



Intern Information

Position Interning For: _____

First Name Middle Name Last Name

Birth Date SSN M F
Sex

School Associated with: _____

Home Phone: _____ Cell Phone: _____

Email Address: _____

Street Address

City, State, Zip Code

Emergency Contacts

Name:		Home Phone:	
Relationship:		Work/Cell Phone:	
Address:			
Name:		Home Phone:	
Relationship:		Work/Cell Phone:	
Address:			

HR Purposes Only:		
Intern Date:	Status: Intern	Job Code:
Dept. ID:	Start Date:	End Date:

**PACIFIC GROVE HOSPITAL
MEDICAL STAFF SIGNATURE IDENTIFICATION**

Printed Name of Staff _____

Credential _____

Medical Staff Number/s _____ / _____ / _____

Staff Signature and credentials (Must sign on each of the five lines below)

Staff Initials: _____, _____, _____, _____, _____

Date completed: _____

Signature Identification is to be kept on file in staff credentialing file, Pharmacy file, HR file and/or HIM Department and available to authorized users of the medical record



Signature Identification

Printed Name: _____

Signature: _____

DEA #: (For Pharmacy use ONLY) _____

Tax ID Number: _____

NPI Number: _____

Medicare PTAN:(If Applicable) _____

Medicare UPIN:(If Applicable) _____

cc: Pharmacy
Med cal Records

Conflict of Interest Disclosure Questionnaire

Pursuant to the purposes and intent of the Conflict of Interest policy adopted by the Governing Board, disclosure is required of personal or professional interests and activities which may constitute a conflict of interest between an employee, contractual staff, or Medical and Professional Staff member and the facility's mission, goals, philosophy, business or activities. This disclosure form shall be completed by all governing board members at the initial time of appointment and annually thereafter; during an employee's time of initial hire; and by other persons whenever potential conflict of interest situations may arise.

1. Outside Interests/ Employment

Identify any interests, activities, investments, or employment of yourself or immediate family:

- a. Private arrangements for employment with or for patients or other customers (i.e. vendors, referral sources, etc.) of this facility.

- b. Employee, agent, principal, shareholder, director, partner, or contractor of or with any sole proprietorship, corporation, partnership or other entity which provides services in direct competition with those provided by this facility.

- c. Employee, agent, principal, shareholder, director or partner of, OR
 Contractor of or with any sole proprietorship, corporation, partnership or other entity OR
 Provide direct, managerial, or consultative services for reimbursement to any entity from whom the facility or corporation secures services, supplies, or materials.

Signature: _____

Date: _____

Findings/ Actions:

Administrator Signature: _____

Date: _____

Conflict of Interest Disclosure Questionnaire

2. Confidential Information

My initials in the following spaces indicate my knowledge and understanding of the facility's policy on conflict of interest regarding confidential information and my agreement to comply with that policy as follows:

Initials	
	I will not use information about the facility gained in the course of employment for any business or other personal profit advantage.
	I will not encourage patients or potential patients to utilize the services of entities that compete with this facility except when making a referral to another facility that can better meet the needs of the patients/ potential patient.
	I will not utilize information about this facility and/or solicit patients or potential patients of the facility for the purpose of working in or establishing business competitive to this facility.
	I will not discuss information about the facility (i.e. confidential patient information, employee payroll information, etc.) with anyone not authorized to receive such information and/or who has no work-related reason or need to know.

3. Gifts/ Gratuities

My initials in the following space certify that I have knowledge and understanding of the facility's policy on conflict of interest regarding acceptance of gifts and gratuities and agree to comply with that policy.

Initials	
	I will not accept gifts and gratuities (other than those of nominal or token value that are clearly expressions of respect and/or appreciation such as candy or flowers or receive any gifts and gratuities which could be construed to influence the performance of my duties.

I agree to notify the appropriate management staff of the facility if a conflict in values, beliefs, or activities should arise to follow the facility's Human Resources Management policies and procedures for conflict resolution. I acknowledge the rights and responsibilities of the facility to resolve conflicts in a manner and with an outcome that services the best interest of the patient.

It is my understanding that this information shall be considered and handled as confidential and shall be utilized for documentation and evaluation of identified conflicts of interest for resolute by the Governing Board of the facility for board members, management staff, employees and contractual workers.

Signature: _____

Date: _____

CONFIDENTIALITY AGREEMENT

The undersigned below in consideration of his/her employment by **Pacific Grove Hospital** ("Facility") hereby agree as follows:

1. **Acknowledgement.** Employee hereby acknowledges that in connection with his/her performance of services for Facility, he/she may have access to certain confidential information relating to the financial, marketing, clinical or business operation of Facility. Employee acknowledges that the use of such information outside the scope of his /her employment would operate to the economic detriment of Facility.
2. **Covenant of Confidentiality.** While in the employ of Facility and after any termination of employment, regardless of the reason for the termination, Employee, except as required in the disclose or publish directly or indirectly, any Confidential information (as defined herein) obtained by him/her while in Facility's employ. Employee further agrees to assist Facility in developing and preserving the Confidential Information. For purposes of this Agreement, "Confidential Information" means all proprietary information concerning the Company's operation methodologies and clinical systems and techniques used by the Company in evaluation its operations and the quality of its financial and clinical performance, all financial and clinical software, data and pricing information relevant to the Company's operations and all business and marketing plans and financial problems.
3. **Return of Facility's Materials.** Employee acknowledges that all documents, records, notebooks, training manuals, policies and procedures, manuals, files, computer generated data, computer software and systems, photocopies, personal notes taken during the course of employment, letter, financial statements, and analysis and other similar items that contain any Confidential information, whether prepared by Employee or others, are and shall remain the property of Facility. On termination of Employee's employment with Facility, Employee shall immediately return to Facility all such material then in Employee's possession or under his/her control.
4. **Specific Performance Waiver.** Employee agrees that in addition to all other rights and remedies which may be available to Facility because of any breach by Employee of this Agreement, Facility shall have the right to enforce this Agreement by specific performance and enjoin or restrain any breach of this Agreement by Employee Waiver by Facility of any breach by Employee or any provision of this Agreement shall not operate or be construed as a waiver by Facility of a breach of a different provision or a waiver of any subsequent breach of the same provision.
5. **Governing Law; Severability; Entire Agreement.** This Agreement shall be governed by, and construed under and enforced in accordance with, the laws of the State of Tennessee. If a court holds any provision of this Agreement or its application to any circumstance invalid, the validity of that provision in any other circumstance or the

validity of the remaining provisions of this Agreement shall not be affected. This Agreement constitutes the entire agreement between the parties regarding its subject matter. It supersedes all prior agreements, correspondence, arrangements and understandings between the parties, except for any confidentiality agreements employee may have previously entered into with Facility.

6. **Not an Employee Contract.** This Agreement is not a contract of employment and shall not be construed to give Employee any rights to employment with Facility.

WITNESS the signature of the undersigned employee as of the date written below.

Employee Signature

Date

Human Resources Signature

Date



ACKNOWLEDGMENT OF CODE OF CONDUCT FORM

- I acknowledge that I have received and read the Acadia Code of Conduct and that I understand its contents.
- I understand and agree that I must comply with the Acadia Code of Conduct and Corporate Compliance Program and all laws, regulations, policies, procedures and other guidance applicable to the responsibilities of my position, contract or affiliation.
- I agree to fully cooperate with the implementation of the Acadia Code of Conduct and Corporate Compliance Program and to report any instances of possible violations of law, regulations or policies that are applicable to Acadia of which I become aware.
- I acknowledge that Acadia maintains a Compliance Hotline for the purpose of receiving notifications of possible violations of law, regulations or policies of the Acadia Code of Conduct and Corporate Compliance Program.
- I understand that my failure to report any concerns regarding possible violations of law, regulations, the Code of Conduct or the Corporate Compliance Program may result in disciplinary action, up to and including termination of employment, contract or affiliation.
- Upon termination of my employment, contract or affiliation with Acadia, I will immediately return all Acadia property (e.g., keys, documents, medical records, ID badges, Cellular Phones, Laptop, etc.) to Acadia. I agree that my obligations regarding confidential information as set forth in the Code of Conduct, Acadia policies and procedures will continue after the termination of my employment, contract or affiliation with Acadia Healthcare.

Signature: _____

Print Name: _____

Title: _____

Date: _____



Patient's Rights Acknowledgement

In accordance with Section 70707 of the California Administrative Code, the hospital and medical staff have adopted the following list of patient's rights.

