



*The Collective Voice
of Health IT*

POLICY & PROCEDURE MANUAL

Effective 5/14/2026

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1 Introduction

1.1 Purpose

This Policy & Procedure Manual defines policies and procedures that clarify, support, and implement the tenets of the WEDI Bylaws. The Bylaws take precedent in situations where there is a conflict between this manual and the Bylaws.

The Board of Directors is responsible for the policies and procedures contained in this manual. Members agree to adhere to these policies and procedures as a condition of membership. Non-member participants afforded specific collaboration privileges agree to adhere to these policies and procedures as a condition of those privileges.

The policies and procedures in this manual have been reviewed and approved by the Board of Directors and are effective as of the date on the title page. Previous versions are identified in 8 Document History.

This manual is subject to change. All changes must be approved by the Board of Directors.

1.2 Development of Policies and Procedures

Recommendations for policies and procedures may be proposed by any Director, WEDI Committee, or Member for consideration by the Board of Directors. The recommendation should be submitted in writing to the Executive Director or Officer (Chair, Chair-Elect, Immediate Past Chair, and Vice Chairs) who shall review the proposed policies and procedures in light of existing policies and procedures, seek advice of legal counsel as appropriate, and present the proposed policies and procedures to the Board of Directors at its next meeting for consideration and action. It is recommended that proposed policies and procedures be submitted to the Directors for their review within a reasonable timeframe prior to the meeting to allow adequate consideration.

2 Organization

2.1 Articles of Incorporation

The purposes for which the corporation is organized are:

To promote the interests of the health care community in the development and implementation of health information exchange standards and processes by:

- (a) Promoting and facilitating an orderly migration to electronic health information exchange standards and processes in the health care community;
- (b) Serving as a coordinated education resource on electronic health information exchange standards and processes including development of materials for use by members of the health care community;

- (c) Monitoring and reporting on the progress of electronic health information exchange standards and processes implementation in the health care community;
- (d) Identifying obstacles to the implementation of electronic health information exchange standards and processes and proposing solutions for their removal; and
- (e) Building consensus on electronic health information exchange standards and processes issues and on legislative and regulatory framework.

Notwithstanding the foregoing or any other provision of these Articles or the Bylaws of the corporation:

- No part of the net earnings of the corporation shall inure to the benefit of or be distributable to, its Directors, Officers, Members, or other private persons, except that the corporation shall be authorized and empowered to pay reasonable compensation for services rendered and to make payments and distributions in furtherance of the purposes set forth above; and
- The corporation shall not carry on any activities not permitted to be carried on by a corporation exempt from federal income tax and described in Section 501(c)(6) of the Internal Revenue Code of 1986, as amended.

2.2 Corporate Seal

RESOLVED, that the seal presented to this Board of Directors is hereby approved as the seal of the Corporation and the Secretary (Chair-Elect) is directed to place an imprint of the seal in the minutes of this meeting (4/18/1995).

2.3 Bylaws

The Board of Directors has adopted Bylaws of the Corporation that may be updated from time to time as necessary, per Article IX "Amendments" of the WEDI Bylaws.

2.4 Rules of Order

The rules contained in Robert's Rules of Order, current edition, shall govern the meetings of the Members, Board of Directors, and Executive Committee except where otherwise provided by law, WEDI's Articles of Incorporation, Bylaws, or this resolution.

The Board of Directors hereby vests in its chair the authority to prescribe the maximum amount of time allowed for: (1) debate of any motion properly before the Directors and (2) each person to speak to such motion. The Directors may, however, revise any such time limits imposed by the chair through the adoption of motions to limit or extend debate upon the affirmative vote of two-thirds (2/3rd) of the Directors present and voting.

The Board of Directors hereby vests in its chair the authority to suspend these rules in whole or in part as to one or more information items on the agenda, provided that the Directors may, upon motion duly

made and seconded, overrule such a decision by the chair upon the affirmative vote of two-thirds (2/3rd) of the Directors present and voting.

2.5 Mission and Vision

WEDI's mission is:

Provide multi-stakeholder leadership and guidance to the nation's healthcare system on how to use and leverage the industry's collective technology, knowledge, expertise, and information resources to improve the administrative efficiency, quality, and cost effectiveness of health care information.

WEDI's vision is:

Better health care at lower cost through collective action.

2.6 Role

WEDI's role is:

- Industry convener and collaborator
- Provider of knowledge and guidance
- Consultative problem solver
- Business development catalyst
- Bridge builder and consensus creator
- Legislative policy advocate and shaper

2.7 Business Address

WEDI's business address is:

3503 Connecticut Avenue, NW, Suite 205 Washington,
DC 20008

2.8 Antitrust Policy

WEDI adheres to the following antitrust policy in all meetings of the Board of Directors, Committees, workgroups, subworkgroups, and all other groups.

WEDI ANTITRUST GUIDELINES FOR MEETINGS

WEDI has had the following guidelines prepared in order to facilitate compliance with the antitrust laws in conducting WEDI meetings.

Role of Chair. The Chair of the meeting will ensure that discussion follows the agenda. Matters outside of the scope of the agenda should not be discussed without the approval of the Chair. If necessary, the Chair will redirect, limit, or stop discussion in order to ensure compliance with these guidelines.

Subjects of Discussion. As a general matter, the antitrust laws prohibit competitors from agreeing on the prices they will charge, the products they will offer, the customers they will serve, and the markets in which they will compete. Therefore, there should be no discussion or disclosure of information with respect to profits, premiums, prices, surcharges, or discounts; specific customers or classes of customers, or whether participants will or will not do business with them; allocation of geographic or product markets; any refusal to deal with a customer or supplier; how to deal with the market behavior of a competitor; or any other topic involving anticompetitive practice.

Some topics of discussion may lead to agreements that are not unlawful on their face but that may have an unlawful anticompetitive effect, depending upon their scope and how they are implemented. There are no hard and fast rules regarding how much discussion may occur with respect to possible agreements that are not unlawful on their face, and the answer will vary depending on such factors as the nature of the subject matter, its relationship to competition among WEDI participants, and the degree of restraint that WEDI participants can be expected to exercise. For example, it is lawful for WEDI participants to agree on standard forms or processes that will lead to administrative simplification, but WEDI standards should not be used in a way that unreasonably limits competition.

Board and Committee Business Only Conducted at Meetings. There should be no informal, secret, or “rump” meetings in which some or all WEDI participants discuss business matters “off the record.” All discussions relating to the business of the WEDI Board or committees shall be held at formal meetings.

Questions, Concerns. Questions or concerns about these guidelines or about any WEDI-sponsored meeting, discussion, or practice should be directed to WEDI’s Executive Director and/or to the participant’s own counsel.

2.9 Website

The Executive Director, in conjunction with other WEDI staff, oversees the development and maintenance of the WEDI website. Workgroups, subworkgroups, and other individuals may be asked to contribute content for the website.

2.10 Media Relations

Media relations are managed by the Executive Director and other appropriate WEDI staff. They have the responsibility to screen, prepare, approve, and distribute materials released to the media. They may consult with or receive input from the Vice Chair of Membership & Communications and other ad hoc individuals as deemed necessary.

The Executive Director and Chair are the designated official spokespersons for WEDI for purposes of communicating with the press or media. They may designate other WEDI staff, Officers (Chair, Chair-

Elect, Immediate Past Chair, and Vice Chairs), Board of Directors, workgroup or subworkgroup co-chairs, or other individuals to speak on behalf of WEDI when deemed applicable.

2.11 Logo Use

WEDI's logo is intended for official use only. The logo may not be used in a manner that would imply endorsement or approval of any products, services, events, or policy or position statements not specifically approved by the Board of Directors. Individuals wishing to be granted approval for use of the logo must submit a request to the Executive Director. The Executive Director, in consultation with the Executive Committee or legal counsel, as necessary, will decide the approval or denial of the request.

