

# ACADIA

H E A L T H C A R E



## CODE OF CONDUCT

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# Our Purpose, Mission, Vision, and Values

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## OUR PURPOSE

Lead Care With Light

## OUR MISSION

Acadia Healthcare's mission is to provide compassionate care that improves lives, inspires hope, and elevates communities.

We strive to become the indispensable behavioral health provider for high-acuity and complex needs patient populations by growing facilities, accelerating expansion of care, strengthening capabilities, and leveraging technology.

## OUR VISION

Double our business to improve access and outcomes.

## OUR VALUES

- + We Set The Standard For Care
- + We Lift and Uplift
- + We Innovate Quickly to Change Lives
- + We Succeed as One

## OUR LEADERSHIP

Support for Acadia's Compliance Program and Code of Conduct starts from the top, our Board of Directors and Executive Leadership Team. With this support, it is up to all of us to abide by the guidelines set forth in our Code of Conduct and do the right thing in all circumstances.

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# Our Culture of Integrity

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## CODE OF CONDUCT

The Code is one of the most important parts of our 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, Human Resources, the Corporate Compliance Department, or through the confidential Compliance Hotline.

### Related Words of Wisdom:

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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

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# Our Culture of Integrity

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## 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.





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# Elements of the Acadia Compliance Program

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1. To create, maintain, and demonstrate a culture of doing the right thing.
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 provide compassionate care that improves lives, inspires hope, and elevates communities.

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.

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—Maria Chapa Lopez, U.S. Attorney, Middle District of Florida



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**Additional Information:** Acadia Compliance Program Policy ALL.ACHC.COMP.0010

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# Elements of the Acadia Compliance Program

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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. Important elements of the program include:

- + Written policies and procedures, including this Code of Conduct;
- + Corporate Compliance Officer and compliance committees;
- + Training and education;
- + Providing effective lines of communication, including a Confidential Disclosure Program (Compliance Hotline) for confidentially reporting concerns;
- + Screening employees and vendors for government sanctions;
- + Auditing and monitoring of core risk areas;
- + Responding promptly to detected offenses and taking corrective action; and
- + Enforcement of standards through well-publicized disciplinary guidelines.

## **CONFIDENTIAL DISCLOSURE PROGRAM (COMPLIANCE HOTLINE)**

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

Such individuals may include your immediate supervisor, facility leadership, Risk Management, Human Resources, Facility Compliance Leader, Director of Quality, the Acadia Corporate Compliance Department, or the Acadia Legal Department.

You may also make a report by contacting the **Compliance Hotline (833-854-7417 or [acadia.ethicspoint.com](https://www.acadia.ethicspoint.com))**. Reports to the Compliance Hotline 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.

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**Additional Information:** Conducting Internal Investigations Policy ALL.AHCH.COMP.0120;  
Reporting Unethical or Illegal Conduct Policy ALL.AHCH.COMP.0100.

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# A Culture of Integrity in the Workplace

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## DISCRIMINATION, HARASSMENT, & DISRUPTIVE BEHAVIOR

Acadia values each individual and has established numerous policies and processes 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 all appropriate actions to address complaints regarding violations of these laws, regulations, or policies.

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, gender, 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, Facility Compliance Leader, or to the Compliance Hotline (833-854-7417 or [acadia.ethicspoint.com](http://acadia.ethicspoint.com)).

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



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# A Culture of Integrity in the Workplace

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## 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 will not 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 Human Resources, your Facility Compliance Leader, supervisor, or contact the Compliance Hotline (833-854-7417 or [acadia.ethicspoint.com](http://acadia.ethicspoint.com)).

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

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# A Culture of Integrity in the Workplace

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## 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, Risk Manager, the Corporate Compliance Department, or contact the Compliance Hotline (833-854-7417 or [acadia.ethicspoint.com](https://acadia.ethicspoint.com)).



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**Additional Information:** Safety Programs Policy HR-605

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# A Culture of Integrity in the Workplace

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## 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 ensure that all licensed, certified, or other credentialed providers maintain a valid professional license, certification, or other necessary credentials. In fact, they cannot work without them.

