

Patient Privacy	13
Social Media.....	14
Electronic Media, Records, & Documents	15
Retention & Disposal of Documents & Records.....	16
Patient Rights.....	17
Patient Incentives	18

A CULTURE OF INTEGRITY IN OUR BUSINESS PRACTICES

Accrediting Bodies, Regulatory Compliance, Government, or Union Officials	19
Federal & State False Claims Act (FCA) Laws.....	20
Financial Arrangements with Physicians & Referral Sources.....	21–22
Coding & Billing	23
Financial Reporting & Records.....	24
Conflict of Interest	25
Inside Information, Securities Trading, & Proprietary Information.....	26
Political Activities & Contributions.....	27
Code of Conduct Acknowledgment	28

Our Mission, Principles, & Leadership

OUR MISSION

Acadia Healthcare's mission is to be a world-class organization that sets the standard for excellence in the treatment of mental health and addiction concerns. We strive to maintain our standing as a thought leader in the behavioral healthcare industry, providing treatment that is synonymous with compassion and innovation.

To our patients, we commit ourselves to providing quality, individualized care at treatment facilities that offer them a supportive, caring environment in which they can regain hope.

To our employees, we commit ourselves to offering an enviable internal culture that encourages them both personally and professionally, supporting them as they reach their career goals and achieve to their greatest potential.

To the professionals with whom we work, we commit ourselves to developing partnerships that promote respect and integrity through collaboration as we work together to better serve our communities.

At Acadia Healthcare, we strive in all we do to make the facilities within our treatment network stand out from others through the delivery of compassionate, clinically excellent care that places the needs of others above all else.

OUR PRINCIPLES

- + Understanding of and sensitivity to our patients and their families;
- + Appreciation and practical integrated application of the most current practices of psychotherapy, psychodynamic clinical care, and psychoeducation;
- + Engagement and cooperation with the persons and organizations working together for the benefit of our patients;
- + Commitment to promote and improve the mental well-being of our community.

OUR LEADERSHIP

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At Acadia Healthcare, we believe that our leadership and management teams should lead the way in demonstrating our mission, ethics, principles, and values. Through this demonstration and the encouragement of our employees, we will achieve the best care for our patients.

”

—Debbie Osteen, CEO Acadia Healthcare

Our Culture ... of Integrity

CODE OF CONDUCT

The Code is one of the most important parts of the organization's Compliance Program and provides guidance about key principles to guide our actions while at work and beyond.

What Is Integrity?

When we say that a person has integrity, it means that the person is honest and has strong moral principles. That is the main concept the Code of Conduct encourages.

How Should I Use the Code?

Please use the Code of Conduct as a resource whenever you have questions or concerns.

What Should You Do If You Have Questions or Concerns?

You should always feel comfortable raising the question to a supervisor, Facility Compliance Leader, Risk Manager, Facility Privacy Leader, Corporate Compliance, or through the Confidential Disclosure Program (i.e., "Hotline").

Related Words of Wisdom:

“

Integrity is doing the right thing even when no one is watching. —C.S. Lewis

Integrity, the choice between what's convenient and what's right. —Tony Dungy

Unless someone like you cares a whole awful lot, nothing is going to get better.
It's not! —Dr. Seuss

To be persuasive we must be believable; to be believable we must be credible;
to be credible we must be truthful. —Edward R. Murrow

”

Our Culture ... of Integrity

A JUST CULTURE

A “just culture” is one that supports a commitment to shared accountability between employees and the organization. It is a culture that holds organizations accountable for the systems they design and ensures that staff behaviors are responded to fairly and justly.

At Acadia, we believe that promoting a just culture is a way to demonstrate integrity and fairness throughout our organization, and we ask our employees to ensure that their actions and decisions reflect these principles as well.



Elements of the Acadia Compliance Program

1. To create, maintain, and demonstrate a culture of doing the right things.
2. To prevent improper conduct.
3. To detect potential risk areas and improve processes to reduce or eliminate the risk.

WHAT IS THE ACADIA COMPLIANCE PROGRAM?

Acadia's mission is to create a world-class organization that sets the standard for excellence in the treatment of specialty behavioral health and addiction disorders.

In fulfilling this mission, Acadia is dedicated to adhering to the highest ethical standards and recognizes the importance of full compliance with all applicable federal and state laws, rules, and regulations.

