



## Self-Assessment

# Organizational Responsibilities

## General Instructions for the SAFER Self-Assessment Guides

The SAFER Guides are designed to help healthcare organizations conduct self-assessments to optimize the safety and safe use of electronic health records (EHRs) in the following areas.

- High Priority Practices
- Organizational Responsibilities
- Contingency Planning
- System Configuration
- System Interfaces
- Patient Identification
- Computerized Provider Order Entry with Decision Support
- Test Results Reporting and Follow-up
- Clinician Communication

Each of the nine SAFER Guides begins with a Checklist of recommended practices. The downloadable SAFER Guides provide fillable circles that can be used to indicate the extent to which each recommended practice has been implemented. Following the Checklist, a Practice Worksheet gives a rationale for and examples of how to implement each recommended practice, as well as likely sources of input into assessment of each practice, and fillable fields to record team members and follow-up action. In addition to the downloadable version, the content of each SAFER Guide, with interactive references and supporting materials, can also be viewed on ONC's website at [www.healthit.gov/SAFERGuides](http://www.healthit.gov/SAFERGuides).

The SAFER Guides are based on the best evidence available at this time (2016), including a literature review, expert opinion, and field testing at a wide range of healthcare

organizations, from small ambulatory practices to large health systems. The recommended practices in the SAFER Guides are intended to be useful for all EHR users. However, every organization faces unique circumstances and will implement a particular practice differently. As a result, some of the specific examples in the SAFER Guides for recommended practices may not be applicable to every organization.

The SAFER Guides are designed in part to help deal with safety concerns created by the continuously changing landscape that healthcare organizations face. Therefore, changes in technology, practice standards, regulations and policy should be taken into account when using the SAFER Guides. Periodic self-assessments using the SAFER Guides may also help organizations identify areas in which it is particularly important to address the implications of change for the safety and safe use of EHRs. Ultimately, the goal is to improve the overall safety of our health care system.

The SAFER Guides are not intended to be used for legal compliance purposes, and implementation of a recommended practice does not guarantee compliance with HIPAA, the HIPAA Security Rule, Medicare or Medicaid Conditions of Participation, or any other laws or regulations. The SAFER Guides are for informational purposes only and are not intended to be an exhaustive or definitive source. They do not constitute legal advice. Users of the SAFER Guides are encouraged to consult with their own legal counsel regarding compliance with Medicare or Medicaid program requirements, HIPAA, and any other laws.

For additional, general information on Medicare and Medicaid program requirements, please visit the Centers for Medicare & Medicaid Services website at [www.cms.gov](http://www.cms.gov). For more information on HIPAA, please visit the HHS Office for Civil Rights website at [www.hhs.gov/ocr](http://www.hhs.gov/ocr).



## Self-Assessment

# Organizational Responsibilities

## Introduction

The *Organizational Responsibilities SAFER Guide* identifies individual and organizational responsibilities (activities, processes, and tasks) intended to optimize the safety and safe use of EHRs. A safe EHR implementation is critically dependent on the people involved. This guide, compared to all of the other SAFER Guides, focuses chiefly on human behavior and relationships, and it is organized differently than the other guides. In particular, it includes principles that apply to the people who have responsibility for patient safety in EHR-enabled healthcare organizations.

Safe EHR implementations require attention to social as well as technical matters. This guide is designed to help safely manage the individual and organizational responsibilities in a complex “sociotechnical” healthcare organization. Responsibilities can be shifted, forgotten, or newly created when EHRs are implemented. Careful attention to the details of those responsibilities is a critical factor in system safety and in realizing the potential benefits of EHRs.

Completing the self-assessment in the Organizational Responsibilities SAFER Guide requires the engagement of a wide variety of people within the organization. Because this guide is designed to help organizations prioritize EHR-related safety concerns, clinician leadership in the organization should be engaged in assessing whether and how any particular recommended practice affects the organization’s ability to deliver safe, high quality care. The collaboration between clinicians and staff members in completing the self-assessment in this guide will enable an accurate snapshot of the organization’s EHR responsibility status, in terms of safety. Even more importantly, collaboration should lead to a consensus about the organization’s future path to optimize EHR-related safety and quality: setting priorities among the recommended practices not yet addressed, ensuring a plan is in place to maintain recommended practices already in place, dedicating the required resources to make necessary improvements, and working together to mitigate the highest priority responsibility-related safety risks introduced by the EHR.



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# Organizational Responsibilities

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The SAFER Self-Assessment Guides were developed by health IT safety researchers and informatics experts:

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The *Checklist* is structured as a quick way to enter and print your self-assessment. The checklist is based on a core set of underlying principles and specific recommended practices. Your selection on the checklist will automatically update the related section of the corresponding recommended practice worksheet.

**Introduction**

The Organizational Responsibilities Guide has a unique layout compared to the other SAFER Guides. In addition to mapping recommended practices to domains as for the rest of the series, this Guide takes the additional step of mapping recommended practices to "principles." These principles, listed below, add clarity to how each recommended practice applies to the assigned domain.

**Principle: Defined decision making activities to ensure EHR safety**

Pertains to Recommended Practices 1.1-1.4

**Principle: Activities to optimize EHR quality and data quality to ensure EHR safety**

Pertains to Recommended Practices 2.1-2.5

**Principle: Activities to ensure safe use of the EHR to prevent EHR safety hazards**

Pertains to Recommended Practices 2.6-2.12

**Principle: Activities to ensure the availability of information in the EHR to prevent EHR safety hazards**

Pertains to Recommended Practices 3.1-3.3

**Principle: Activities to help the organization learn from EHR safety efforts to prevent EHR safety hazards**

Pertains to Recommended Practices 3.4-3.8

The *Domain* associated with the *Recommended Practice(s)* appears at the top of the column.

