



Health IT Certification Program

The Office of the National Coordinator for Health Information Technology

REAL WORLD TESTING PLAN

GENERAL INFORMATION

Plan ReportID Number: [For ONC-Authorized Certification Body use only]

Developer Name: InPracSys

Product Name(s): InPracSys EHR

Version Number(s): 9.0

Certified Health IT: Yes

Product List (CHPL) ID(s): 15.05.05.2762.INPS.01.00.1.191206

Developer Real World Testing Page URL: <https://inpracsys.com/rwt/>

JUSTIFICATION FOR REAL WORLD TESTING APPROACH

As we did in 2022, We plan on beginning real work testing using the same representative clinic's data, that agreed to all criteria that are included in the requirement list for RWT. If some criteria or criterion remain unused by the testing clinic, InPracSys will perform that part of the test at InPracSys Lab.

The tests will be performed on real data using data queries and presented as counts of successes and failure on screens available to authorized users. The data presented will also be benchmarked against InPracSys internal benchmark for expected results and acceptable failure rates to ensure continuing success. All failures will be documented and used for process improvement and/or training of clinic staff.

All tests will be carefully aligned to meet criteria's requirements and technical outcomes. E.g., B(1) can the IT detect valid vs invalid ToC referral summaries.

If, for any reason, the test clinic has not used one or more functions, for their own reasons, e.g., Transmission to Public health agencies, we plan on running the tests manually a few times during the calendar year(s) to ensure continuing functionality thru the year(s) of the unused functions.

STANDARDS UPDATES (INCLUDING STANDARDS VERSION ADVANCEMENT PROCESS (SVAP) AND UNITED STATES CORE DATA FOR INTEROPERABILITY (USCDI))

Standard (and version)	All Standards are the 2015 Versions
Updated certification criteria and associated product	NA
Health IT Module CHPL ID	NA
Method used for standard update	NA
Date of ONC-ACB notification	NA
Date of customer notification (SVAP only)	NA

Conformance measure	NA
USCDI-updated certification criteria (and USCDI version)	NA

MEASURES USED IN OVERALL APPROACH

Each plan must include at least one measurement/metric that addresses each applicable certification criterion in the Health IT Module’s scope of certification. Describe the method for measuring how the approach(es) chosen meet the intent and purpose of Real World Testing.

For each measurement/metric, describe the elements below:

- ✓ Description of the measurement/metric
- ✓ Associated certification criteria
- ✓ Justification for selected measurement/metric
- ✓ Care setting(s) that is addressed (Ambulatory Medical Clinic)
- ✓ Expected outcomes

DESCRIPTION OF MEASUREMENT/METRIC –

Describe the measure(s) that will be used to support the overall approach to Real World Testing.

Measurement/Metric	Description
Transitions of Care as CCDA – Create	Using data query, Count of C-CDA referral summaries created, formatted to release 2.1, during the measurement period
Transitions of Care CCDA - Conformance	Use CMS validator API to Automatically test a Random sampling of messages created during the measurement period to ensure at a minimum that messages meet the Release, content and PT matching criteria
Transitions of Care CCDA Receive	Using data query, Count of C-CDA referral summaries received during the measurement period grouped by status (valid/invalid) AND “grouped by” containing XDM package
Transitions of Care CCDA Display	Using data query, count of referral summaries received and successfully displayed, during the measurement period, “grouped by” CCD release (1.1, 1.2)
Transitions of Care CCDA Display section order	Using data query, count of referral summaries displayed where the display order was changed by the user

Clinical information reconciliation and incorporation	Using data query, Count of reconciliations, during the measurement period, where the auto-matched PT flag is set to true, and occurred from the side-by-side display page
Electronic prescribing	Count of prescriptions successfully transmitted, during the measurement period, where the units are in mL and where the Qty is set to 0.XX where XX is any numeric value
Data export	Using data query, Count of summaries created by the user where a user entered single date or date range and destination locations are saved in database in the appropriate fields, during the measurement period.
Clinical quality measures (CQMs) - record and export	Using data query, count of patients, in measurement period, where the criteria is met or where the patients fall in exclusions, with coded exclusion reason, for all certified CQMs, and where data was successfully exported
VDT - View	Using data query count of patients who viewed their data including complete common clinical data set, lab reports and Dx reports, containing provider name/contact, in human readable format, for one or more date ranges during the measurement period.
VDT - download and Transmit	Using data query count of patients who downloaded or transmitted their data including complete common clinical data set, lab reports and Dx reports containing provider name/contact, for one or more date ranges, during the measurement period.
VDT - Activity Logging	Using data query generate a list of top 10 patients/ reps who, during the measurement period, viewed, downloaded, and/or transmitted their data including the user (patient/rep) who performed the action and NTP timestamp when the action was performed
Creation of syndromic surveillance messages	Using data query, count of Syndromic Surveillance messages created by staff as needed, per HL7 2.5.1 standard, during the measurement period.
Transmission to public health agencies	Using data query count eligible cases when a trigger is matched in accordance with provision (f)(5)(ii), where the Health IT Module created a case report with only the required subset of CCDS data elements, during the measurement period
Direct Project – Stored addresses	Using data query, count the direct addresses entered and stored in the health IT module, grouped by binding (domain/Address) and hosting (DNS and LDAP), during the measurement period
Direct Project – Wrapped message success	Using data query, count the wrapped messages successfully transmitted to third parties during the measurement period