The Compliance Program helps guide Acadia in its management and operation of compliance-related activities and provides guidance to employees on how to perform job responsibilities ethically and legally.

“

Trust and integrity undergird the confidence and reliability in our healthcare system.

”

—Maria Chapa Lopez, U.S. Attorney, Middle District of Florida (June 2020)



Additional Information: Acadia Compliance Program Policy CC-1.00

Elements of the Acadia Compliance Program

An important part of the Compliance Program is to ensure that we have processes in place to help prevent, detect, and deter fraud, waste, and abuse in government healthcare programs. Important elements of the program include:

- + Written policies and procedures,
- + Code of Conduct,
- + Corporate Compliance Officer and compliance committees,
- + Training and education,
- + Screening employees and vendors for government sanctions,
- + Auditing and monitoring of core risk areas, and
- + Providing a Confidential Disclosure Program (Hotline) for confidentially reporting concerns.

CONFIDENTIAL DISCLOSURE PROGRAM

If at any time you become aware of or suspect illegal or unethical conduct or a violation of policy by anyone in our facilities, please report it immediately to an appropriate individual.

Such individuals may include your immediate supervisor, facility leadership, risk management, Human Resources Director, Facility Compliance Leader, Director of Quality and Compliance, the Chief Quality and Compliance Officer, or the Acadia Legal Department.

You may also make a report by calling the toll-free Compliance Hotline at **(888) 610-6593**. Reports using this method may be made anonymously, if you choose.

Retaliation in any form against anyone who makes a good faith report of wrongdoing or cooperates in an investigation is strictly prohibited. If any individual feels that they have been retaliated against, the individual should report it immediately.

Additional Information: Conducting Internal Investigations Policy CC-12.00; Reporting Unethical or Illegal Conduct Policy CC-10.00

A Culture of Integrity in the Workplace

DISCRIMINATION, HARASSMENT, & DISRUPTIVE BEHAVIOR

Acadia values each individual and has established numerous policies to protect employees and provide a workplace free from improper discrimination, harassment, or disruptive behavior. We provide an equal opportunity environment and promote compliance with all laws, regulations, and policies. We will take action to address complaints of these actions.

We should treat different viewpoints as an opportunity for our business success. We should not discriminate, harass, or retaliate based on any legally protected characteristics of conduct. In addition, disruptive behavior will not be tolerated in the workplace.

Our policy is to provide equal opportunity without regard to race, color, creed, religion, national origin, sex, age, veteran status, disability, or other legally protected characteristics.



SITUATION:

There is an open position in my department. I overheard my supervisor saying something about an applicant being too old and pulling them from consideration. Should I say something about this?

SOLUTION:

Our policy is to provide equal opportunity and comply with all laws, regulations, and policies. You should report this to your supervisor, Human Resources Director, Facility Compliance Leader, or to the Confidential Disclosure Hotline (888-610-6593).

Additional Information: Equal Employment Opportunity Policy HR-030; Non-Discrimination and Harassment HR-040; Workplace Violence Policy HR-620

A Culture of Integrity in the Workplace

SUBSTANCE USE & CONTROLLED SUBSTANCES

Ensuring the safety of our patients and our work environment is a top priority. To support this priority, we are committed to an alcohol- and drug-free workplace. Reporting to work under the influence of any illegal drug or alcohol or using, possessing, or selling illegal drugs while on work time or property is not in the best interest of our patients and cannot be tolerated. We may use drug or alcohol testing as a means of enforcement. The use of prescription drugs prescribed for someone other than you while on the job is also prohibited.

All team members must report for work free from the influence of alcohol and illegal drugs. At times, you may need to take prescription or over-the-counter drugs that could impair your job performance. It is required that you notify your supervisor if your medication could adversely affect your job performance. Also, the medication must be appropriately secured so that others cannot access the medication.



SITUATION:

You suspect that a coworker is under the influence of alcohol or drugs. What should you do?

SOLUTION:

Report the situation immediately to your Human Resources Director, Facility Compliance Leader, supervisor, or call the Confidential Hotline (888-610-6593).