**Recommended Practices for Domain 1 — Safe Health IT**

Practice ID	Practice Description	Worksheet	Implementation Status			reset
			Fully in all areas	Partially in some areas	Not implemented	
1.1	Staff members are assigned to regularly monitor and maintain EHR hardware, software, and network/Internet service provider (ISP) performance and safety.	<a href="#">Worksheet 1.1</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	reset
1.2	Staff members are assigned to regularly test and promptly correct problems with EHR hardware, software, and network/ISP performance and safety.	<a href="#">Worksheet 1.2</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	reset
1.3	Staff members are assigned responsibility for selecting, testing, monitoring, and maintaining clinical decision support (CDS) performance and safety.	<a href="#">Worksheet 1.3</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	reset
1.4	Organizations train all EHR users and IT staff on best practices related to maintaining patient privacy and data confidentiality while working with protected health information (PHI).	<a href="#">Worksheet 1.4</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	reset

**Recommended Practices for Domain 2 — Using Health IT Safely**

Practice ID	Practice Description	Worksheet	Implementation Status			reset
			Fully in all areas	Partially in some areas	Not implemented	
2.1	The highest level decision makers (e.g., boards of directors, owners of physician practices) are committed to promoting a culture of safety that incorporates the safety and safe use of EHRs.	<a href="#">Worksheet 2.1</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	reset

The *Recommended Practice(s)* for the topic appear below the associated *Domain*.

Select the level of implementation achieved by your organization for each *Recommended Practice*.

Your *Implementation Status* will be reflected on the *Recommended Practice Worksheet* in this PDF.

To the right of each *Recommended Practice* is a link to the *Recommended Practice Worksheet* in this PDF.

The *Worksheet* provides guidance on implementing the *Practice*.



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**Introduction**

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**Principle: Defined decision making activities to ensure EHR safety**

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Pertains to Recommended Practices 2.1-2.5

**Principle: Activities to ensure safe use of the EHR to prevent EHR safety hazards**

Pertains to Recommended Practices 2.6-2.12

**Principle: Activities to ensure the availability of information in the EHR to prevent EHR safety hazards**

Pertains to Recommended Practices 3.1-3.3

**Principle: Activities to help the organization learn from EHR safety efforts to prevent EHR safety hazards**

Pertains to Recommended Practices 3.4-3.8

**Recommended Practices for Domain 1 — Safe Health IT**

			Implementation Status			
			Fully in all areas	Partially in some areas	Not implemented	
<b>1.1</b>	Staff members are assigned to regularly monitor and maintain EHR hardware, software, and network/Internet service provider (ISP) performance and safety.	<a href="#">Worksheet 1.1</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<a href="#">reset</a>
<b>1.2</b>	Staff members are assigned to regularly test and promptly correct problems with EHR hardware, software, and network/ISP performance and safety.	<a href="#">Worksheet 1.2</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<a href="#">reset</a>
<b>1.3</b>	Staff members are assigned responsibility for selecting, testing, monitoring, and maintaining clinical decision support (CDS) performance and safety.	<a href="#">Worksheet 1.3</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<a href="#">reset</a>
<b>1.4</b>	Organizations train all EHR users and IT staff on best practices related to maintaining patient privacy and data confidentiality while working with protected health information (PHI).	<a href="#">Worksheet 1.4</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<a href="#">reset</a>

**Recommended Practices for Domain 2 — Using Health IT Safely**

			Implementation Status			
			Fully in all areas	Partially in some areas	Not implemented	
<b>2.1</b>	The highest level decision makers (e.g., boards of directors, owners of physician practices) are committed to promoting a culture of safety that incorporates the safety and safe use of EHRs.	<a href="#">Worksheet 2.1</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<a href="#">reset</a>



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*Recommended Practices for **Domain 2 — Using Health IT Safely***

**Implementation Status**

			Fully in all areas	Partially in some areas	Not implemented	
<b>2.2</b>	An effective decision making structure exists for managing and optimizing the safety and safe use of the EHR.	<a href="#">Worksheet 2.2</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="button" value=""/>
<b>2.3</b>	Staff members are assigned responsibility for the management of CDS content.	<a href="#">Worksheet 2.3</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="button" value=""/>
<b>2.4</b>	Practicing clinicians are involved in all levels of EHR safety-related decision making that impact clinical use.	<a href="#">Worksheet 2.4</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="button" value="reset"/>
<b>2.5</b>	Clear clinician oversight is maintained when clinicians delegate aspects of order entry, medication reconciliation, or documentation tasks.	<a href="#">Worksheet 2.5</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="button" value="reset"/>
<b>2.6</b>	EHR training and support are sufficient for the needs of EHR users and readily available.	<a href="#">Worksheet 2.6</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="button" value="reset"/>
<b>2.7</b>	EHR training and support are high quality, provided by qualified trainers, and appropriately tailored to specific types of users' needs.	<a href="#">Worksheet 2.7</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="button" value="reset"/>
<b>2.8</b>	Content and delivery of EHR training and support are assessed regularly to optimize complete and safe use of the EHR.	<a href="#">Worksheet 2.8</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="button" value="reset"/>
<b>2.9</b>	Workflow analysis is used to map clinical work and to ensure that the EHR is used safely for delivering care.	<a href="#">Worksheet 2.9</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="button" value="reset"/>
<b>2.10</b>	Clinical staff is assigned responsibility for ensuring that CDS content, such as alerts and protocols, supports effective clinical workflow in all practice settings.	<a href="#">Worksheet 2.10</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="button" value="reset"/>
<b>2.11</b>	Organizational policy facilitates reporting of EHR-related hazards and errors and ensures that reports are promptly investigated and addressed.	<a href="#">Worksheet 2.11</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="button" value="reset"/>
<b>2.12</b>	Records of reported and addressed EHR-related hazards and errors are maintained.	<a href="#">Worksheet 2.12</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="button" value="reset"/>



