

# 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



**Jay Crosson, CEO of Cumberland Heights and  
Ethics Committee Chair, NAATP**



**Marvin Ventrell, JD-Executive Director, NAATP**



**Peter Thomas, Quality Assurance Officer, NAATP**

**VOICE.  
VISION.  
LEADERSHIP.**



1. Welcome: Our Common Concern
2. The Problem of the Unscrupulous Profiteer:  
5 Primary Unethical Practices
3. The NAATP Response:  
*Quality Assurance Initiative (The QAI)*
4. History of the Ethics Code
5. Accountability: The Complaint Process
6. Ethics 2.0  
Breaking Down the NAATP Ethics Code (Ethics 2.0)  
Preamble  
Patient Brokering  
Predatory Web Practices  
Billing Abuses and Urine Drug Screens  
Payment Kickbacks  
Licensing and Accreditation Misrepresentation (Marvin Ventrell)
7. Q & A

## AGENDA

# 1. Our Common Concern

- Problematic Addiction Treatment Practices Hurt Everyone
- [The Florida Shuffle: The Sometimes Dirty Business of Rehab](#)
  - The Consumer
  - The Payer
  - The Addiction Treatment Field at Large
- We Welcome Scrutiny
- Together We Can Clean this Up
- We Need to Identify the Bad Guys and the Good Guys

## 2. The Unscrupulous Profiteer

- A minority but aggressive highly competitive element of predatory entrepreneur coming into the addiction “space”
- Profit motivation above all
- If its not specifically prohibited, they will do it
- There is a criminal element as well
  1. Patient Brokering
  2. Predatory Web Practices
  3. Insurance and Billing Abuses
  4. Payment Kickbacks
  5. Licensing and Accreditation Misrepresentation

### 3. The NAATP Response: The QAI

- Quality Assurance Initiative - Separate breakout
- Goals of the QAI
  1. Promote Best Business Practice
  2. Deter Problematic Business Practice \*
  3. Assist Payers in the Discernment of Services
  4. Inform Law and Policy Makers
  5. Educate and Protect the Consumer
  6. Train and Educate the Provider \*

**\* Ethics Code 2.0 addresses.**

## 4. History of the Ethics Code

- Original Ethics Code was established in 2012
- Complaints process was established
- Internal complaints could be generated
- Fall 2017 Board approves updating the Ethics Code
- January 2018 ---Ethics code 2.0 in place incorporating concepts developed by QAI, Ethics committee and NAATP staff and leadership.
- Over 70 facilities and over \$100k in dues forfeited by non-renewal of former members.

## 5. The Complaint Process – Peter Thomas

- Who can file a complaint?
- Best practices before filing a complaint to NAATP:
  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.
    - a) [CARF](#)
    - b) [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. The Complaint Process (continued)

- The Complaint must:
  - a. Identify the member organization that is alleged to have violated the Code (the “Respondent”);
  - b. describe the act(s) at issue and the reason(s) for filing the Complaint;
  - c. state whether the acts are ongoing or continuing;
  - d. explain why the acts violate the Code;
  - e. provide any relevant or supporting information and documentation;
  - (f) be signed and dated by the Complainant.

## 6. The NAATP Code of Ethics 2.0

- Adopted January 1, 2018
- Establishes a Uniform Industry Standard and a Common Foundation for Ethical Practice
- Significant Focus on:
  - Marketing Accuracy
  - Marketing Transparency
- Addresses the Most Pressing Concerns - the Big 5:
  - Patient Brokering
  - Predatory Web Practices
  - Insurance and Billing Abuses
  - Payment Kickbacks
  - Licensing and Accreditation Misrepresentation

# Code Sections

- Preamble
- Treatment
- Management
- Facilities
- Marketing
  - Financial Rewards
  - Deceptive Advertising
  - Client Identities

## Preamble - Marvin Ventrell

- We believe in SUD as a potentially fatal primary chronic disease of the brain accompanied by psychological and social conditions.
- NAATP members treat SUD along the entire continuum of care through best practices.
- Best practices include values-based ethical business practice.
- The Code defines unacceptable practices.
- All NAATP members must adhere to the code.
- NAATP Members agree to be removed for violation.

## Preamble (continued)

“NAATP members provide SUD treatment and support. In so doing, NAATP members must adhere to the highest levels of professionalism and ethical conduct through the entire continuum and spectrum of clinical and business services, including development and marketing, admissions, treatment services, management, human resources, and relationships with the public, press, and policy makers. To ensure that NAATP members adhere to such responsibility and accountability, NAATP has adopted this Code of Ethics (Code). All NAATP members agree to abide by all provisions of the Code as a condition of membership and further agree to removal from membership for violating the Code based upon such a determination by NAATP. NAATP also offers this Code as an ethical conduct guide for addiction treatment providers outside NAATP membership.”

