

DEPARTMENT: Regulatory Compliance Support	POLICY DESCRIPTION: Prohibition of Contingency-Based Coding Arrangements for Non-Hospital Entities
PAGE: 1 of 2	REPLACES POLICY DATED: 12/15/99, 9/1/02 (HIM.PHY.009), 3/1/06 (GOS.OSG.009) 3/6/06, 7/1/09, 10/15/10
EFFECTIVE DATE: January 1, 2016	REFERENCE NUMBER: REGS.OSG.009
APPROVED BY: Ethics and Compliance Policy Committee	

<p>SCOPE: All personnel responsible for performing, supervising or monitoring coding/claims processing for all Non-Hospital entities including, but not limited to:</p> <p>Administration Ambulatory Surgery Division (ASD) Ethics and Compliance Officer HCA Physician Services Group (PSG) OSG Practice Management, operations, and coding/billing consultants Owned Freestanding Outpatient Centers (<i>i.e.</i>, ASC, IDTF, physician directed clinics, clinical offices, radiation oncology, catheterization lab) Employed Physicians, non-physician practitioners and physicians at teaching hospitals Shared Services Centers (SSC)</p>
<p>PURPOSE: To ensure that all external coding consulting companies/personnel are NOT retained via a contingency-based contractual arrangement for the purpose of performing or auditing coding processes.</p>
<p>POLICY: Unless approved in writing by the SVP and Chief Ethics and Compliance Officer, contingency-based contractual arrangements are not acceptable for use within the company.</p>
<p>PROCEDURE:</p> <ol style="list-style-type: none"> 1. Company affiliates/entities will not enter into external consulting arrangements that include “risk sharing” or a “percentage of dollars” identified during the performance or auditing of coding processes. 2. The entity must not have any contingency-based coding arrangements in place. In the event that an entity does have a contingency-based coding arrangement it must be terminated immediately. 3. Consult the entity’s Legal Operations Counsel for advice on contract termination. 4. External coding consulting arrangements should be based on any one of the following: <ol style="list-style-type: none"> a. Time required to review or audit for complete, accurate and consistent coding; b. Materials required to review or audit for complete, accurate and consistent coding, and/or

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<p>c. Number or volume of records reviewed or audited for complete, accurate and consistent coding.</p> <p>5. The entity's Legal Operations Counsel should be contacted for review of new contracts with external coding consultants.</p> <p>6. Regulatory Compliance Support or Legal Operations Counsel will review and monitor external consulting relationship contracts.</p> <p>7. 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.</p>
<p>REFERENCES:</p> <p>1. Coding Documentation for Non-Hospital Entities, REGS.OSG.001</p> <p>2. Coding Documentation for Outpatient Services Policy, REGS.COD.002</p>