Situations in which permission may be granted include, but are not limited to:

- Display by a Member organization in good standing on websites, program announcements, booth displays, and other published materials for the purpose of signifying membership in and support of WEDI and its mission and goals.
- Display by an industry organization in collaboration with WEDI to signify co-sponsorship of an educational event or joint support of an industry initiative.

Any identified use of the logo that is perceived to be inappropriate should be reported to the Executive Director for review and follow up action as deemed appropriate.

2.12 Collaborations and Endorsements

The Executive Director has the authority to negotiate and recommend to the Executive Committee or Board of Directors proposed business relationships with other organizations offering educational programs, certification credentialing, or other business services deemed to be of value to WEDI. Any recommended business relationships, programs, or services must be consistent with WEDI's mission, Bylaws, and policies. See 6.3 Conflict of Interest for additional details related to conflicts of interest.

Any formal proposals must be submitted to the Executive Director in writing with specific details of the arrangements to be agreed upon including any services and products to be provided, costs, sharing of revenues, and reciprocal arrangements. The Executive Director will review each proposal on a case-by-case basis for compliance with existing policy, legal considerations, and potential Member benefits. The review process will be conducted on an impartial and fair basis, and without any implication of endorsement of products or services being considered. The Executive Director will then submit the proposal along with his/her recommendations to the Executive Committee or Board of Directors as appropriate for their review and action.

2.13 Liaisons

2.13.1 Policy

WEDI has established liaisons to various industry allied organizations to facilitate collaboration with those organizations. WEDI will designate, through approval by the Board of Directors or Executive

Committee, a primary and at least one alternate representative for each allied organization identified.

The liaison relationship, sometimes defined through a Memorandum of Understanding (MOU), will be defined as either 'Formal' or 'Monitor'.

- Formal Representatives are "subject matter experts" (SMEs) and shall have the authority to vote for WEDI, make recommendations, have sufficient familiarity to comment factually on existing WEDI policies, and reference existing white papers or other documents.
- Monitor Representatives might be SME's but would only be authorized to observe in the assigned activities, and reference WEDI documents related to the discussion being monitored as potential resources.

2.13.2 Guidelines for Liaisons

Liaisons must adhere to the following guidelines in the course of their appointment:

- All representatives, Formal and Monitor, are required to seek further guidance from the Executive Director or Chair, or their designee, on matters that they are unfamiliar with, or require specific authority to act upon.
- All liaisons must clarify whether they are speaking on behalf of WEDI or their own organization when they are participating in liaison activities. It is essential that their personal or corporate positions are not construed as those of WEDI.
- All liaisons are required to submit a brief report to the Executive Director within two (2) business days of a meeting attended on behalf of WEDI, summarizing the key actions or points of interest covered in the meeting. This report will be disseminated to the Board of Directors and any other pertinent committees, task groups, or workgroups.
- All liaisons must adhere to 2.13.3 Position Statements with respect to requests to submit statements of WEDI's positions or recommendations or cast straw ballots on specific issues.

2.13.3 Position Statements

All liaisons must be familiar with 3.5 Comment Development Process, 3.7 Communications with Government Entities, and 3.8 Speaking at Industry Events.

Any testimony or position statements presented by a liaison must be developed through the 3.5 Comment Development Process. If a request for a WEDI position statement or recommendation or to cast a straw ballot cannot be accommodated through existing WEDI comments, recommendations, or position statements, the Executive Committee shall be tasked with rendering the necessary authority or guidance as granted by the Bylaws, Article VI, Section 6.2, within the necessary timeframe for the liaison to complete his/her assignment.

If asked to vote or cast a straw ballot, the liaison must vote in the manner that supports WEDI's position or recommendations on the topic or abstain from the vote or straw ballot.

2.14 Intellectual Property

See also 5.4 WEDI Developed Content.

Content developed by workgroups, subworkgroups, and task groups shall be the intellectual property of WEDI. The work products will contain a copyright statement, as follows:

This document is Copyright © 20XX by WEDI. It may be freely redistributed in its entirety provided that this copyright notice is not removed. It may not be sold for profit or used in commercial documents without the written permission of the copyright holder. This document is provided “as is” without any express or implied warranty.

Fair use of WEDI developed content should be properly cited.

3 Advisory role

3.1 HIPAA Authority

WEDI is named as an advisor to the Secretary of the U.S. Department of Health and Human Services (HHS) in the Health Insurance Portability and Accountability Act (HIPAA) of 1996, specifically Section 1172 (c) as follows:

“(3) CONSULTATION REQUIREMENT.

“(A) IN GENERAL. A standard may not be adopted under this part unless—

“(i) in the case of a standard that has been developed, adopted, or modified by a standard setting organization, the organization consulted with each of the organizations described in subparagraph (B) in the course of such development, adoption, or modification; and

“(ii) in the case of any other standard, the Secretary, in complying with the requirements of subsection (f), consulted with each of the organizations described in subparagraph (B) before adopting the standard.

“(B) ORGANIZATIONS DESCRIBED. The organizations referred to in subparagraph (A) are the following:

“(i) The National Uniform Billing Committee.

“(ii) The National Uniform Claim Committee.

“(iii) The Workgroup for Electronic Data Interchange.

“(iv) The American Dental Association.

3.2 Lobbying

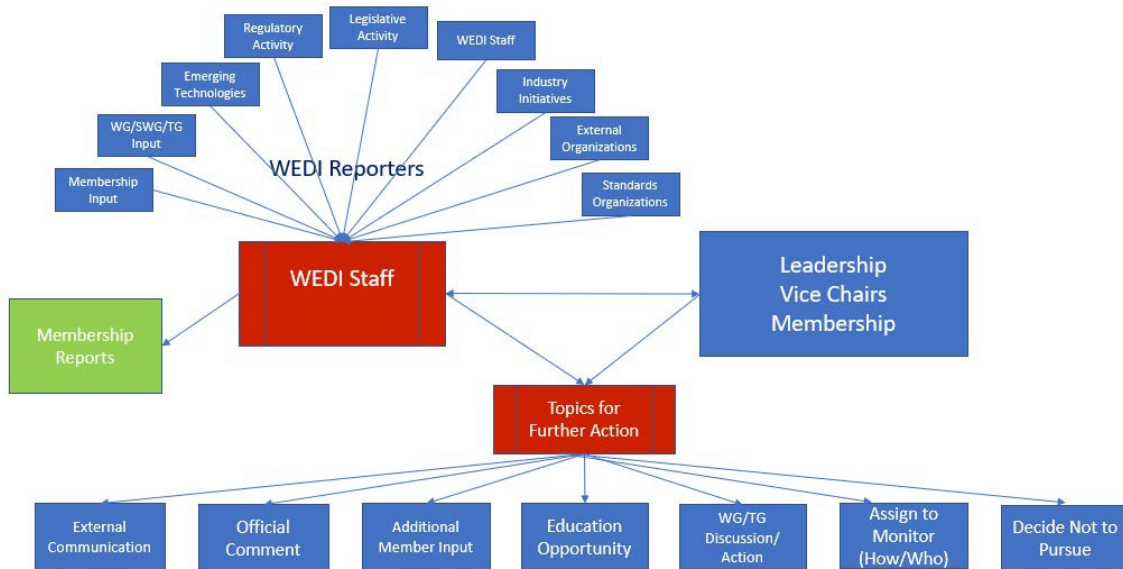
WEDI is an advisor to HHS and, as such, does not engage in official lobbying activities or attempt to influence the positions or decisions of legislators regarding pending legislation. Not lobbying is in keeping with WEDI’s purpose, further described in 2.2 Role, to be an industry convener, educator, and collaborator.

WEDI’s engagement with federal, state, Congressional, other government entities, and individuals is for

advisory and educational purposes only.

3.3 Industry Issues Coordination Process

The Industry Issues Coordination Process (IICP) is the monitoring and coordination process for identifying, sharing, and tracking relevant industry activities, initiatives, and technologies. Per the diagram, the process encompasses learning about what is happening in the industry and sharing it with WEDI staff and leadership to identify potential education, collaboration, response, or other action.