# Patient Brokering

## *Code Section IV, A, 1-5*

### SECTION IV: Marketing

#### A. Financial Rewards for Patient Referrals

1. Patient brokering is prohibited. No financial rewards, substantive gifts, or other remuneration may be offered for patient referrals. NAATP members must not provide compensation for a patient referral. A NAATP member must not charge or receive compensation for providing a referral.
2. ...may not compensate referral out...
3. ...may not engage in the buying and selling of leads...
4. ...no inducements...
5. ...no waiver of patient responsibility as to deductibles and co-pay...

# Patient Brokering Code Section IV, A, 1-5



[Addiction Inc.: Inside the lucrative business of America's opioid crisis](#)

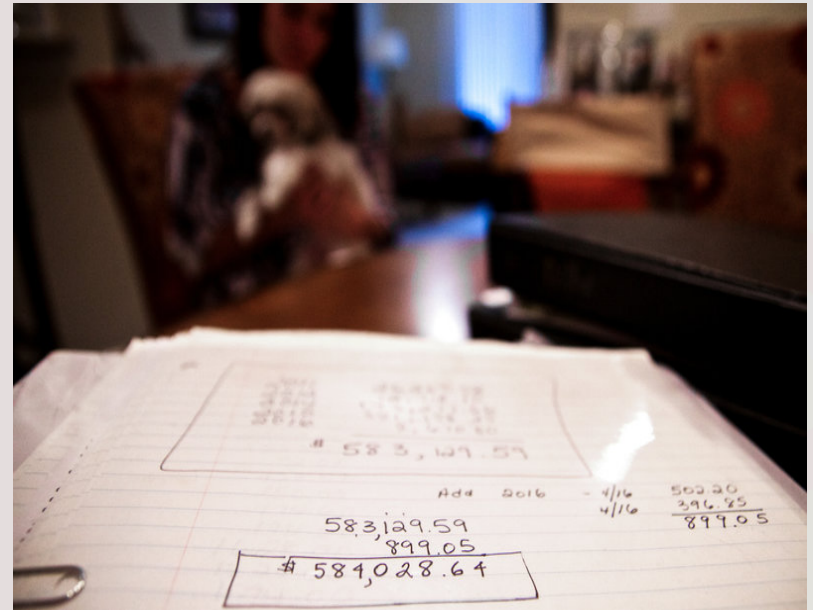
## NPR article

### 'Body Brokers' Get Kickbacks To Lure People With Addictions To Bad Rehab

The corrupt owner of a drug treatment center might pay \$500 per week in kickbacks to the operators of sober homes who send them clients with health insurance — clients like Dillon Katz.

At her home in Boynton Beach, Fla., Dillon's mom, Staci Katz, pulls out three huge binders where she keeps track of his medical bills. She's tallied up the charges for the five years her 25-year-old son has been in-and-out of treatment: more than \$600,000 dollars.

"You could see by the billing — this was very lucrative," Staci says.





## How It Works

Through our extensive marketing network in TV, radio, print, online SEO, internet campaigns, and our wide range of affiliates, we receive more than 1,000 calls each day from individuals seeking addiction treatment for themselves or loved ones. We want to connect these people with qualified facilities able to meet their special treatment needs. In working with facilities, we learn their capabilities for receiving patients. The questions we ask to determine how our products can work for you are:

- How many patients is the facility able to work with at one time?
- Does the facility have trained staff to determine if those seeking treatment will be able to meet treatment requirements at the facility?
- During what hours is the facility able to take treatment seeking calls?
- Does the facility have trained and qualified staff to screen patient insurance and payment methods?

Based on the answers to these ques-

tions and a little insight into the uniqueness of your facility, the Raw Calls and Filtered Calls are intended to be customized to meet your facilities' needs and then be modified as required based on your growing needs. Our specialists will guide you through the process of selecting call volumes from our Raw and Filtered Call products, and they will assist you in setting the bid per call that makes sense for your facility.