Additional Information: Drug-Free Workplace Policy HR-015; Drug Diversion Policy HR-019

A Culture of Integrity in the Workplace

A HEALTHY & SAFE ENVIRONMENT

It is important for all team members to help ensure that all waste products, hazardous materials, and other regulated items are stored, handled, and disposed of in compliance with applicable laws and regulations.

Please report any condition you perceive to be unsafe, unhealthy, or hazardous to the environment to a supervisor, the Director of Performance Improvement, Risk Manager, the Corporate Compliance Department, or the Confidential Disclosure Program.



Additional Information: Safety Programs Policy HR-605

A Culture of Integrity in the Workplace

PROFESSIONAL LICENSES, CERTIFICATIONS, & CREDENTIALS

Patient care and integrity are at the center of everything we do. One way to help ensure quality care is to maintain a valid professional license, certification, or other necessary credentials. In fact, we cannot work without them.

Ineligible Persons

Federal and state agencies will generally not pay for services provided by individuals whom they determine are “ineligible.” Therefore, we do not contract with, employ, or bill for services rendered by an individual or entity that is considered ineligible. We also monitor on an ongoing basis to help ensure that we comply.

If you suspect that anyone doing business at or with your facility is excluded, debarred, or ineligible to participate in federal or state healthcare programs, please report to your Human Resources Department, Director of Performance Improvement, Risk Manager, or the Hotline.



SITUATION:

Your coworker tells you that their license has lapsed but says that they won't bring it up because they are going to get it done soon and need the money.

SOLUTION:

Working without a valid license affects patient care and puts the employee at risk for disciplinary action. Let your Facility Compliance Leader, Human Resources Director, or direct supervisor know.

Additional Information: Licensure and Certification Verification Policy HR-130; Resource: Ineligible Persons Policy CC-8.00

A Culture of Integrity in the Workplace

GIFTS

The receipt of or giving of gifts from/to vendors should be discussed with your supervisor, Facility Compliance Leader, or Risk Manager.

A general rule to follow: Any gifts that compromise, or appear to compromise, Acadia's ability to make objective business decisions are inappropriate.

No gift (given or received) should create or appear to create a conflict of interest.

Gifts given to coworkers is a situation that also occurs. While we wish to avoid strict rules in this regard, no one should ever feel compelled to give a gift to anyone, and any gifts offered or received should be appropriate to the circumstances.

PERSONAL FUNDRAISING

Employees, friends, or family members may participate in organizations outside of work, such as team sports, clubs, or religious organizations. While we support employees being involved in outside interests, we ask that employees do not fundraise or solicit funds benefiting interests outside of work without written approval from the Group President and Chief Quality and Compliance Officer.



SITUATION:

We've had the same vendor for about five years now. The rep offered me playoff tickets because we are such a good customer. Can I accept them?

SOLUTION:

No, you must only give or receive gifts or entertainment of nominal value on an infrequent basis. The cost of playoff tickets would be well beyond nominal. Check with the Facility Compliance Leader if you are uncertain.

Additional Information: Acadia Compliance Program Policy CC-1.00

A Culture of Integrity in the Workplace

COMPLAINT RESOLUTION

Your Human Resources Department can provide assistance in preparing and presenting a workplace grievance.

SITUATION:

You have an issue with your manager, and after meeting with your manager, no resolution is found.

SOLUTION:

You should ask the Human Resources Department about next steps and the process for addressing a grievance.



Additional Information: Grievance and Problem-Solving Policy HR-235

A Culture of Integrity in the Workplace

APPROPRIATE USE OF OUR ELECTRONIC TOOLS

Appropriate Use of the Internet

The internet should be used for business purposes and should not be used to download entertainment software, images, audio, videos, or games unless there is a work-related reason to do so.

Secure Use of Email

Email users should take care to protect sensitive data. If sensitive information is being sent outside of Acadia's network, the email must be encrypted by typing [SECURE] in the subject line (note: the square brackets around SECURE must be included in the subject). Alternately, information can be sent via Secure File Transfer.

Please contact the Acadia Helpdesk if you need assistance (helpdesk@acadiahealthcare.com).

Protecting Laptops, Tablets, & Mobile Devices

All laptops, tablets, and other devices should be appropriately protected in accordance with company policy.



Additional Information: Email and Internet Use Policy HIPAA-IT050, Mobile Devices Policy HIPAA-IT020, Laptop/Tablet Security Policy (HIPAA-IT110).