3.4 Comment Development Decision Process

3.4.1 Policy

The purpose of this policy is to establish the criteria and process to determine if WEDI develops comments on a document including, but not limited to, Notice of Proposed Rulemaking (NPRM), Interim Final Rule with Comments (IFC), Request for Information (RFI), requests for testimony, and other documents or requests for which industry feedback is sought. The term “comments” encompasses letters, written testimony, and oral testimony.

3.4.2 Comment Development Decision Criteria

The following criteria are considered when deciding to develop comments:

- Importance of the subject matter to WEDI’s mission
- Direct request to submit comments
- Previous comments or activity on the subject matter
- Existing workgroup or subworkgroup on the subject
- Importance of the government body or organization to WEDI, e.g., HHS, Centers for Medicare & Medicaid Services (CMS), Office of the National Coordinator for Health Information Technology

(ONC), Office of Civil Rights (OCR), National Committee on Vital and Health Statistics (NCVHS), Health Information Technology Advisory Committee (HITAC)

- Timing of when the comments are due
- Availability of resources at the time the comments must be developed

3.4.3 Responsibility for Making Decision to Develop Comments

The responsibility for making the decision of whether WEDI develops comments on a document is held by one or a combination of the following:

- Chair, Chair-Elect, and Immediate Past Chair
- Vice Chair of Policy
- Executive Director
- Senior Director of Federal Affairs

3.4.4 Comment Development Decision Steps

1. When any Member becomes aware of a document open for comment and believes a response is required, they notify any Director or workgroup or subworkgroup co-chair.
2. Once alerted, the Director or workgroup or subworkgroup co-chair notifies the Chair, Chair-Elect, Immediate Past Chair, Vice Chair of Policy, Executive Director, or Senior Director of Federal Affairs.
3. Any combination of the following discusses via oral or electronic communication using the Comment Development Decision Criteria and makes the decision as to whether WEDI develops comments on the document.
 - Chair, Chair-Elect, and Immediate Past Chair
 - Vice Chair of Policy
 - Executive Director
 - Senior Director of Federal Affairs
4. The decision as to whether WEDI develops comments on the document is communicated by the Chair, Chair-Elect, Immediate Past Chair, Vice Chair of Policy, or Executive Director via oral or electronic means to the Board of Directors, the person who brought forward the document for consideration, and any other relevant WEDI groups or member.
5. If any Director wishes to appeal a decision of whether WEDI develops comments on a document, the appeal must be made in writing to the Chair or Executive Director within 48 hours of the notification of the decision.
6. The appeal is communicated to the Board of Directors.
 - a. The Board of Directors is given the opportunity with a deadline to submit information for or against the appeal.
7. The Chair, Chair-Elect, Immediate Past Chair, Vice Chair of Policy, and Executive Director review the appeal, consult with others as they deem necessary, and, by simple majority vote (51%) make the final decision on whether WEDI will develop comments on the document.
8. The decision of the appeal is communicated to the Board Directors and is final.

3.5 Comment Development Process

3.5.1 Policy

The purpose of this policy is to establish the process by which WEDI develops comments on a document or request including, but not limited to, NPRM, IFC, RFI, requests for testimony, and other documents for which industry input and data are sought. The term “comments” encompasses letters, written testimony, and oral testimony.

3.5.2 Assignment of Comment Development

The Chair, Chair-Elect, Immediate Past Chair, Vice Chairs of Policy, and Executive Director discuss the approval to develop comments on an identified document or request. They determine the appropriate group or individual to develop the comments.

The following criteria are considered when deciding who to assign to develop the comments:

- Scope of the content contained in the document
- Perceived impact of the document on the industry
- Timing of when the comments are due
- If a workgroup or subworkgroup currently works on the subject of the request

3.5.3 Leader of Comment Development

The following can be appointed to lead comment development for WEDI:

1. Member Position Advisory (MPA) process (Described in 3.6 Member Position Advisory Process)
2. Ad hoc task group of the Board of Directors convened for the purpose of developing comments and disbanded when the task is complete
3. Relevant WEDI workgroup or subworkgroup
4. Senior Director of Federal Affairs
5. Other individuals designated by the Chair, e.g., Director, workgroup or subworkgroup co-chair(s), etc.

3.5.4 Comment Development

1. If the decision is to use the MPA process, the Vice Chair of Policy oversees the process.
2. If the decision is to create an ad hoc group of the Board of Directors, the Chair, or designee, oversees the work, including, but not limited to, notifying the Board of Directors, identifying volunteers, setting up calls, drafting comments, and conducting outreach to gain additional input as needed.
3. If the decision is for the relevant workgroup or subworkgroup to develop the comments, the Vice Chair of Programs & Services is notified and oversees the work, including, but not limited to, notifying the co-chairs of the workgroup or subworkgroup, setting up calls, drafting or reviewing the comments, updating the Officers (Chair, Chair-Elect, Immediate Past Chair, and

Vice Chairs) on the progress of the work, and assisting the co-chairs of the workgroup or subworkgroup with obtaining any resources needed.

4. If the decision is for the Senior Director of Federal Affairs to develop the comments, he/she is notified and completes the development of the comments.
5. If the decision is for other individual(s) to develop the comments, they are notified and complete the development of the comments.

The Senior Director of Federal Affairs may assist will all the above options for comment development. Any previously approved comments relevant to the current document under review are provided to the comment developers as reference and to include as reference or citations as deemed appropriate.

Comment developers are given a deadline for when a final draft is required to be completed to allow an appropriate amount of time for approval prior to the submission. If any combination of the Chair, Chair-Elect, Immediate Past Chair, and Vice Chair of Policy determines there will be insufficient time to review the draft comments, they can decide that WEDI will not submit comments on the document.

3.5.5 Approval of Comments Developed

WEDI comments developed through the MPA process must be approved by the Board of Directors. When timing is a factor for submitting comments, the Board of Directors delegates the approval to the Executive Committee. The Chair and Executive Director decide when timing is a factor for submitting comments.

WEDI comment letters developed through other processes are sent to the Board of Directors for review and an opportunity to submit comments for consideration by the letter authors. The Executive Committee provides the final approval for these letters. It is the Chair's discretion when comment letters developed through processes other than the MPA process require a vote by the Board of Directors for approval.

3.5.6 Dissenting Opinions or Minority Perspectives

Any Director of the Board may submit statements of dissenting opinions or minority perspectives for consideration to be included in WEDI comments. Inclusion of any statements must be approved by a simple majority (51%) of the Board of Directors. Approved statements are included in the comment letter, written testimony, or oral testimony as a footnote in the location that is relevant for the statement to be made.

Members, on their own behalf, may communicate with legislators and department or agency officials, at any time, on any issue, legislation, or regulation.

3.5.7 Submission of Comments

Once approval is finalized, the Executive Director submits the comments using the required submission format prior to the deadline.

WEDI comments are submitted under the signature of the Chair with a carbon copy to the Board of Directors.

A copy of the final comments is sent to the Board of Directors, published to the WEDI website, and linked to in other WEDI announcements in a timely manner.

3.6 Member Position Advisory Process

3.6.1 Policy

The purpose of the Member Position Advisory (MPA) process is to ensure that Members provide input and data on relevant topics that assist the Vice Chair of Policy, Policy Committee, and Board of Directors in developing recommendations, comments, and positions that reflect the views held by WEDI's diverse Members. This process may include requests for written statements, surveys, virtual meetings, in-person meetings, interviews, electronic polling tools, and other means to gather the necessary input.

The goal of the MPA process is to offer more options for data collection through which Members can advise WEDI on topics and issues of importance. The flexibility has the potential for more Members to participate thereby giving WEDI greater insights into the perspectives and concerns of a broader range of Members. Additionally, the formats provide for expedited means to collect the input and data.

The MPA process is designed for Members to advise the Board of Directors on the topics and issues in which it has knowledge, background, experience, and perspectives. The Board of Directors' responsibility is to develop recommendations, comments, and positions that reflect the input and advice of the Members while aligning them with WEDI's mission.

