Name of Policy:	**Coding Noncompliance**	
Policy Number:	3364-105-504	THE UNIVERSITY OF TOLEDO **MEDICAL CENTER**
Department:	Health Information Management	
Approving Officer:	Chief Executive Officer - UTMC	
Responsible Agent:	Director, Health Information Management	**Effective Date**: 9/1/2020
Scope:	Health Information Management	Initial Effective Date: 8/2003

_____	New policy proposal	_____	Minor/technical revision of existing policy
_____	Major revision of existing policy	__X__	Reaffirmation of existing policy

(A) Policy Statement

The practice of noncompliant coding **shall not** be upheld at the University of Toledo Medical Center (UTMC).

(B) Purpose of Policy

To ensure our commitment to practice ethical, accurate, and consistent coding, and adherence with guidelines for Medicare Compliance and Avoidance of Medicare Fraud and Abuse.

(C) Procedure

UTMC shall adhere to Federal requirements by continuing the educational training of the coders and the coding quality review program to ensure accurate coding. Employees shall have the responsibility to adhere to coding policies in order to generate accurate codes. In compliance with Federal regulations, UTMC shall maintain a zero tolerance policy for coding fraud. Due to the potential risk and severity of Federal consequences, employees who knowingly up code/down code, and/or purposely try to defraud any insurance program shall be subject to disciplinary action up to and including termination.

Approved by:	**Review/Revision Date:**
	04/98
	07/99
	04/02
/s/	11/2008
Pamela Eaton Date	7/2011
Director HIT & HIM	7/1/2014
	8/1/2017
/s/	8/1/2020
Richard P. Swaine, CPA Date	
Chief Executive Officer – UTMC	
Review/Revision Completed By:	
* Health Information Management*	
	Next Review Date: 08/1/2023
Policies Superseded by This Policy: 10-081	

t is the responsibility of the reader to verify with the responsible agent that this is the most current version of the policy.