



Code of Professional Conduct for NCQA-Certified HEDIS® Auditors™

Applicants for certification must agree to the following Code of Conduct for NCQA-Certified HEDIS Auditors. This Code of Conduct governs all NCQA HEDIS Audits. This code of conduct governs all NCQA HEDIS audits. As a certified auditor I agree to the following. In promoting high standards of ethical conduct, I shall:

1. Avoid conflicts of interest and the appearance of conflicts of interest by:

- Not auditing what I create, including:
 - Not performing an NCQA HEDIS Compliance Audit for a health care organization for which I, or another audit team member, have previously provided HEDIS consulting services or have created systems or processes related to HEDIS reporting in the previous two years.
- Maintaining the independence and integrity of the HEDIS Compliance Audit by not promoting use of, or not forming a partnership with, any NCQA Certified Measure Vendor, organizations implementing NCQA Digital HEDIS for reporting purposes or organizations validated or certified through the NCQA Data Aggregator Validation program.
- Not serving as an NCQA Certified HEDIS Compliance Auditor for any company, division or business with which, to the best of my knowledge, I or a family member have a direct financial relationship.

For the purpose of this Code of Conduct, the following definitions apply:

- “Family members” are an Auditor’s brother, sister, child, spouse, partner or parent.
- “Direct financial relationship” with an organization subject to an audit is:
 - Owning an equity or ownership interest (with the exception of an investment in a mutual fund which happens to hold an investment in an organization subject to audit and the auditor or family member does not make direct stock investment decisions).
 - Being a director, officer or employee.
 - Being engaged in the sale or lease of real estate.
 - Furnishing services (including management or any other consultant services).
 - Having a creditor/debtor relationship with the organization or any division or business.
- Not serving as a Certified Auditor for, or auditing any work by, a primary competitor of any company, division or business unit by which I am employed or with which I have a consulting arrangement in effect, unless I have written approval from all parties.
- Not accepting retainers, commissions, fees or other valuable considerations from an audited health care organization except for the fee paid to the Licensed Organization.
- Not accepting any inducement, commission, gift or any other benefit from audited organizations or their employees, or from any interested party, or knowingly allowing colleagues to do so.
- Upholding the principle that an NCQA-Licensed Organization may not audit any HEDIS reporting modules or algorithms that it helped create.
- Waiting 12 months after the final HEDIS Audit report has been issued and appeals are resolved before personally soliciting or performing consulting work related to HEDIS reporting, or to any information systems supporting the collection and reporting of HEDIS data for the health care organization for which the Licensed Organization has performed a HEDIS Audit. This requirement applies to each member of a HEDIS Audit team, regardless of NCQA Certification.
- Upholding the principle that Licensed Organizations may not sell work until the final designations are given.

- Disclosing to any client or employer any relationships that influence or give the appearance of influencing my judgment.
2. Conduct myself professionally, with truth, accuracy, fairness and responsibility to my clients.
 3. Act as a faithful agent/trustee for each employer and client.
 4. Strive to enhance the prestige and competence of the HEDIS auditing profession.
 5. Help those in my employment or under my supervision develop their HEDIS auditing skills.
 6. Ensure that work of others is given credit.
 7. Not misrepresent my own or another audit team member's qualifications, competence or experience, or undertake auditing work beyond my qualifications.
 8. Maintain confidentiality of all information pertaining to the audit and not discuss or disclose any information, unless authorized in writing by the health care organization. This requirement includes, but is not limited to, not uploading any information pertaining to the organization or the audit into any generative artificial intelligence (AI) website, application or system unless authorized in writing by the health care organization.
 9. Not accept retainers, commissions, fees or other valuable considerations from any interested parties in exchange for offering confidential information or disclosures that are in any way related to NCQA, clients, Licensed Organizations, audited health care organizations or the HEDIS Audit.
 10. Not intentionally communicate false or misleading information that may compromise the integrity of any audit or any of NCQA's programs.
 11. Preface any public statements related to the HEDIS Audit that I may issue by clearly indicating on whose behalf they are made.
 12. Not accept compensation from more than one party for the same service without the consent of all parties.
 13. Not act in any way that would prejudice the reputation of NCQA or the HEDIS Audit.
 14. Notify NCQA immediately and fully cooperate with an inquiry in the event of an alleged breach of this code.
 15. Not reproduce transmit or use any NCQA intellectual property or copyrighted materials or confidential information, including, but not limited to, any of NCQA's HEDIS publications (e.g., Volumes 2 and 5, including the Roadmap), NCQA-produced audit means and percentile data, Data Aggregator Validation documentation or any other proprietary documentation, in any form or by any means, for activities other than performing under the HEDIS Audit Program including contributing the creation and/or development of tools or software for conducting non-HEDIS audits. NCQA intellectual property, copyrighted materials and confidential information may not be uploaded or entered into generative AI websites, applications or systems for any reason without NCQA's prior written authorization. The use of these materials is granted solely to support collecting and reporting data audited under the HEDIS Audit Program, which may be used by health care organizations for internal quality improvement, or for submitting audited data to NCQA or organizations with which NCQA has agreements to use data audited under the HEDIS Audit Program. Any use of these materials outside of the HEDIS Audit Program is strictly prohibited, including but not limited to use for machine learning or other AI training or as part of a generative AI application.

NCQA may amend the NCQA Policies and Procedures, Grievance and Appeal Procedures, the application, this Handbook, including any fees described herein, or any audit program policy, at its sole discretion, within 30 days.