3.6.2 Initiating the MPA Process

The MPA process may be initiated for a variety of reasons including, but not limited to, any invitation to speak to or communicate in an official capacity with a government entity, such as CMS, ONC, OCR, NCVHS, HITAC, or other federal, state, or local agency or through an NPRM, IFC, RFI, requests for testimony, and other documents for which industry feedback is sought.

Additionally, as noted in 3.7 Communications with Government Entities, if it is anticipated that WEDI will be expected to present specific formal recommendations, comments, or positions during a meeting with a government entity, those recommendations, comments, or positions must be vetted and approved by the Board of Directors, or Executive Committee. The MPA process may be used to obtain input and data to inform such recommendations, comments, or positions.

3.6.3 MPA Process

1. If the MPA process is invoked in 3.5 Comment Development Process, the Vice Chair of Policy works with the Policy Committee on establishing the format to be used.
2. The Policy Committee may delegate the activity of the MPA process to a task group of volunteers, existing workgroup or subworkgroup, or other relevant group as deemed

appropriate. The Policy Committee will continue to oversee and remain responsible for the MPA process.

3. The MPA process used may depend on:
 - a. the response being developed, e.g., letter, testimony, or other response
 - b. deadline for submitting letter or testimony
4. The MPA process will include an interactive component of the MPA participants, such as an in-person or virtual meeting. During the meetings, participants will engage in guided discussion and draft and vote on recommendations, comments, and positions. MPAs will be open only to members to attend. Should a vote take place, member attendees are permitted only one vote per member organization.
5. The MPA process may also include any one or more of the following as means to receive input:
 - a. Request to submit written position statements
 - b. Survey to solicit input on specific questions
 - c. Interviews with specific Members
 - d. Electronic voting tool to obtain feedback on support
 - e. Other tools for obtaining input
6. The Senior Director of Federal Affairs will provide the Policy Committee, or delegated group, with a summary of recommendations, comments, and positions made by WEDI in previous letters and testimony relevant to the current request. The Policy Committee, or delegated group, will use this information to develop the MPA request materials, survey questions, meeting materials, interview questions, etc.
7. After the MPA format is decided, the Policy Committee, or delegated group, will determine the rules or guidelines to be used.
8. The MPA format will be conducted.
9. The Policy Committee, or delegated group, will collect and analyze the information and data received from the MPA participants. The analysis will include identifying any gaps in input from any stakeholder groups and if that gap is relevant for the final recommendations, comments, and positions being developed.
10. The Policy Committee, or delegated group, with the assistance of the Senior Director of Federal Affairs, will draft an analysis with preliminary recommendations, comments, and positions that will be sent to the Policy Committee (if drafted by a delegated group) and Board of Directors for review. If timing is an issue, the Executive Committee may complete the review of the analysis and recommendations, comments, and positions.
11. If there are conflicting views on one or more recommendations, comments, or positions from the Members, the Policy Committee, or delegated group, may conduct a poll using an electronic polling tool to attempt to gain consensus on the topic.
12. Based on feedback from the Board of Directors or Executive Committee, the Senior Director of Federal Affairs will draft the letter or testimony incorporating the recommendations, comments, and positions and send it to the Board of Directors or Executive Committee for review and final approval.
13. Following submission of the letter or testimony, it is published on the WEDI website.

3.6.4 Evaluation of MPA Process

The Policy Committee, with the assistance of the Senior Director of Federal Affairs, will track the use of

the MPA process including dates, request or document for which comments were sought, MPA format used, comments and impressions by the Policy Committee at the time the MPA process was conducted, etc. The Policy Committee will periodically conduct an evaluation of the MPA process and report its findings to the Board of Directors.

3.6.5 Example

The following is a hypothetical example showing how the MPA process can be used for a 60-day comment period. The range of days are estimates and not meant to establish requirements.

Day 1 – 4: A significant NPRM is published with a 60-day public comment review period. Per the Comment Development Decision Process, the Officers agree that WEDI will comment on the NPRM and the Board of Directors is notified. The Chair, Chair-Elect, Immediate Past Chair, Vice Chair of Policy, and Executive Director discuss the comment development process to be used. The decision is to use the MPA process.

Day 5 – 7: The Senior Director of Federal Affairs is notified and provides summaries of the NPRM and previous recommendations, comments, and positions made by WEDI on the topic of the NPRM.

Day 8 – 10: The Policy Committee reviews the summaries and decides the format of the MPA will be a virtual meeting preceded by participants submitting written statements answering specific questions.

Day 11 – 15: The Policy Committee develops a list of questions for the MPA participants to submit prior to the virtual meeting. The WEDI staff schedule the virtual meeting to be held on Day 30.

Day 16: The plans for the virtual meeting and questionnaire are released for Members to register and complete.

Day 17 – 29: The Policy Committee completes planning for the virtual meeting, which includes:

- Planning a webinar on Day 28 by the Senior Director of Federal Affairs who walks through the topics of the NPRM relevant to WEDI.
- Deciding on the rules for the MPA participants to follow during the virtual meeting.
- Compiling the results of the submitted questionnaires and developing slides with the content and draft recommendations or comments to be reviewed during the meeting.
- Developing voting questions to be used during the virtual meeting.
- Sending participants materials for the virtual meeting.

Day 28: The webinar is held.

Day 30: The virtual meeting is held. The meeting begins with 3 hours of discussion on prepared recommendations, comments, and positions on the topics the Policy Committee determined needed Member input. Each participant is limited to 3 minutes to speak and is required to wait until all others speak before speaking again. The meeting includes a 2-hour break that allows the facilitators time to reconcile the information heard, develop additional voting questions, and wordsmith language. The virtual meeting concludes with 1 hour of voting on final language and discussion of next steps.

Day 31 – 40 : The Policy Committee analyzes the input received and results of the voting during the virtual meeting. During the analysis, the Policy Committee identifies a specific topic that was not covered during the virtual meeting and they want to gather specific input on it. They developed a brief survey of specific questions and send it to the Members with a deadline to complete in 5 days.

Day 41 – 45: The Policy Committee with the assistance of the Senior Director of Federal Affairs, begin writing an analysis with preliminary recommendations, comments, and positions.

Day 45: The Policy Committee reviews the survey results of the follow up survey to the Members and

incorporates the findings into the overall analysis. The analysis is finalized and sent to the Board of Directors for review.

Day 45 – 50: The Board of Directors or Executive Committee reviews the analysis and provides feedback via email to the Policy Committee and Senior Director of Federal Affairs.

Day 51 – 54: The Senior Director of Federal Affairs drafts the letter of recommendations and sends it to the Board of Directors for review.

Day 55 – 59: The Board of Directors meets on one of these days and the letter is approved.

Day 60: The letter is submitted per the NPRM submission instructions. The letter is also posted on the WEDI website.

3.7 Communications with Government Entities

3.7.1 Communications Involving Board of Directors

Any invitation to speak to or communicate in an official capacity with a government entity, such as CMS, ONC, OCR, NCVHS, HITAC, or other federal, state, or local agency must be immediately forwarded to the Executive Director and Chair who will determine whether to accept the invitation and identify who will represent WEDI.

The Executive Director has the authority to consult with administrative, department, and agency officials and legislators and their staff for the purpose of representing WEDI and providing information pertinent to fulfilling the objectives and advisory role of WEDI.

If it is anticipated that WEDI will be expected to present specific formal recommendations or comments during a meeting with a government entity, those recommendations or comments must be vetted and approved by the Board of Directors, or Executive Committee, if time is of the essence, prior to the meeting, as per 3.5.5 Approval of Comments Developed.

