

NAATP NATIONAL 2018 QUALITY ASSURANCE

40th ANNUAL
NATIONAL
ADDICTION LEADERSHIP
CONFERENCE



MAY 20-22, 2018
Omni Interlocken Resort
Denver, Colorado



NATIONAL ASSOCIATION
OF
ADDICTION TREATMENT PROVIDERS

Deceptive or Transparent?

There IS a Bright Line in Web Marketing



NATIONAL ASSOCIATION
OF
ADDICTION TREATMENT PROVIDERS



Robert Ferguson - Moderator
Founder, Jaywalker Lodge and Alpha 180



Peter Thomas
NAATP Quality Assurance Officer



Gina Thorn
CMO, Harmony Foundation

Deceptive Practices

- Code of Ethics 2.0
- Current Problematic Practices
 - Impact on Members
- Ethics Complaint Process
 - Types of Complaints
 - Process

Code of Ethics 2.0

- Member Ethics Requirement
 - NAATP membership is a privilege. NAATP requires that all members adhere to NAATP Values, Membership Conditions, and the NAATP Code of Ethics. During the application and renewal process, members are required to attest that they have read, understand, and agree to adhere to each of these. Members must further agree that a failure to adhere, as determined in the sole discretion of NAATP, will result in disciplinary action by NAATP that may include: denial of membership application, corrective action by the member, or revocation of membership.

Code of Ethics 2.0

Primary Areas of Complaint

- Section IV: Marketing
 - A. Financial Rewards for Patient Referrals
 - An NAATP member may not engage in the buying and selling of patient leads. Any collection or aggregation of leads for compensation is prohibited.
 - B. Deceptive Advertising or Marketing Practices
 - NAATP members must not engage in false, deceptive, or misleading statements, advertising, or marketing practices, including but not limited to, predatory web practices, payment kickbacks, services, and license and accreditation misrepresentation. Facilities operating under a “Florida model” providing outpatient clinical services along with a housing component must label clearly their program as such, and distinguish themselves from licensed residential facilities.
 - NAATP members must be transparent regarding their identity and services. NAATP members must provide prominent information in all their advertising, on their websites, and in their collateral marketing materials about the type and model of services, corporate entity, treatment program brand, licensing, accreditation, location of facility or facilities, and staff credentials.
 - Web directories that use facilities’ images, name, logos, and trademarks that do not clearly identify that facility’s direct phone number and website are prohibited. Banners and borders on websites that utilize a web directory’s call center number, especially when conveying an appearance of being a consultant or independent specialist, are prohibited.

<https://www.naatp.org/resources/ethics/code-ethics>

Problematic Practices- Lead Aggregation

Code Section IV-B-1,2,3,4



Get Help Today ☎ (877) 697-0534

GET YOUR LIFE BACK

CLICK HERE

Scam Warning Signs

Law enforcement and experts have come together to create a list of common warning signs that scams often exhibit. The following is a list of things to be on the lookout for in order to avoid the [worst drug rehab centers](#).

- Drug treatment brokers just want you to go to one of their treatment centers because they receive referral fees. The wellbeing of the addict is the last thing on their mind.
- Be on the [lookout for generic advertisements and websites](#) that don't really clarify what types of treatments they offer. Many of these types of sites and advertisements are designed to get your [details](#), which is then passed on to brokers.
- Be aware of offers to pay for travel or for insurance coverage. They may also offer to waive deductibles and co-payments. If someone does offer to pay for something along these lines, phone your insurance company or the rehab to ensure that they are in fact employees.
- Since drug rehab scams make most of their money by billing your insurance company for unnecessary tests and treatments, be on the lookout for daily lab tests.
- They may offer patients free rent at a sober living environment or home if the patient uses a particular rehab center.
- Since rehab scams aren't interested in the recovery of the patient, they often don't ask for information from any previous counselors or therapists. [They also don't bother asking the patient in-depth questions about their addiction.](#)
- Be aware when marketers call you to offer you out-of-state services. This will allow the rehab to bill your insurer more.

Submit your information to receive a call back:

First Name

Last Name

Date Of Birth

Zip Code

Phone

Email

By checking this box and clicking "Continue", I consent to receive calls and text messages from Rehab Advisors, LLC at my telephone number listed above, even if a wireless number, to receive information about substance abuse treatment. I understand these calls may be generated using an automated dialer or may contain a

Questions to Ask

The following questions should be easily answered by the [best drug rehabs in Florida](#) or any state.