1. Each person admitted as a voluntary or involuntary patient to a general acute care psychiatric hospital shall have certain rights which include, but are not limited to:
 - A. The right to wear one's own clothes
 - B. The right to keep and use one's own personal possessions including toilet articles
 - C. The right to have access to individual storage space for one's own private use
 - D. The right to see visitors each day
 - E. The right to have reasonable access to telephones both to make and receive confidential calls
 - F. The right to have reasonable access to letter writing materials including stamps
 - G. The right to mail and receive unopened correspondence
 - H. The right to refuse shock treatment and any form of convulsive therapy
 - I. The right to refuse psychosurgery
 - J. The right to see and receive the services of a patient advocate
 - K. Other rights as specified by regulation or which are statutory or constitutional
2. Access to county patient rights advocates as well as patient advocates provided by Pacific Grove Hospital.
3. Good cause for denying a patient the exercise of a right exists when the professional person in charge of a facility or his designee has good reason to believe:
 - A. That the exercise of the specific right would be injurious to the patient
 - B. That there is evidence that the specific right, if exercised, would seriously infringe on the rights of others.
 - C. That the institution or facility would suffer serious damage if the specific right is not denied
 - D. That there is no less restrictive way of protecting the interest in a, b, and c.
4. A right shall not be withheld or denied as a punitive measure nor, shall a right be considered a privilege to be earned.
5. Treatment modalities shall not include denial of any rights.
6. Waivers signed by the patient or the responsible relative, guardian or conservator shall not be used as a basis for denying rights.
7. A Physician's Order is necessary to deny the rights of the patient.
8. The reason used to justify the denial of rights to a patient must be related to the specific right denied.
9. When a specific right is denied to an individual patient, the reason for denial shall be documented in the Progress Notes of the patient's Medical Record immediately, and shall include:
 - A. Date and time the right is denied
 - B. The specific right denied
 - C. Good cause for the denial of the right
 - D. Signature of the person denying the right per order of physician



10. Any restrictions of a patient rights are fully explained to the patient and family (when applicable and approved by the patient) and are determined with their participation. Documentation shall occur indicating that this has been done in the progress notes.
11. A right will not continue to be denied when the good cause for denial no longer exists.
12. Any order for restriction must be reviewed at least every twenty-four (24) hours. If not renewed at that time by a physician, the order for restriction shall expire automatically. If renewed, it must be in writing and at intervals no greater than every twenty-four (24) hours. A date for this review is to be included in the progress notes of the patient's medical record.
13. Each day, a review of all rights denied shall occur and documentation placed in the patient's Medical Record indicating the denial of rights was reviewed.
14. On a monthly basis the Director of Nurses shall complete the tally of Patient rights Denial Forms and submit to the Riverside County Mental Health Department, Patient Rights Office by the 10th day of the month.
15. Any restrictions of a patient rights shall be incorporated into the patient's treatment plan.

I certify that I have read and understand this statement and will comply in accordance with the California Administrative Code Section 70707.

Name: _____

Employee Signature: _____

Date: _____



PACIFIC GROVE HOSPITAL

Statement of Health Practitioner

Date: _____

Name: _____

Specialty: _____

Please choose the appropriate statement:

- I am not aware of any health conditions or disability which might impair my ability to render treatment to the patients at Pacific Grove Hospital.
- I do have a health condition or disability which might require special adjustments to my schedule at Pacific Grove Hospital. (If this statement is chosen please provide, in writing, details of the health conditions/disability that affects your ability to provide care to Pacific Grove Hospital patients.)

TB Test done on ____/____/_____

- Negative
- Positive

Comment: _____

Failure to provide accurate information regarding your ability to provide quality care to the patients at Pacific Grove Hospital could result in suspension of your privileges at this facility.

Print Name

Signature

Date

To be kept in Credential File.

Tuberculosis (TB) Skin Test (PPD)

The following are signs and symptoms of TB. I attest that the following answers to the TB Screening are true and correct to the best of my knowledge.

Do you currently have symptoms?

- | | | |
|------------------------------|-----------------------------|---|
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Had a persistent cough for more than two weeks? (Different from a “smoker’s cough”) |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Coughed up blood frequently recently? |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Experiences unexplained chest pain or shortness of breath lately? |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Experienced unexplained, unrelieved fatigue? |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Experienced night sweats? |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Experienced unexplained weight loss? |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Experienced unexplained loss of appetite? |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Had unexplained fever(s)? |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Been exposed to someone with confirmed TB? |

History:

- | | | |
|------------------------------|-----------------------------|--|
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Have you received the measles vaccine within the last 4 weeks? |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Are you taking cortisone/ steroid medications, chemotherapy or radiation therapy at this time? |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Have you ever received a BCG Vaccination?
<small>• BCD is a vaccine against Tuberculosis given in some countries where rates of Tuberculosis are high. It is not given in the United States. History of BSG does not prohibit skin testing.</small> |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Have you ever had a positive TB skin test or Quantiferon-TB Gold?
If yes, date of positive TB test: ____/____/____ |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Have you ever received INH (Isoniazid)?
<small>• INH is a medication give for the treatment or prevention of Tuberculosis</small> |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Have you traveled outside the United States during the past year?
If so, where are how long: _____ |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Have you knowingly been exposed to an individual with active TB?
If yes, what were the circumstances? _____ |

Date of placement: _____ R arm L arm
 Placed By: _____
 Lot#: _____ Expiration Date: _____
 Date of Measurement: _____ Induration: _____ mm
 Erythma present: Yes No
 Read by: _____
 Interpretation: Negative Positive Inconclusive
 Interpretation by DON: _____

**** Measurement of skin test must be done 48-72 hours after administration ****

Name: _____

Employee Signature: _____ Date: _____

Chest X-Ray Required

Date Done: ____/____/____ Results: _____

Chest X-Ray Previously Completed: _____ (Serves as annual Questionnaire only)

COVID-19 Update Attestation

Topics/Policies Covered

- COVID-19 Update
- Transmission-based Precautions
- Protection Strategies
- Exposure, Quarantine, Isolation, Return to Work Protocols

Post-training exam

1. True False COVID-19 is widespread and proper precautions must be taken to reduce the spread in our facility and community.
2. True False Screening at admission is required. If a patient exhibits a cough, or shortness of breath, or at least two of the following: fever, chills, repeated shaking with chills, muscle pain, headache, or new loss of taste/smell, the patient must be isolated for further screening, and the AOC, Risk Director and Infection Control Practitioner must be informed.
3. True False Social distancing is only required in group and meal times.
4. The appropriate transmission-based precautions in our facility for COVID-19 patients includes:
 - a. Contact only
 - b. Contact and Droplet
 - c. Airborne only
 - d. No precautions are required
5. True False Wearing a mask is only required for direct care staff such as nurses and BHAs
6. True False If a patient is coughing, sneezing, or spitting while talking, they must be masked right away.
7. True False If a staff member had prolonged exposure to an unmasked COVID-19 positive individual they can still work, as long as they wear a mask.
8. True False Staff members can return to work after COVID-19 exposure without being tested.
9. True False Staff members must show no fever (without fever reducing medications) for at least 3 days, show improvements in symptoms, allow at least 10 days to pass since symptoms first started, and be cleared by Riverside County Public Health before returning to work.
10. True False Only cleaning will prevent COVID-19 from spreading via surfaces.

My signature indicates my attendance and completion of this mandatory training and my agreement to follow the principles outlined in this training in the performance of my duties.

Staff Printed Name: _____ Staff Signature _____ Date _____

ACADIA

H E A L T H C A R E
COMPLIANCE POST TEST

Acadia Healthcare has an active and ongoing Corporate Compliance Program designed to ensure ongoing conformity with all standards, laws and guidelines as outlined in our Code of Conduct. Please answer the following compliance related questions. Indicate your answer by circling T= true or F= false.

- T or F 1. The Compliance program applies to all Acadia employees, medical staff, and others authorized to act as representatives of Acadia Healthcare.
- T or F 2. The Compliance program only applies to full time staff. Part time staff **do not** have compliance rules and/or guidelines.
- T or F 3. Confidential reports may be made by calling 800-500-0333 24 hours a day.
- T or F 4. Each Acadia affiliated individual has a personal responsibility for reporting any activity by an employee, physician, board member, contractor or a vendor that appears to violate applicable laws, rules, regulations or our Code of Conduct.
- T or F 5. If I report in good faith a concern to the Corporate Compliance Hotline and someone finds out, I will be reprimanded or terminated.
- T or F 6. Our patients' health information is confidential and must be protected. Therefore , we must comply with all federal and state health information privacy and security laws.
- T or F 7. Chart entries must reflect the care provided and support charges submitted for payment.
- T or F 8. Bribes from individuals wanting to establish a business contract with Acadia **should and can** be accepted.
- T or F 9. It is OK to accept expensive gifts from patients or their family. It is also OK to date former or current patients.
- T or F 10. Employees who have access to confidential information **are permitted** to use or share that information for stock trading purposes.
- T or F 11. If you become aware of any form of discrimination or harassment that violates these or other employment policies, you should bring the matter to immediate attention of your supervisor or Human Resources Director.
- T or F 12. Federal law prohibits unauthorized duplication or copying of any copyrighted material, including copyrighted computer software, periodicals and books. Acadia employees are required to abide by Federal law.

Signature: _____ Date: _____

Print Name: _____ Dept.: _____

Reviewed by: _____ Score: _____

* anything less than 100% requires remediation. Issued 1/13



ZERO TOLERANCE ALLEGATIONS TRAINING

Boundaries, Abuse, Neglect, and Exploitation Post-Test

Please answer all 10 questions. Select your answer by circling T (true) or F (false).