3.7.2 Communications Involving Workgroups or Subworkgroups

From time to time, government individuals or entities may contact chairs or individuals of WEDI's workgroups or subworkgroups for general information or clarification on a variety of topics within WEDI's scope of work. All inquiries must be reported to the Workgroup Leadership Committee Co-chairs and Administrative Coordinator, who will in turn inform the Executive Director and Vice Chair of Programs & Services. Any need for further action or coordination among the Officers (Chair, Chair-Elect, Immediate Past Chair, and Vice Chairs) or Board of Directors will be determined, and appropriate steps taken as necessary.

There can be confusion as to what type of information may be shared with the person or entity making the inquiry. The following guidelines can assist individuals in deciding what to share. If there are any questions about what should be shared, the individuals should consult further with the Workgroup Leadership Committee Co-chairs and Administrative Coordinator.

Guidelines:

- Documents posted to the WEDI website and publicly available may be shared without further guidance required.
- Documents not posted to the WEDI website or publicly available require permission of the Administrative Coordinator or Executive Director to share.
- Webinar and educational event presentations and materials not available for free on the WEDI website require permission of the Vice President of Education & Events or Executive Director.

3.8 Speaking at Industry Events

Any invitation to speak at the programs of other associations or organizations must be forwarded to the Executive Director and Chair who will determine whether to accept the invitation and identify who will present on behalf of WEDI. The goal with choosing the speaker will be to match the requested topic with an appropriate subject matter expert. No Board of Directors review or approval of these presentations are required unless the speaker is going to present specific comments or positions on behalf of WEDI that have not been previously authorized.

3.9 Federal Policy Consultation

3.9.1 Policy

The purpose of the Federal Policy Consultation (FPC) process is to be an information gathering process to ensure that industry stakeholders have an opportunity to provide input and data proactively or reactively on relevant topics that assist WEDI in its statutory role to inform and advise HHS, its agencies, and other appropriate policymaking bodies.

The FPC is differentiated from the MPA process by the following:

- The process could be requested by a federal agency or policymaking body
- The process could be proactively initiated by WEDI
- The process will typically occur prior to the release of a proposed rule
- The process will permit and solicit participation from non-members
- The process is not aimed at developing consensus-based recommendations but rather synthesizing the information presented to WEDI
- The process will result in a report on the findings from WEDI to the appropriate federal entity
- The report will be made public

This process may include requests for written statements, surveys, virtual and in-person meetings or hearings, interviews, electronic polling tools, and other means to gather the necessary input. The goal of the FPC process is to offer options for information collection through which industry stakeholders can share perspectives with WEDI on topics and issues of importance. This flexibility has the potential for a wider variety of industry organizations to participate thereby giving WEDI greater insights into stakeholder perspectives and concerns.

The FPC is designed for industry stakeholders to share their perspectives on the topics and issues in which it has knowledge, background, and experience and WEDI to capture all majority and minority perspectives in a report on the findings to the appropriate entity. The report will be shared with the WEDI Board of Directors for review prior to sending to the appropriate entity. The Board of Directors' responsibility is to ensure that the report accurately reflects all feedback shared during the FPC process.

The FPC report represents what WEDI hears from the industry and does not necessarily represent WEDI's own position. Implementing an FPC does not preclude WEDI from submitting its own position on an issue or issues, separate from the FPC report, once approved by the Board of Directors.

The overall goal of the FPC process is to provide the appropriate entity the information they need to make informed decisions.

3.9.2 Initiating the FPC

A FPC may be initiated for a variety of reasons including, but not limited to, any official request from a government entity, such as ONC, CMS, OCR, or other policymaking entity for industry feedback. Once the request is received, the Executive Committee shall determine if the FPC process is to be initiated.

3.9.3 FPC Process

1. If the FPC is invoked, the Vice Chair of Policy will work with the Policy Committee and WEDI staff to establish the format (including charge, timing, method of information solicitation, facilitators, etc.).
2. The Policy Committee may delegate the activity of the FPC to a task group of volunteers, existing workgroup or subworkgroup, WEDI staff, or another group as deemed appropriate. The Policy Committee will continue to oversee and remain responsible for the FPC.
3. The process of collecting stakeholder perspectives may depend on:
 - a. The type of response being developed, e.g., report, letter, testimony, or other response
 - b. Submission deadline
4. WEDI leadership will discuss and coordinate with the appropriate policymaking entity options for how to communicate the FPC process to the public.
5. The FPC will be open to non-members to attend and participate. WEDI will deploy a dedicated effort to communicate to and engage with non-members.
6. The FPC may also include any one or more of the following to receive input:
 - a. Conduct a hearing or listening session
 - b. Request to submit written position statements
 - c. Survey to solicit input on specific questions
 - d. Interviews with specific stakeholders
 - e. Electronic voting tools to obtain feedback on support
 - f. Additional tools and methods for obtaining input
7. WEDI staff will provide the Policy Committee, or delegated group, with a summary of comments, and positions made by WEDI in previous letters and testimony relevant to the current request. The Policy Committee, WEDI staff, or delegated group, may use this information to develop FPC materials, survey questions, meeting materials, interview questions, etc.

8. After the FPC format is decided, the Policy Committee, working with WEDI staff, or other delegated group, will determine the rules or guidelines to be used.
9. The FPC will be conducted.
10. The Policy Committee, WEDI staff, or delegated group, will collect and analyze the information and data received from the FPC participants. The analysis will include identifying any gaps in input from any stakeholder groups, if that gap is relevant for the final report being developed, and how that gap should be addressed.
11. The Policy Committee, WEDI staff, or delegated group, will draft a preliminary draft of the report that will be sent to the Policy Committee (if drafted by WEDI staff or a delegated group) and then to the Board of Directors for review. If timing is an issue, the Executive Committee may complete the review of the report.
12. The WEDI Executive Committee may decide to publicly release the draft report for additional public input. WEDI staff will incorporate that feedback into the draft report.
13. Based on feedback from the Executive Committee and Board of Directors, WEDI staff will draft the final version of the report for final approval by the Board of Directors.
14. Following finalization of the report, it is submitted to the appropriate federal entity, released publicly, and published on the WEDI website.

3.9.4 Evaluation of the FPC

The Policy Committee, with the assistance of WEDI staff, will track the use of the FPC including dates, format used, comments and impressions by the Policy Committee at the time the process was conducted, etc. The Policy Committee will periodically conduct an evaluation of the FPC process and report its findings to the Board of Directors.

3.9.5 Example

The following is a hypothetical example showing how the FPC can be used to respond to, for example, a federal agency request. The range of days are estimates and not meant to establish requirements.

Day 1 – 4: A request is received. The WEDI Executive Committee discusses the request and determines that WEDI will convene a FPC and the Board of Directors is notified. The Vice Chair of Policy raises the issue with the Policy Committee and determines the process to be used.

Day 5 – 7: WEDI staff is notified and provides summaries of any relevant documents, previous recommendations, comments, and positions made by WEDI on the topic of the FPC.

Day 8 – 10: The Policy Committee reviews the summaries and decides the format of the FPC, for example, a virtual meeting preceded by participants submitting written statements answering specific questions.

Day 11 – 15: The Policy Committee, working with WEDI staff, develops a list of questions for the FPC participants to submit prior to the virtual meeting. The WEDI staff schedule the virtual meeting to be held on Day 30.

Day 16: The plans for the virtual meeting and questionnaire are released to the public to register and participate.

Day 17 – 29: The Policy Committee completes planning for the virtual meeting, which includes:

- Deciding on the rules for the FPC participants to follow during the virtual meeting.

- Compiling the results of the submitted questionnaires and developing slides with the content and draft recommendations or comments to be reviewed during the meeting.
- Developing voting questions to be used during the virtual meeting.
- Sending participants materials for the virtual meeting.

Day 30: The virtual meeting is held.

Day 31 – 40: WEDI staff analyzes the input received and results of any voting during the virtual meeting. During the analysis, specific topics are identified that were not covered during the virtual meeting or specific stakeholders did not participate. WEDI staff develop a plan to address any gaps.

Day 41 – 45: WEDI staff begins writing a preliminary draft of the report that synthesizes and summarizes findings.

