Prime Clinical Systems

Real World Testing Plan for CY 2023

Executive Summary

This is the real world test plan for CY 2023 for Prime Clinical Systems Patient Chart Manager certified EHR solution. We will be testing on the most current version, 7.1, which is deployed to our user community.

As ONC has stated in its rule, “The objective of real-world testing is to verify the extent to which certified health IT deployed in operational production settings is demonstrating continued compliance to certification criteria and functioning with the intended use cases as part of the overall maintenance of a health IT’s certification.” We have worked toward this objective in designing our test plan and its subsequent real world testing measurements and metrics.

This document builds toward the final testing measurements and metrics we will use to evaluate our product interoperability within production settings. Within each use case, we document planned testing methodology, associated ONC criteria, justification for measurement, expected outcomes from the testing, care settings applied for the respective measure, and if applicable the number of clients to use our real world testing approach, including how our test cases were created, our selected methodology, the number of client/practice sites to use, and our general approach and justification for decisions.

We have included our timeline and milestones for completing the real-world testing in CY 2023, and information about compliance with the Standards Version Advancement Process updates.

A table of contents with hyperlinks is provided later in the plan quick access to any document section, including the testing measurements and metrics found at the end of this document. Our signed attestation of compliance with the real-world testing requirements is on the following page.

Developer Attestation

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.

Authorized Representative Name: Clifford Ermshar

Authorized Representative Email: cepcm@primeclinical.com

Authorized Representative Phone: 760-892-1583

Authorized Representative Signature:

DATE: 10-21-2022

General Information

Plan Report ID Number	20221129PCS
Developer Name	Prime Clinical Systems, Inc.
Product Name	Patient Chart Manager
Version Number	7.1
Certified Health IT Criteria	170.315 (b)(1), (b)(2), (b)(3), (b)(6); (c)(1)-(c)(3); (e)(1); (f)(1), (f)(2), (f)(4); (g)(7), (g)(9); (h)(1)
Product List (CHPL) ID	15.02.05.2206.PRIC.01.03.1.220114
Product List (CHPL) Link	https://chpl.healthit.gov/#/listing/10791
Developer Real-World Testing Page URL	http://www.primeclinical.com/primeclinical_real_world_testing.html

Timeline and Milestones for Real-World Testing CY 2023

Date/Timeframe	Key Milestones
Q1 2023	Real World Testing Results for CY 2022; final collection of all data for analysis
Q1 2023 January 2023	Real World Testing Results for CY 2022; creation of report and results submission to ONC-ACB (SLI Compliance, per their instructions)
January 2023	Real World Testing CY 2023; begin data collection as laid out by this plan
Quarterly, 2023	Real World Testing CY 2023; collect and review data as laid out by this plan
Q3-Q4 2023	Real World Testing CY 2023; gathering of collected data for analysis & observation as laid out by this plan
Q4-2023	Real World Testing CY 2024; begin Real World Test Plan preparation for CY 2024 for submission before the end of the year

Standards Updates

For CY 2023, we are not planning to make any version updates on approved standards through the SVAP process.

Standard (and version)	2015 Edition Cures Update
Updated certification criteria and associated product	(b)(1), (b)(2),(b)(3), (c)(3), (e)(1), (g)(9)
Health IT Module CHPL ID	15.02.05.2206.PRIC.01.03.1.220114
Method used for standard update	2015 Edition Cures Update
Date of ONC-ACB notification	10/21/2022
Date of customer notification (SVAP only)	N/A
Conformance measure	Measure 1- (b)(1) Measure 2-(b)(2) Measure 3-(b)(3) Measure 5-(c)(3) Measure 6- (e)(1) Measure 10- (g)(9)
USCDI-updated certification criteria (and USCDI version)	(b)(1), (b)(2), (e)(1), (g)(9), USCDI v1

Real World Testing Measurements

The measurements for our real-world testing plan are described below. Each measurement contains:

- Associated ONC criteria
- Relied Upon or Third Party Software
- Testing Methodology
- Description of the measurement/metric
- Justification for the measurement/metric
- Expected outcomes in testing for the measurement/metric
- Care Settings Targeted is ambulatory care settings

In each measurement evaluated, we elaborate specifically on our justification for choosing this measure and the expected outcomes. All measurements were chosen to best evaluate compliance with the certification criteria and interoperability of exchanging electronic health information (EHI) within the certified EHR.