- Is there licensed staff available 24/7?
- Are they able to treat other conditions such as mental health disorders or diseases?

Problematic Practices- Buying Calls and Leads

Code Section IV-A-3

The screenshot shows the AddictionCenter website interface. At the top left is the AddictionCenter logo. At the top right, it says "Get 24/7 help now: (888) 512-5518" and "All calls free and confidential." Below this is a navigation bar with links for "Find Rehab", "Alcohol", "Drugs", "Treatment", "Community", and "Search". A white pop-up window titled "Where do calls go?" is centered on the screen. It contains the text "Callers will be routed to:" followed by a dropdown menu showing "Recovery Center". To the left of the pop-up is a "HON @ CODE CERTIFIED 09/2016" logo and text stating "This site complies with for trustworthy health verify here." Below the pop-up, there is a copyright notice: "Copyright © 2018 AddictionCenter.com | For immediate treatment help call: (888) 512-5518". Below the copyright notice are social media icons for Facebook and Twitter. At the bottom of the page, there is a footer with links for "About Us", "Contact Us", "Privacy Policy", "Disclaimer", and "Where do calls go?". Below the footer is a disclaimer paragraph: "AddictionCenter.com is a referral service that provides information about addiction treatment practitioners and facilities. AddictionCenter.com is not a medical provider or treatment facility and does not provide medical advice. AddictionCenter.com does not endorse any treatment facility or guarantee the quality of care provided, or the results to be achieved, by any treatment facility. The information provided by AddictionCenter.com is not a substitute for professional treatment advice."

Problematic Practices- Unbranded Aggregation

Code Section IV-A, IV-B

The screenshot shows the DrugFree.com website interface. At the top, there are navigation links: Drug Guide, Find Treatment (highlighted), Symptoms & Signs, Drug Effects, Helpline, and Facts. Below the navigation is a map of Prescott, AZ, with a red pin marking Prescott House Inc. The map labels include Williamson, Wood Trap, Prescott National Forest, Skull Valley, Wilhoit, Prescott, Prescott Valley, Yavapai Hills, Dewey-Humboldt, and Groom Creek. To the right of the map, the business details for Prescott House Inc. are displayed:

- PRESCOTT HOUSE INC**
- Rating: ★★★★★
- Services: Residential Long-Term, Self payment (+5)
- Phone: (520) 979-3403
- Location: Prescott, AZ
- Description: Licensed by the state of Arizona, Prescott House has been helping men achieve a life of freedom and recovery from a wide range of issues including addictions for more than two decades. Their male clients receive the highest quality of treatment and care in a residential setting that's very encouraging and supportive.
- Learn More button
- All numbers ring to [redacted]

(719) 694-2623	(970) 460-3036	(800) 420-9064	(719) 633-4114	(303) 447-2038
(719) 694-2626	(800) 420-9064	(970) 345-2254	(719) 754-3927	(303) 453-1000
(720) 239-1171	(303) 699-8181	(970) 920-5555	(800) 420-9064	(303) 544-9875
(720) 263-5688	(303) 745-1281	(270) 889-6025	(970) 264-2333	(800) 420-9064
(720) 306-8225	(303) 750-7411	(303) 694-7430	(303) 245-0123	(970) 874-9180
(720) 310-2023	(303) 752-2390	(719) 264-0718	(303) 283-5991	(303) 412-3960
(800) 420-9064	(719) 376-2511	(719) 276-5170	(303) 441-0400	(303) 825-0373
(970) 315-0224	(719) 589-3671	(719) 346-8183	(303) 441-1275	(303) 825-0508
(970) 315-0226	(719) 589-5176	(719) 572-6340	(303) 443-2154	(719) 447-9800
(970) 323-4339	(720) 310-2023	(719) 573-5606	(303) 443-3920	(719) 526-2862

Problematic Practices-

Unbranded, Aggregation, and Lead Sales Sites

70 Aggregation and lead sales sites identified. These are considered deceptive under the NAATP Code of Ethics.

Misrepresentation

Code Section IV-B-1



What is Drug Rehab Accreditation?