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*Recommended Practices for **Domain 3 — Monitoring Safety***

**Implementation Status**

		Fully in all areas	Partially in some areas	Not implemented		
<b>3.1</b>	Staff members are assigned responsibility, adequately funded, and given appropriate oversight for the maintenance of the EHR-related hardware, software, CDS, and network/ISP performance.	<a href="#">Worksheet 3.1</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<a href="#">reset</a>
<b>3.2</b>	Staff members regularly monitor maintenance of the EHR-related hardware, software, CDS, and network/ISP performance and safety.	<a href="#">Worksheet 3.2</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<a href="#">reset</a>
<b>3.3</b>	Organizational procedures ensure that EHR users are able to get timely help when there are EHR-related hardware, software, CDS, or network/ISP problems.	<a href="#">Worksheet 3.3</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<a href="#">reset</a>
<b>3.4</b>	Communication mechanisms ensure that EHR users learn of EHR changes before they are put in place, and users are able to give feedback on related safety concerns before and after they are implemented.	<a href="#">Worksheet 3.4</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<a href="#">reset</a>
<b>3.5</b>	Staff members with job responsibilities for EHR safety are encouraged to participate in relevant professional activities and communicate with others in similar positions.	<a href="#">Worksheet 3.5</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<a href="#">reset</a>
<b>3.6</b>	Self-assessments, including use of the SAFER Guides, are conducted routinely by a team, and the risks of foregoing or delaying any recommended practices are assessed.	<a href="#">Worksheet 3.6</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<a href="#">reset</a>
<b>3.7</b>	Organizations develop a strategy for measurement of high priority EHR safety hazards.	<a href="#">Worksheet 3.7</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<a href="#">reset</a>
<b>3.8</b>	Healthcare organizations and EHR developers share responsibility for identifying and addressing EHR safety concerns.	<a href="#">Worksheet 3.8</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<a href="#">reset</a>



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A multi-disciplinary team should complete this self-assessment and evaluate potential health IT-related patient safety risks addressed by this specific SAFER Guide within the context of your particular healthcare organization

This Team Worksheet is intended to help organizations document the names and roles of the self-assessment team, as well as individual team members' activities. Typically, team members will be drawn from a number of different areas within your organization, and in some instances, from external sources. The suggested Sources of Input section in each Recommended Practice Worksheet identifies the types of expertise or services to consider engaging. It may be particularly useful to engage specific clinician and other leaders with accountability for safety practices identified in this guide.

The Worksheet includes fillable boxes that allow you to document relevant information. The Assessment Team Leader box allows documentation of the person or persons responsible for ensuring

that the self-assessment is completed. The section labeled Assessment Team Members enables you to record the names of individuals, departments, or other organizations that contributed to the self-assessment. The date that the self-assessment is completed can be recorded in the Assessment Completion Date section and can also serve as a reminder for periodic reassessments. The section labeled Assessment Team Notes is intended to be used, as needed, to record important considerations or conclusions arrived at through the assessment process. This section can also be used to track important factors such as pending software updates, vacant key leadership positions, resource needs, and challenges and barriers to completing the self-assessment or implementing the Recommended Practices in this SAFER Guide.

Assessment Team Leader

Assessment Completion Date

Assessment Team Members

Assessment Team Notes

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Each *Worksheet* provides guidance on implementing a specific *Recommended Practice*, and allows you to enter and print information about your self-assessment.

The *Rationale* section provides guidance about “why” the safety activities are needed.

Enter any notes about your self-assessment.

Enter any follow-up activities required.

Enter the name of the person responsible for the follow-up activities.

**Recommended Practice**

**1.4** System-to-system interfaces are properly configured and tested to ensure that both coded and free-text data elements are transmitted without loss of or changes to information content.<sup>15, 17</sup>  
[Checklist](#)

**Rationale for Practice or Risk Assessment**

Maintaining a system-to-system interface within a rapidly evolving clinical information system environment is challenging, in part because many changes are required. Without the ability to implement and test these changes prior to go-live, and a consistent practice of doing so, a healthcare organization would be placed at significantly increased risk of data loss, corruption, or theft, which could negatively impact patient safety. Failure to test system interface components is one of the leading causes of EHR-related patient safety events.<sup>18</sup>

**Assessment Notes**

**Follow-up Actions**

**Person Responsible for Follow-up Action**

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**Implementation Status**

▼

**Suggested Sources of Input**

EHR developer  
Health IT support staff

**Examples of Potentially Useful Practices/Scenarios**

- System-to-system interfaces are tested before going into production and after changes to hardware, software, or content (e.g., the allowable list of data elements to be exchanged) on either side of the interface.
- Free text data fields accessible to clinical end users of one system are transferred without corruption or truncation of characters to the other system.<sup>19</sup>
- Free text data fields that are not supported by the system-to-system interface should be avoided, if at all possible, and clearly marked as such for all users if they exist.
- The organization (or interface developer) should develop a reference or validation data set that includes boundary cases (i.e., data that are slightly below, at, and slightly above key thresholds). These test data are run through the interface repeatedly after any change to the hardware or software on either end of the interface to document that the interface is continuing to work appropriately.

The *Suggested Sources of Input* section indicates categories of personnel who can provide information to help evaluate your level of implementation.

The *Examples* section lists potentially useful practices or scenarios to inform your assessment and implementation of the specific *Recommended Practice*.