Testing Methodologies

For our test plan, we plan on using Reporting/Logging methodologies.

- The data will be gathered automatically to include our entire client base using production based database queries and logs.
- In some instances we may also utilize other reports, audit logs and database logs, including client engagement to gather Automated Measure (170.315.g.2) reports to determine or compare the measure count if necessary.
- Successful transmissions and error rates will be tracked and trended over time.
- PHI will not be exposed through this process.
- The gathered data will be queried for events indicative for specific certified workflows that occurred over specified time, for example; over a 3 month period (or more).
- The results will be quantified and summarized
- If we find criteria that are not being used, or not widely used by our customer base, we may test the respective measure in our own production-sandbox environment given lack of customer experience with the criteria functionality.

Care/Practice Settings

Prime Clinical Systems Patient Chart Manager EHR supports medical clinics in an ambulatory care setting. All measures outlined in the Real World Testing are designed for and will be performed within the ambulatory care setting.

RWT Measure #1. Transitions of Care

Testing Methodology	Reporting/Logging:
Measurement Description	This use case tracks the number of C-CDAs created and successfully sent from the EHR Module to a 3rd party during a transition of care event using Direct messaging over the course of a given interval.
Associated Criteria	170.315(b)(1), (h)(1)
Relied Upon Software	Backbeach Software, Newcrop LLC
Measurement Justification	This use case has one measure capture. It will provide a numeric value to indicate both the how often this interoperability feature is being used as well as its compliance to the requirement. An increment to this measure indicates that the EHR can create a C-CDA patient summary record, including ability to record all clinical data elements, and by sending the C-CDA patient summary record, the EHR demonstrates successful interoperability of an exchanged patient record with a 3rd party. This measurement shows support for Direct Edge protocol in connecting to a HISP for successful transmission which reveals compliance to the associated criteria listed above.
Measurement Expected Outcome	Successful Transition of Care to demonstrate the exchange of electronic health information (EHI) in an ambulatory setting. We will gather and report on the numbers of C-CDAs sent over a specified timeframe, i.e., over a three (3) month period (or more) to include our entire production client base. The performance of C-CDA error detection and successful transmissions will be tracked, queried, logged and trended over time. Errors encountered in the transmission are also logged, to be able to diagnose failures. Successfully completing this measure implies users have a general understanding of the EHR functional operations for this EHR Module and an overall support for the user experience while not completing this measure may indicate lack of understanding or possibly lack of use or need for this functionality.
Care Settings	All measures outlined in this Real World Testing are designed for and will be performed within the ambulatory care setting.

RWT Measure #2. Clinical Information Reconciliation and Incorporation

Testing Methodology	Reporting/Logging:
Measurement Description	This use case tracks the number of C-CDAs successfully received as part of a transition of care or referral for patient encounters from a 3rd party using Direct messaging in which the clinician conducts clinical information reconciliation for medication, medication allergy, and current problem list over the course of a given interval.
Associated Criteria	170.315(b)(2)
Relied Upon Software	N/A
Measurement Justification	This measure will log how often C-CDAs received from 3rd parties are incorporated into the patient record and then updating the patient's problem list, medication list, and medication allergy list with the clinical data contained in the C-CDA. Through this means of testing, we can determine compliance to the associated criteria listed above in real world use.
Measurement Expected Outcome	Successful Clinical Information Reconciliation to demonstrate the exchange of electronic health information (EHI) in an ambulatory setting. We will gather and report on the numbers of C-CDAs received over a specified timeframe, i.e., over a three (3) month period (or more) to include our entire production client base. The performance of successful Clinical Information Reconciliations performed will be tracked, queried, logged and trended over time. If we find this criterion is not widely used by our customer base, we may test this respective measure in our own production-sandbox environment given lack of customer experience with the criteria functionality. Successfully completing this measure implies users have a general understanding of the EHR functional operations for this EHR Module and an overall support for the user experience while not completing this measure may indicate lack of understanding or possibly lack of use or need for this functionality.
Care Settings	All measures outlined in this Real World Testing are designed for and will be performed within the ambulatory care setting.

