



ONC 2015 Cures Update Real World Test Plan

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SYSTEM: Enablemypractice Version: EHR5

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1 GENERAL INFORMATION

This is Enabledoc LLC's ONC information:

Plan Report ID Number: 20211111ENA

Developer Name: Enabledoc LLC

Product Name(s): Enablemypractice

Version Number(s): EHR5.2

Product List (CHPL) ID(s): CHPL Product Number: 15.02.05.1439.ENAD.01.01.1.220118

ONC-ACB Certification ID: 15.02.05.1439.ENAD.01.01.1.220118

Developer Real World Testing Page URL:

2 JUSTIFICATION FOR REAL WORLD TESTING

At this time, Enablemypractice EHR is sold to clinical groups, behavioral health organizations, health departments and correctional facility settings. For this reason, the Real World Testing plan will apply to these care settings. Since the Enablemypractice supports all medical specialties for clinical documents and clinical workflows, we are certifying for measures we expect our customers will require or have requested. The work flow for these measures does not vary from setting-to-setting, therefore we will utilize clinical groups from different specialties for our real world testing.

CDA Testing

All criteria involving the Consolidated Clinical Document Architecture (C-CDA) documents will be tested, including 170.315 (h)(1): Direct Project, § 170.315(b)(1) Transitions of care, and § 170.315(e)(1) View, download, and transmit to 3rd party. Enablemypractice supports Data export, so Real World Testing has been included for the criterion, § 170.315(b)(6). Verification of the created patient record export is performed between our EHR and our Enablemyhealth portal platform, but may also be used with any other FHIR based system.

Application Access - FHIR API Testing

API testing for population health will be conducted between our EHR and portal platforms to send and receive clinical FHIR data. Patient API will test accessing data from another EHR and importing the data into the system. This functionality will cover measure §170.315(g)(7-9) Application Access.

Quality Measures

Quality measures will be updated annually and use Real Word Testing for our clinical customers using measure §170.315(c)(1-3) Clinical quality measures (CQMs).

Transmission to Immunizations Registry Testing

Transmission to Immunization Registry is already in use complying with measure §170.315(f)(1). A Real Word test report will provide an audit of immunization data sent.

3 STANDARDS UPDATES (INCLUDING STANDARDS VERSION ADVANCEMENT PROCESS (SVAP))

The EHRUT tested for this study was Enablemypractice EHR5 Release, an ambulatory EHR.

Standard (and version)	All standards defined ONC 2015 below.
Method used for standard update	NA
Date of ONC-ACB notification (SVAP only)	NA
Date of Customer Notification SVP only	NA

4 CARE SETTINGS

Enablemypractice electronic health records system is marketed for use in the Ambulatory Care Settings, including group practices, behavioral health, pediatrics, health departments, and correctional facilities. The Enablemyhealth patient platform system supports the storage and tracking of longitudinal health records.

5 MEASURES USED BY CASE TEST APPROACH

The following are the measures Enabledoc is Real World Testing for compliance and is broken out into 6 Test cases:

USE CASE 1: As part of the Real World Testing, we will test a patient meeting the following certification criteria and the ability to send, receive, download and reconcile clinical data: 170.315 (h)(1): Direct Project, § 170.315(b)(1) Transitions of care, § 170.315(b)(2) Clinical information reconciliation and incorporation, and § 170.315(e)(1) View, download, and transmit to 3rd party.

Measure 1: Sharing. This measure will use Direct Messaging as the transport mechanisms used to share transitions of care documents and EHI, as well as track usage of Direct Messaging,

View, Download, and Reconcile. Associated certification criteria for Direct Messaging on Enablemypractice EHR in an ambulatory care setting include:

Certification Criteria	Requirement
§ 170.315(b)(1) Transitions of care	(i)(A) Send transition of care/referral summaries
	(i)(B) Receive transition of care/referral summaries
§ 170.315(b)(2) Clinical information reconciliation and incorporation	(b)(2)(i) Reconcile
	(b)(2)(ii) Match Patient
	(b)(2)(iii)(A) Display current & Received Data
	(b)(2)(iii)(B) - (D) Review & Validate
	(b)(2)(iv) Create CDA with reconciled data
§ 170.315(e)(1) View, download, and transmit to 3rdparty	(i)(B)(2) Download ambulatory summary or inpatient summary using CCD Template
	(i)(B)(3) (inpatient setting only) Download of transition of care/referral summaries
	(i)(C)(1) Transmit to third party