- T or F 1. Acadia provides Zero Tolerance Allegations Training to educate facility staff about not entering into any type of sexual or romantic relationship with facility patients/residents/clients, which is strictly prohibited.
- T or F 2. According to Zero Tolerance Allegations Training, facility staff members may contact a facility patient/resident/client through social media (Facebook, Twitter, Instagram, Snapchat, etc.).
- T or F 3. Acadia's liability insurance will cover a facility employee who was found guilty of sexual misconduct with a patient/resident/client.
- T or F 4. It is okay to withhold a snack from a patient/resident/client as punishment for poor behavior or for not following rules.
- T or F 5. When a facility staff member does not conduct patient safety observation checks as ordered by a physician, and as expected per policy, then it is considered neglect.
- T or F 6. Acadia's Zero Tolerance Allegations Training educates on boundary/abuse policies which only applies to facility staff members who provide direct care to patients/residents/clients. Non-direct care staff are excluded from abiding by facility boundary/abuse policies.
- T or F 7. A therapeutic relationship with a patient/resident/client is the same as having a personal relationship with them.
- T or F 8. I have a responsibility to report any activity by an employee, physician, board member, contractor, or a vendor who appears to violate boundary/abuse policies.
- T or F 9. It is okay for a facility staff member to accept a \$50 gift card from the family of a patient/resident/client who wants to show appreciation for the care provided.
- T or F 10. If a facility patient/resident/client or visitor asks a facility staff member for his/her personal phone number, or contacts a facility staff member through social media, then the facility staff member should report that to a supervisor immediately.

Signature: _____ Print Name: _____ Date: _____

Facility Name: _____ City/St: _____ Job Title: _____

Reviewer's Signature: _____ Print Name: _____ Date: _____

This pass/fail test is required to be passed with a 100% score. Reviewer's signature validates that this test's score is 100%.

COVID-19 Update

Created by Kimberly Tomas, Infection Preventionist
Pacific Grove Hospital
May 4, 2020

Disclosure

- Information in this presentation supersedes all prior information provided that may conflict
- Information provided in this presentation is up-to-date as of May 4th, 2020
- More updated information will be provided via email
- Thank you for being patient as news constantly evolves during this pandemic

Learning Objectives

- After completing this presentation, you will be able to:
 - Describe standard and transmission-based precautions
 - List the strategies Pacific Grove Hospital is implementing to reduce the spread of COVID-19
 - Describe the procedures of possible exposure
 - List how to take care of yourself in home-isolation or home-quarantine
 - Describe the requirements for returning to work

3

COVID-19 Background

- COVID-19 is a pandemic respiratory disease spreading from person-to-person caused by a novel (new) coronavirus. The virus that causes COVID-19 is infecting people and spreading easily from person-to-person. On March 11, the COVID-19 outbreak was characterized as a pandemic by the WHO.
- Symptoms include: dry cough, shortness of breath or any two of the following: fever, chills, shaking with chills, muscle pain, headache, new loss of taste/smell, sore throat
 - Other reported (less common) symptoms include: fatigue, diarrhea
- COVID-19 has affected millions worldwide—currently there are over 2.4 million cases and 169,000 deaths.
- In the United States alone, there are close to 750,000 cases and over 35,000 deaths as of April 20th.
 - Riverside County has over 2,800 confirmed cases (236 hospitalized, 76 in the ICU), 85 deaths, and 700 recovered as of April 20th.

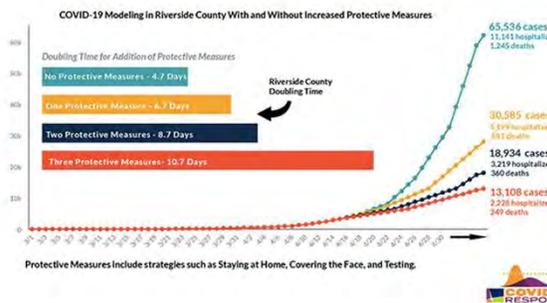
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Riverside County Projections—more protective measures means more time in between new cases

Numbers have and will continue to adjust as resources and change

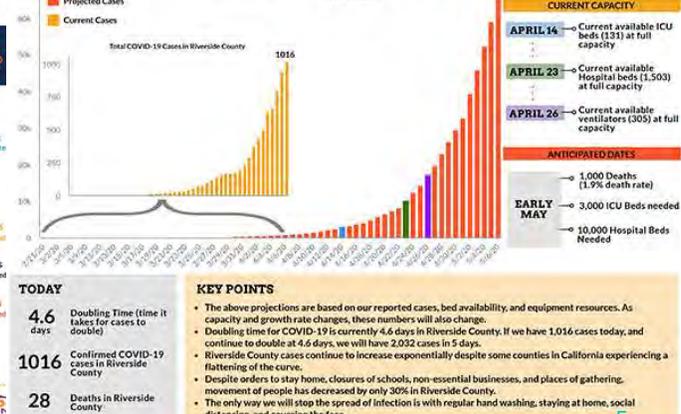
How Protective Measures Can "Flatten the Curve" for COVID-19

April 14th, 2020



COVID-19 Projections in Riverside County

April 7, 2020



To protect healthcare workers providing care to our communities, we implement precautions...

Standard Precautions

Standard Precautions

- applies to ALL Patients
- Designed to protect the healthcare worker from exposure to blood-borne pathogens
- Previously called Universal Precautions
- Consists of:
 - Wearing barriers such as gloves when handling bodily fluids
 - Hand Hygiene before and after contact with patient or patient environment
- When Standard Precautions is not enough to block the route of transmission we add additional precautions...

Transmission-based Precautions: Contact

○ Contact

- MRSA, VRE, C.diff, MDR, infestations as well as any infection where there is purulent drainage. All drainage must be contained within a dressing for a patient to be permitted in milieu, group or have cafeteria privileges. All patients with infected wounds must be in a private room. COVID-19 with Droplet precautions.
- Consists of:
 - Gown
 - Gloves
 - Hand Hygiene before and after contact with patient or patient environment (e.g., medical equipment, environmental surfaces)



7

Transmission-based Precautions: Droplet

○ Droplet

- are designed to prevent or reduce transmission of microorganisms by droplets (sneezing, coughing, spitting, talking)
- Consists of:
 - surgical mask
 - Hand hygiene before donning and after donning PPE
- Influenza, COVID-19 (with contact precautions)
- **Airborne** –gloves, N-95 respirator (Pacific Grove does not implement this precaution because we do not have airborne infection isolation rooms (AIIR) as characterized by negative pressure rooms)



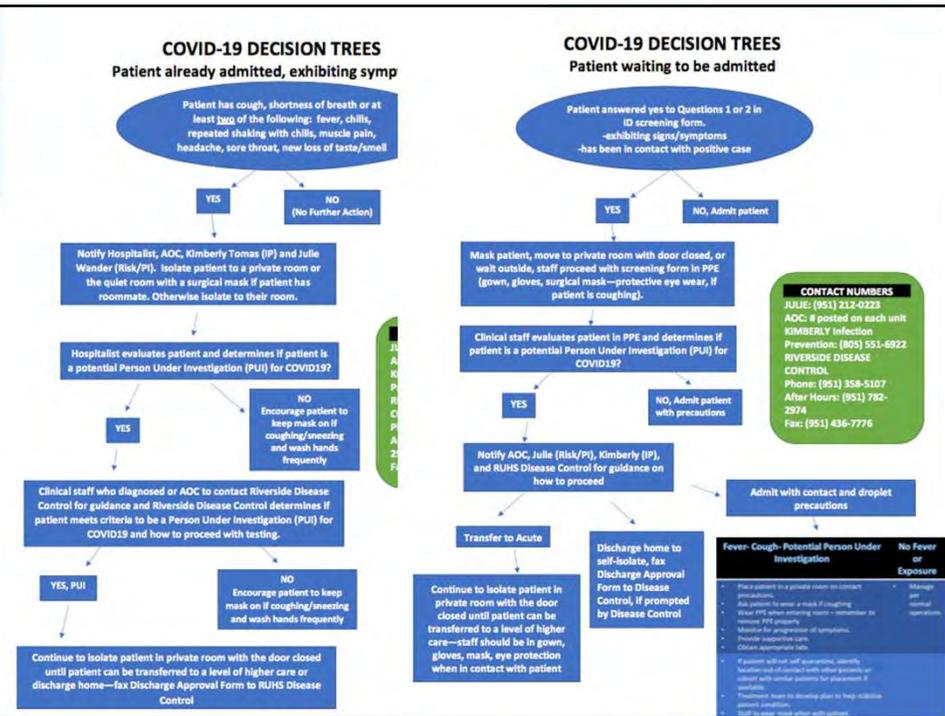
Protective Measures

- In the following slides, we will review the strategies that Pacific Grove Hospital is following to best prevent the spread of COVID-19 in our facility.
 - Screening Procedures
 - Social Distancing
 - Hand Hygiene
 - Cleaning and Disinfection
 - PPE use

Strategies—Screening

Pacific Grove Hospital has implemented the following screening precautions:

- Temperature screening (for all patients and staff)
- Restricting visitors
- Procedures in place to transfer patients exhibiting symptoms
- Signage with pertinent information