Day 45: The Policy Committee reviews the preliminary draft of the report, WEDI staff incorporate edits identified, and the revised report is sent to the Board of Directors for review.

Day 45 – 50: The Board of Directors or Executive Committee reviews the analysis and provides feedback.

Day 51 – 54: WEDI staff draft the final version of the report.

Day 55: The report is submitted to the appropriate federal entity. The report is also released publicly and posted on the WEDI website.

4 Membership

Additional information about WEDI membership is in the WEDI Bylaws Article III “Membership.”

4.1 Responsibilities

Responsibilities of the Members and their representative(s) include:

- Each Member is expected to represent the perspective of their applicable company.
- Organization Members are to name a primary representative.
- Members are expected to fulfill the obligations of membership. Members who are in habitual default of the obligations outlined in these policies or the Bylaws may have their membership temporarily or permanently revoked.

4.2 Anti-Harassment

4.2.1 Policy

WEDI, as an inclusive organization, has a zero-tolerance of any type of harassment. It is WEDI’s policy that all participants in WEDI education events, meetings, and other activities act in a respectful, professional, and collegial manner. Participants should exercise consideration and respect in their speech and actions during all interactions with others.

4.2.2 Definition

WEDI defines harassment as unwelcome verbal, physical or visual conduct that denigrates or shows hostility toward an individual because of his/her race, color, religion, sex, sexual orientation, gender identity, national origin, age, or disability creating an intimidating, hostile, or offensive environment that

interferes with or otherwise adversely affects an individual's participation in educational events, meetings, or other activities. Harassing conduct includes, but is not limited to, slurs or negative stereotyping; threatening, intimidating, or hostile acts; denigrating jokes; and written, electronic, or graphic material that denigrates or shows hostility toward an individual or group.

Sexual harassment includes making unwelcome sexual advances or requests for sexual favors or other verbal, physical, or visual conduct of a sexual nature; creating an intimidating, hostile, or offensive environment; or otherwise unreasonably interfering with an individual's participation in educational events, meetings, or other activities. Sexual harassment may include such conduct as explicit sexual propositions, sexual innuendo, suggestive comments or gestures, descriptive comments about an individual's physical appearance, and any unwelcome physical contact.

4.2.3 Reporting Incidents of Harassment

Any person who believes they have experienced or witnessed an incident of harassment should promptly notify the Executive Director or Officer (Chair, Chair-Elect, Immediate Past Chair, and Vice Chairs).

All reported incidents will be promptly and thoroughly investigated. Immediate action may be taken to protect the safety of participants, which may include having the violator removed from the educational event, meeting, or other activity, without warning or refund. Any additional corrective action may be taken, which may include, but is not limited to:

- Prohibiting the violator from attending future WEDI events or activities.
- Removing the violator from leadership or other roles in WEDI activities.
- Prohibiting the violator from future leadership or other roles in WEDI activities.
- Notifying the violator's employer or sponsoring organization of the actions taken by WEDI.

The accuser will be notified when the investigation is closed.

The reporting of incidents, subsequent investigations, and any disciplinary actions will be kept confidential to the fullest extent possible.

Retaliation against anyone who has reported harassment will not be tolerated.

4.3 Diversity, Equity, and Inclusion

WEDI is committed to fostering, cultivating, and preserving a culture of diversity, equity, and inclusion. We rely on the collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities, and talent of our Members. We embrace and encourage the differences in age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socio-economic status, veteran status, and other characteristics that make the individuals of our Members unique.

We demonstrate these principles through:

- Respectful communication and cooperation
- Teamwork and participation
- Dignity and respect

All Members are expected to exhibit conduct that reflects diversity, equity, and inclusion during their work with WEDI, including within workgroups/subworkgroups, at educational events, within meetings, and at other WEDI-sponsored events.

Members who believe they been subjected to or witnessed any violations of this policy should report the incident to the Executive Director, other WEDI staff, or Officers (Chair, Chair-Elect, Immediate Past Chair, and Vice Chairs).

4.4 Code of Conduct

WEDI is a professional organization that promotes an open and inclusive community. Members at all times should conduct themselves in a professional and collegial manner in virtual and in-person settings. When participating in WEDI activities, Members are expected to:

- Adhere to the 4.2 Anti-Harassment policy.
- Communicate with others in a professional manner. This includes, but is not limited to, when participating in workgroup and subworkgroup meetings, at educational events, in email exchanges, and in other WEDI-convened meetings. Behavior, such as disruptive behavior, personal attacks, insulting or derogatory comments, and verbal abuse, will not be tolerated.
- Maintain confidentiality of Members-only information.
- Adhere to copyright and intellectual property laws, both in the development of and use of WEDI materials.
- Not speak on behalf of WEDI, unless given permission to do so.
- Adhere to the 4.5 Social Media policy.

Violations of this policy should be brought to the attention of the Executive Director, other WEDI staff, or Officers (Chair, Chair-Elect, Immediate Past Chair, and Vice Chairs).

4.4.1 Abuse of the Code of Conduct

Abuse of the Code of Conduct may result in the temporary or permanent expulsion of an individual's participation with WEDI and/or the revocation of WEDI membership as a result of violation of the Membership Code of Conduct; nonconformity with the Bylaws or Policy & Procedure Manual; or engages in other actions the Board of Directors determines to be injurious to the good name or good will of WEDI.

When there are credible allegations that a Member or individual has abused the Code of Conduct, either the WEDI Board or the WEDI Executive Committee may advance a resolution proposing suspension or expulsion from WEDI for that Member or individual. No such suspension or expulsion shall be affected

without affording a reasonable opportunity for the Member or individual to consider the charges and be heard in his or her own defense. Upon the approval of a resolution regarding proposed suspension or expulsion, the WEDI Chair shall appoint a Hearing Committee to review the alleged abuse(s) and make recommendations regarding the proposal.

Once the Board or Executive Committee approves a proposal to suspend or expel, the Member or individual will be immediately notified, by electronic mail, of the proposed expulsion or suspension and the reason(s) for the proposal. The electronic letter shall specify to the Member or individual that they have 30 calendar days to request to be heard by the Hearing Committee. The Member or individual may submit written comments and other relevant documents regarding the electronic mail notice prior to the specified Hearing date, as outlined in the following section.

4.4.2 Hearing Committee Process

1. Upon request of a Member or individual to be heard regarding their proposed expulsion or suspension, the Hearing Committee shall set a date for a hearing.
2. The Member or individual subject to the proposed expulsion or suspension will be notified, by electronic mail, at least 15 calendar days before of the date of the hearing, including instructions on the hearing process, and ability to submit any materials prior to the hearing.
3. The Hearing Committee will meet virtually for a specified time allowing the Member or individual a designated time on the agenda to provide a verbal presentation to supplement any comments submitted in writing. The Member or individual shall give notice of their desire to provide a verbal presentation at least 7 days in advance of the hearing date. The Chair or Vice-Chair of the Hearing Committee will preside over the Hearing Committee meeting in accordance with the governing rules of WEDI, professional standards of conduct, due process rules, and the Bylaws.
4. At the conclusion of the hearing, the Hearing Committee shall meet to develop a summary, including background information on the grounds for proposed expulsion or suspension, findings, recommendations, and a resolution, to be advanced to the Board of Directors at a special meeting. The Board meeting will be held as soon as practicable following the Hearing Committee meeting, which will normally be within 10 calendar days.
5. If the Member of individual does not elect to provide additional information to the Hearing Committee, the Committee will develop a summary and make recommendations to the Board on the basis of the information that is available to it.
6. The decision of the Board of Directors will be sent to the Member or individual by electronic mail and shall be final.

The Hearing Committee process may be used to resolve other Member grievances, at the discretion of the Chair.

4.5 Social Media

4.5.1 Policy

WEDI supports Members' use of social media to support and promote its work.

WEDI recognizes that social media serves as a valuable communication tool for industry engagement. Appropriate uses of social media include, but are not limited to, networking, marketing, sharing relevant information, engaging with stakeholders, and conducting other professional activities.