- Justification:** Enablemypractice includes functionalities of interest: (A) Send transition of care/referral summaries, (B) Receive transition of care referral summaries, including (C) XDM processing, . Transitions of care documents are shared using Edge protocols (e.g., SMTP, Direct) while other EHI may be shared through the patient portal using downloads and encrypted or unencrypted transmissions. This metric will provide information on the types of transmissions deployed (e.g., what types of Edge protocols, downloads and unencrypted vs. encrypted transmission) and the frequency of usages.
- Test methodology:** Enablemypractice system logs and direct messaging logs will be reviewed to determine the frequency and the transport mechanism used by providers for sending/receiving transitions of care using Edge protocols and downloading or transmitting EHI by patients using the patient portal. Log files obtained during Real World Testing will be de-identified and used for analysis in several areas to validate the

proper operation of the transport mechanisms and input for the calculation of the metric on the specific types of transport mechanisms used. This test methodology will primarily test the conformance of the implementation.

- **Expected outcome(s):** It is expected that providers (and authorized staff) and patients (or their authorized representatives) will be able to share EHI using the transmission mechanisms provided. Error rates will be tracked and trended over time.

USE CASE 2: Real World Testing will demonstrate that Enablemypractice is conformant to the following certification criteria and the ability to export EHR data for one or all patients on demand in standard CDA format: § 170.315(b)(6) Data export.

Measure 2: Patient Export. This measure will assess functionality used to export EHI for a single or group or all patients using the application to export CDA files. The associated certification criterion is:

Certification Criteria	Requirement
§170.315(b)(6) Data Export	(b)(6)(i)(A) Filter data by fields, date & facility
	(b)(6)(i)(B) Limit access
	(b)(6)(ii) Configure export summaries
	(b)(6)(iii)(A) Set export date/time period
	(b)(6)(iii)(B) Export Real Time or Scheduled
	(b)(6)(iv) Set storage location

Justification: The export of EHI associated with a patient or a group/all patients is another way to share information with an external organization. Export is typically used when there is a need for a full patient record. This metric will provide information on the type of data exported for a single, group, or all patients and the frequency of usage.

Test Methodology: Enablemypractice audit logs and export log will be reviewed for each period to determine the frequency of use. Log files obtained during Real World Testing will be de-identified and used for analysis in several areas to validate the proper operation of the export. This test methodology will primarily test the conformance of the implementation.

Expected outcome(s): It is expected that authorized users will be able to use Data export to retain a copy, provide to another provider or the patient or migrate to another system. EHI using the export function will provide 100% accuracy as compared to the system data.

USE CASE 3: Real World Testing will demonstrate that Enablemypractice is conformant to the following certification criteria and ability for patients to access and retrieve their clinical data and other applications and system to send and receive clinical and demographic data in bulk for one or more patients as defined in §170.315(g)(7-9) Our Enablemyhealth app is a patient portal, longitudinal health record and population health platform, which uses APIs and FHIR to share data with the Enablemypractice EHR platform.

As part of the Real World Testing requirements for Application Access - All Data Access (§ 170.315(g)(9)) (patient services only), the Certified Health IT Developer has identified the following metrics for their testing plan:

Measure 3: Conformance to Application Access - Patient Selection §170.315(g)(7), Data Category Request §170.315(g)(7). This measure will test the conformance of the FHIR API technology using the Enablemyhealth portal and other 3rd party applications, if any. The associated certification criterion in the ambulatory clinical setting is:

Certification Criteria	Requirement
§ 170.315(g)(7) Application Access- Patient Selection	(i) Identify patient
	(ii)(A)(1-3) API documentation & Agreement
	(v)(B) Provisioning Technical Documentation

Justification: Enablemyhealth FHIR developer accounts limit access to specific clinical organization and specific patient data through the FHIR® interfaces, which will provide a metric on the use of FHIR® APIs to access patient data. Additionally, credentialing requirements will be tested indirectly, as only authorized users will have access to patient data. This will be further verified through the review of audit logs.