### Ineligible Persons

Federal and state healthcare programs (e.g., Medicare and Medicaid) will generally not pay for services provided by individuals whom they determine are “ineligible” due to being excluded from participation in such programs. Therefore, we do not contract with, employ, or bill for services rendered by an individual or entity that is considered ineligible. We also monitor the exclusion lists on an ongoing basis to help ensure that we comply with these requirements.

If you suspect that anyone doing business at, or with, your facility is excluded, debarred, or otherwise ineligible to participate in federal or state healthcare programs, please report it to your Human Resources Department, Risk Manager, the Corporate Compliance Department, or contact the Compliance Hotline (833-854-7417 or [acadia.ethicspoint.com](http://acadia.ethicspoint.com)).

### SITUATION:

Your coworker tells you that her license has lapsed but says that she won't bring it up because she is going to get it renewed soon and she needs to keep her job since she needs the money.

### SOLUTION:

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

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**Additional Information:** Licensure and Certification Verification Policy HR-130; Resource: Ineligible Persons Policy ALL.AHCH.COMP.0080.

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# A Culture of Integrity in the Workplace

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## 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.

In addition, gifts to/from actual or potential referral sources (e.g., physicians, hospitals) could violate federal and state fraud, waste, and abuse laws.

**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 may participate in, and support, 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 fund raise or solicit funds benefiting their own or their family or friends' personal interests outside of work.



### SITUATION:

We've had the same vendor for about five years now. The vendor's representative offered me playoff tickets because we are such a good customer. May 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 or Corporate Compliance Department if you are uncertain.

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**Additional Information:** Acadia Compliance Program Policy ALL.ACHC.COMP.0010

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# A Culture of Integrity in the Workplace

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## COMPLAINT RESOLUTION

Your Human Resources Department can provide assistance in preparing and presenting a workplace grievance. In addition to the workplace grievance process, employees may also submit workplace employment concerns to the Compliance Hotline (833-854-7417 or [acadia.ethicspoint.com](http://acadia.ethicspoint.com)).



### 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.



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



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# A Culture of Integrity in the Workplace

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## APPROPRIATE USE OF OUR ELECTRONIC TOOLS

### Appropriate Use of the Internet

While using Acadia-provided resources, 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 IT Helpdesk if you need assistance (ITSupport@acadiahealthcare.com).

### Protecting Laptops, Tablets, & Mobile Devices

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



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**Additional Information:** Email and Internet Use Policy ALL.ACHC.IT.0600, Mobile Devices Policy HIPAA-ALL.ACHC.IT.0300, Laptop/Tablet Security Policy ALL.ACHC.IT.0310.

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# A Culture of Integrity & Our Patients

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## PATIENT PRIVACY

Protecting the privacy of our patients is extremely important, and federal and state privacy laws prevent us from disclosing individually identifiable information of any patient without their consent or a valid legal exception.

### What Is “Individually Identifiable Information”?

At a basic level, it is information that we reasonably believe could identify an individual. This includes not just medical records or system information, but can include 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 the patient's care and approved by the Facility Compliance Leader, Risk Manager, or Corporate Compliance Department. There should be very few occasions where recording patients is appropriate, and approval must be obtained prior to recording any patient.

**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 cannot 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 Compliance or Privacy Leader, and give the original copies and contact information to the Facility Compliance or Privacy Leader so that the matter can be properly logged and reported.

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**Additional Information:** Wireless Communication Policy ALLACHC.IT.0310

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# A Culture of Integrity & Our Patients

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## 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 of Corporate Compliance Department if you have any questions.



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**Additional Information:** Social Media Policy HR-260

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# A Culture of Integrity & Our Patients

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## ELECTRONIC MEDIA, RECORDS, & DOCUMENTS

Electronic media such as telephones, other communications systems, email, internet access, and voicemail are provided to employees 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, IT Department, and Facility Privacy Leader. One way email communication can be secured and encrypted if sent outside the organization 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 Compliance or Privacy Leader, or contact the Compliance Hotline (833-854-7417 or [acadia.ethicspoint.com](http://acadia.ethicspoint.com)).

### Impact Fact:

The average cost of a data breach was \$4.45 million in the most recent reporting year. The United States had the highest average number of data breaches and the healthcare industry had the most data breaches and the highest average cost of data breaches.