A Culture of Integrity & Our Patients

PATIENT PRIVACY

Patient privacy goes beyond a person's name, and privacy laws prevent us from disclosing individual identifiable information that might affect a patient's reputation.

What Is “Individually Identifiable Information”?

At a basic level, it is information that we reasonably believe could identify an individual. This is not just a medical record or system information but can be videos, pictures, texts, social media, or other recordings.

What Does This Mean?

Pictures and video – To demonstrate our integrity to our patients and avoid patient privacy concerns, we should not take pictures, voice recordings, or video of our patients unless specifically related to patients' care (e.g., wound care) and approved by the Facility Compliance Leader, Risk Manager, or Facility Privacy Leader. Even if done innocently, this information is generally not of our job duties and should not occur.

Texting – We should also avoid sending texts related to patient care unless it is done within a company-sanctioned, secure texting application. Even then, the communications should be general and can't be considered a part of the medical record.



SITUATION:

A patient reports to you that they received another patient's information in their discharge instructions.

SOLUTION:

Secure the discharge instructions if possible, note the name and contact information of the patient reporting the concern, contact the Facility Privacy Leader, and give the original copies and contact information to the Facility Privacy Leader.

Additional Information: Electronic Devices Policy HR-230

A Culture of Integrity & Our Patients

SOCIAL MEDIA

For many of us, social media is a positive way to stay connected with friends, family, and coworkers. However, there is never a legitimate reason to reference the treatment of specific patients or company privileged information, or to post pictures or videos taken at work, even if you believe that your social media group is limited or private. Again, we want to be sure that our patient and company information always remains confidential.

SITUATION:

A coworker had a breakthrough with a patient and is very proud of their progress. At the end of the day, they express their pride by posting about it on their favorite social media platform.

SOLUTION:

While it is natural to be proud of progress our patients have made, it is never acceptable to post about treatment of specific patients. All our patients have a right to privacy and deserve our protection. Please check with your Facility Privacy Leader if you have any questions.



Additional Information: Social Media Policy HR-260

A Culture of Integrity & Our Patients

ELECTRONIC MEDIA, RECORDS, & DOCUMENTS

Electronic media such as telephones, other communications systems, email, internet access, and voicemail are provided to team members for business use.

Be aware – Since these electronic media (telephones, email, internet, etc.) are the property of the organization, we should assume that these communications are not private and may be monitored. We must not use the organization’s electronic media to distribute or transmit any unlawful or obscene materials.

Be sure that sensitive information of any type is secure – Unless authorized by the company or required or authorized by law, any confidential patient information, nonpublic proprietary business information (trade secrets, intellectual property, company financial data, plans, strategies, research, analyses), or other legally confidential information must not be conveyed by any media sources unless appropriate security measures are in place.

Do not transmit sensitive information via email or other electronic means unless a secure mechanism or transmission has been approved by facility leadership, Information Systems Department, and Facility Privacy Leader. One way email communication can be secured is by typing [SECURE] in the subject line of your email.



SITUATION:

You notice your coworker forwarding an email containing sensitive information to her personal email address. She wants to make sure that she has the information she needs to complete a task at home. Is this OK?

SOLUTION:

You should report this to a manager, supervisor, the Facility Privacy Leader, or the Confidential Disclosure Line.

Impact Fact:

In 2019, the average cost of a data breach was \$3.92 million. The United States had the highest average cost of breach at \$8.19 million, and healthcare was the most expensive industry, with an average breach cost of \$6.45 million. The average size of a data breach in 2019 was 25,575 records.

—Ponemon Institute

Additional Information: Email and Internet Use Policy HIPAA-IT050

A Culture of Integrity & Our Patients

RETENTION & DISPOSAL OF DOCUMENTS & RECORDS

Legal and regulatory practice requires the retention of certain records for various periods of time, particularly in the following areas: health information, patient accounting, tax, personnel, health and safety, environment, contract, and corporate office. In addition, no records or files may be destroyed when there is pending or imminent litigation, government investigation, or an audit; relevant records must not be destroyed until the matter is concluded.

What Can I Do to Help?