Test methodology: As APIs are accessed and used, audit log files obtained during Real World Testing will be de-identified and used for analysis in several areas to validate the proper operation of § 170.315(g)(7-9) Patient Access. Proper credentialing and validation that all required data elements are supported is included in the test.

Expected outcome(s): It is expected that data access issues are rare and that the functionalities identified in the above criteria perform without errors. Error rates will be tracked across these functions as part of a baseline for the initial testing year. Any errors will be fixed.

USE CASE 4 (All Data) Metrics: As part of the Real World Testing requirements for Patient Application - All Data Access (§ 170.315(g)(9)), the Enabledoc has identified the following metrics working with the Enablemyhealth app and/or third party app developers or other systems company:

Measure 1: Completeness of Response. This measure will test providers’ usage of the Enablemyhealth FHIR api, assessing completeness of responses relative to requests across provider-users. The associated certification criterion in the ambulatory care setting is:

Certification Criteria	Requirement
§ 170.315(g)(7) Application Access - Patient Selection	(g)(7)(i) Request Patient ID
	(g)(7)(ii)(A)(1) API functional documentation
	(g)(7)(ii)(A)(2) API software documentation
	(g)(7)(ii)(A)(3) API Terms of Use
	(g)(7)(ii)(B) Public hyperlink
§ 170.315(g)(8) Application access — data category request	(g)(8)(i)(A) Request Patient data by category
	(g)(8)(i)(B) Date specific response
	(g)(8)(ii)(A)(1 - 3) API documentation
	(g)(8)(ii)(B) Public hyperlink
§ 170.315(g)(9) Application access — all data request	(g)(9)(i)(A) Request Patient ID for all data
	(g)(9)(i)(B) Date specific response
	(g)(9)(ii)(A)(1) API documentation
	(g)(9)(ii)(B) Public hyperlink

- **Justification:** Enablemyhealth FHIR developer accounts limit access to specific clinical organization and specific patient data through the FHIR® interfaces, which will provide a metric on the use of FHIR® APIs to access patient data. Additionally, credentialing requirements will be tested indirectly, as only authorized users will have access to patient data. This will be further verified through the review of audit logs.

- **Test methodology:** Logs will be reviewed to determine how often providers use the Enablemyhealth API. Embedded in the log data (for the purposes of Real World Testing) will be the length of time used to run the queries and the data fields used for the query. Log files obtained during Real World Testing will be de-identified and used for analysis in several areas to validate the proper operation of FHIR® APIs, this includes proper credentialing and expected behavior of FHIR® category requests. This test methodology will primarily test the conformance of the implementation.
- **Expected outcome(s):** Based on the log files, the following information can be derived: access to the sets of data elements used for the query/return, the total number of FHIR® requests made, and the response time of the query/return. We will validate that access to the data elements are accurate and complete.

USE CASE 5: Real World Testing will demonstrate that Enablemypractice is conformant to the following certification criteria and ability to generate and report on patient quality measures for §170.315(c)(1-3) Clinical quality measures (CQMs) — as part of SVAP each year.

Measure 1: Quality Measures. This measure tests the generation of clinical population data for a group of measures using ONC provided Cypress test tool. We will continue each year to use the SVAP process to compile with this measure each year. The associated certification criterion in the ambulatory care setting is:

Certification Criteria	Requirement
§170.315(c)(1)Clinical quality measures - record and export	(c)(1)(i) Calculate CQM
	(c)(1)(ii) Export CQM
§170.315(c)(2)Clinical quality measures - import and calculate	(c)(2)(i) Import QRDA
	(c)(2)(ii) Calculate QRDA
§170.315(c)(3)Clinical quality measures (CQMs) — report	(C)(3) Report

- **Justification:** Clinical organizations are required to submit QRDA data for Medicare and Medicaid programs each year. Enablemypractice must produce QRDA III files for the groups to successfully comply.
- **Test methodology:** Enabledoc will select measures and download test data from Cypress, then import into Enablemypractice to generate the patient records and encounter clinical data. Through the Enablemypractice MIPS Dashboard, the

appropriate provider(s) and year is selected to export the QRDA III and QRDA I files for each selected measure. The test results are then provided to the ACB for testing. This process is performed annually.