### Factors For Bid Amounts

- The days and times that you receive calls will impact your bid range
- The capacity of a facility's admissions staff can affect your target bid
- The volume of calls you can receive will affect your bid
- The types of insurance and payment a facility accepts will determine your bid goal
- The amount of patients a facility can receive will factor into your bidding



[treatmentcalls.com](http://treatmentcalls.com)

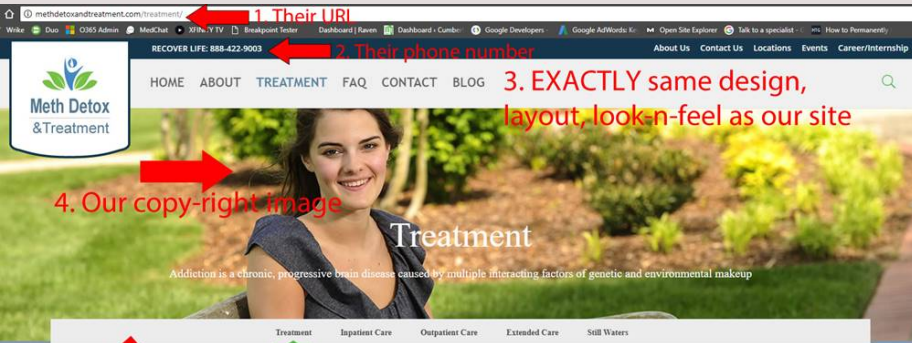
866-203-7397

# Predatory Web Practices

*Code Section IV, B1, B2*

- NAATP members must not engage in false, deceptive, or misleading statements, advertising, or marketing practices, including but not limited to, predatory web practices.
- NAATP members must be transparent regarding their identity and service. 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.

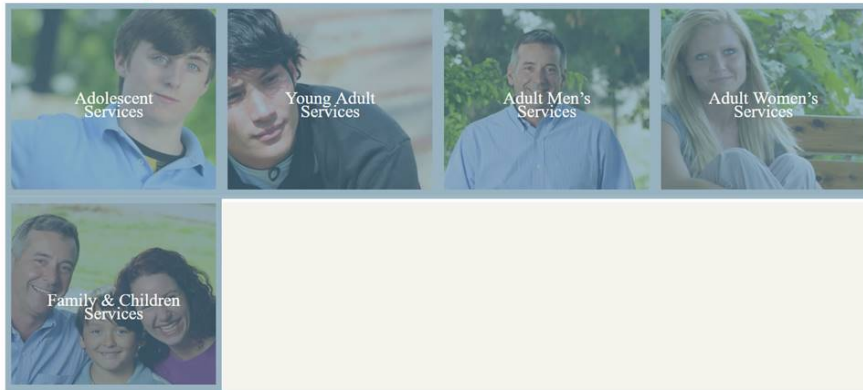
1: This is a screenshot of a near identical design and look of our page: [www.cumberlandheights.org/treatment/](http://www.cumberlandheights.org/treatment/). I placed the red arrows and wrote the text to help point out some items.