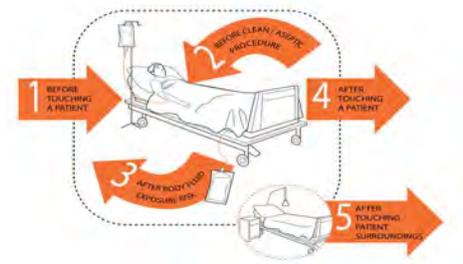


Strategies— Social Distancing



- COVID-19 is mainly spread through respiratory droplets that are released when someone coughs, sneezes, spits, or talks.
- Maintaining 6 feet between you and others will prevent those droplets from landing on you.
 - Hand hygiene will prevent you from being affected by contaminated surfaces.
- Pacific Grove Hospital has set up the lobby and group rooms so individuals can maintain 6 feet.
- If social distancing is not possible, remember to **practice hand hygiene** as often as possible, **keep your mask on correctly**, and **practice respiratory hygiene**
 - Respiratory hygiene or respiratory cough etiquette means wearing a mask if you are coughing, and sneezing or coughing into a tissue, throwing it away, and performing hand hygiene
- *we are still working on improving these measures, please feel free to send me any suggestions 11

Strategies— Hand Hygiene



- The best way to prevent infection!
- Use at least 60% Alcohol-based hand sanitizer, get a generous/full amount, rub all surfaces of your hands until dry
 - When your hands are not visibly soiled
 - Before and after touching a patient/patient's environment
 - Before putting on gloves/after removing gloves
 - Prior to a clean, aseptic procedure (e.g. giving an injection)
 - After contact with blood, body fluids or contaminated surfaces
- Wash with soap and water for at least 20 seconds
 - When your hands are visibly soiled
 - After using the bathroom
 - After eating

12

Strategies—Cleaning and Disinfection



- Cleaning and disinfecting our workspaces and "high touch" areas is an important part of infection prevention
- Staff should clean and disinfect their workspaces and any "high touch" areas around them (such as door knobs, push bars, light switches, etc.) at least three times per shift.

CLEANING VERSUS DISINFECTING

- **Cleaning**
 - Removal of dirt and impurities, including germs, from surfaces.
 - Does not kill germs.
 - Removal of the germs stops the spread of infection
- **Disinfecting**
 - Use of chemicals to kill germs on surfaces.
 - Does not always clean the surface or remove the germs.
 - Killing the germs prevents the spread of infection.



- We are in an "all hands on deck" situation: Non-clinical staff may be cross-trained to provide coverage for EVS

EVS SKILLS CHECKLIST (Emergency Operations: Non-clinical staff)			
Date of Evaluation: _____ Name: _____			
<input type="checkbox"/> EVS staff <input type="checkbox"/> BSA <input type="checkbox"/> Other: _____ Date of Hire: _____			
EVALUATOR: Initial and Check the Method of Evaluation and Score 1 = Proficient, 2 = In need of additional training/Supervision			
Competency	Method of Evaluation	Score	Comments
Preparation-All Programs	<input type="checkbox"/> Observation <input type="checkbox"/> Exam	1, 2	
• Able to recognize when hand hygiene is performed and demonstrate proper hand hygiene technique	<input type="checkbox"/> Observation <input type="checkbox"/> Dual Evaluation <input type="checkbox"/> Self-Demo	1, 2	
• Able to recognize appropriate PPE for the task being performed (gloves, gown, face shield)	<input type="checkbox"/> Observation <input type="checkbox"/> Exam	1, 2	
• Able to describe appropriate knowledge of a. Standard and universal precautions b. Bloodborne and other body fluids c. Waste removal and storage	<input type="checkbox"/> Observation <input type="checkbox"/> Dual Evaluation <input type="checkbox"/> Self-Demo	1, 2	
• Demonstrate correct technique of cleaning	<input type="checkbox"/> Observation <input type="checkbox"/> Exam	1, 2	
• Demonstrate correct technique of cleaning a. Floors b. Walls c. Counters and Casework d. Stairs	<input type="checkbox"/> Observation <input type="checkbox"/> Dual Evaluation <input type="checkbox"/> Self-Demo	1, 2	
• Demonstrate correct technique of cleaning a. Patient rooms b. Exam rooms c. Light fixtures d. Trolleys e. Staircases	<input type="checkbox"/> Observation <input type="checkbox"/> Exam <input type="checkbox"/> Dual Evaluation <input type="checkbox"/> Self-Demo	1, 2	
• Demonstrate correct technique of cleaning a. Patient rooms b. Exam rooms c. Staircases	<input type="checkbox"/> Observation <input type="checkbox"/> Exam <input type="checkbox"/> Dual Evaluation <input type="checkbox"/> Self-Demo	1, 2	
• Demonstrate correct technique of cleaning a. Patient rooms b. Exam rooms c. Staircases	<input type="checkbox"/> Observation <input type="checkbox"/> Exam <input type="checkbox"/> Dual Evaluation <input type="checkbox"/> Self-Demo	1, 2	
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• Demonstrate correct technique of cleaning a. Patient rooms b. Exam rooms c. Staircases	<input type="checkbox"/> Observation <input type="checkbox"/> Exam <input type="checkbox"/> Dual Evaluation <input type="checkbox"/> Self-Demo	1, 2	

Strategies—Mask Use and PPE

- On April 6th, 2020 Riverside County issued a Public Health Order requiring everyone to wear a face covering when leaving their home—this includes Essential Workers.
- This means that all staff must wear a homemade mask or surgical mask at all times when working
- Cloth masks must be a similar shape as a surgical mask and must not have any inappropriate paraphernalia.

HOW TO PUT ON, USE, TAKE OFF AND DISPOSE OF A MASK

WHEN TO USE A MASK

Masks are effective only when used in combination with frequent hand-cleaning with alcohol-based hand rub or soap and water

If you wear a mask then you must know how to use it and dispose of it properly

HOW TO PUT ON, USE, TAKE OFF AND DISPOSE OF A MASK

Before putting on a mask, clean hands with alcohol-based hand rub or soap and water

HOW TO PUT ON, USE, TAKE OFF AND DISPOSE OF A MASK

Cover mouth and nose with mask and make sure there are no gaps between your face and the mask

HOW TO PUT ON, USE, TAKE OFF AND DISPOSE OF A MASK

Avoid touching the mask while using it; if you do, clean your hands with alcohol-based hand rub or soap and water

HOW TO PUT ON, USE, TAKE OFF AND DISPOSE OF A MASK

Replace the mask with a new one as soon as it is damp and do not re-use single-use masks

HOW TO PUT ON, USE, TAKE OFF AND DISPOSE OF A MASK

To remove the mask: remove it from behind (do not touch the front of mask); discard immediately in a closed bin; clean hands with alcohol-based hand rub or soap and water

PPE Donning/Doffing

Donning

- 1) Gown
- 2) Mask
- 3) Goggles or Face Shield
- 4) Gloves
- 5) Hand hygiene

Doffing

- 1) Gown and gloves (at the same time)
- 2) Goggles or Face Shield
- 3) Mask
- 4) Hand Hygiene

- While the risk of caring for a confirmed COVID-positive patient is low at PGH, precautions must be taken with our patient population and the public. Standard precautions apply to all patients. If a patient is coughing, sneezing, or spitting while talking, mask them right away.
- Wear proper PPE when interacting with symptomatic patients (mask, gloves if possible exposure to blood-borne pathogens) 15

What to do if exposed

- Alert your supervisor
- 14-day quarantine if no PPE on source patient nor yourself
- OR you can work with a mask on at all times, if source patient and you were wearing masks at point of exposure
- Self-monitor for symptoms
 - Take note of any changes in your health
 - Twice daily temperature checks
 - When in doubt, talk to your healthcare provider
 - Testing open to all Riverside County residents. Call 800-945-6171 for an appointment
- If any symptoms appear or you test positive for COVID-19, you must be excluded from work and follow home-isolation protocols

16

Home Care

- [Links for home-isolation:](#)
- [Instructions for Home-Isolation](#)
- [Instructions for 14-day Home Quarantine](#)
- [CDC Guidance for steps when you are sick](#)

10 things you can do to manage your COVID-19 symptoms at home

If you have possible or confirmed COVID-19:

1. **Stay home** from work and school. And stay away from other public places. If you must go out, avoid using any kind of public transportation, ridesharing, or taxis. 
2. **Monitor your symptoms** carefully. If your symptoms get worse, call your healthcare provider immediately. 
3. **Get rest and stay hydrated.** 
4. If you have a medical appointment, call the healthcare provider ahead of time and tell them that you have or may have COVID-19. 
5. For medical emergencies, call 911 and notify the dispatch personnel that you have or may have COVID-19. 
6. **Cover your cough and sneezes.** 
7. **Wash your hands often** with soap and water for at least 20 seconds or clean your hands with an alcohol-based hand sanitizer that contains at least 60% alcohol. 
8. As much as possible, **stay in a specific room and away from other people** in your home. Also, you should use a separate bathroom, if available. If you need to be around other people in or outside of the home, wear a facemask. 
9. **Avoid sharing personal items** with other people in your household, like dishes, towels, and bedding. 
10. **Clean all surfaces** that are touched often, like counters, tabletops, and doorknobs. Use household cleaning sprays or wipes according to the label instructions. 



