


Name of Policy: Coding Non-compliance Policy Number: 3364-105-504 Approving Officer: Chief Operating Officer Responsible Agent: Administrative Director, Outcome Management Scope: University of Toledo Medical Center		 Effective date: 4/9/2025 Original effective date: 8/2003	
Key words: Coding, Medicare, Compliance, Fraud and Abuse, Quality			
<input type="checkbox"/>	New policy proposal	<input type="checkbox"/>	Minor/technical revision of existing policy
<input type="checkbox"/>	Major revision of existing policy	<input checked="" type="checkbox"/>	Reaffirmation of existing policy

(A) Policy statement

The practice of non-compliant 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 and state 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 to generate accurate codes. In compliance with all Federal and state 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.

<p>Approved by:</p> <p>/s/</p> <hr/> <p>Christine Stesney-Ridenour Chief Operating Officer</p> <p>3/31/2025</p> <hr/> <p>Date</p> <p>/s/</p> <hr/> <p>Angela Ackerman Administrative Director, Outcome Management</p> <p>4/9/2025</p> <hr/> <p>Date</p> <p><i>Review/Revision Completed by: Administrative Director, Outcome Management</i></p>	<p>Policies Superseded by This Policy:</p> <ul style="list-style-type: none">• 10-081 <p>Initial effective date: 8/2003</p> <p>Review/Revision Date:</p> <p>04/98 07/99 04/02 11/2008 7/2011 7/1/2014 8/1/2017 8/1/2020 8/15/2023 4/9/2025</p> <p>Next review date: 4/9/2028</p>
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