6. Our design layout and sign-up form, their phone number



5. All 5 of our copy-right images



6. Our design layout and sign-up form, their phone number



METH DETOX AND TREATMENT IS PROUDLY ACCREDITED BY



PAY YOUR BILL ONLINE



2: And here is the source code I wrote line-for-line which proves they are stealing our intellectual property – down to even leaving some of the links and images pointing BACK to our servers!

```
view-source:methoddetoxandtreatment.com/treatment/
Apps Write O365 Admin MedChat XFINITY TV Breakpoint Tester Dashboard | Raven Dashboard - Cumber Google Developers Google AdWords: Ki Open Site Explorer Talk to a specialist
1005 </div> <!-- .et_pb_row -->
1006 </div> <!-- .et_pb_section --><div class="et_pb_section please et_pb_section_1 et_section_regular">
1007
1008 <div class="sibog et_pb_row et_pb_row_1 et_pb_row_fullwidth">
1009
1010 <div class="et_pb_column et_pb_column_4_4 et_pb_column_1">
1011
1012 <div class="et_pb_text et_pb_module et_pb_bg_layout_light et_pb_text_align_left et_pb_text_1">
1013
1014 <div class="top-panel">
1015 <ul>
1016 <li class="active">
1017 <a href="http://methoddetoxandtreatment.com/treatment/" title="Treatment" location.href="https://www.cumberlandheights.org/treatment/"; rel="bookmark">Treatment</a></li>
1018 <li>
1019 <a href="http://methoddetoxandtreatment.com/inpatient/" title="Inpatient Care" onclick="location.href='http://methoddetoxandtreatment.com/inpatient/';" rel="bookmark">Inpatient Care</a>
1020 <li>
1021 <a href="http://methoddetoxandtreatment.com/outpatient/" title="Outpatient Care" onclick="location.href='http://methoddetoxandtreatment.com/outpatient/';" rel="bookmark">Outpatient Care</a>
1022 <li>
1023 <a href="http://methoddetoxandtreatment.com/extended-care/" title="Extended Care" onclick="location.href='https://www.cumberlandheights.org/treatment/extended-care/';" rel="bookmark">Extended Care</a>
1024 <li>
1025 <a href="http://methoddetoxandtreatment.com/still-waters/" title="Still Waters" onclick="location.href='http://methoddetoxandtreatment.com/still-waters/';" rel="bookmark">Still Waters</a>
1026 </ul>
1027 </div>
1028 </div> <!-- .et_pb_text -->
1029 </div> <!-- .et_pb_column -->
1030
1031 </div> <!-- .et_pb_row --><div class=" et_pb_row et_pb_row_2 et_pb_row_fullwidth">
1032
1033 <div class="et_pb_column et_pb_column_4_4 et_pb_column_2">
1034
1035 <div class="et_pb_code et_pb_module et_pb_code_0">
1036
1037 <div class="grid">
1038 <div class="grid-size"><div>
1039 <p><a href="http://methoddetoxandtreatment.com/adolescent-services/"></p>
1040 <div class="grid-item">
1041 <figure class="tint"></figure>
1042 <div class="grid1">Adolescent Services</div>
1043 </p>
1044 </div>
1045 <p><!-- #grid-item --><br />
1046 </a><br />
1047
1048 <div class="grid-item">
1049 <figure class="tint" id="heya"></figure>
1050 <div class="grid2">Young Adult Services</div>
1051 </p>
1052 </div>
1053 </div> <!-- #grid-item --><br />
1054 </a><br />
1055 </div> <!-- .et_pb_row --></div> <!-- .et_pb_section --></div> <!-- .et_pb_row --></div> <!-- .et_pb_section --></div>
```

1. You can clearly see it's their domain but they left certain code linked back to our site/images

2. →

3. Notice the IMAGE SRC tag →

# Predatory Web Practices

*Code Section IV, B1, B2*

[The Verge: Review Sites Have Deep Ties To The Rehabs They Promote](#)



# Predatory Web Practices

## Code Section IV, B1, B2

drugrehab.org

Download Far

FIND A REHAB CENTER | TOP RATED REHABS | PAYING FOR REHAB | BLOG | RESOURCES

To Begin Your Journey On A Successful Recovery Program

## Call 1-800-319-5178

*I'd rather send an email*

Find Treatment Now

### Cumberland Heights Alcohol and Drug Treatment

8283 River Road  
Nashville, TN 37209

For More Information Call: 1-800-319-5178

#### Addiction Treatment Provider Specializes

- Drug And Alcohol Treatment Services

#### Treatment Offered

- Substance Abuse and Drug Addiction Treatment
- Alcohol and Drug Detox
- Naltrexone (oral)
- Vivitrol© (injectable Naltrexone)

#### Treatment Methodologies

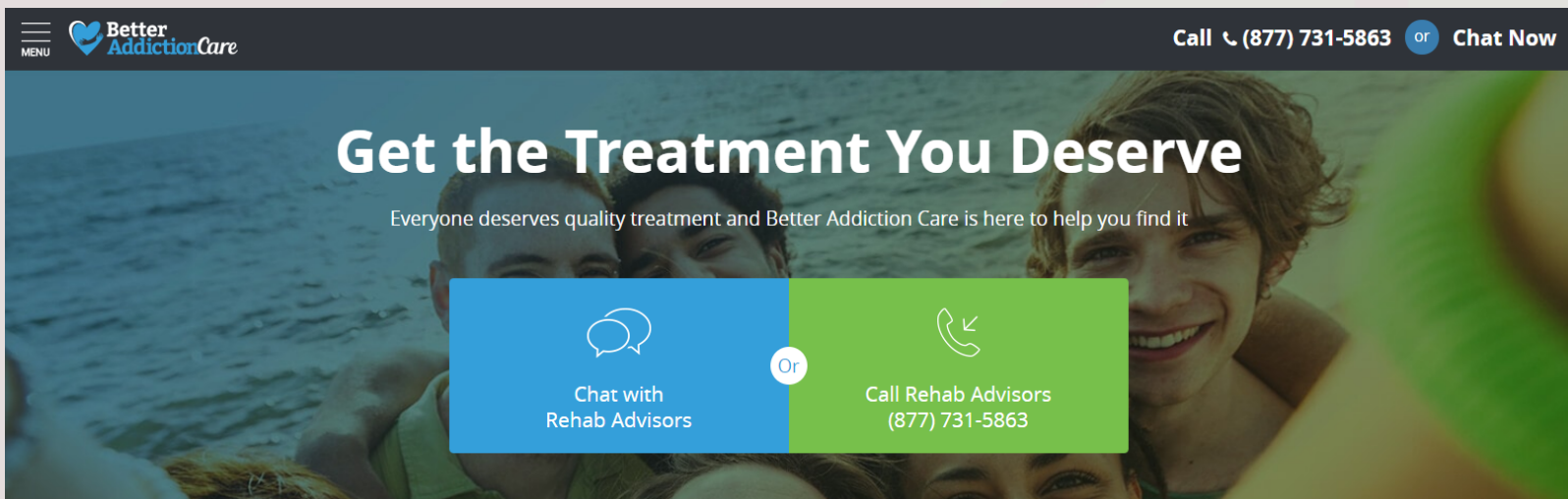
- Cognitive/behavioral therapy
- Dialectical behavioral therapy
- Life Coach
- Trauma-related counseling