ASSOCIATED CERTIFICATION CRITERIA

List certification criteria associated with the measure and if updated to the 2015 Edition Cures Update criteria.

Measurement/Metric	Associated Certification Criteria	Relied Upon
Transitions of Care as CCDAs – Create	170.315(b)(1) Transitions of Care	EMR Direct
Transitions of Care CCDAs - Conformance	170.315(b)(1) Transitions of Care	EMR Direct
Transitions of Care CCDAs Receive	170.315(b)(1) Transitions of Care	EMR Direct
Transitions of Care CCDAs Display	170.315(b)(1) Transitions of Care	EMR Direct
Transitions of Care CCDAs Display section order	170.315(b)(1) Transitions of Care	EMR Direct
Clinical information reconciliation and incorporation	170.315 (b)(2) Clinical information reconciliation and incorporation	EMR Direct
Electronic prescribing	170.315 (b)(3) Electronic prescribing	Dosespot
Data export	170.315 (b)(6) Data export	EMR Direct
Clinical quality measures (CQMs) – record and export	<i>170.315(c)(1) Clinical quality measures (CQMs) – record and export</i>	None
VDT- View	<i>170.315(e)(1) View, download, and transmit to 3rd party</i>	None
download and transmit	<i>170.315(e)(1) View, download, and transmit to 3rd party</i>	None
Activity Logging	<i>170.315(e)(1) View, download, and transmit to 3rd party</i>	None
Creation of syndromic surveillance to required standard	<i>170.315(f)(2) Transmission to public health agencies – syndromic surveillance</i>	None
Transmission to public health agencies – electronic case reporting	<i>170.315(f)(5) Transmission to public health agencies – electronic case reporting</i>	None
Application access – patient selection Success	<i>170.315(g)(7) Application access – patient selection</i>	None
Application access – patient selection failed	<i>170.315(g)(7) Application access – patient selection</i>	None
Application access – all data request	<i>170.315(g)(9) Application access – all data request</i>	None
Direct Project – Stored addresses	<i>170.315(h)(1) Direct Project</i>	EMR Direct

Direct Project – Wrapped message success	170.315(h)(1) Direct Project	EMR Direct
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JUSTIFICATION FOR SELECTED MEASUREMENT/METRIC

Provide an explanation for the measurement/metric selected to conduct Real World Testing.

Measurement/Metric	Justification
Transitions of Care as CCDA – Create	Counts of valid CCDAs created during the measurement period, demonstrates that the Health IT is working as expected and certified to create CCDs
Transitions of Care CCDA - Conformance	Counts of conforming CCDAs created during the measurement period, demonstrates that the Health IT is working as expected and certified
Transitions of Care CCDA Receive	Counts of invalid and /or valid CCDA received during the measurement period, demonstrates the ability of the IT to detect valid/invalid CCDA
Transitions of Care CCDA Display	Counts of CCDAs grouped by R1.1 and R2.1 demonstrates the ability of the IT to handle both releases
Transitions of Care CCDA Display section order	Our technology is able to save the display preferences of the application. Counting the number of times this activity took place, during the measurement period demonstrates functionality
Clinical information reconciliation and incorporation	Our technology automatically matches the patient to the ToC and has the user verify the match and sets the auto-match flag true. Counting cases that the flag is set to true, and the page the action was performed on, during the measurement period, demonstrates that the product is working as expected.
Electronic prescribing	Getting counts of prescriptions, during the measurement period, that were successfully received by the service provider and not rejected, that contained units in mL as well as quantity, demonstrates this function.
Data export	Our application allows the user to choose the instances, date range and location of the destination of the export. Therefore reporting counts of summaries created, grouped by date range and destination demonstrates this function.
Clinical quality measures (CQMs) – record and export	Reports of patients by the CQM including status (Met, Unmet and Exclusion, with reason medical, Patient, System) demonstrates that the Health IT is working as expected and certified for this function.
VDT - View	Counts of occurrence(s) during the measurement period demonstrate that the function is working as expected for viewing data.
VDT - download and Transmit	Counts of occurrence(s) during the measurement period demonstrate that the function is working as expected for downloading or transmitting data
VDT - Activity Logging	Counts of occurrence(s) during the measurement period demonstrate that NTP time stamp and user activity logging is working.
Creation of syndromic surveillance to required standard	Since our technology validates messages on creation, getting counts demonstrates that the function is working.