[cdc.gov/coronavirus](https://www.cdc.gov/coronavirus)

Return to Work Guidance

- Three methods to determine when individuals may discontinue home isolation:
- Symptom-based strategy
 - At least **3 days (72 hours)** have passed since no fever (without the use of fever-reducing medications)
 - AND improvement in respiratory symptoms (cough, shortness of breath)
 - AND at least **10 days** have passed since **symptoms first appeared**
- Test-based strategy
 - Afebrile **for 72 hours** without the use of fever-reducing medications (same as above)
 - AND substantial improvement or complete resolution in respiratory symptoms **for at least 72 hours**
 - AND at least **10 days** have passed since **last positive test**
- Time-based strategy (asymptomatic).
 - **10 days** have passed since the **date of their first positive COVID-19** diagnostic test assuming they have not subsequently developed symptoms since their positive test. If they develop symptoms, then the symptom-based or test-based strategy should be used. .
- Staff must be cleared to return to work by Riverside County Public Health Call **(951) 955-9099**

Novel Coronavirus COVID-19 Testing

Riverside County is offering COVID-19 testing at the following locations:

Blythe: Colorado River Fairgrounds (591 Olive Lake Blvd, Blythe, 92225)
*April 22-26 only -- 8 a.m. to 3 p.m.

Indio: Indio Fairgrounds (46350 Arabia Street, Indio, 92201)
Sunday through Thursday -- 6:30 a.m. to 1 p.m.

Lake Elsinore: The Diamond (500 Diamond Drive, Lake Elsinore, 92530)
Sunday through Thursday -- 9:30 a.m. to 3 p.m.

*Individuals with symptoms may make appointments for the Lake Elsinore site at www.projectbaseline.com/study/covid-19. Asymptomatic individuals may call the appointment line below.

Perris: Southern California Fair (18700 Lake Perris Drive, Perris, 92571)
Tuesday through Saturday -- 9 a.m. to 3 p.m.

Riverside: Harvest Community Church (6115 Arlington Ave., Riverside, 92504)
Tuesday through Saturday 9:30 a.m. to 3 p.m.

Testing is available by appointment only; we are not able to accommodate walk-ins.

Please call 800.945.6171 to schedule an appointment.

Appointments may be made whether or not individuals are experiencing symptoms.

Questions or concerns?

- We always welcome any suggestions to improve our processes. Please feel free to let your supervisor know, or contact me. Anonymous suggestions can be submitted with incident reports.
- Want your questions answered anonymously? Please leave questions with incident report submissions.
- Kimberly Tomas, Infection Preventionist
 - Kimberley.tomas@pacificgrovehospital.com (different spelling)
 - kimberlytomas@shassociates.com
 - (213) 290-5209

19

Resources

- Current Case Counts
 - <https://coronavirus.jhu.edu/us-map>
 - <https://www.rivcoph.org/coronavirus>
- Transmission-based Precautions
 - <https://www.cdc.gov/infectioncontrol/basics/transmission-based-precautions.html>
- Hand Hygiene
 - <https://www.cdc.gov/handhygiene/providers/index.html>
- Cleaning and Disinfection
 - <https://www.cdc.gov/infectioncontrol/basics/transmission-based-precautions.html>
- PPE sequence
 - <https://www.cdc.gov/hai/pdfs/ppe/ppe-sequence.pdf>
 - <https://www.cdc.gov/HAI/pdfs/ppe/ppeposter148.pdf>
- Exposure, Isolation, Quarantine, Return to Work Guidance
 - <https://www.rivcoph.org/Portals/0/Documents/CoronaVirus/April/HealthProviders/Riverside%20County%20Public%20Health%20Local%20Guidance%20for%20Providers%20410.pdf?ver=2020-04-10-134138-240×tamp=1586551347655>
 - <https://www.cdc.gov/coronavirus/2019-ncov/downloads/10Things.pdf>
 - <https://www.cdc.gov/coronavirus/2019-ncov/hcp/guidance-risk-assessment-hcp.html>

20



Code of Conduct

Acadia Healthcare ...

Doing the right thing for the right reason

TABLE OF CONTENTS

INTRODUCTION	3
Conflict of Interest	4
Zero Tolerance Policy	4
Insider Trading	4
Corporate Opportunities	5
Fair Dealing	5
Unauthorized Use of Corporate Funds	5
Antitrust, Unfair Competition and Restraint of Trade	6
Employment Laws and Policies	6
Sanctioned/Excluded Individuals and Entities	7
Laws Concerning the Healthcare Service Industry	7
Anti-Corruption and Anti-Bribery Policies	8
Making False Reports to Government Agencies and Auditors	8
Laws and Policies Concerning Political Contributions	9
Laws Concerning Copyrights and Intellectual Properties	9
Laws Concerning Protection of the Environment	9
Facility Advertising	9
Response to Government Inquiries	9
Confidential Information	10
Giving and Receiving Gifts and Entertainment to Obtain or Retain Business	10
Reporting of Violations	10
Investigation of Violations	10
Discipline for Violations	10
Individual Judgment	11
Amendments and Waivers	11
Conclusion	11

Code of Conduct

Introduction

This Code of Conduct is an integral component of the Acadia Healthcare Compliance Program. Our intent in developing the Code is not only to document Acadia Healthcare's legal and ethical compliance requirements, but also to encourage each of us to regularly think about our actions and the consequences of our behavior in the workplace. We hope in so doing, that we can help promote and develop strong clinical and business leaders who will continue to uphold Acadia Healthcare's commitment to ethics and legal compliance.

Our Code of Conduct and our Compliance Program applies to all Acadia employees, Medical Staff, Board of Governors and Board of Directors members, contractors, subcontractors, agents, and other persons who provide patient and/or patient care items or services or who perform billing or coding functions on behalf of Acadia. The term "we", as used in this Code, is meant to refer collectively to each of these individuals.

While our Code of Conduct is designed to provide overall guidance, it may not address every situation you encounter. As many issues included in the Code of Conduct are broad and complex, more specific guidance may be provided in supplemental Compliance Program Policies and Procedures, as well as in facility Medical Staff by-laws, rules and regulations, Acadia Employee Handbooks and other applicable compliance related agreements or regulations.

This Code of Conduct is intended to promote Acadia Healthcare's commitment to the creation of behavioral health centers where people receive individualized and quality care that enables them to regain hope in a supportive, caring and financially responsible environment. Be alert and sensitive to situations that could result in improper, unethical or illegal conduct. If you have any questions about the information in the Code or any other compliance related questions, you can speak to your supervisor. Or, if you are uncomfortable speaking with your supervisor and / or prefer to discuss the matter with Acadia Healthcare's Chief Compliance Officer, contact the toll-free Compliance Hotline (800-500-0333) which is available to you 24 hours a day, seven days a week. All compliance related communications will be handled in strict confidence within the boundaries of the law. Do not hesitate to ask for assistance as these resources exist to help us meet our compliance obligations. You may also submit concerns to <https://yfcs.alertline.com>

Each Acadia affiliated individual has a personal responsibility for reporting to the Compliance Officer or designated individual, including Corporate Legal, any activity by an employee, physician, board member, contractor or a vendor that appears to violate applicable laws, rules, regulations or our Code of Conduct.

Conflict of Interest

A “conflict of interest” exists when a person’s private interest interferes, or appears to interfere, in any way with the interests of the Company. A conflict situation can arise when an employee, officer or director takes actions or has interests that may make it difficult to perform his or her Company work objectively and effectively. Conflicts of interest may also arise when an employee, officer or director, or members of his or her family, receives improper personal benefits as a result of his or her position in the Company. Loans to, or guarantees of obligations of, employees and their family members may create conflicts of interest.

It may be a potential conflict of interest for a Company employee to work simultaneously for a competitor, customer or supplier. You are not allowed to work for a competitor as a consultant or board member. The best policy is to avoid any direct or indirect business connection with our customers, suppliers or competitors, except on our behalf. Conflicts of interest are prohibited as a matter of Company policy, except under guidelines approved by the Board of Directors. Conflicts of interest may not always be clear-cut, so if you have a question, you should consult with facility management or the, company management, or the company’s Legal Department. Any employee, officer or director who becomes aware of a conflict or potential conflict should bring it to the attention of a supervisor, manager or other appropriate personnel. In addition, to the extent any conflict of interest situation exists or arises, each Acadia employee and director should disclose the conflict to the Legal Department and to the Chief Compliance Officer.

Some examples of possible Conflicts of Interest include:

- Awarding business to a consultant or entity owned or controlled by a family member;
- Owning (or possessing a significant ownership interest in) an entity which is a competitor or supplier of Acadia;
- Providing charitable contributions to entities where an employee or family member has an interest;
- Receiving loans or guarantees of an obligation from a customer or vendor;
- Accepting a gift that influences a decision with respect to a specific vendor or customer; and
- Using Acadia resources for personal business or gain.

Patient Abuse: Zero Tolerance Policy

Acadia has and strictly enforces a Zero Tolerance policy prohibiting resident or patient physical or emotional abuse including but not limited verbal or physical abuse, use of undue force or any type of sexual or romantic relationship with our patients. Each Acadia affiliated individual has a personal responsibility for reporting any activity by an employee, physician, contractor or vendor that appears to violate Acadia’s Zero Tolerance policy.