- + Be sure to think about the next person to need the information you are retaining and ensure that they are appropriately organized, indexed, or identified as defined by company policy.
- + Be a good steward of company resources by destroying records after they have met the retention period specified in our Document Retention Schedules.



SITUATION:

You noticed that your department has a full filing cabinet of business records dated back 10–15 years and are unsure if you still need it. Should you suggest throwing them away?

SOLUTION:

Reference the record retention schedule and take action accordingly.

Additional Information: Record Retention Policy CC-9.00

A Culture of Integrity & Our Patients

PATIENT RIGHTS

Patients should expect effective communication that provides information in a manner that can be understood. We will provide interpreting, translation services, or auxiliary aids at no cost and in a manner that meets patient needs related to vision, speech, hearing, or cognitive impairments. The information should be provided in a way that will allow the patient to formulate an informed consent for treatment.

Additionally, patients have the right to information about the bill for services, receipt of the Notice of Privacy Practices, ability to request an accounting of disclosures, a restriction of use or disclosure of protected health information, or an amendment to the medical record.



SITUATION:

Patient presents to the facility for treatment, but the patient has trouble communicating with the providers, and it becomes obvious that care team and patient are unable to effectively communicate.

SOLUTION:

We are committed to providing effective communication with the patient; we should contact a qualified interpretation service. If you need assistance, contact the Patient Intake Director, Director of Nursing, Chief Quality Officer, or Facility Compliance Leader.

Additional Information: Individuals must be properly trained and certified to provide healthcare interpretation services to patients. We may not rely on uncertified multilingual staff, family members, or friends of patients to provide interpretation services.

A Culture of Integrity & Our Patients

PATIENT INCENTIVES

We like to show appreciation to our patients for choosing us as their provider, but it is important to know that the appreciation can't take the form of gifts or other items of value.

Federal law and regulation generally do not allow us to provide items of value to potential Medicare or Medicaid patients, as they could inappropriately influence their choice of providers.

Please check with your Director of Nursing, Facility Compliance Leader, or Corporate Quality and Compliance if you have questions.



Additional Information: Specifics about these requirements can be found under section 1128A(a)(5) of the Social Security Act or the OIG Special Advisory Bulletin, "[Offering Gifts and Other Inducements to Beneficiaries.](#)"

A Culture of Integrity in Our Business Practices

ACCREDITING BODIES, REGULATORY COMPLIANCE, GOVERNMENT, OR UNION OFFICIALS

Healthcare services may be provided only pursuant to federal, state, and local laws, rules, and regulations. As a result, we are visited by various accrediting, auditing, and investigating bodies. We should always demonstrate our culture of integrity by treating accrediting agencies and bodies in a forthright manner. We should not mislead a surveyor or survey team.

Upon presentation of a search warrant, subpoena, or other criminal or administrative legal process by a law enforcement official (e.g., FBI, State Bureau of Investigation, U.S. Department of Justice, HHS Office of the Inspector General, etc.), notify Acadia's Legal Department and the Corporate Compliance Department.

Good communication helps everyone to prepare and meet our obligations. When any of these events occur, please notify your Chief Executive Officer, Chief Nursing Officer, Director of Nursing, Risk Manager, the Corporate Director of Quality, or the Legal Department.



SITUATION:

A member of a Joint Commission survey team approaches you and asks you a question about your processes.

SOLUTION:

Be honest in your responses and seek clarification or assistance as necessary. If you are not certain of your answer, please check with your supervisor.

Additional Information: Response to Government Inquiries, Investigations, or Audits; Policy CC-15.00; Service of and Responding to Legal Process L-310

A Culture of Integrity in Our Business Practices

FEDERAL & STATE FALSE CLAIMS ACT (FCA) LAWS

What Is the FCA?

The False Claims Act (FCA) Law provides that civil penalties may be imposed against any person or entity that knowingly presents or causes to be presented a false or fraudulent claim to a federal healthcare program for payment.

The federal False Claims Act includes whistleblower protection provisions that protect any individual who is discharged, demoted, suspended, threatened, harassed, or in any other manner discriminated against for filing an action under the federal False Claims Act.

Many states have enacted False Claims Act statutes that contain provisions that are similar to the federal statute, including whistleblower provisions.



SITUATION:

A member of your department is concerned that counseling sessions are not being charged or billed accurately.