Social media includes any interactive digital communication through the internet, such as blogs, online communities, discussion forums, posting, sharing, and any other form of digital social networking. Examples include, but are not limited to, Facebook, X (formerly Twitter), LinkedIn, Instagram, Snap Chat, and YouTube.

4.5.2 Guidelines

When using social media related to WEDI, Members are expected to follow these guidelines:

- Never claim to speak for WEDI in an official capacity, unless asked to do so by the Executive Director, other WEDI staff, or Officers (Chair, Chair-Elect, Immediate Past Chair, and Vice Chairs).
- Clarify that statements are personal views and do not represent the views of WEDI.
- Refrain from making negative or offensive statements about individuals or organizations, especially Members.
- Be considerate of others' views and opinions.
- Do not post confidential information and respect the privacy of internal discussions.
- Never include content that is defamatory, discriminatory, abusive, hateful, harassing, obscene, threatening, invasive of a person's privacy, or otherwise in violation of any law.

If negative content about WEDI is encountered, it should be brought to the attention of the Executive Director, other WEDI staff, or Officers (Chair, Chair-Elect, Immediate Past Chair, and Vice Chairs).

Repeated abuses of these guidelines may result in the revoking of WEDI membership.

4.6 Reciprocal Memberships

Reciprocal memberships may be initiated with health care associations and other not-for-profit organizations or coalitions whose overall missions and activities are compatible with and supportive of WEDI's mission and strategic objectives. Reciprocal membership simply entails the exchanging of memberships between both entities with no requirement for dues. Those organizations agreeing to such a relationship will be designated as Strategic Partners, can participate in WEDI's programs and activities, and will be listed in any directories as Strategic Partners. Strategic Partners are not eligible to serve on the Board of Directors nor to vote for Directors and will not have voting privileges normally provided to Members.

The following SDO organizations: HL7, X12, and NCPDP, may be appointed to serve on the Board of Directors on an annual basis and to have voting privileges normally provided to Members, except to vote for Directors.

5 Workgroups, Subworkgroups, and Task Groups

5.1 Workgroups and Subworkgroups

Workgroups (WG) and subworkgroups (SWG) are intended to be long-term working groups. New WGs and SWGs may need to be established.

5.1.1 Formation of New WG or SWG

1. When a need for a new WG or SWG is identified, a project proposal must be completed and submitted to the Vice Chair of Programs & Services, Chair, or Executive Director.
2. The Coordinating Committee is convened to review the proposal. A final proposal is presented to the Board of Directors for its review and approval.
3. Once a new WG or SWG is approved, a convener or facilitator is assigned.
4. The convener or facilitator works with the WEDI staff, Vice Chair of Programs & Services, and Workgroup Leadership Committee co-chairs to recruit co-chairs, complete a charter, market the new group, and complete other administrative tasks as necessary.
5. Membership in WGs and SWGs shall be open to all individual and organizational Members of WEDI.

5.1.2 WG or SWG Hiatus or Closure

Any WG or SWG can be put on hiatus for an unlimited amount of time. Periodic evaluations should be done to determine if the WG or SWG should remain on hiatus or be permanently closed. When a WG or SWG that has been on hiatus wants to be reactivated, the co-chairs must notify the WEDI staff, Workgroup Leadership Committee co-chairs, or Vice Chair of Programs & Services who can assist the WG or SWG with reviewing the charter, marketing the group, and completing other administrative tasks as necessary.

Proposals to close a WG or SWG should be made to the co-chairs of the Workgroup Leadership Committee and Vice Chair of Programs & Services who will complete a review by gathering additional information from relevant individuals, i.e., other WG and SWG co-chairs, Directors of the Board, or WEDI staff. The final decision will be reported to the Board of Directors and WEDI staff to complete any necessary administrative tasks.

5.2 Task Groups

Task groups (TG) are intended to address a defined project. When a need to create a TG is identified, a project proposal must be completed and submitted to the Chair or Executive Director. The TG can be created through appointment by the Executive Director and Chair or approval of the Board of Directors, depending on the need and scope of project.

Once a TG is approved, a convener or facilitator will be assigned to work with the WEDI staff to recruit co-chairs, draft a scope of work statement, market the new group, and complete other administrative tasks as necessary. TGs report to the Workgroup Leadership Committee or the Board of Directors,

depending on the scope of work and need for oversight, which is identified in the TG's scope of work statement. Membership on TGs shall be open to all individual and organizational Members of WEDI.

If work within a TG becomes long-term, it will be transitioned to an existing WG or SWG or converted to a WG or SWG following approval of a proposal, as described above.

5.3 Work Product Development Process

The "Work Product Development Process" and templates are maintained by the Workgroup Leadership Committee. Current versions of these documents are located in the Workgroup Leadership Committee Forum space on the WEDI website.

5.4 WEDI Developed Content

All work products produced under the WEDI aegis become the copyrighted property of WEDI unless otherwise defined in a collaboration agreement or memorandum of understanding (MOU).

5.5 Surveys

WEDI conducts surveys periodically to gather data on various topics to inform educational and advisory activities or upon the request of a government entity. The following are guidelines for conducting surveys:

- All surveys are reviewed by the Board of Directors and approved by the Peer Review Committee, as described in the "Work Product Development Process."
- Surveys are conducted using a web-based tool to which access is limited to WEDI staff.
- Unless specifically necessary and adequately noted to the respondents, all surveys are conducted anonymously.
- Raw data collected are for use by WEDI only. Appropriate awareness must be made that any results made publicly available may be used by others.
- Raw survey data are made available to the workgroup, subworkgroup, or other group that developed the survey for the purpose of analyzing, summarizing, and drawing conclusions from the data. Individuals granted access to raw survey data are expected to maintain its confidentiality. Permission must be granted to share the data with others.
- Sharing of the data within the workgroup, subworkgroup, other group, or membership may be restricted when the surveys are conducted at the request of a government entity.

6 Financials

See Bylaws Article VII "Fiscal Matters" for additional information regarding WEDI's financial matters.

6.1 Financial Policy

The Board of Directors, with advice of the Finance Committee, establishes the financial and investment

policy for WEDI. Financial policies will be in alignment with WEDI's 501(c)(6) tax-exempt status and all other audit and expenditure requirements.

6.2 Whistleblower Policy

WEDI encourages its Members to report any concerns they may have of any violations of WEDI policies, regulatory requirements, or laws by the Executive Director, Officers (Chair, Chair-Elect, Immediate Past Chair, and Vice Chairs), or WEDI staff. Violations can include, but are not limited to, undisclosed conflicts of interest, concerns of financial misconduct, questionable accounting or audit practices, or other illegal activities. All reported incidents will be promptly and thoroughly investigated. Retaliation against anyone who has reported a suspected violation will not be tolerated.

6.3 Conflict of Interest

Annually, each Director of the Board must acknowledge and disclose any conflicts of interest, per the following policy:

WEDI recognizes the potential for conflicts of interest to arise among its Board members. WEDI understands that actual or perceived conflicts of interest could potentially damage WEDI's reputation and credibility. The existence of undue influence on WEDI by individuals or groups external to WEDI could reduce the ability of WEDI to act in its best interests and in a manner consistent with WEDI's standards. Conflicts of interest have the greatest potential to impact WEDI when they occur among its leadership, but they also may be of consequence in other settings. Through this Policy Statement, WEDI seeks to address the potential for such actual or perceived conflicts of interest.

A conflict of interest exists when an individual participates in the deliberation and resolution of an issue important to WEDI while, at the same time, the individual has other professional, business, or volunteer responsibilities outside of WEDI that could predispose or bias the individual to a particular view or goal.

This Policy Statement applies to WEDI Board members and Chief Executive Officer ("WEDI Individuals"). Such persons should disclose to the WEDI Chair or executive staff representative any situations in which they, their employer, or a member of their family have interests that could interfere with their ability to act in an unbiased manner on behalf of WEDI. In order to facilitate such disclosure, WEDI Individuals will be asked to complete the attached acknowledgment and disclosure form on an annual basis.

