2024 Real World Testing Plan

Executive Summary

This is the Real World Test Plan for CY 2024 for our Prime Clinical Systems Patient Chart Manager certified EHR software.

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 test plan is virtually the same as last year’s approved Real World Test Plan with a few updates on how the test data is collected; and the removal of (b)(6), and addition of (b)(10) and (g)(10).

As with last year’s plan, it provides the real-world test measurements and metrics that meet the intent and objectives of ONC’s Condition of Certification and Maintenance of Certification requirement for real world testing (§ 170.405 Real world testing).

We believe these test methods are appropriate and value in accessing certification criteria and interoperability of exchanging electronic health information within the care and practice setting of our customers.

We have included our timeline and milestones for completing the real world testing in 2024, and information about compliance with the USCDI v1 and SVAP updates.

A table of contents with hyperlinks is provided later in the plan with quick access to any document section, including the testing measurements and metrics found at the end of this document.

Table of Contents

General Information

Plan Report ID Number	20231027PCS
Developer Name	Prime Clinical Systems, Inc.
Product Name	Patient Chart Manager
Version Number	7.1
Certified Health IT Product List (CHPL) Product Number(s)	15.02.05.2206.PRIC.01.03.1.220114
Developer Real-World Testing Page URL	http://www.primeclinical.com/primeclinical_real_world_testing.html

Justification for Real World Testing Approach

For each measurement, a testing methodology is used. For our test plan, we use the following methodologies.

Reporting/Logging: 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

Self-Test: In addition to Reporting/Logging, 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.

PHI will not be exposed through this process.

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.

Standards Updates

Standards (and version)	(b)(1), (b)(2),(e)(1),(g)(9)- HL7 CDA® R2 IG: C-CDA Templates for Clinical Notes R2.1 Companion Guide, Release 2 and USCDI v1 (b)(3)-NCPDP SCRIPT Standard, Implementation Guide, Version 2017071 (c)(3)- CMS Implementation Guide for Quality Reporting Document Architecture: Category I; Hospital Quality Reporting; Implementation Guide for 2020 Category III; Eligible Clinicians and Eligible Professionals Programs; Implementation Guide for 2020 (e)(1) WCAG 2.0, Level AA Conformance
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 for (b)(1),(b)(2),(b)(3),(c)(3), (e)(1), (g)(9)
Date of customer notification (SVAP only)	N/A
Conformance measures	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)	USCDI v1- (b)(1), (b)(2), (e)(1), (g)(9)

Measures Used In Overall Approach

The measurements for our real-world testing plan are described below, each measurement contains:

- Description of the measurement/metric
- Associated ONC criteria
- Relied Upon Software
- Justification for the measurement/metric
- Expected outcomes
- Care Setting

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.

RWT Measure #1. Transitions of Care

Testing Methodology	Reporting/Logging
Description	This measure is tracking and counting how many C-CDAs are created and successfully sent from the EHR Module to a 3rd party via Direct messaging during a transition of care event over the course of a given interval.
Associated Criteria	170.315(b)(1), (h)(1)
Relied Upon Software	(b)(1)Backbeach Software AND Newcrop LLC (h)(1) Newcrop LLC
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. 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.
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
Description	This measure 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
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.
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
Description	This measure is tracking and counting how many NewRx electronic prescriptions were created and successfully sent from the EHR Module to a pharmacy destination over the course of a given interval.
Associated Criteria	170.315(b)(3)
Relied Upon Software	Newcrop LLC
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. An increment to this measure indicates that the EHR can create a NewRx SCRIPT electronic prescription and transmit it to a pharmacy 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.
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. Electronic Health Information Export

Testing Methodology	Reporting/Logging
Description	This newer criterion enables a clinician, or their staff, to export all EHI stored in our Certified Health IT product for a single patient or the EHI for the clinician's entire patient population. This supports individual patients' access to their electronic data, and also empowers providers and provider organizations to migrate all the EHI from one Certified Health IT product to any health IT system of their choosing This measure tracks the two use cases of single patient and patient population EHI export functionalities.
Associated Criteria	170.315(b)(10)
Relied Upon Software	N/A
Justification	This measure will provide a numeric value to indicate both the how often this interoperability features is being used, and the number of patient records exported. An increment to this measure indicates that the EHR can create single patient and patient population EHI export functionalities, and a count of records exported also provided.
Expected Outcome	The measurement will produce numeric results over a given interval. We will gather and report on the number EHI 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
Description	This measure is tracking and counting how many eCQM quality measures were successfully reported on by the EHR Module to CMS during their 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
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.
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
Description	This measure is tracking and counting how many patients are successfully logged into and accessed their patient portal account as well as email transmissions from the portal over the course of a given interval.
Associated Criteria	170.315(e)(1)
Relied Upon Software	Newcrop LLC
Justification	This measure will log how often patients log into their patient portal to view, download, or transmit their health data, this 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.
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
Description	This measure is tracking how immunization messages are created and successfully sent from the EHR Module to an IIS/immunization registry over the course of a given interval.
Associated Criteria	170.315(f)(1)
Relied Upon Software	N/A
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.
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
Description	This measure is tracking 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
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
Expected Outcome	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
Description	This measure is tracking 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
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
Expected Outcome	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. Standardized API for Patient and Population Services

Testing Methodology	Reporting/Logging:
Description	Prime Clinical FHIR® API allows other health IT applications to make read-only data requests for patient health information that is part of USCDIv1. §170.315(g)(7), §170.315(g)(9) and §170.315(g)(10) - API interface would allow a request for "all" the patient data, or specific "by specific data category." This measure is tracking the clients which are registered for usage of FHIR resources. We track the clients via our registered users log
Associated Criteria	170.315(g)(7), (g)(9), (g)(10)
Relied Upon Software	Dynamic Health IT FHIR Server for (g)(10) N/A for (g)(7), (g)(9)
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. 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.
Expected Outcome	We will gather and report on the number of clients interacting with the FHIR server over a specified timeframe, i.e., over a three (3) month period (or more) to include our entire production client base. 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.

Schedule of Key Milestones

Date/Timeframe	Key Milestones
Q1 2024	Real World Testing Results for CY 2023; final collection of all data for analysis
Q1 2024 January 2024	Real World Testing Results for CY 2023; creation of report and results submission by February 1, 2024 to SLI.
January 2024	Real World Testing CY 2024; begin data collection as laid out by this plan
Quarterly, 2024	Real World Testing CY 2024; collect and review data as laid out by this plan
Q3-Q4 2024	Real World Testing CY 2024; gathering of collected data for analysis & observation as laid out by this plan
Q4-2024	Real World Testing CY 2024; begin Real World Test Plan preparation for CY 2025 for submission by October 15, 2024 to SLI

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
Email	cepcm@primeclinical.com
Phone	760-892-1583
Signature	
Date	October 25, 2024