—Ponemon Institute and IBM Security Report

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**Additional Information:** Email and Internet Use Policy ALL.ACHC.IT.0600

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# A Culture of Integrity & Our Patients

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## 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: patient medical records, patient accounting, tax, human resources, compliance, and risk management. 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. The Legal Department will notify you if you are subject to a litigation or investigation hold.

### 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 Record Retention Policy and Schedules.



#### SITUATION:

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

#### SOLUTION:

Reference the Acadia Record Retention Policy and Schedules and take action accordingly.

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**Additional Information:** Record Retention Policy ALL.ACHC.COMP.0090



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# A Culture of Integrity & Our Patients

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## 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 cost of services provided and patient responsibility, 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, Facility Quality Director, or Facility Compliance Leader.

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**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.

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## A Culture of Integrity & Our Patients

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### 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 regulations generally do not allow us to provide items of value to federal healthcare program patients (e.g., Medicare or Medicaid), as such gifts could inappropriately influence their choice of providers.

Please check with your Facility Compliance Leader or Corporate Compliance Department if you have questions.



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

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# A Culture of Integrity in Our Business Practices

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## ACCREDITING BODIES, REGULATORY COMPLIANCE, GOVERNMENT, OR UNION OFFICIALS

Healthcare services must be provided in compliance with 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 respectful 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, DEA, etc.), notify Acadia's Legal Department and the Corporate Compliance Department.



### SITUATION:

A member of The 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.

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**Additional Information:** Response to Government Inquiries, Investigations, or Audits, ALL.ACHC.COMP.0150; Service of and Responding to Legal Process ALL.ACHC.LEG.0200.

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# A Culture of Integrity in Our Business Practices

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## FEDERAL & STATE FALSE CLAIMS ACT (FCA) LAWS

### What Is the FCA?

The federal False Claims Act (FCA) 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 (like Medicare or Medicaid) 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 similar 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 Compliance Hotline (833-854-7417 or [acadia.ethicspoint.com](http://acadia.ethicspoint.com)).

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# A Culture of Integrity in Our Business Practices

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## FINANCIAL ARRANGEMENTS WITH PHYSICIANS & REFERRAL SOURCES

Financial relationships with physicians and other potential referral sources must comply with established policies, federal laws, such as the Stark Law and Anti-Kickback Statute, and all applicable state laws.

### 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 the 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.

“

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.

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—Former Assistant Attorney General Benczkowski



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# A Culture of Integrity in Our Business Practices

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## FINANCIAL ARRANGEMENTS WITH PHYSICIANS & REFERRAL SOURCES (CONT.)



### 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 annual Compliance training that agreements with physicians for anything of value must be in writing and appropriately approved.

### SOLUTION:

Contact your Facility Compliance Leader or Corporate Compliance Department

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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.

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—U.S. Attorney Fajardo Orshan

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# A Culture of Integrity in Our Business Practices

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## 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 the submission of 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 Corporate Compliance Department if you have any questions.

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**Additional Information:** Billing and Claims Reimbursement, ALL.ACHC.COMP.0160; Billing and Coding Policy, ALL.ACHC.BO.0250; Accounting for Cost Report Settlements and Medicare Bad Debt Policy ALL.ACHC.ACC.1105

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# A Culture of Integrity in Our Business Practices

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## 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 as part of your annual Compliance training, 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.

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# A Culture of Integrity in Our Business Practices

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## 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 them immediately to your supervisor, Facility Compliance Leader, and the Corporate 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 facility leadership to help avoid a potential conflict of interest. You will need to remove yourself from any involvement in the negotiations.



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**Additional Information:** Conflicts of Interest Policy,

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# A Culture of Integrity in Our Business Practices

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## 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 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.

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**Additional Information:** Insider Trading and Disclosure Policy, ALL.ACHC.LEG.0100

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# A Culture of Integrity in Our Business Practices

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## 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, and not those of the company.



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**Additional Information:** Acadia Compliance Program Policy ALL.ACHC.COMP.0010



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## Acknowledgment

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All employees must additionally complete the Acadia Code of Conduct course in our Learning Management System (LMS) and will be asked to acknowledge receipt of, and abide by, the Code of Conduct.



## **Acadia Healthcare**

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