RWT Measure #3. Electronic Prescribing

Testing Methodology	Reporting/Logging:
Measurement Description	This use case tracks the number of electronic prescriptions created and successfully sent from the EHR Module to a pharmacy over the course of a given interval.
Associated Criteria	170.315(b)(3)
Relied Upon Software	Newcrop LLC
Measurement Justification	This use case measure will provide a numeric value to indicate how often this interoperability feature is being used as well as its compliance to the requirement. An increment to this measure indicates that the EHR can create a NewRx SCRIPT electronic prescription message and transmit it to a pharmacy, typically via the Surescripts Network. This use case will also show successful integration with our ePrescribing partner NewCrop and through its completion will reveal compliance to the associated criteria listed above.
Measurement Expected Outcome	Successful e-prescription messages to a pharmacy demonstrate the eRx is transmitted to a pharmacy via the Surescripts Network using SCRIPT 2017071 standard and demonstrates successful integration with our e-Prescribing partner NewCrop. We will gather and report on the number of successfully sent electronic prescriptions over a specified timeframe, i.e., over a three (3) month period (or more) to include our entire production client base. The performance of successful eRx sent will be tracked, queried, logged and trended over time. In case of eRx failure, the error is logged to help diagnose the problem. Successfully completing this measure implies users have a general understanding of the EHR functional operations for this EHR Module and an overall support for the user experience while not completing this measure may indicate lack of understanding or possibly lack of use or need for this functionality.
Care Settings	All measures outlined in this Real World Testing are designed for and will be performed within the ambulatory care setting.

RWT Measure #4. Batch Patient Data Export

Testing Methodology	Reporting/Logging:
Measurement Description	This use case tracks the number of times an authorized user successfully uses the 'Export Batch CCDA' feature to export Clinical Summaries for patients whose information is stored in the EHR
Associated Criteria	170.315(b)(6)
Relied Upon Software	N/A
Measurement Justification	We do not know how many of our customers are using the batch patient exporting so by using logging, we can definitively determine how often clinicians use the batch patient export feature. Batch patient export can be used for various use cases, including working with an HIE or registry as well as to study quality and population health metrics.
Measurement Expected Outcome	We will gather and report on the number CDA exports performed over a specified timeframe, i.e., over a three (3) month period (or more) to include our entire production client base. The performance will be tracked, queried, logged and trended over time. If we find this criterion is not being used by our customer base, we may test this respective measure in our own production-sandbox environment given lack of customer experience with the criteria functionality. Successfully completing this measure implies users have a general understanding of the EHR functional operations for this EHR Module and an overall support for the user experience while not completing this measure may indicate lack of understanding or possibly lack of use or need for this functionality.
Care Settings	All measures outlined in this Real World Testing are designed for and will be performed within the ambulatory care setting.

RWT Measure #5. Clinical Quality Measures

Testing Methodology	Reporting/Logging:
Measurement Description	This use case tracks eCMQ measures successfully reported on by the EHR Module to CMS during the submission period for MIPS Quality reporting. CQM criteria, 170.315(c)(1)-(c)(3), all work collectively together in the eCQM functionality of the EHR Module, this measurement is used for all three.
Associated Criteria	170.315(c)(1)-(c)(3)
Relied Upon Software	N/A
Measurement Justification	This measure will provide a count and list of electronic clinical quality measures (eCQMs) which are calculated and submitted to CMS for a given program, like MIPS, where there are significant financial incentives for accurate reporting. Because CQM criteria, 170.315(c)(1)-(c)(3), all work collectively together in the eCQM functionality of the EHR Module, this measurement is used for all three.
Measurement Expected Outcome	During the testing period, testing data will be gathered automatically to include our entire production client base using database queries and logs to get reporting values on the count and list of eCQMs IDs for which reports have been created for during the report submission performance period. The performance will be tracked, queried, logged and trended over time. Successfully completing this measure implies users have a general understanding of the EHR functional operations for this EHR Module and an overall support for the user experience while not completing this measure may indicate lack of understanding or possibly lack of use or need for this functionality.
Care Settings	All measures outlined in this Real World Testing are designed for and will be performed within the ambulatory care setting.