SVAP RWT will be conducted on Customer QRDA III generated reports. Customer data QRDA III files for each certified quality measure will be generated and reviewed for accuracy against the QRDA I files.

- **Expected outcome(s):** Each file provided is expected to pass the Cypress test for each quality measure selected. One customer quality measure QRDA III file for each certified measure will match the QRDA I files and be produced in real-time.

USE CASE 6: Real World Testing will demonstrate that Enablemypractice is conformant to the following certification criteria and ability to send electronic immunizations to state registries for patients as defined in §170.315(f)(1) Transmission to Immunization Registry.

Measure 1: Transmit Immunizations. Enablemypractice already has deployed HL7 2.5.1 Immunizations and will use logs to report on successful sending the immunizations. The associated certification criterion in the ambulatory care setting is:

Certification Criteria	Requirement
§170.315(f)(1) Transmission to Immunization Registry	(i) Create immunizations with CVX codes
	(2) Send Immunizations in HL7 2.5.1 format.

- **Justification:** Family practice, health departments and pediatric organizations must submit immunizations provided to state health departments.
- **Test methodology:** Logs will be reviewed to show succession of creating and sending immunizations. Log files obtained during Real World Testing will be de-identified and used for analysis in several areas to validate the proper operation of immunizations as specified in § 170.315(f)(1). This test methodology will primarily test the conformance of the implementation.
- **Expected outcome(s):** Each immunization will be successfully sent conforming to the HL7 2.5.1. format and specifications.

6 OVERALL EXPECTED OUTCOMES

Enablemypractice ONC 2015 Cures Update Real Word Testing will yield the following results:

- Real World Testing will demonstrate that Enablemypractice is conformant to the following certification criteria and the ability to send, receive, download and reconcile clinical data: 170.315 (h)(1): Direct Project, § 170.315(b)(1) Transitions of care, § 170.315(b)(2) Clinical information reconciliation and incorporation, and § 170.315(e)(1) View, download, and transmit to 3rdparty.

- Real World Testing will demonstrate that Enablemypractice is conformant to the following certification criteria and the ability to export data and EHR data on demand in standard CDA format: § 170.315(b)(6) Data export.
- Real World Testing will demonstrate that Enablemypractice is conformant to the following certification criteria and ability to send and receive clinical and demographic data by patient category or all as defined in: §170.315(g)(7 - 9) Application Access.
- Real World Testing will demonstrate that Enablemypractice is conformant to the following certification criteria and ability to generate and report on patient quality measures for §170.315(c)(1 - 3) Clinical quality measures (CQMs).
- Real World Testing will demonstrate that Enablemypractice is conformant to the following certification criteria and ability to send immunizations to state registries to care for patients as defined in §170.315(f)(1) Transmission to Immunization Registry.

7 SCHEDULE OF KEY MILESTONES

Real World testing will be conducted with different clinical group specialities. There is no functional difference in the operation of these features.

Key Milestone	Date/Time Frame
Release of documentation for the Real-World Testing to be provided to authorized representatives and providers. This includes surveys, specific instructions on what to look for, how to record issues encountered, and Customer Agreements.	Jan 31, 2022
Establish data collection structure and reporting using exported audit logs.	March 1, 2022
Release all measure SVAP updates with data collection methods	March 31, 2022
Follow-up with providers and staff quarterly and gather input	June 30, 2022
Follow-up with providers and staff quarterly and gather input	September 30, 2022
Real World Testing is completed and all data is collected and reported on	January 1, 2023

Analysis and Report Completed	January 15, 2023
Submit Real World Test Report to ACB	February 1, 2023


8 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 EnableDoc LLC's Real World Testing requirements.

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