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**Recommended Practice**

**Implementation Status**

**1.1**

Staff members are assigned to regularly monitor and maintain EHR hardware, software, and network/internet service provider (ISP) performance and safety.

[Checklist](#)



**Rationale for Practice or Risk Assessment**

- Problems can be caught before harm is done.
- Providers and others can learn from their mistakes.
- The impact of changes to the EHR or clinical decision support (CDS) is transparent.

**Responsibility**

*Large organization:*

Safety officer, informatics-type department, health IT

*Small organization:*

Office management, health IT staff/contractor, providers

**Suggested Sources of Input**

- |   |                         |
|---|-------------------------|
| Leadership team   | Multi-professional team |
| Health informatics team                                   | Health IT support staff |
| Clinicians, support staff, and/or clinical administration |                         |

Assessment Notes

Follow-up Actions

Person Responsible for Follow-up Action

**Examples of Potentially Useful Practices/Scenarios**

- A plan outlining responsibility for EHR safety monitoring is in place.<sup>1,2,3</sup>
- Errors involving system-to-system interfaces are routinely monitored.
- Providers and others (including leadership in large organizations) are encouraged to use tools to monitor EHR safety and care quality.
- A plan exists for learning from incidents to improve EHR safety.
- The review and communication of lab results are monitored.
- The test results reporting loop is closed.
- Selected post-implementation care outcomes are monitored.
- Alert and reminder responses are monitored.
- Alert and reminder specificity and sensitivity are appropriately managed.

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## Recommended Practice

## Implementation Status

**1.2**

Staff members are assigned to regularly test for and promptly correct problems with EHR hardware, software, and network/ISP performance and safety.

[Checklist](#)



### Rationale for Practice or Risk Assessment

- Customization of either the EHR or content must be skillfully done or upgrades to the EHR can produce unique hazards.
- Inadequate or unprepared staff members are more likely to permit problems to remain unaddressed.

### Responsibility

*Large organization:*

Safety officer, informatics-type department, health IT

*Small organization:*

Office management, health IT staff/contractor, providers

### Suggested Sources of Input

Leadership team                      Health IT support staff

Health informatics team              EHR developer

Clinicians, support staff, and/or clinical administration

### Examples of Potentially Useful Practices/Scenarios

- The organization has adequate numbers of trained staff members available either on site or elsewhere to modify software.
- Adequate technical staff members are available to fix hardware problems during operating hours.
- Staff members are available to catch and promptly correct errors in areas such as registration, order entry, or test results communication.
- When errors occur, a multi-disciplinary review and discussion takes place.
- The organization has a rigorous process in place for testing new software.<sup>4</sup>
- The organization has a rigorous process in place for testing new hardware.
- Workflow analysis that shows the way work is actually done is conducted prior to any system upgrade.
- Risk assessments are conducted prior to go-live.
- The potential impact of any EHR upgrade is carefully assessed.<sup>5</sup>

### Assessment Notes

### Follow-up Actions

### Person Responsible for Follow-up Action

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## Recommended Practice

## Implementation Status

**1.3**

Staff members are assigned responsibility for selecting, testing, monitoring, and maintaining clinical decision support (CDS) performance and safety.<sup>6</sup>

[Checklist](#)



### Rationale for Practice or Risk Assessment

- Untested CDS can lead to patient care errors.
- Lessons from testing can prevent implementation of error prone CDS.

### Responsibility

*Large organization:*

Safety officer, informatics-type department, health IT

*Small organization:*

Office management, health IT staff/contractor, providers

### Suggested Sources of Input

Leadership team

Health IT support staff

Health informatics team

EHR developer

Clinicians, support staff, and/or clinical administration

### Examples of Potentially Useful Practices/Scenarios

- The organization has a rigorous process in place for testing new CDS.<sup>4</sup>
- Risk assessments are conducted prior to go-live with new CDS.
- Clinical content is developed or modified by a multi-disciplinary group, including clinical specialists when appropriate.

### Assessment Notes

### Follow-up Actions

### Person Responsible for Follow-up Action

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## Recommended Practice

## Implementation Status

**1.4**

Organizations train all EHR users and IT staff on best practices related to maintaining patient privacy and data confidentiality while working with protected health information (PHI).<sup>7</sup>

[Checklist](#)

### Rationale for Practice or Risk Assessment

- A rapid increase in computerization of health care organizations (HCOs) has raised their profile as lucrative targets for cyber-criminals.

### Responsibility

*Large organization:*  
Patient safety officer, compliance officer, chief information security officer

*Small organization:*  
Owners

### Suggested Sources of Input

Clinical, administrative  
and IT leadership team

### Assessment Notes

### Follow-up Actions

### Person Responsible for Follow-up Action

### Examples of Potentially Useful Practices/Scenarios

- All employees should be required to take, and pass, a course (either on-line or in-person) that focuses on best practices for handling protected health information (PHI).<sup>8</sup>
- All employees are trained on ransomware prevention strategies, including how to identify malicious e-mails (i.e., spam, phishing, and spear-phishing messages), and to avoid clicking on potentially weaponized attachments (e.g., \*.exe, \*.zip, \*.rar, \*.7z, \*.js, \*.wsf, \*.docm, \*.xlsm, \*.pptm, \*.rtf, \*.msi, \*.bat, \*.com, \*.cmd, \*.hta, \*.scr, \*.pif, \*.reg, \*.vbs, \*.cpl, \*.jar files). Safe file attachment formats include \*.jpg, \*.png, \*.pdf, \*.docx, \*.xlsx, and \*.pptx.<sup>7</sup>
- Organizations train all employees not to use USB flash drives unless the drives are obtained from a trusted source.<sup>7,9</sup>

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## Recommended Practice

## Implementation Status

**2.1**

The highest level decision makers (e.g. boards of directors, owners of physician practices) are committed to promoting a culture of safety that incorporates the safety and safe use of EHRs.<sup>10</sup>

[Checklist](#)

### Rationale for Practice or Risk Assessment

- Leadership can provide motivation for all staff to pay attention to EHR safety.
- Those in authority can provide resources for ensuring EHR safety.
- Without leadership involvement, EHR safety efforts will likely fail.