Insider Trading

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 conduct of our business. All non-public information about the Company or any company with which we do business should be considered confidential information. To use non-public information for personal financial benefit or to “tip” others who might make an investment decision on the basis of this information is not only unethical but also illegal. In order to assist with compliance with laws against insider trading, the Company has adopted a specific policy governing employees’ trading in securities of the Company. This

policy has been distributed to every employee. If you have any questions, please consult the Company's Legal Department.

Corporate Opportunities

Employees, officers and directors owe a duty to Acadia to advance the Company's business objectives when the opportunity to do so arises. In connection with this duty, Acadia's employees, officers and directors may not:

- Take for themselves, directly or indirectly, any business opportunity that would interest or likely interest the Company, or that is discovered through the use of corporate property, information or position, unless the Company has already been offered the opportunity and turned it down;
- Use Company assets (including without limitation equipment, funds, facilities, knowhow, or personnel) or their position with the Company for personal gain; or
- Knowingly compete with Acadia in acquiring or selling any asset or property (whether tangible or intangible) or otherwise interfere in the Company's business affairs for the director's, officer's or employee's direct or indirect benefit.

Fair Dealing

Acadia is committed to conducting its business affairs in a fair, ethical and legal manner, and expects its employees, officers and directors to do the same. Each employee, officer and director should strive to deal fairly with Acadia's customers, suppliers, service providers, competitors and employees.

Stealing proprietary information, possessing trade secret information that was obtained without the Company's consent, or inducing such disclosures by past or present employees of other companies is prohibited. No employee, officer or director should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any unfair dealing practice.

Unauthorized Use of Corporate Funds and Assets

Acadia's employees and directors are strictly prohibited from using any Company assets or property for any unlawful or improper purpose. In this regard, Acadia's policy is to solicit and obtain business only through sales and marketing programs that have been formally approved by the Company. No employee is permitted to give any unauthorized gifts, discounts, rebates, concessions, commissions or incentives, bribes or other payments, to obtain or retain business or to accomplish any otherwise legitimate Acadia business purpose. The books and records of Acadia must be accurate and complete to properly document the transactions of the Company. Accordingly:

- No false or misleading entries shall be made in Acadia's books and records for any reason, and no employee shall engage in any activity that results in such prohibited act.
- No undisclosed or unrecorded fund or asset of the Company shall be established for any purpose.
- No payment on behalf of the Company shall be approved or made with the intention or understanding that any part of such payment is to be used for any purpose other than that described by the documents or entries supporting the payment.
- The recording of any transaction will not be delayed.

Any employee having information or knowledge of any unrecorded fund or asset or any prohibited act shall promptly report such matter to the Chief Financial Officer, the Legal Department or the

confidential hotline. All managers shall be responsible for the enforcement of this policy and shall ensure that all employees in their department are aware of and comply with this policy.

Antitrust, Unfair Competition and Restraint of Trade

Acadia is committed to free and open competition in the marketplace and requires its employees to strictly adhere to the antitrust, unfair competition and related laws of the United States and other countries in which the Company does business. No employee should ever assume that the Company's interest ever requires any other course of conduct.

Antitrust laws are complex and difficult to interpret. These laws apply to a wide range of business activities. Although not exhaustive, the following examples provide a general guide to antitrust compliance:

- No employee, officer or director shall discuss with or provide information to any competitor about pricing or related matters, whether such information concerns the Company or the Company's suppliers, distributors, wholesalers or customers.
- No employee, officer or director shall gather any information on competitors through deception, theft or any other illegal or unethical means.
- No employee, officer or director shall participate in any conduct, agreement or understanding (including agreements based on a course of conduct) with a competitor of Acadia or anyone else to illegally fix prices, agree to labor costs, allocate markets, engage in group boycotts, abuse privileged information or engage in any unfair practice.
- No employee, officer or director shall publish advertising or promotional claims which are not fair, balanced and accurate or which are not supported by appropriate studies or data.

Employees, officers and directors are encouraged to contact the Legal Department if they have any concerns with respect to potential antitrust violations or unfair competition practices.

Employment Laws and Policies

Acadia has established numerous policies mandating compliance with applicable employment laws in order to provide a workplace free from improper discrimination, harassment or disruptive behavior. This section provides a summary of the Company's policies relating to discrimination, harassment, and disruptive behavior, all of which are prohibited. If you have questions concerning these or other employee policies, please contact the Human Resources Department. Acadia makes all employment decisions without regard to race, creed, color, religion, national origin, sex, age, physical or mental disability unrelated to an individual's ability to perform essential functions of a particular job, status as a Vietnam veteran or qualified disabled veteran, or any other characteristic protected under the law. This policy applies to all employment practices and personnel actions at the Company, including but not limited to hiring, promotion, transfer, compensation, participation in training or educational activities or programs, discipline and termination.

No form of harassment, whether physical, verbal or visual, will be tolerated. Examples include degrading or humiliating jokes, slurs, and intimidation, verbal or physical conduct of a sexual nature that interferes with work performance or creates an intimidating, hostile, or offensive work environment. Disruptive behaviors may also include actions such as verbal outburst and physical threats, refusing to perform assigned tasks or exhibiting uncooperative attitudes, or other oppositional behaviors.

If you become aware of any form of discrimination , harassment or other disruptive behaviors that violate these or other employment policies, you should bring the matter to the immediate attention of your supervisor or, if involving the supervisor would be inappropriate for any reason, to the immediate attention of the Human Resources Department, the Legal Department, or the confidential hotline.

Sanctioned / Excluded Individuals and Entities

Many of the services we provide are paid for by the federal government or state agencies. Individuals and/or entities may be debarred or suspended from participating in federal or state programs for various reasons including inappropriate use of federal or state funds. We will not knowingly employ or contract with any individual or business which is debarred or suspended from participating in the applicable program. We take proactive steps to check the federal and state governments' lists of excluded and debarred individuals to ensure that no employee, medical staff member, vendor or member of any related Acadia Healthcare Board of Governors or Boards of Trustees have been placed on any applicable exclusion list. All individuals seeking positions with Acadia as employees or contractors have a duty to inform Acadia of any change in their eligibility to participate in government programs. Consultants and contractors must be eligible to contract with Acadia, and must operate in accordance with our Code of Conduct.

Laws Concerning the Health Care Services Industry

Numerous federal, state and local laws and regulations regulate the health care services industry. These laws are intended to protect the health and safety of our customers and relate to, among other things: billing practices and prices for services; relationships with psychiatrists, physicians and other referral sources ; necessity and quality of medical care; condition and adequacy of Acadia's facilities; qualifications of Acadia's medical and support personnel; confidentiality, maintenance and security issues associated with health-related information and personal information and medical records; the screening, stabilization and/or transfer of patients who have emergency medical conditions; certification, licensure and accreditation of Acadia's facilities; operating policies and procedures; activities regarding competitors; and the addition and expansion of Acadia's facilities and services.

Among these laws are the Anti-Kickback Statute, the Stark Law, the federal False Claims Act and similar state laws. These laws impact the relationships that Acadia may have with psychiatrists, physicians and other referral services.

Violations of these laws may result in severe penalties against the responsible employees and Acadia, including criminal and civil penalties. These penalties may include the loss of Acadia's licenses to operate one or more facilities and exclusion of one or more of Acadia's facilities from participation in the Medicare, Medicaid and other federal and state health care programs.

Although not exhaustive, the following examples provide a general guide to health care compliance:

- No employee, officer or director shall disclose confidential information pertaining to Acadia facility patients without the express written consent of the patient and in accordance with applicable law and Acadia applicable policies and procedures.
- Employees, officers or directors shall only submit for payment or reimbursement claims for services actually rendered and evidenced by an accurate and legible note in a patient's medical record. In no event shall any employee, officer or director participate in any false billing of patients, government entities or any other parties.

- No employee, officer or director shall employ or contract with any individual or entity who is listed by any state or federal agency as being sanctioned, debarred or otherwise ineligible to participate in applicable state or federally funded health care programs.
- No employee, officer or director shall engage in any business practice intended to unlawfully obtain favorable treatment or business from any government entity, psychiatrist, physician, other referral source, patient, vendor or any other party in a position to provide such treatment or business.
- Except as permitted by applicable law, no employee, officer or director shall directly or indirectly solicit, receive, offer or pay money or other remuneration to other individuals or entities in return for using, referring, ordering, recommending or arranging for such referrals or orders of services or other items covered by a federal or state health care program.

The laws and regulations governing the health care services industry are extremely complex. Therefore, employees are to immediately report any suspected violation of such laws to the Legal Department or the confidential hotline.

Anti-Corruption and Anti-Bribery Policies

Federal law specifically prohibits the making of any offer, promise, payment or gift of any value to any Government Official (as defined below), directly or indirectly. Federal law also prohibits giving gifts to any union official or employee in order to influence his or her decisions. Many states and foreign countries have similar laws prohibiting such gifts. Acadia's policy is that every Acadia employee, officer and director must comply fully with these and all applicable laws.

The term "Government Official" is broadly construed and includes officials, employees and all persons, in the United States, any other country or any other political division or subdivision of any nation, employed, or are to be employed in any official public law capacity or are employed by any public authority or in any department on behalf of which they are required to place public orders regardless of the organizational form adopted for the purpose of carrying out such activities, or who perform duties on behalf of any such official administration, or act as official representatives of or on behalf of a political party or an international organization. Acadia employees are required to conduct all Acadia business in a lawful and ethical manner and in accordance with current laws and regulations, including the American law on the Prevention of International Corruption, namely the Foreign Corrupt Practices Act of 1977 (the "FCPA").