Arizona's Only Dually-Accredited Drug Rehab Facility

When one is seeking for a drug treatment center, one of the first recommendations to be heard is if a program is accredited? What does it mean for a program to be accredited? Does accreditation actually ensure quality treatment and rehab? In addition to getting licensed by the state and/or municipality governing behavioral health, some addiction rehab programs decide to get accredited by a third party.

In the U.S.A, drug treatment rehab centers are most commonly accredited by:



CARF (the Commission on Accreditation of Rehabilitation Facilities) – a nonprofit, independent organization that accredits addiction, dual diagnosis and co-occurring disorder programs. It is the largest accrediting body for drug rehab and addiction treatment programs in the U.S.

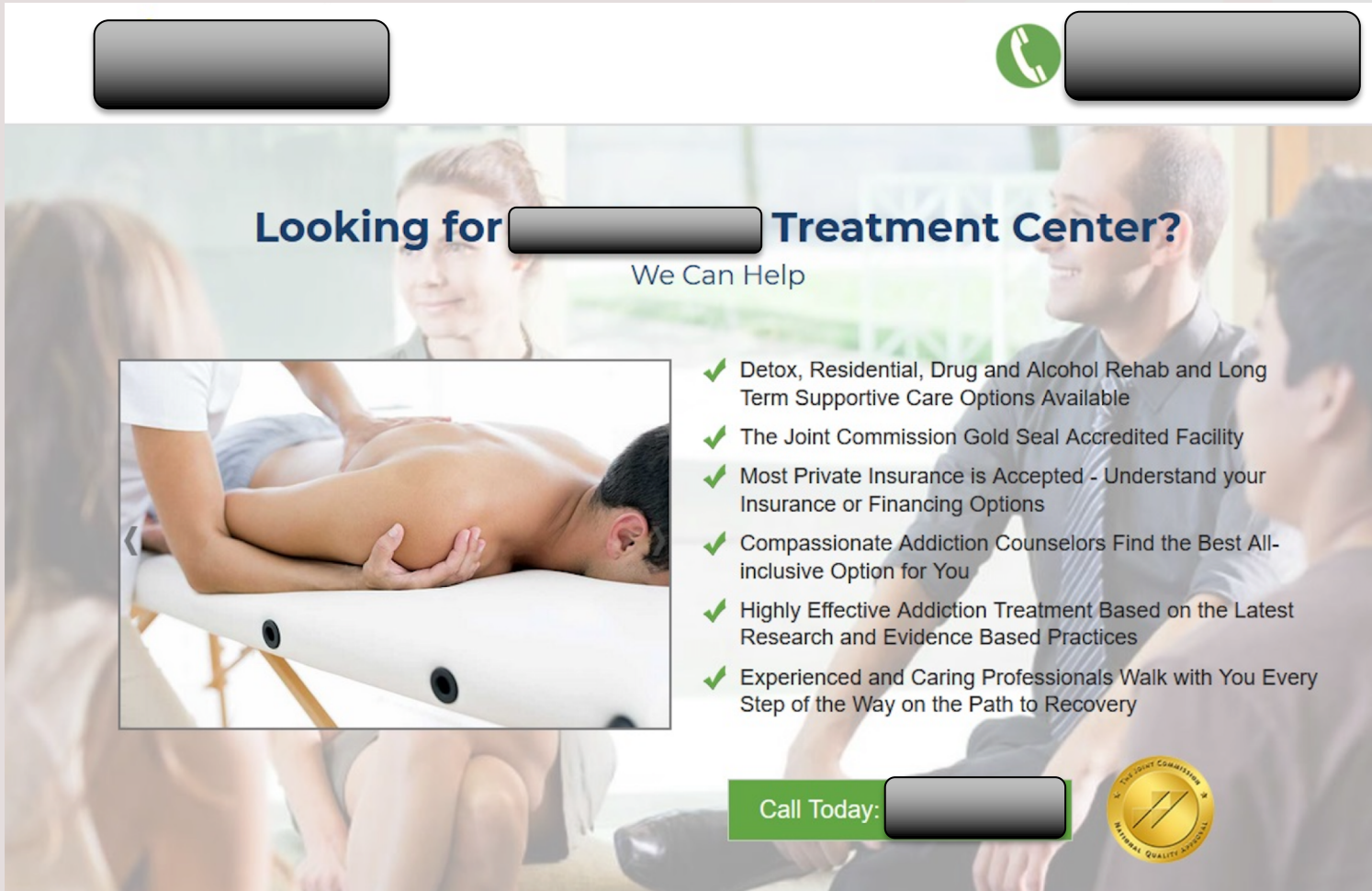


The Joint Commission (formerly JCAHO) is America's biggest accreditor of health care services and businesses as well as the second largest accreditor of addiction treatment programs.