### Responsibility

*Large organization:*

Board of directors, parent organization, CEO

*Small organization:*

Owners

### Suggested Sources of Input

Leadership team

Multi-professional team

### Assessment Notes

### Follow-up Actions

### Person Responsible for Follow-up Action

### Examples of Potentially Useful Practices/Scenarios

- Highest level decision makers recognize that EHR safety is integral to patient safety.<sup>11</sup> They ensure that EHR safety is integrated into organizational policies and procedures and risk management practices.<sup>12</sup>
- Highest level decision makers ensure that adequate staffing and resources exist so that safety issues associated with adoption and use of EHRs can be addressed in a timely fashion.
- Highest level decision makers review the results of assessments of EHR safety, such as those from SAFER Guide use.<sup>13</sup>
- Highest level decision makers identify EHR-related patient safety goals, assess whether those goals are being reached, and address any shortcomings.
- Highest level decision makers identify and support staff members so that they can provide well thought out, coordinated feedback to the EHR developers regarding the perceived shortcomings of their EHRs.

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## Recommended Practice

## Implementation Status

**2.2**

An effective decision making structure exists for managing and optimizing the safety and safe use of the EHR.

[Checklist](#)

### Rationale for Practice or Risk Assessment

- Clarifies responsibility.
- Maximizes involvement of disciplines.
- Ensures that important EHR safety issues are addressed.

### Responsibility

*Large organization:*

Board of directors

*Small organization:*

Owners

### Assessment Notes

### Follow-up Actions

### Person Responsible for Follow-up Action

### Suggested Sources of Input

Leadership team

Multi-professional team

### Examples of Potentially Useful Practices/Scenarios

- For larger organizations, all of the following are represented in decision making about EHR safety: clinicians, administrators, patients, health IT/informatics, board of directors and CEOs, and quality and legal staff.
- For smaller ambulatory practices and small hospitals, both clinical and administrative staff members are represented in decision making about EHR safety, with assistance from outside experts as needed.
- An EHR safety officer, or someone assigned that responsibility part time in a small organization, plays a key role in assuring safety.
- EHR safety is appropriately included in job performance appraisals.
- For a larger organization, an EHR safety oversight committee is in place,<sup>14,15</sup> or these functions are assumed by an EHR or safety and quality oversight committee.

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## Recommended Practice

## Implementation Status

**2.3**

Staff members are assigned responsibility for the management of CDS content.<sup>6</sup>

[Checklist](#)



### Rationale for Practice or Risk Assessment

- Facilitates decision making about CDS and other content.
- Provides accountability for decisions.
- Avoids hazardous, wrong, or outdated content in the EHR.

### Responsibility

*Large organization:*  
Informatics-type department

*Small organization:*  
Providers

### Suggested Sources of Input

Health informatics team	Multi-professional team
Clinicians, support staff, and/or clinical administration	EHR developer
	Pharmacy

### Assessment Notes

### Follow-up Actions

### Person Responsible for Follow-up Action

### Examples of Potentially Useful Practices/Scenarios

- A decision making structure exists for making decisions about clinical content.<sup>16,17,18,19</sup>
- Responsibility for management of content, from selection to maintenance, is clear.
- Committees or other collaboration mechanisms are in place to approve order sets and documentation templates.<sup>20</sup>
- The healthcare organization routinely reviews the CDS content embedded in their EHR and provides feedback to their EHR developer about local standards of care.
- There is clear responsibility for the review of new CDS that becomes available from developers and other sources (e.g., professional organizations).
- Developers provide clear documentation of CDS content and the evidence-base to support that content.
- Developers routinely review and update CDS content they provide.
- Personnel are available, either internally or externally, to ensure that CDS is tailored to the workflows of professional roles and specialties.<sup>21,22,23,24,25</sup>

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## Recommended Practice

## Implementation Status

**2.4**

Practicing clinicians are involved in all levels of EHR safety-related decision making that impact clinical use.

[Checklist](#)



### Rationale for Practice or Risk Assessment

- Facilitates informed decision making about clinically relevant issues.
- Assures focus on patient care.
- Increases acceptance of decisions.

### Responsibility

*Large organization:*  
Administration

*Small organization:*  
Providers

### Suggested Sources of Input

Clinicians, support staff, and/or clinical administration

Multi-professional team

### Assessment Notes

### Follow-up Actions

### Person Responsible for Follow-up Action

### Examples of Potentially Useful Practices/Scenarios

- Clinicians (including physicians, nurses, pharmacists, and others) are included on the EHR safety oversight committee of a large organization.<sup>26</sup>
- Clinicians are involved in decision making about proposed changes to the EHR that affect clinical care (e.g., changes to screen design, content of order sets, charting templates, clinical alerts, role-based access to system resources, placement of workstations).

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## Recommended Practice

## Implementation Status

**2.5**

Clear clinician oversight is maintained when clinicians delegate aspects of order entry, medication reconciliation, or documentation tasks.

[Checklist](#)



### Rationale for Practice or Risk Assessment

- Assures that the safety risks of assigning these tasks to medical assistants or scribes are carefully weighed.
- Assures that responsible providers take the time to review delegated work.