SOLUTION:

We want to make sure that individuals know that they have many options to find answers to their questions, including a member of management, the Facility Compliance Leader, or the Hotline.

Impact Fact:

In 2019, DOJ recovered \$3.054 billion in FCA “settlements and judgments;” \$2.605 billion, or 85%, were healthcare-related recoveries.

Additional Information: Education on Federal and State False Claims Act Policy CC-5.00

A Culture of Integrity in Our Business Practices

FINANCIAL ARRANGEMENTS WITH PHYSICIANS & REFERRAL SOURCES

Financial relationships with physicians will comply with established policies, Stark Law, and federal Anti-Kickback Statute.

What Should We Do?

We will ensure that a compensation arrangement with a provider is not determined in a manner that takes into account the value or volume of referrals, or other business generated between parties in determining when to enter into an arrangement or in establishing compensation to be paid or received. Physicians may not accept any item, favor, or service with a monetary value in exchange for referrals.

All payments made to physicians and/or other potential referral sources must be:

- + Pursuant to a current and fully executed written agreement.
- + At fair market value for actual services performed.

What Does This Mean?

- + Department leaders charged with overseeing a physician contract should ensure that appropriate documentation is provided to Accounts Payable to support the payment.
- + Accounts Payable should ensure that each physician payment is appropriately supported by detailed documentation and consistent with the terms of a fully executed contract.
- + Hospital leadership should ensure that these processes are in place.

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Hospital operators that improperly influence a physician’s medical decision-making in pursuit of profits do so at their own peril. Where we find such conduct, the Criminal Division’s Health Care Fraud Unit, together with our Civil Division and law enforcement colleagues, will aggressively prosecute those responsible to the fullest extent of the law.

”

—Former Assistant Attorney General Benczkowski

Additional Information: Anti-Kickback and Stark Law Policies CC-6.00 & CC-7.00

A Culture of Integrity in Our Business Practices

FINANCIAL ARRANGEMENTS WITH PHYSICIANS & REFERRAL SOURCES (CONT.)

Financial relationships with physicians will comply with established policies, Stark Law, and federal Anti-Kickback Statute.



SITUATION:

Upon arriving to work, you notice that a local physician and his staff have moved into a new space in the hospital. You comment to your supervisor about the physician moving in, and your supervisor says, “Yes, I agreed to let Dr. Smith use the space because his office is being renovated.” You ask your supervisor if administration approved the move, and she isn’t sure. You remember from the Code of Conduct training that agreements with physicians for anything of value must be in writing and appropriately approved.

SOLUTION:

Contact your Facility Compliance Leader.

“

Our office will continue to enforce prohibitions on improper financial relationships between healthcare providers and their referral sources, as these relationships can serve to corrupt physician judgment about a patient’s true health needs.

• • •

We will devote all necessary resources to ensure that those rendering medical care do so for the sole benefit of the patient and in compliance with the law.

”

—U.S. Attorney Fajardo Orshan

Additional Information: Anti-Kickback and Stark Law Policies CC-6.00 & CC-7.00

A Culture of Integrity in Our Business Practices

CODING & BILLING

Coding of diagnoses and procedures will be in accordance with the Centers for Medicare and Medicaid Services (CMS) recognized coding guidelines. The organization will maintain a routine auditing and monitoring program to verify the accuracy and validity of coded data and claims regardless of the source of payment.

All individuals responsible for coding and billing for services will adhere to all official coding and billing guidelines, rules, regulations, statutes, and laws. You are prohibited from knowingly causing or permitting false or fraudulent claims.



SITUATION:

You queried the provider three times for a diagnosis on a patient's chart you tried to code in the past 30 days with no answers. This affects your productivity. You reach out to your manager for assistance. Your manager tells you that she knows this provider, and he is the only provider who does these procedures at your facility. She tells you that the diagnosis is always XYZ for this procedure. Should you go ahead and code the chart with your manager's approval or wait for the physician's answer?

SOLUTION:

You should wait for the physician's answer before coding the chart. You are prohibited from knowingly causing or permitting false or fraudulent claims. Contact your Facility Compliance Leader or the Hotline if you have any questions.