WEDI has identified a number of general categories of actual or potential conflicts of interest. They include the following:

A. Current or contemplated contractual relationships between WEDI or a WEDI Individual or a WEDI Individual's employer or family member.

B. Current or contemplated contractual relationships between WEDI and an outside

organization when a WEDI Individual or a WEDI Individual's employer or family member has an interest in such outside organization.

C. Any position in another organization that might cause, or appear to cause, a WEDI Individual to act in manner contrary the best interests of WEDI.

When conflicts or potential conflicts arise, they should be evaluated thoroughly by the WEDI Chair and executive staff representative and should be resolved appropriately by the Chair and executive staff representative. It is anticipated that in most cases the WEDI Individual affected by the conflict or potential conflict would not participate in the deliberations or decision-making process of WEDI relating to the matter at issue, although in some cases it might be appropriate to permit the WEDI Individual – with full disclosure of the actual or potential conflict – to make presentations with respect to the matter at issue.

Conflicts or potential conflicts of interest should be resolved, if possible, by the WEDI Individual involved and the WEDI Chair and executive staff representative. The WEDI Chair and executive staff representative should report any such conflict and its resolution to the WEDI Board as soon as practicable. The WEDI Board shall ratify or alter the reported resolution with respect to any conflict or potential conflict. If any conflict or potential conflict of interest involves the WEDI Chair or executive staff representative, the matter in the first instance shall be referred to and resolved by the WEDI Board. Decisions with respect to any conflict or potential conflict shall be made by the WEDI Board by majority vote.

6.4 Establishment of Bank Accounts

RESOLVED, that the Treasurer, hereafter titled Vice Chair of Finance, of the Corporation is hereby authorized and directed to open one or more checking or savings accounts with JPMorgan Chase Bank, Chicago, Illinois and to take other such actions as may be necessary to establish such accounts, including applying for a federal employer identification number and obtaining approval from this Board of Directors relating to resolutions that may be required by the bank regarding authorized signatures. The Executive Director is authorized to approve unbudgeted expenditures up to \$5,000. For amounts from \$5,001-\$20,000, one additional signature from the Chair, Chair-Elect, or Vice Chair of Finance will be required for approval.

Regarding check authorizations, the Executive Director may sign for budgeted payables up to \$25,000. For amounts from \$25,001-\$50,000, one additional authorized signature shall be required and for amounts from \$50,001 and above, two additional authorized signatures shall be required.

Adopted: 03/23/00

The Board of Directors adopts the fiscal policy to strive to establish and maintain a reserve account equivalent to six months operating funds.

Adopted: 01/26/00

The Board of Directors authorizes the transferring of the WEDI corporate checking account to an interest-bearing account.

The Board of Directors authorizes the establishment of a temporary Reserve Account.

6.5 Election of Tax-Exempt Status

Approved: 06/01/95

RESOLVED, the Board approved forming a 501(c)(6) nonprofit corporation and filing the appropriate application.

Approved: 04/18/95

RESOLVED, that the Corporation shall apply to the Internal Revenue Service for qualification as a tax-exempt organization under Section 501(c)(6) of the Internal Revenue Code.

7 Other Policy Statements

7.1 Implementation Guides

Adopted: 09/14/10

RESOLVED, implementation guides will be developed by others, except in the event that owning SDOs are not interested in pursuing development for an unidentified industry business need.

The Board approved WEDI developing a Health ID Card Implementation Guide as an exception to the 1995 policy which stated implementation guides would be developed by others.

FURTHER RESOLVED, WEDI support for development of Implementation Guides by Standards Development Organizations (SDOs) (e.g., ASC X12, HL7, NCPDP) support for collaboration between the SDOs and the Data Content Committees (DCCs) (e.g., DeCC, NUBC, NUCC); development of formal criteria in and WEDI ASC X12 to coordinate data content and technical consistency and working with the SDOs and the DCCs to develop consistent and more specific healthcare names and terms.

That WEDI support a single standard Implementation Guide and set of operating rules per transaction.

Adopted: 11/11/96

That the preface to WEDI Implementation Guides list all changes to the version.

That WEDI provide guidance to the industry as to which transactions, standards, versions, etc. should be used.

That WEDI solicit involvement of under-represented stakeholders in the standards development process.

Adopted: 08/02/95

RESOLVED, WEDI will develop a framework that will eventually achieve a manageable solution for dealing with attachments. This framework will establish high level recommendations that all trading partners can agree upon. WEDI will consider all recommendations made from other groups

including NUBC, NUCC, payer groups, etc., for national implementation.

7.2 Standards Organizations

WEDI recognizes and supports the Standards Development Organizations, X12, HL7, and NCPDP, and Operating Rule Authoring Entities, CAQH CORE and NACHA, in their work as developers of standards and operating rules that meet health care administrative simplification requirements defined in the Health Insurance Portability and Accountability Act of 1996 (HIPAA), Patient Protection and Affordable Care Act of 2010 (ACA), and other relevant legislation.

Adopted: 11/11/96

That the NUCC, NUBC, and ADA be officially recognized as the appropriate organizations to specify the data content for those portions of the administrative simplification legislation within their scope and that WEDI encourages the development of standard definitions for those data elements that are common among them.

That the Workgroup for Electronic Data Interchange (WEDI) believes that for optimal consumer benefit, all organizations participating in the health care industry should adopt electronic health care standards. Such standards with assurance of privacy and confidentiality safeguards, must result in business practices that are cost effective, reduce administrative costs, assure access to patient care and work towards improving the quality of health care; and be it further resolved that WEDI endorses the development and maintenance of standards that can be broadly supported and implemented and will enable full health care industry participation in electronic commerce.

Adopted: 09/14/10

That WEDI support the adoption, by the Secretary of Health and Human Services, of all applicable transactions developed by ANSI SDOs as standards for the administrative and financial transactions described in Public Laws 104-191 and 111-148

That the Board of Directors of WEDI, mindful of WEDI's special role as the broadest coalition in the health care EDI industry, reaffirms its responsibility to provide expert counsel, guidance, and resources in support of the development and implementation of standards required in the administrative simplification provisions of Public Laws 104-191 and 111-148.

7.3 Clinical Activity

WEDI will develop industry strategies and solutions to support the implementation and ongoing business and clinical operations, addressing operational needs and regulatory requirements in the clinical health care sector. WEDI intends to assist in improving business, clinical, and technical operations, while ensuring that patient information is kept confidential and secure. This would include the following areas:

- Health care data standards. Individual data elements and fields including nomenclature, size, format, etc.
- Clinical transaction standards. The means by which data is moved from application or location to another. Transaction standards may include movement of clinical, administration, or financial data or a combination of them.

- Security
- Privacy
- Interoperability between administrative and clinical workflows
- Establishment of standardized health information exchange (HIE) networks
- Standardized reporting of patient data (e.g., copy of designated record set; use of technology to structure free-form text to be used in reporting, patient care, data analysis and similar operations; etc.)
- Assist in meeting regulatory technical, privacy, and security requirements
- Interoperability between clinical applications, such as electronic health records (EHR) and standardized clinical interfaces

WEDI has also adopted the following guiding principles to provide further clarity on the aforementioned areas of focus:

- WEDI activity will not attempt to influence how clinical data should be applied in determining patient care
- WEDI will not address how medical equipment captures and relays clinical information
- WEDI will consider how efficiencies can be gained through improvement in data movement in clinical settings

8 Document History

The current version of the WEDI Policy & Procedure Manual is the most recent effective date.

Effective Date	Description
01/01/2022	Complete revision of WEDI policies and creation of new WEDI Policy & Procedure Manual
10/1/2022	Revision of 4.4 Code of Conduct
2/24/2026	Approval of 3.9 Federal Policy Consultation Non-substantive edits
5/14/2026	Revision of 3.6.3 MPA Process Non-substantive edits