### Responsibility

*Large organization:*  
Hospital departments

*Small organization:*  
Providers

### Suggested Sources of Input

Clinicians, support staff, and/or clinical administration

Multi-professional team

### Assessment Notes

### Follow-up Actions

### Person Responsible for Follow-up Action

### Examples of Potentially Useful Practices/Scenarios

- The organization has a written policy and procedure in place regarding delegation of order entry, medication reconciliation, and clinical documentation tasks.
- There is a process in place to ensure competency (i.e., administrative, clinical, and EHR knowledge) of those with delegated EHR data entry authority that includes regular evaluation of their work and written documentation of the results of that evaluation.<sup>27</sup>
- For teaching hospitals and clinics, attending physicians are diligent about reviewing the work of trainees.<sup>28,29</sup>
- In community non-teaching settings, responsible providers oversee and are diligent about reviewing the delegated work.

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## Recommended Practice

## Implementation Status

**2.6**

EHR training and support are sufficient for the needs of EHR users are readily available.

[Checklist](#)

### Rationale for Practice or Risk Assessment

- If the EHR is not used or is poorly used, patient harm can result.
- Training and support staff must be well trained to maximize effectiveness.

### Assessment Notes

### Follow-up Actions

### Person Responsible for Follow-up Action

### Responsibility

*Large organization:*

Informatics-type department, health IT, developer

*Small organization:*

Office management, developer

### Suggested Sources of Input

Leadership team	Health IT support staff
Health informatics team	EHR developer
Clinicians, support staff, and/or clinical administration	

### Examples of Potentially Useful Practices/Scenarios

- All users are trained prior to their using the system, supported while they are first using the system, and trained again before each change to the system.<sup>1</sup>
- Different modalities for training are offered to accommodate user schedules and learning styles.
- EHR safety is covered in EHR training.
- Users are trained on how to proceed during system unavailability (i.e., downtimes).
- Providers must demonstrate competency in using the system before using order entry.
- In larger organizations, health IT and informatics staff receive training from the developer and are certified as appropriate.
- A process is in place so that users can get help immediately whenever and wherever they need it.<sup>22</sup>

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**Recommended Practice**

**Implementation Status**

**2.7**

EHR training and support are high quality, provided by qualified trainers, and appropriately tailored to specific types of user needs.

[Checklist](#)

 

**Rationale for Practice or Risk Assessment**

- Suboptimal training and support lead to wasted time for users.
- Lack of diligence can cause EHR safety hazards.

**Responsibility**

*Large organization:*  
Informatics-type department, health IT, developer

*Small organization:*  
Office management, developer

**Suggested Sources of Input**

Leadership team	Health IT support staff
Health informatics team	EHR developer
Clinicians, support staff, and/or clinical administration	

Assessment Notes

Follow-up Actions

Person Responsible for Follow-up Action

**Examples of Potentially Useful Practices/Scenarios**

- Whether done by dedicated internal trainers or others hired from outside, pre-implementation training prepares users for go-live.
- Training and support are provided by individuals who can fill the gap between the clinical and health IT languages and understand clinical workflow.<sup>21</sup>
- Support provided is appropriate to the level of clinical training and EHR competency. Support should be available on-site at least during the first week or so after EHR go-live and might be in the form of expert EHR users.
- A written policy and procedure exists so that all users know how to get technical, software, and connectivity support.
- Initial training includes running through scenarios that simulate the tasks users will need to accomplish.<sup>30</sup>
- Training stresses the need to be diligent about entering accurate data.<sup>1,31,32,33,34</sup>
- User skills are monitored and upgraded when needed.

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**Recommended Practice**

**Implementation Status**

**2.8**

Content and delivery of EHR training and support are assessed regularly to optimize complete and safe use of the EHR.

[Checklist](#)

**Rationale for Practice or Risk Assessment**

- To achieve full value from EHR implementation, continuous improvement of training and support is important.

**Responsibility**

*Large organization:*  
Informatics-type department, health IT, developer

*Small organization:*  
Office management, developer

**Suggested Sources of Input**

Leadership team	Health IT support staff
Health informatics team	EHR developer
Clinicians, support staff, and/or clinical administration	

Assessment Notes

Follow-up Actions

Person Responsible for Follow-up Action

**Examples of Potentially Useful Practices/Scenarios**

- A training plan outlines regular, ongoing training opportunities so that users can optimize their use of the EHR.
- Training and support must be tailored to the needs of EHR users.
- A plan exists for ongoing assessment of training and support.
- Feedback about training and support is effectively addressed.

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**Recommended Practice**

**Implementation Status**

**2.9**

Workflow analysis is used to map clinical work and to ensure that the EHR is used safely for delivering care.<sup>35</sup>

[Checklist](#)



**Rationale for Practice or Risk Assessment**

- Inattention to how the EHR fits workflow can result in wasted time and money.
- Workarounds that result from workflow-related problems can lead to errors that affect patients.

**Responsibility**

*Large organization:*

Informatics-type department, health IT, developer

*Small organization:*

Office management, developer or consultant

**Suggested Sources of Input**

Leadership team

EHR developer

Health informatics team

Multi-professional team

Assessment Notes

Follow-up Actions

Person Responsible for Follow-up Action

**Examples of Potentially Useful Practices/Scenarios**

- Workflow analysis is conducted prior to implementation of the EHR.<sup>36</sup>
- Workflow analysis is conducted prior to any major change to the EHR system.
- An effective change management approach (e.g., strategies for promoting the adoption and effective use of EHRs) guides any needed workflow changes based on the workflow analysis.<sup>37</sup>

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## Recommended Practice

## Implementation Status

**2.10**

Clinical staff is assigned responsibility for ensuring that CDS content, such as alerts and protocols, supports effective clinical workflow in all practice settings.

[Checklist](#)



### Rationale for Practice or Risk Assessment

- Without customization, generic CDS that is not useful to the recipient's role or specialty may create hazards.