Under the FCPA it is forbidden to make, promise or to approve unlawful payments and also to furnish a Government Official with any advantage with the intention of inducing the Government Official in question to undertake an official action or to take an official decision in order to help a company to obtain or to retain an order. It is further forbidden under the FCPA for any company or person to use another company or person for the purpose of carrying out any such activities. As a US corporation, Acadia is obliged to observe the FCPA and could even be held responsible for the commercial activities of third parties (referred to "business partners") acting on Acadia's behalf or in connection with Acadia's activities anywhere in the world. Acadia requires all its business partners to conduct all business related to Acadia activities in accordance with these principles.

Making False Reports to Government Agencies and Auditors

Federal law prohibits making any false, fictitious or fraudulent statement or report to any federal governmental agency. Hiding or concealing any material fact that would make a statement or report

misleading by its omission is also illegal. Many states have enacted similar laws. In addition, Acadia's internal and external auditors gather information that may be reported to federal or state agencies or disclosed in accordance with federal or state law. Acadia requires that all information provided on its behalf to any governmental agency or by any employee to any internal or external auditor be true and complete (to the best of the Company's knowledge) in all material respects at the time provided.

Laws and Policies Concerning Political 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 co-workers 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.

Laws Concerning Copyrights and Intellectual Property

Federal law prohibits unauthorized duplication or copying of any copyrighted material, including copyrighted computer software, periodicals and books. Unauthorized duplication of copyrighted materials can result in severe penalties to individuals and the Company, and is prohibited. In addition, no Acadia employee, officer or director shall knowingly infringe any intellectual property rights of third parties.

Laws Concerning Protection of the Environment

As a responsible member of our community, Acadia believes it is important to maintain a safe environment. Each employee is responsible for ensuring that all waste products, hazardous materials and other regulated items are stored, handled and disposed of in compliance with applicable laws and regulations. Employees are to immediately report any unsafe storage or improper disposal or release of a hazardous or toxic substance to their supervisor or department head and to the environmental compliance officer responsible for the facility.

Facility Advertising

Acadia's policy is to advertise and promote its facilities and services only through programs and materials that have been formally approved by the Company. All such programs and materials are reviewed by appropriate Acadia personnel to ensure compliance with applicable state and federal laws and regulations. Unauthorized alteration of promotional brochures or other literature may result in severe penalties against the responsible individual and the Company. No Acadia employee should modify any portion of any promotional brochure or other literature, without prior authorization from the by appropriate Acadia personnel responsible for the advertisement. Use of any unapproved, false or misleading promotional materials or advertisements is strictly prohibited.

Response to Government Inquiries

Various external organizations may contact individuals associated with Acadia to initiate a compliance-related inquiry. We will comply with lawful and reasonable requests or demands made as part of a government inquiries. At the same time, it is imperative that we protect the rights of Acadia and its personnel. Both Acadia and its employees have the right to be represented by legal counsel during any government inquiry. That means that Acadia employees have the right to have an attorney present during questioning, whether that questioning occurs at work or away from work. Any individual who

receives an inquiry, visit, subpoena or other legal document from a government agency, at work or at home, regarding Acadia business shall immediately notify his or her supervisor or Corporate Legal.

Confidential Information

A fundamental responsibility of every employee, officer and director of Acadia is to maintain the confidentiality of the Company's nonpublic information, as well as nonpublic information of outside parties (e.g., customers, suppliers, business partners, etc.) that may be received in confidence during the course of employment with the Company. The commitment to maintain the confidentiality of nonpublic information continues in force at all times during and after employment with the Company (whether such termination is voluntary or involuntary).

Giving and Receiving Gifts and Entertainment to Obtain or Retain Business

All gifts, including entertainment, whether given or received, must comply with normally accepted business practices and Acadia's policies. All gifts and entertainment must be of nominal value and designed to promote business good will, not to gain any special advantage in a business relationship. Any gifts that compromise, or appear to compromise, Acadia's ability to make objective business decisions are inappropriate. This policy applies to anything given or received as a result of a business relationship for which the recipient does not pay fair market value. This standard of conduct is not intended to prohibit normal business practices such as providing meals, entertainment, tickets to cultural or sporting events or promotional gifts, as long as they are of nominal and reasonable value under the circumstances. Even gifts of nominal value may be improper if given or received frequently.

Reporting of Violations

Acadia expects all employees to report suspect or questionable conduct to the Compliance Officer or person designated by the Compliance Officer to handle such matters. Reports can be made anonymously by calling the Compliance Hotline. Because failure to report misconduct can be viewed as misconduct itself, we strongly encourage the immediate reporting of action that is questionable. Failure to do so may result in disciplinary action against those who fail to report. Any manager or supervisor who receives a report of a potential violation must likewise immediately contact the Compliance Officer. There will be no retribution for those who report misconduct in good faith, and the identity of the employee making the report will be kept confidential, to the extent possible. If a law conflicts with a policy in this Code of Conduct, you must comply with the law. No manager or supervisor has authority to instruct you to disobey the law or any Company policy,

Investigation of Violations

All reported violations of the Code of Conduct, hospital policies or applicable laws will be investigated in a timely manner. Employees are required to cooperate in the investigation of an alleged violation and will be disciplined for not cooperating in any such investigation.

Discipline for Violations

Disciplinary actions may be taken for involvement in any way, in actions that violate the Code of Conduct, hospital policies or prevailing laws; failure to report any violation or to cooperate in any investigation; failure to detect or purposefully overlooking violations of other; or retaliation against anyone who reports possible or actual violations.

Disciplinary action may include dismissal, although principles of fairness will apply, including the availability of hearings and other appeal processes established in our policies.

Individual Judgment

Employees are often faced with making critical decisions based on activities in the workplace. Remember to always use good judgment and common sense. If anything within the Code of Conduct goes against your own good judgment, you are encouraged to discuss it with your supervisor or with the Compliance Officer.

Acadia requires that all employees be provided with or have access to their own copy of the Code of Conduct and that they read and sign an acknowledgment form that they have received, read and understand the content and requirements. From time to time, these codes will be updated and employees will receive updated versions and be asked to sign new acknowledgment forms.

Amendments and Waivers

This Code of Conduct may be amended at any time without prior notice. From time to time, the Company may waive certain provisions of this Code of Conduct. Any employee, officer or director who believes that a waiver may be called for should discuss the matter with the General Counsel of the Company. Waivers for directors or executive officers of the Company, including, but not limited to the Chief Executive Officer or the Chief Financial Officer may be made only by the Board of Directors or the Audit Committee of the Board of Directors.

In Conclusion

We, as employees of Acadia Healthcare, are often faced with making critical decisions based on activities in the workplace. Remember, to always use good judgment and common sense. If anything with this Code of Conduct goes against your own good judgment, you are encouraged to discuss it with your supervisor, hospital CEO or with the Compliance Officer.

If you are faced with a situation in which you are unsure of the appropriate course of conduct, ask yourself the following questions:

- IS IT LEGAL?
- IS IT ETHICAL?
- IS IT THE RIGHT THING TO DO?

IF THE ANSWER IS NO TO ANY OF THE ABOVE, DO NOT DO IT. IF YOU ARE NOT SURE, THEN ASK AND KEEP ASKING UNTIL YOU GET AN ANSWER.

Acadia Healthcare...Doing the right thing for the right reason.



ACADIA

H E A L T H C A R E

Zero Tolerance Allegations Training

Boundaries, Abuse, Neglect & Exploitation

Definitions

ZERO TOLERANCE

- The policy and practice of not tolerating undesirable behavior.

BOUNDARIES

- Rules which govern the relationship that a healthcare employee has with a patient.
- A therapeutic relationship is not the same as a social relationship or “friendship.”
- Relate to patients within the scope and practice of your job responsibilities.

ALLEGATIONS

- An accusation or charge of wrongdoing which may be against policy/protocol, and may involve illegal activity.

Zero Tolerance Allegations Training is provided in support of Human Resources policies regarding patient abuse and neglect, and regarding staff-patient boundary violations.

Acadia Healthcare Does Not Tolerate Any Action Which Can Be Construed As Abuse, Neglect, Or Exploitation



ALL Zero Tolerance violation allegations will be investigated.



ANY employee found guilty of a criminal act will be terminated and reported to the identified authorities



Acadia's liability insurance will not cover employees found guilty of sexual misconduct or any abuse of a patient.



ANY employee who fails to report an incident of patient abuse, neglect, or exploitation is subject to disciplinary action.