[REDACTED] Dually-Accredited for the Highest Level of Care Imaginable

[REDACTED] is Dually-Accredited! Meaning we are CARF AND The Joint Commission Accredited. What does that mean? [REDACTED] is held to the highest standards of not only one, but two of America's top health care and addiction accrediting organizations. These accrediting organizations have similar goals and mission statements, but they are independent in terms of what they ask their providers to uphold. From safety issues to ensuring proper protocols for doctors and prescribing medicines, to ensuring the utmost client safety and protection in the actual treatment setting, i.e. campuses, homes, hospitals etc. You can rest

Deceptive Practices: Code section IV-B-2




Looking for [redacted] Treatment Center?

We Can Help

- ✓ Detox, Residential, Drug and Alcohol Rehab and Long Term Supportive Care Options Available
- ✓ The Joint Commission Gold Seal Accredited Facility
- ✓ Most Private Insurance is Accepted - Understand your Insurance or Financing Options
- ✓ Compassionate Addiction Counselors Find the Best All-inclusive Option for You
- ✓ Highly Effective Addiction Treatment Based on the Latest Research and Evidence Based Practices
- ✓ Experienced and Caring Professionals Walk with You Every Step of the Way on the Path to Recovery

Call Today: [redacted]

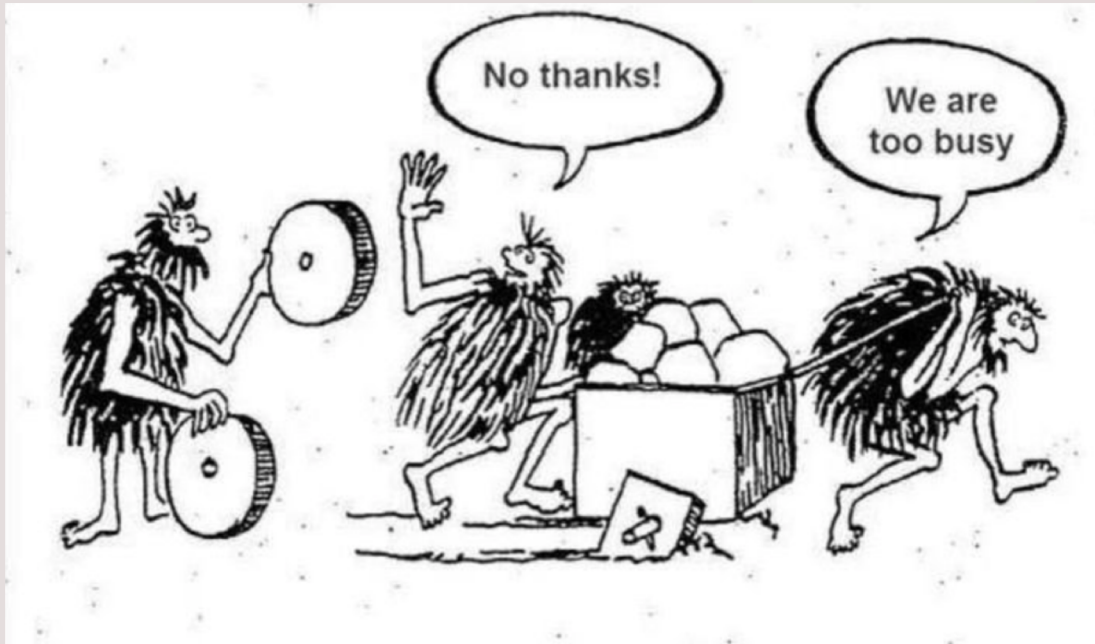


Complaints, Denials, Removals

- Complaints: 23 Complaints Filed with NAATP
 - 10 allege marketing abuses
 - 8 for treatment violations
 - 4 for management violations
- Membership Denials: 5 in last year
 - 3 due to marketing abuses
 - 2 for not being licensed
- Removals: 83 facilities since December 2017
 - 72 due to marketing abuses
 - 11 for not being licensed or licensing misrepresentations