RWT Measure #6. View, download, and transmit to 3rd party

Testing Methodology	Reporting/Logging:
Measurement Description	This use case tracks how patients are interacting with their Patient Portal account over the course of a given interval.
Associated Criteria	170.315(e)(1)
Relied Upon Software	Newcrop LLC
Measurement Justification	This use case measure will provide a numeric value to indicate both the how often this interoperability feature is being used as well as its compliance to the requirement for ability to view, download and transmit records. An increment to this measure indicates that the EHR can perform such function by logging exactly which option was selected. The patient portal is intended to support patient engagement with their health records, and the ability to transmit their patient data, as a C-CDA or human readable copy, can be a useful feature.
Measurement Expected Outcome	We will gather and report on the numbers of times the view, download & transmit options were used over a specified timeframe, i.e., over a three (3) month period (or more) to include our entire production client base. The performance of C-CDA error detection and successful transmissions will be tracked, queried, logged and trended over time. Successfully completing this measure implies users have a general understanding of the EHR functional operations for this EHR Module and an overall support for the user experience while not completing this measure may indicate lack of understanding or possibly lack of use or need for this functionality.
Care Settings	All measures outlined in this Real World Testing are designed for and will be performed within the ambulatory care setting.

RWT Measure #7. Transmission to Immunization Registries

Testing Methodology	Reporting/Logging:
Measurement Description	This use case tracks the active engagement with a public health immunization registry/immunization information system (IIS) for submitting immunization data over the course of a given interval.
Associated Criteria	170.315(f)(1)
Relied Upon Software	N/A
Measurement Justification	This measure will be used to determine real world interoperability and usability, specifically how many immunization messages were sent to an immunization information system (IIS) or public health immunization registries by the provider. This measure will provide a numeric value to indicate both the how often this interoperability feature is being used as well as its compliance to the requirement. An increment to this measure indicates that the EHR can create an immunization message, including ability to record all clinical data elements, and by sending the message, the EHR demonstrates successful interoperability with an IIS/immunization registry.
Measurement Expected Outcome	We will gather and report on the numbers of immunization data messages sent over a specified timeframe, i.e., over a three (3) month period (or more) to include our entire production client base. The performance of immunization data messages error detection and successful transmissions will be tracked, queried, logged and trended over time. These reports include; the number of messages sent, number accepted, number accepted with errors, number rejected. Successfully completing this measure implies users have a general understanding of the EHR functional operations for this EHR Module and an overall support for the user experience while not completing this measure may indicate lack of understanding or possibly lack of use or need for this functionality.
Care Settings	All measures outlined in this Real World Testing are designed for and will be performed within the ambulatory care setting.