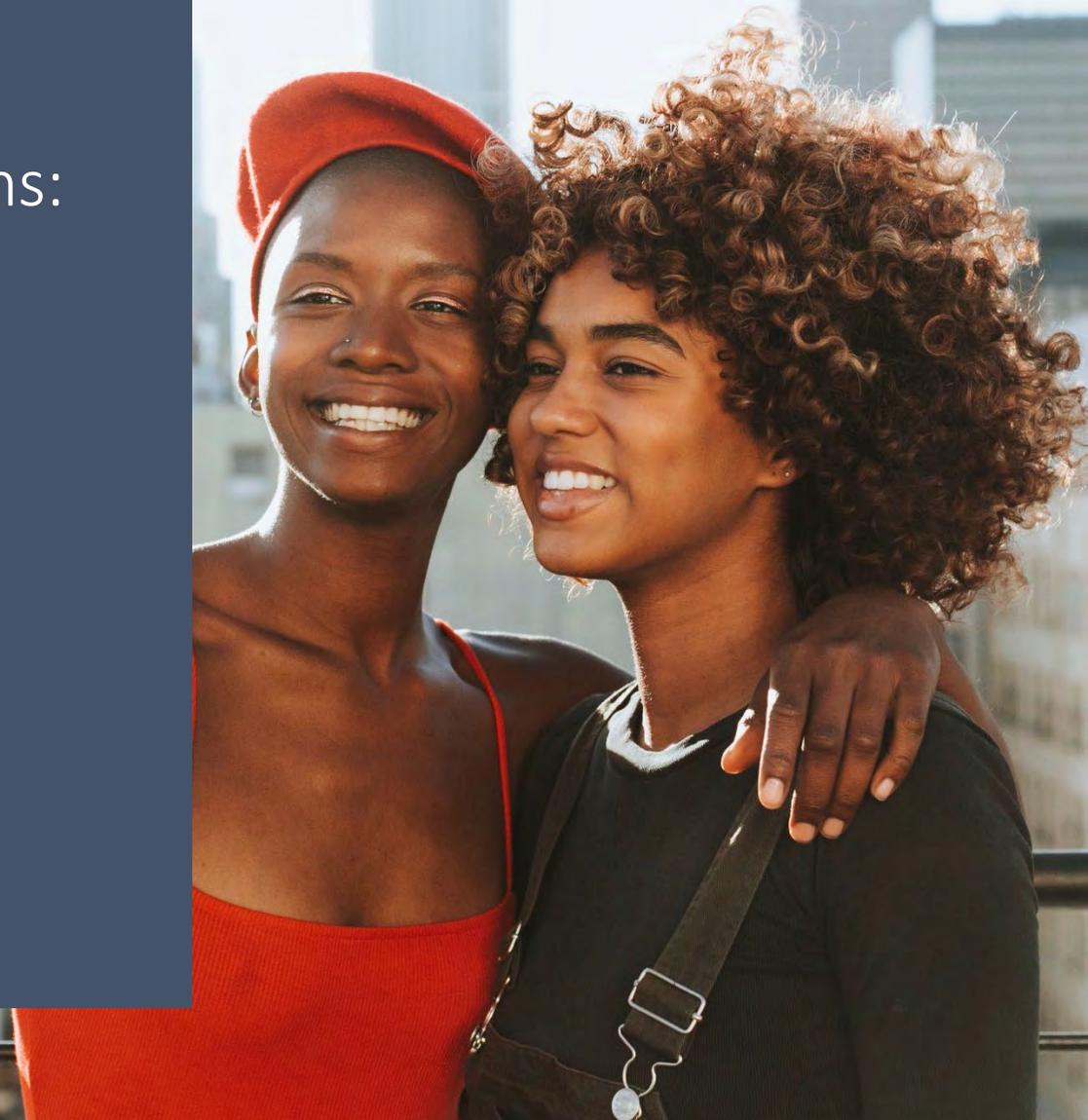
Four Primary Types Of Boundary Violations: Self-Disclosure

- Avoid disclosing unnecessary/non-therapeutic personal information about yourself.
- Telling a patient about your own personal problems or work issues.
- Giving a patient your phone number, address, email, or social media/contact info (Facebook, Snapchat, Twitter, etc.).
- Revealing your personal attraction to a patient (also known as Countertransference).



Four Primary Types Of Boundary Violations: Dual Relationships

- When staff has an existing personal relationship of some kind with the patient outside of treatment programming, especially when that relationship carries emotional or financial power over the patient.
- Staff should never treat their own family members or friends.
- Supervisors should never do “therapy” with subordinates.



Four Primary Types Of Boundary Violations: Becoming Personal Friends

- Having a favorite patient or showing a preference to a certain patient(s).
- Keeping secrets with a patient.
- Business dealings with current or former patients (includes services like plumbing or landscaping, as well as direct marketing selling or purchasing of cosmetics, health/wellness products, jewelry, home/cooking products, etc.).



Four Primary Types Of Boundary Violations: Physical Contact/Touching

- Physical contact should be appropriate to the patient population.
- Physical contact which could be interpreted by the patient as affectionate or sexual must be avoided.

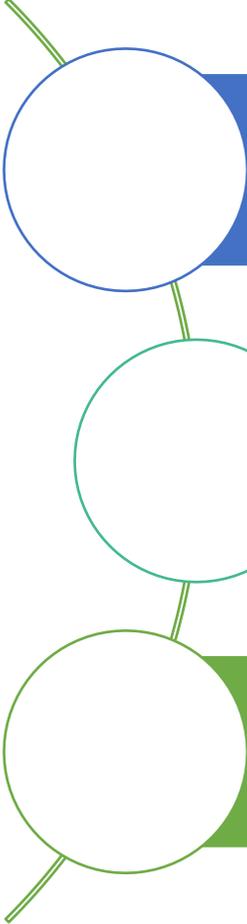


What Is Abuse?

The willful infliction by a caretaker of physical pain or injury, or the willful deprivation of services necessary to the physical safety of an individual.



Mental/Psychological Abuse



Acts that inflict emotional harm, invoke fear and/or humiliate, intimidate, degrade, demean or otherwise negatively impact the mental health or safety of an individual.

Derogatory, threatening, belittling, humiliating, or profane or obscene language toward a patient

Physical intimidation

Verbal Abuse

The use of offensive and/or intimidating language that can provoke or upset an individual.

Cursing/verbally threatening a patient.

Cursing/verbally threatening in front of a patient even if not directed toward the patient.

Verbally criticizing a patient and family.

Physical Abuse

Acts of assault or battery

Pushing, hitting, slapping, or striking a patient

Putting a patient in a restraint or seclusion (lack of freedom) without justification of imminent danger to self or others

Sexual Abuse

Acts of a sexual nature
between patients and
staff

Any sexual activity or
sexualized behavior with
patients is unacceptable
and harmful!!!

There is NO consensual sex between staff and adult patients.

This applies to ALL employees: housekeeping, marketing, billing office, direct care employees, etc.

Examples of Neglect

Failure to care or act within your scope of practice and job duties (this may also be a licensure violation)

Non compliance or falsification of required patient safety observation checks, or hygiene or medical interventions

Not offering meals or snacks to a patient as dietary requests/orders

Denial of basic needs such as nutrition, food, water, shelter, clothes

Leaving/forgetting a patient in a vehicle

Dropping off a minor patient at door without seeing the caregiver or the patient enter the residence

Failure to provide sun screen for patients before they start their day which includes being outside

Complacency & Neglect In The Workplace

Defined as: a state of satisfaction especially when accompanied by unawareness of actual dangers or deficiencies.

Complacency in the workplace is a threat to employee and patient safety.

Complacency Can Result In:

- Blind Spots
- Inaction
- Poor Quality
- Status Quo

Combat Complacency By:

- Becoming intentionally aware of the things you do and the environment around you.
- Becoming aware of the actions of other people.
- Mixing up your routine, even the smallest change could reveal a hazard you did not recognize before.
- Completing tasks with a critical eye.

What Is Exploitation?

The theft or misappropriation of property and/or monetary resources which are intended to be used for, or by, an individual.



Theft of patient property



Accepting money or items of significant monetary value which are posed as “gifts”



Taking advantage of a patient which benefits the employee financially or otherwise



Harmful Consequences

Boundary violations may result in harmful consequences to the patient!

These may include but are not limited to:

- Shame, fear, or rage
- Guilt and self-blame
- Isolation and emptiness, disengagement from services
- Identity confusion
- Loss of trust and damage to self esteem
- Self-harm
- Death, including Suicide

It Is Never Appropriate To...

Hit a patient

Yell at a patient

Use curse words with a patient

Use insulting gestures such as rolling eyes at a patient

Give a patient unkind nicknames (in front of or away from the patient)

Not properly keep a patient clean

Visit the patient in their room casually or not as per policy/protocol

Allow others to bully a patient

Withhold food or medication from a patient

Take patient property

Have social contact with patients or families outside of the scope of work

Provide transportation to patients or families in personal vehicles

Share personal information or problems with patients or families

E-mail, phone, text and access patient and/or family personal websites or via social media

Directly receive gifts of significant monetary value from patients and families

Share religious or political beliefs with patients or families

Enter into business relationships with patients or families

Conclusion



There is **“Zero Tolerance”** for abuse and neglect, and boundary violations.



Provide care to patients without preferential treatment.



Maintain professional/therapeutic boundaries.



Be in full compliance with policies.



Report and investigate suspected policy infractions immediately.



Understand potential consequences of personal actions.



It is the obligation of the caregiver to make the patient feel respected and safe. We will not accept any less from Acadia staff at any level of the organization.

Contact Your Supervisor With Questions About The Zero Tolerance Allegations Training Policy