What You Can Do:

- Take the long view
 - Build your Brand
 - Sell what you do
 - “The harder you look, the better we we look”



What You Can Do:

- Protect your Brand
 - NAATP has developed Member Resources to help you protect your brand.
 - <https://www.naatp.org/members/treatment-research/protecting-your-brand>
- Document problematic practices
- File grievances with offending companies
- Notify regulatory groups
- File complaints with NAATP

What You Can Do:

If you have a complaint about a NAATP treatment center member, please follow these steps:

1. **Contact the treatment center.**
 - Most treatment facilities have an internal complaint process.
2. **Contact the accrediting body.** This is typically CARF (Commission on Accreditation of Rehabilitation Facilities) or TJC (The Joint Commission). Accrediting bodies require that treatment centers deliver care pursuant to specific quality and safety standards.
 - [CARF](#)
 - [JHACO](#)
3. **Contact the [State Licensing Agency](#).** Addiction treatment should only be delivered if the agency is licensed to deliver the specific service. Treatment centers and their professional employees are usually licensed by the state in which the center does business. Contact the state licensing agency to file a complaint or to speak with someone about your concerns.
4. **File a complaint** by contacting the [State Better Business Bureau](#). The Treatment Center must be registered with the BBB in order to file a formal complaint.
5. **File a complaint** with NAATP by using the online form linked at the bottom of the page.

www.naatp.org/ethics



ETHICS FROM A LEADERSHIP PERSPECTIVE

WHY ARE WE HAVING THIS CONVERSATION?

- **Greed**

- **Desperation**
 - Industry has census highs and lows
 - Unpredictable business behavior

- **Lack of Awareness**
 - Not sure what questions to ask?
 - Following others behaviors
 - Buying leads so common

- **Don't have the ability to do it the right way**
 - More inclined to do things the wrong way.

THERE IS NO SILVER BULLET

- Want to make things happen fast to fill the beds
- Online, Truth Well Told is truth well shared. It's the classic truth well told.
- Brand is everything
- We need to trademark – leaving ourselves vulnerable to others to poach or steal or brand.
- Our websites need to be informative, communicating our philosophy and values. We need to demonstrate how we are intimately familiar with staff, philosophy and carries the message.
- We need to remain solution-focused

Ethics an Inside Job

- Ethical practices begin at the top.
- Baked into an organization with clear expectations and strong follow-through.
- The ethical environment in an organization is built and developed by the leaders as they have an influential role in the organization and in developing the organizational values.
- As leaders, this is the single most important job we have the privilege to imbed with our staff and organization.

Leadership Training and Guidelines



How to Create a Culture of Ethics and Business Integrity

- Create a Code of Ethics
- Transparency – Communication with staff
- Encourage accountability and ownership
- Communicate and encourage response
- Truth in Selling – Deliver what was promised
- 3 E's
 - Educate- [NAATP Guide to Treatment Program Selection](#)
 - Engage – Partner and learn from strong long-standing programs.
 - Empower -

360 Degree's of Ethical Accountability

CONSUMERS, CLIENTS AND FAMILIES

- Add to website: NAATP Guide to Treatment Program Selection
- Train admissions team to discuss best practices
- Strong Facebook and social media platforms that communicate our story.
- Truly inform and build the relationship with trust and credibility
- Tell the truth and court our consumers, clients, families and alumni with positive intent and not just to fill a bed.

360 Degree's of Ethical Accountability

SUPERVISORS, CO-WORKERS AND DIRECT REPORTS

- Call analytics – tracking SEO – helps stay away from bad practices
- Allows you to listen to calls and track call performance to train and mentor and coach
- Build your internal tribe – maintain a consistent message internally and externally.
- Often marketing efforts are focused externally, but we need to court our internal staff as well.

360 Degree's of Ethical Accountability

COLLEAGUES & COMPETITORS IN THE MARKET ARENA

- Lead by Example
- Build collaboration, even with the those that are questionable.
- Educate, educate, educate.
- Mentor and Coach
- Create a space for accountability with our colleagues and competitors