Transmission to public health agencies — electronic case reporting	Counts of eligible cases generated and transmitted during the measurement period illustrates that this function is working.
Direct Project – Stored addresses	Storing direct addresses to the database during the measurement period demonstrates this function
Direct Project – Wrapped message success	Counting wrapped messages transmitted during the measurement period demonstrates this function

CARE SETTING(S)

Care Setting	Justification
Ambulatory Medical Clinic	Ambulatory Medical Clinic (Urology Clinics) Note: Our application is specific to the practice of Urology

EXPECTED OUTCOMES

Measurement/Metric	Expected Outcomes
Transitions of Care as CCDA – Create	CCDA messages were successfully created with no errors, which exceeds our benchmark of 99%.
Transitions of Care CCDA – Conformance	CCDA messages created conform to B(1) requirements, with no errors, which exceeds our benchmark of 99%.
Transitions of Care CCDA Receive	the CCDA messages were successfully received, reconciled and data incorporated with no errors exceeding our benchmark of 99%.
Transitions of Care CCDA Display	the CCDA messages were successfully received and displayed. There were no errors, which exceeds our benchmark of 99%.
Transitions of Care CCDA Display section order	the CCDA messages were successfully received, order of sections displayed with no errors, which exceeds our benchmark of 99%.
Clinical information reconciliation and incorporation	That the CCDA messages were successfully reconciled, and data incorporated with no errors, exceeding our benchmark of 99%.
Electronic prescribing	The prescriptions in the measure were successfully transmitted and acknowledged by the recipient service provider, with no errors, which exceeds our benchmark of 99%.
Data export	That summaries were successfully exported and transmitted without errors, and final destination recorded. Our benchmark of 99% was exceeded.
Clinical quality measures (CQMs) — record and export	Data was successfully exported and error free. Our benchmark of 99% was exceeded.
VDT - View	Data was successfully viewed and error free. Our benchmark of 99% was exceeded.
VDT - Download and Transmit	Data was successfully downloaded or transmitted and error free. Our benchmark of 99% was exceeded.
VDT - Activity Logging	Data viewed, successfully downloaded or transmitted, contains user and timestamp. There were no errors. Our benchmark of 99% was exceeded.
Creation of syndromic surveillance to required standard	Messages were successfully created to HL7 2.5.1 standard and there were no errors. Our benchmark of 99% was exceeded.

Transmission to public health agencies — electronic case reporting	Messages were successfully transmitted without errors, exceeding our benchmark of 99%.
Direct Project – Stored addresses	Greater than one each of address and domain bound Direct addresses are stored without errors, Our benchmark of 99% was exceeded.
Direct Project – Wrapped message success	Messages are successfully sent to third parties without errors. Our benchmark of 99% was exceeded.

SCHEDULE OF KEY MILESTONES

For each key milestone, describe when Real World Testing will begin in specific care settings and the date/timeframe during which data will be collected.

Key Milestone	Care Setting	Date/Timeframe
Complete RWT Development	Ambulatory Medical Clinic	Nov 30 2022
Test RWT plan	Ambulatory Medical Clinic	Dec 15 2022
Implement RWT Plan	Ambulatory Medical Clinic	Jan 2 2023
Report Results to SLI	Ambulatory Medical Clinic	Jan 6 2024

ATTESTATION

The Real World Testing plan must include the following attestation signed by the health IT developer authorized representative.

Note: The plan must be approved by a health IT developer authorized representative capable of binding the health IT developer for execution of the plan and include the representative's contact information.ⁱ

This Real World Testing plan is complete with all required elements, including measures that address all certification criteria and care settings. All information in this plan is up to date and fully addresses the health IT developer’s Real World Testing requirements.

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Authorized Representative Signature: Ashu Kataria

Date: 12/12/2022

ⁱ<https://www.federalregister.gov/d/2020-07419/p-3582>