RWT Measure #8. Syndromic Surveillance Registries

Testing Methodology	Reporting/Logging
Measurement Description	This use case tracks the clinician's active engagement with a public health agency to submit syndromic surveillance from an urgent/non-urgent care setting over the course of a given interval.
Associated Criteria	170.315(f)(2)
Relied Upon Software	N/A
Measurement Justification	This measure will provide a numeric value to indicate both the how often this interoperability feature is being used as well as its compliance to the requirement. This type of data is important to report, as it warns the Public Health Service of the prevalence or frequency of disease outbreaks. An increment to this measure indicates that the EHR can create a syndromic surveillance message, including ability to record all clinical data elements, and by sending the message, the EHR demonstrates successful interoperability with a public health registry
Measurement Expected Outcome	During Real World Testing for CY 2022, surveys demonstrated this option is currently not being requested /used; and auto-transmission to public health registries is currently not in use. Since the functionality to export syndromic surveillance CDAs exists, there may be a possibility that syndromic surveillance CDA (xml files) are being exported and sent to a registry via direct upload submission. During the testing period, as the clinician exports syndromic surveillance case CDAs in their normal workflow and clinical activities, testing data will be gathered automatically using database queries and logs to get reporting values on the number of times a syndromic surveillance CDA is exported over a specified timeframe, i.e., over a three (3) month period (or more) to include our entire production client base. The number of syndromic surveillance CDAs exported will be tracked, queried, logged and trended over time. The specific type of message i.e. Registration, Discharge, and Update is logged as well. If we find this criterion is not being used by our customer base, we may test this respective measure in our own production-sandbox environment given lack of customer experience with the criteria functionality. Successfully completing this measure implies users have a general understanding of the EHR functional operations for this EHR Module and an overall support for the user experience while not completing this measure may indicate lack of understanding or possibly lack of use or need for this functionality.
Care Settings	All measures outlined in this Real World Testing are designed for and will be performed within the ambulatory care setting.

RWT Measure #9. Cancer Registries

Testing Methodology	Reporting/Logging
Measurement Description	This use case tracks the clinician's active engagement with a public health agency for submitting cancer case data over the course of a given interval.
Associated Criteria	170.315(f)(4)
Relied Upon Software	N/A
Measurement Justification	This measure will provide a numeric value to indicate both the how often this interoperability feature is being used as well as its compliance to the requirement. This type of data is important to report, as it warns the Public Health Service of the prevalence or frequency of cancer cases. An increment to this measure indicates that the EHR can create a cancer specific CCDA message, including ability to record all clinical data elements, and by sending the message, the EHR demonstrates successful interoperability with a public health registry
Measurement Expected Outcome	During Real World Testing for CY 2022, surveys demonstrated this option is currently not being requested /used; and auto-transmission to cancer registries is currently not in use. Since the functionality to export Cancer CDAs exists, there may be a possibility that Cancer CDA (xml files) are being exported and sent to a registry via direct upload submission. During the testing period, as the clinician exports cancer case CDAs in their normal workflow and clinical activities, testing data will be gathered automatically using database queries and logs to get reporting values on the number of times a Cancer CDA is exported over a specified timeframe, i.e., over a three (3) month period (or more) to include our entire production client base. The number of Cancer CDAs exported will be tracked, queried, logged and trended over time. If we find this criterion is not being used by our customer base, we may test this respective measure in our own production-sandbox environment given lack of customer experience with the criteria functionality. Successfully completing this measure implies users have a general understanding of the EHR functional operations for this EHR Module and an overall support for the user experience while not completing this measure may indicate lack of understanding or possibly lack of use or need for this functionality.
Care Settings	All measures outlined in this Real World Testing are designed for and will be performed within the ambulatory care setting.

RWT Measure #10. API Access

Testing Methodology	Reporting/Logging:
Measurement Description	This use case tracks the number successful interactions for patient data requests within the API over the course of a given interval.
Associated Criteria	170.315(g)(7), (g)(9)
Relied Upon Software	N/A
Measurement Justification	This measure will look at API request data request usage to determine real world interoperability and usability, specifically how many 3rd party systems or applications are integrated and using the EHR's API interface. The usage logs and clients with connectivity will be reported on, and each query to the API is logged for the type of information retrieved. API capabilities are an important component of the modern health IT system, and utilization of API resources will help improve patient care and care coordination.
Measurement Expected Outcome	We will gather and report on the number of successful API interactions for patient data requests over a specified timeframe, i.e., over a three (3) month period (or more) to include our entire production client base. The performance of successful API interactions will be tracked, queried, logged and trended over time. If we find this criterion is not being used by our customer base, we may test this respective measure in our own production-sandbox environment given lack of customer experience with the criteria functionality. Successfully completing this measure implies users have a general understanding of the EHR functional operations for this EHR Module and an overall support for the user experience while not completing this measure may indicate lack of understanding or possibly lack of use or need for this functionality.
Care Settings	All measures outlined in this Real World Testing are designed for and will be performed within the ambulatory care setting.