### Responsibility

*Large organization:*  
Informatics-type department

*Small organization:*  
Providers

### Suggested Sources of Input

Clinicians, support staff, and/or clinical administration	Health IT support staff Multi-professional team Pharmacy
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### Assessment Notes

### Follow-up Actions

### Person Responsible for Follow-up Action

### Examples of Potentially Useful Practices/Scenarios

- A process exists for the review and modification of any locally developed, commercial, or freely available CDS so that it is appropriate for a particular setting.<sup>38</sup>
- A clinical rules committee has a defined process for evaluating and overseeing the testing and monitoring of CDS.
- The unique needs of the pediatric population are taken into account when reviewing and modifying CDS.<sup>39,40</sup>

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**Recommended Practice**

**Implementation Status**

**2.11**

Organizational policy facilitates reporting of EHR-related hazards and errors and ensures that reports are promptly investigated and addressed.

[Checklist](#)

**Rationale for Practice or Risk Assessment**

- A culture of safety relies on reporting and follow-up.
- If hazards exist but remain unreported they could cause harm.

**Responsibility**

*Large organization:*  
Safety officer, all those involved in safety initiatives, informatics-type department responsibility

*Small organization:*  
Office management, providers

**Suggested Sources of Input**

Leadership team                      Health informatics team  
Clinicians, support staff,  
and/or clinical  
administration

Assessment Notes

**Examples of Potentially Useful Practices/Scenarios**

- The mechanism for anonymous, no-fault, internal reporting of EHR-related safety hazards is clear to all users.<sup>41</sup>
- Those who manage EHR and patient safety initiatives for the organization have a clear process for addressing identified problems and for reporting problems externally to the developer and/or a Patient Safety Organization (PSO) when appropriate.<sup>4,33</sup>

Follow-up Actions

Person Responsible for Follow-up Action

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## Recommended Practice

## Implementation Status

**2.12**

Record of reported and addressed EHR-related hazards and errors and maintained.<sup>5,42</sup>

[Checklist](#)



### Rationale for Practice or Risk Assessment

- If records of EHR-related hazards are not maintained, the same problems might arise at a future time without access to prior solutions and mitigation strategies.
- There could be liability risks if the history is undocumented.
- If users cannot learn the disposition of their reports, they may not bother submitting future reports.

### Assessment Notes

### Follow-up Actions

### Person Responsible for Follow-up Action

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### Responsibility

*Large organization:*

Safety officer, Informatics-type department

*Small organization:*

Office management, providers

### Suggested Sources of Input

Leadership team

Health informatics team

Clinicians, support staff,  
and/or clinical  
administration

### Examples of Potentially Useful Practices/Scenarios

- Larger organizations often use help desk software to keep track of internal reports and their disposition.
- Smaller organizations develop databases of reports and assign responsibility for maintenance of the database, usually to a health IT person.
- The user who reported the issue should be notified of the outcome when appropriate.



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**Recommended Practice**

**Implementation Status**

**3.1**

Staff members are assigned responsibility, adequately funded, and given appropriate oversight for the maintenance of the EHR-related hardware, software, CDS, and network/ISP performance.

[Checklist](#)

**Rationale for Practice or Risk Assessment**

- Without maintenance, components of the EHR may impede use.
- Inadequate maintenance could cause the EHR to be unavailable, creating safety risks.

**Responsibility**

*Large organization:* Health IT informatics-type department/department HI (for CDS)

*Small organization:* Health IT contractor or internal health IT-oriented person

**Suggested Sources of Input**

Health IT support staff

Assessment Notes

Follow-up Actions

Person Responsible for Follow-up Action

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**Examples of Potentially Useful Practices/Scenarios**

- Regular maintenance of hardware, software, CDS, and the network/ISP is organized and funded.



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## Recommended Practice

## Implementation Status

**3.2**

Staff members regularly monitor maintenance of the EHR-related hardware, software, CDS, and network/ISP performance and safety.

[Checklist](#)



### Rationale for Practice or Risk Assessment

- Inadequate maintenance may result in increased and unplanned downtime.
- Inadequate maintenance may cause the EHR to be unavailable, causing safety risks.

### Responsibility

*Large organization:*

Health IT, informatics-type department

*Small organization:*

Office management

### Suggested Sources of Input

Leadership team

Health IT support staff

Clinicians, support staff, and/or clinical administration

Health informatics team

### Assessment Notes

### Follow-up Actions

### Person Responsible for Follow-up Action

### Examples of Potentially Useful Practices/Scenarios

- When maintenance for these components is provided from outside the organization, oversight is conducted by an internal staff member to assure the competence and performance of the contractors.
- When maintenance is provided internally, regular schedules exist for it.
- EHR developers provide recommendations and timelines for routine maintenance procedures to local healthcare staff members.
- Assessments, using EHR developer-supplied checklists based on the best available evidence, are conducted regularly to ensure adequate maintenance.

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## Recommended Practice

## Implementation Status

**3.3**

Organizational procedures ensure that EHR users are able to get timely help when there are EHR-related hardware, software, CDS, or network/ISP problems.

[Checklist](#)



### Rationale for Practice or Risk Assessment

- Without knowing how to get help, users will develop workarounds, which can be dangerous.
- Time can be wasted when users and staff members have difficulty finding help.

### Responsibility

*Large organization:*

Health IT, informatics-type department

*Small organization:*

Office management

### Suggested Sources of Input

Leadership team

Health IT support staff

Clinicians, support staff, and/or clinical administration

Health informatics team

### Assessment Notes

### Follow-up Actions

### Person Responsible for Follow-up Action

### Examples of Potentially Useful Practices/Scenarios

- In small practices, guidelines exist for determining when to seek help outside the organization.
- In larger organizations, guidelines exist for users to know how to get help, and for health IT staff members to know when and how to get outside assistance.