# Predatory Web Practices

## Code Section IV, B1, B2

- 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.

[BetterAddictionCare.com](http://BetterAddictionCare.com)



The screenshot shows the top section of the Better Addiction Care website. At the top left is a 'MENU' icon and the 'Better Addiction Care' logo. At the top right, it says 'Call (877) 731-5863 or Chat Now'. The main banner features a background image of a group of people smiling. The text 'Get the Treatment You Deserve' is prominently displayed in white. Below this, a smaller line of text reads 'Everyone deserves quality treatment and Better Addiction Care is here to help you find it'. At the bottom of the banner, there are two buttons: a blue button with a chat icon and the text 'Chat with Rehab Advisors', and a green button with a phone icon and the text 'Call Rehab Advisors (877) 731-5863'. An 'Or' icon is placed between the two buttons.



# Billing Abuses and UA

*Code Section II D, III E, IV 5*

- Fee structures must be reasonable, transparent and available to the public.
- NAATP members must collect reasonable fees and rent from the patient for sober living and other non-clinical or ancillary services provided alongside outpatient services.
- Routine waiver of patient financial responsibility related to deductibles and co-pays is prohibited. Waivers must not be provided except in the case of demonstrable financial hardship based on written objective criteria.



# Billing Abuses and UA

*Code Section II D, III E, IV 5*

- About Us

The Thrive Again Program offers a proven compliant revenue participation business model to the behavioral healthcare market.

Projected revenues for 10 new Addiction treatment patients per month \$36,000 +

Toxicology	\$ 13,000 per month
Pharmacogenomic	\$ 2,400 per month
Blood Testing (BMP, CMP, Heptatic)	\$ 2,500 per month
Allergy Testing and Treatment	\$ 16,800 per month

# Billing Abuses and UA

## Code Section II D, III E, IV 5

# Two accused in \$58M sober home fraud, FBI says

**A**ndy Reid **Contact Reporter** Sun Sentinel

Even the urine testing at a [Delray Beach](#) sober home and addiction treatment center became a way to squeeze patients and insurance companies for more money, according to federal investigators.

Double billing for urine testing was part of the “fraudulent activity and bogus treatment” the [Federal Bureau of Investigation](#) says it discovered at the Real Life Recovery Delray treatment center and the Halfway There Florida sober home, newly released court records show.

They billed insurance companies about \$58 million between Jan. 1, 2011, and Sept. 30, 2015, leading to nearly \$19 million in payments to those facilities, according to an FBI complaint filed July 7.

# Payment Kickbacks

## *Code Section IV A2, B1*

- NAATP members may refer families or individuals to treatment or recovery support professionals, including interventionists, continuing care providers, monitoring agencies, and referral sources that offer services to patients prior to or after residential or outpatient treatment. NAATP members must not compensate such individuals or organizations in exchange for referrals, either in the form of direct payment, consulting contracts, fee splitting, or other compensation.
- NAATP members must not engage in - 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.

# Licensing and Accreditation

## *Code Section I, E*

### **SECTION I: Treatment**

- E. NAATP members must be licensed for all services for which their regulatory body provides licensure and must comply with all such licensure requirements.

The Code does not cover Accreditation but Guidebook will.

Q & A

# Materials

- [NAATP Code of Ethics 2.0](#)
- [The NAATP Addiction Industry Directory \(AID\)](#)

Thank you!

NAATP

[www.naatp.org](http://www.naatp.org)

[info@naatp.org](mailto:info@naatp.org)

888.574.1008