

DEPARTMENT: Regulatory Compliance Support	POLICY DESCRIPTION: Prohibition of Contingency-Based Coding Arrangements
PAGE: 1 of 2	REPLACES POLICY DATED: 5/97, 6/3/98, 12/15/99, 8/1/00, 6/1/02 (HIM.COD.009), 3/6/06, 5/15/12, 12/1/13
EFFECTIVE DATE: January 1, 2016	REFERENCE NUMBER: REGS.COD.009
APPROVED BY: Ethics and Compliance Policy Committee	

<p>SCOPE: All Company personnel responsible for performing, supervising or monitoring coding of inpatient and outpatient services including, but not limited to:</p> <table border="0"> <tr> <td>Administration</td> <td>Emergency Department</td> </tr> <tr> <td>Registration/Admitting/Scheduling</td> <td>Ancillary Departments</td> </tr> <tr> <td>Facility Health Information Management</td> <td>Radiology Department</td> </tr> <tr> <td>Corporate Regulatory Compliance Support</td> <td>Service Centers</td> </tr> <tr> <td>Ethics & Compliance Officers</td> <td>Corporate Legal</td> </tr> <tr> <td>Case Management/Quality Resource Management</td> <td>Human Resources</td> </tr> <tr> <td>Laboratory Department</td> <td></td> </tr> <tr> <td>Health Information Management Service Centers (HSC)</td> <td></td> </tr> <tr> <td>Parallon Business Performance Group</td> <td></td> </tr> <tr> <td>Parallon Workforce Solutions</td> <td></td> </tr> </table>	Administration	Emergency Department	Registration/Admitting/Scheduling	Ancillary Departments	Facility Health Information Management	Radiology Department	Corporate Regulatory Compliance Support	Service Centers	Ethics & Compliance Officers	Corporate Legal	Case Management/Quality Resource Management	Human Resources	Laboratory Department		Health Information Management Service Centers (HSC)		Parallon Business Performance Group		Parallon Workforce Solutions	
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<p>PURPOSE: To ensure that all external coding consulting companies and personnel are not retained via a contingency-based contractual arrangement for the purpose of performing or auditing coding processes including auditing of Uniform Hospital Discharge Data Set (UHDDS) data, UB04/CMS 1500 data and other data directly or indirectly impacting coding, reimbursement and/or billing.</p>																				
<p>POLICY: Unless approved in writing by the SVP and Chief Ethics and Compliance Officer, contingency-based external coding consulting arrangements are not acceptable for use within the Company.</p>																				
<p>PROCEDURE:</p> <ol style="list-style-type: none"> 1. External consulting arrangements that include “risk sharing” or a “percentage of dollars” identified during the performance or auditing of coding processes including related UHDDS data elements may not be entered into. 2. The facility/HSC must not have any contingency-based coding arrangements in place. In the event that a facility/HSC does have a contingency-based coding arrangement it must be terminated immediately. 3. Consult facility’s Legal Operations Counsel for advice on contract termination. 4. External consulting arrangements involving review of coding and other data elements should be based on either one of the following: <ol style="list-style-type: none"> a. Time required to review or audit for completeness, accuracy and consistency of coded and reported data. 																				

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- b. Materials required to review or audit for completeness, accuracy, and consistency of coded and reported data.
 - c. Number or volume of records reviewed or audited for completeness, accuracy, and consistency of coded/reported data.
5. Regulatory Compliance Support and/or Parallon Business Performance Group should be contacted prior to entering into new contracts with external coding consultants.
 6. Facility's/HSC Legal Operations Counsel should be contacted for review of new contracts with external coding consultants.
 7. Regulatory Compliance Support, Parallon Business Performance Group and/or Legal will review and monitor external consulting relationship contracts.
 8. The SVP and Chief Ethics and Compliance Officer may grant exceptions to this policy. Exceptions must be obtained **prior** to offering or accepting an agreement.

REFERENCES:

1. Coding Documentation for Inpatient Services Policy, [REGS.COD.001](#)
2. Coding Documentation for Outpatient Services Policy, [REGS.COD.002](#)
3. Query Documentation for Clinical Documentation Improvement (CDI) & Coding – Compliance Requirements, [REGS.DOC.002](#)
4. Coding Documentation for Rehabilitation Facilities/Units Policy, [REGS.COD.013](#)