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**Recommended Practice**

**Implementation Status**

**3.4**

Communication mechanisms ensure that EHR users learn of EHR changes before they are put in place, and users are able to give feedback on related safety concerns before and after they are implemented.

[Checklist](#)



**Rationale for Practice or Risk Assessment**

- If observed errors are not reported, they will generally not be fixed.
- If the developer does not receive feedback, he or she will generally not address the issues.
- Patient harm can result if hazards are not addressed.

**Responsibility**

*Large organization:*  
Health IT, informatics-type department, developer

*Small organization:*  
Office management

**Suggested Sources of Input**

Leadership team	Health IT support staff
Clinicians, support staff, and/or clinical administration	Health informatics team
	EHR developer

Assessment Notes

Follow-up Actions

Person Responsible for Follow-up Action

**Examples of Potentially Useful Practices/Scenarios**

- Responsibility is clear for reporting EHR safety errors and getting feedback.
- Someone is responsible for serving as the liaison to the developer for reporting problems and getting feedback.
- Communication channels are in place for including health information management staff in patient registration error correction and feedback.
- Software errors or desired changes for safety reasons are routinely reported to the developer.
- Reports about EHR safety reach the highest level in the organization routinely, and feedback is given.
- Users know how to report potential and actual EHR safety problems, and to whom they should be reported.

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## Recommended Practice

## Implementation Status

**3.5**

Staff members with job responsibilities for EHR safety are encouraged to participate in relevant professional activities and communicate with others in similar positions.

[Checklist](#)



### Rationale for Practice or Risk Assessment

- If key internal people do not network with outsiders, up-to-date knowledge may not reach them.

### Assessment Notes

### Follow-up Actions

### Person Responsible for Follow-up Action

### Responsibility

*Large organization:*

Health IT, informatics-type department, developer

*Small organization:*

Office management

### Suggested Sources of Input

Leadership team	Health IT support staff
Clinicians, support staff, and/or clinical administration	Health informatics team
	EHR developer

### Examples of Potentially Useful Practices/Scenarios

- Organizations support professional development of staff assigned responsibility for any aspect of EHR safety by budgeting for and encouraging training.
- Staff members with responsibility for EHR safety establish routine mechanisms for discussing problems they encounter as they optimize the safety and safe use of EHRs. This may include participation in specific EHR computer user groups or in professional association activity.
- Professional organizations, including those for clinicians and office administration, often provide information about issues that might affect EHR safety.

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**Recommended Practice**

**Implementation Status**

**3.6** Self-assessments, including use of the SAFER Guides, are conducted routinely by a team, and the risks of foregoing or delaying any recommended practices are assessed.<sup>43</sup>  
[Checklist](#)

 

**Rationale for Practice or Risk Assessment**

- Without learning through use of available self-assessment tools, organizations risk overlooking critical hazards.

**Responsibility**

*Large organization:*  
Safety officer, those involved in safety initiatives, informatics-type department

*Small organization:*  
Office management, providers

**Suggested Sources of Input**

Leadership team	Health IT support staff
Clinicians, support staff, and/or clinical administration	Health informatics team
	EHR developer

Assessment Notes

Follow-up Actions

Person Responsible for Follow-up Action

**Examples of Potentially Useful Practices/Scenarios**

- Self-assessments related to EHRs and patient safety are done routinely.
- The self-assessment process includes setting targets for addressing items that the organizational team identifies.

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## Recommended Practice

## Implementation Status

**3.7**

Organizations develop a strategy for measurement of high priority EHR safety hazards.<sup>44</sup>

[Checklist](#)



### Rationale for Practice or Risk Assessment

- A comprehensive strategy is needed to capture and respond appropriately to the full scope of EHR safety hazards.

### Responsibility

*Large organization:*  
Board of directors

*Small organization:*  
Owners

### Suggested Sources of Input

Clinical and IT leadership team    Multi-professional team  
EHR vendors

### Assessment Notes

### Follow-up Actions

### Person Responsible for Follow-up Action

### Examples of Potentially Useful Practices/Scenarios

- Key measurement areas for HIT safety identified by the National Quality Forum include:
  - Clinical Decision Support
  - System Interoperability
  - Patient Identification
  - User-Centered Design and Use of Testing, Evaluation, and Simulation to Promote Safety across the HIT Lifecycle
  - System Downtime (Data Availability)
  - Feedback and Information-Sharing
  - Use of HIT to Facilitate Timely and High-Quality Documentation
  - Patient Engagement
  - HIT-Focused Risk-Management Infrastructure
- Additional details on each measurement area are available in the NQF report.<sup>44</sup>

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**Recommended Practice**

**Implementation Status**

**3.8** Healthcare organizations and EHR developers share responsibility for identifying and addressing EHR safety concerns.  
[Checklist](#)

 

**Rationale for Practice or Risk Assessment**

- Healthcare organizations and their EHR developers must work together to identify and learn about EHR safety and thus share responsibility for improvement of existing EHRs.<sup>26</sup>

**Responsibility**

*Large organization:*  
Board of directors, EHR developers  
*Small organization:*  
Owners, EHR developers

**Suggested Sources of Input**

Clinical and IT leadership team      Multi-professional team  
EHR vendors

Assessment Notes

Follow-up Actions

Person Responsible for Follow-up Action

**Examples of Potentially Useful Practices/Scenarios**

- EHR developers should develop their own set of system-specific guidance to help their clients configure their EHRs to meet the SAFER Guide recommendations.
- Healthcare organizations should review the SAFER Guide recommendations annually.

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