Additional Information: Billing and Coding Policy BO-117.00; Accounting for Cost Report Settlements and Medicare Bad Debt Policy ACC-114.00

A Culture of Integrity in Our Business Practices

FINANCIAL REPORTING & RECORDS

We must always keep in mind that individual charges, transactions, and financial entries will ultimately be incorporated into our consolidated financial statements and certified by our company leadership as being accurate. We also present this information to the public and the federal government in accordance with generally accepted accounting principles (GAAP) and other regulations. Anyone who makes or contributes to financial entries, financial reports, and other financial transactions has a special ethical obligation to ensure that the information we provide is accurate and complete. When you sign your annual acknowledgment of the Acadia Code of Conduct, you are certifying that you respect the confidentiality of financial and accounting information and promise to proactively promote ethical behavior related to the organization's financial records.



SITUATION:

A manager told their employees about the company's financial goals, and, to do their part, the department must reduce their costs. In reporting the costs for a certain month, a member of the department sees that the costs may exceed the goal amount. What should the department member do?

SOLUTION:

Ensure that the information is reported accurately and focus on the goal during the next month. Never feel like you have to inaccurately change information to artificially meet a goal.

Impact Fact:

As of 2020, the SEC's whistleblower program has awarded more than \$425 million to 79 individuals since issuing its first award in 2012.

A Culture of Integrity in Our Business Practices

CONFLICT OF INTEREST

You should avoid outside financial (or other) interests that might influence your ability or motivation to fulfill your professional obligations. These outside interests could include business or financial relationships with third parties, outside employment, or receipt of gifts from those seeking to do business with the organization. If you have any financial or other interests that could potentially be considered a conflict of interest, please disclose immediately to your supervisor, Facility Compliance Leader, and the Corporate Quality and Compliance Department.



SITUATION:

Your brother is the Vice President of Software Medical, a medical software vendor who is currently in contract negotiations with your facility.

SOLUTION:

Notify your Facility Compliance Leader and Risk Manager to help avoid potential conflict of interest.



Additional Information: Conflict of Interest Policy CC-17.00

A Culture of Integrity in Our Business Practices

INSIDE INFORMATION, SECURITIES TRADING, & PROPRIETARY INFORMATION

Inside information, such as financial and operating data (before it is publicly released), marketing plans, or other business material is nonpublic information. Inside information should only be shared with people inside the organization whose jobs require the information.

Employees who have access to confidential information are not permitted to use or share that information for stock trading purposes or for any other purpose except the conducting of our business. All nonpublic information about the company or any company with which we do business should be considered confidential information.

To use nonpublic information for personal financial benefit or to “tip” others who might make an investment decision based on this information is not only unethical but also illegal. If you have any questions, please consult the company’s Legal Department.



SITUATION:

As a member of your department, you have access to sensitive information about the facility’s processes and types of patients treated. Should I share this information with my friend who works in a competing facility across town?

SOLUTION:

Information you gain while working at your facility should be viewed as private and not disclosed outside of your facility.

Impact Fact:

Former Pequot Capital CEO Art Samberg blatantly asked Microsoft employee David Zilkha for insider information about the tech company in several emails during 2001, which then helped net his hedge fund \$2.1 million. Samberg settled and paid the SEC \$28 million. Pequot, once one of the most famous hedge funds on the Street, was forced to close its doors by mid-2009.

Additional Information: Insider Trading and Disclosure Policy L-210

A Culture of Integrity in Our Business Practices

POLITICAL ACTIVITIES & CONTRIBUTIONS

Employees, officers, and directors are not prohibited from making voluntary personal contributions to any candidate, political party, or cause. However, such contributions are not reimbursable by Acadia, either directly or indirectly. Further, employees, officers, and directors are prohibited from soliciting contributions from coworkers during business hours and may not use company assets or resources in connection with personal political activities. Corporate political contributions by Acadia or any of its subsidiaries are also prohibited unless authorized by an officer of the company or the company's Legal Department.

What Can I Do to Help?

You must recognize that involvement and participation in political activities is on an individual basis, on your own time, and at your own expense. When you speak on public issues, you should make it clear to the audience that your comments are your own personal viewpoints.



Additional Information: Acadia Compliance Program Policy CC-1.00

Acknowledgment

All team members should additionally take the Code of Conduct course in our Learning Management System (LMS) and will be asked to acknowledge receipt of the Code at that time.



Acadia Healthcare

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