

### Code of Conduct

Since its inception in 2004, the Association has represented its member companies with a single voice on issues that affect our industry, as we collaborate to represent our collective customers — the vast majority of hospitals and physicians' practices of all sizes and specialties across the US with operational EHRs. Recognizing the transformative power of health IT, we offer this Code of Conduct as a reflection of our industry's ongoing commitment to collaborate as trusted partners with all stakeholders.. As a company that develops electronic health records (EHRs) and provides health IT software and services, we are committed to the following principles:

### General

- Our business practices will emphasize accurate communication about the functionality and benefits of our products and services.

### Patient Safety

Recognizing that patient safety is a shared responsibility among all stakeholders in an increasingly health IT-enabled, learning healthcare system:

- We are committed to product design, development, and deployment in support of patient safety. We will utilize such approaches as quality management systems (QMS) and user-centered design methodologies, and use recognized standards and guidelines.
- We will participate with one or more Patient Safety Organizations (PSOs) (and/or other recognized bodies) in reporting, review, and analyses of health IT-related patient safety events. The exact nature, extent, and timing of our participation will depend on the outcome of current industry and policy discussions; such factors as legislative, regulatory changes, or agency guidance; the availability of the appropriate recognized organizations; development of standardized definitions for safety events; and other implementation factors. This work will require close collaboration with our customers..
- We will share best practices with our customers for safe deployment, implementation, maintenance, and use of our products.
- We will notify our customers should we identify or become aware of a software issue that could materially affect patient safety, and offer solutions.
- We recognize the value of our customers' participation in discussions about patient safety. We will not contractually limit our customers from discussing patient safety issues in appropriate venues. In applying this policy, we will maintain fair and reasonable intellectual property protections.

### Interoperability and Data Portability

#### Recognizing that data should follow the patient:

- We will enable our customers to exchange clinical information with other parties, including those using other EHR systems, through standards-based technology, to the greatest extent possible.
- We will use available, recognized, and nationally uniform standards to the greatest extent possible in developing interfaces.

### Privacy and Security

- We are committed to developing and implementing our software, services, and business practices in ways that protect patients' privacy through the secure and trusted handling of personal health information.

### Patient Engagement

- We recognize that EHRs can enable increased engagement by patients and families in their healthcare, support patient-centered healthcare and shared decision making, and we will reflect this understanding in our business practices. Although patients and families are not our direct customers, we appreciate that they are the beneficiaries and, in some cases, the direct users of EHR technology.

### Implementation of the Code

- By adopting the Code, we are stating that we will adhere to all of its principles and will have practices in place to apply these principles. Such practices could include educating staff about their obligations under the Code of Conduct; monitoring business adoption; publicizing our adoption of the Code of Conduct to customers, prospects, and partners; and being responsive to questions or concerns related to our adoption of the EHR Developer Code of Conduct.
- As customers implement interfaces and work to achieve interoperability, we will share best practices with them about the safe deployment, implementation, and use of the supporting tools and technologies.
- We will work with our customers to facilitate the export of patient data if a customer chooses to move from one EHR to another. We will enable, at a minimum, the export of one or more standards-based clinical summary formats such as CCD/CCDA (or the then-current equivalent) for all patients.

### Clinical and Billing Documentation

- Our software, services, and business practices will support our customers' needs to efficiently and accurately document care provided.
- We will make available to our customers information about our products' approaches to clinical documentation, coding, and quality measurement, examples of which include the coding guidelines referenced, conformity with applicable regulatory and documentation standards, or the source of a quality measure.

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Published 26th August, 2015.  
Last updated 13th May, 2016.  
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