ONC 2015 Cures Update Real World Test Plan

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Report Version 1.6

SYSTEM: Enablemypractice EHR5

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1   GENERAL INFORMATION

This is Enabledoc LLC's ONC information:

Plan Report ID Number: [For ONC-Authorized Certification Body use only]
Developer Name: Enabledoc LLC
Product Name(s): Enablemypractice
Version Number(s): EHR 5.0
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:
https://www.enabledoc.com/enabledoc-onc-2015-cures-update-real-world-test-plan-and-results/

2   JUSTIFICATION FOR REAL WORLD TESTING

Enablemypractice EHR is sold to clinical groups, behavioral health organizations, health departments and other ambulatory care settings. For this reason, the Real-World Testing plan will apply to these care settings. Since 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 workflow for these measures does not vary from setting-to-setting, therefore we will utilize clinical groups from different specialties for our real-world testing.

Care Coordination and Electronic Exchange Testing
All criteria involving the Consolidated Clinical Document Architecture (C-CDA) documents will be tested, including § 170.315(b)(1) Transitions of care, § 170.315(b)(2) Clinical information reconciliation, and § 170.315(b)(10) Electronic Health Information export, which we plan to certify to before the end of 2022 and already have this functionality deployed.

Patient Engagement Testing
All criteria involving § 170.315(e)(1) View, download, and transmit to 3rd parties.

FHIR API Testing
We are planning to be certified for g(10) by December 2022. API testing for patient search/select and binary CDA export will be conducted between our EHR and external app using FHIR api. Patient API RWT will test accessing data from another EHR, export individual patient data and CDA based on a patient search. This functionality will cover measures §170.315(g)(7), §170.315(g)(9), and §170.315(g)(10).

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) AND UNITED STATES CORE DATA FOR INTEROPERABILITY (USCDI))

The EHRUT test for this study was Enablemypractice EHR Version 5 Release, an ambulatory EHR.

Standard (and version)	All standard versions are those specified in 2015 Cures Edition Update.
Updated Certification criteria and associated product	b(1), b(2), c(3), e(1), g(9)
Method used for update	Cures Update
Date of ONC-ACB notification	December 30, 2022
Date of Customer Notification SVP only	NA
Conformance Measure	b1/b2/e1—Use Case 1/Measure 1, c3—Use Case 4/Measure 1, g9—Use Case 3/Measure 3
USCDI-updated certification criteria (and USCDI version)	b(1), b(2), e(1), g(9) – USCDI Version 1

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 5 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	Relied upon software
§ 170.315(h)(1) Direct Project	(1)(i) Enhanced Send	Kno2 Direct Messaging
	(1)(i) Enhanced Receive	Kno2 Direct Messaging
	(1)(ii) Message Disposition Processed	Kno2 Direct Messaging
	(1)(i) Message Disposition Failed	Kno2 Direct Messaging
§ 170.315(b)(1) Transitions of care	(i)(A) Send transition of care/referral summaries	Kno2 Direct Messaging
	(i)(B) Receive transition of care/referral summaries	Kno2 Direct Messaging
§ 170.315(b)(2) Clinical information reconciliation and incorporation	(b)(2)(i) Reconcile	Kno2 Direct Messaging to receive file, but file could be uploaded
	(b)(2)(ii) Match Patient	None
	(b)(2)(iii)(A) Display current & Received Data	None
	(b)(2)(iii)(B) - (D) Review & Validate	None

	(b)(2)(iv) Create CDA with reconciled data	None
§ 170.315(e)(1) View, download, and transmit to 3rdparty	(i)(B)(2) Download ambulatory summary or inpatient summary using CCD Template	None
	(i)(B)(3) (inpatient setting only) Download of transition of care/referral summaries	None
	(i)(C)(1) Transmit to third party	None

- **Justification**: Enablemypractice includes functionalities of interest: (A) Send transition of care/referral summaries, (B) Receive transition of care referral summaries, including reconcile data, and (C) View, Download and transmit to 3rd party. 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 Direct Messaging mechanisms provided with the success (no errors) for 99% or higher of the transaction as specified by:
  - numerator for total successfully sent and denominator of total sent.
  - numerator for total successfully received and denominator of total received.
  - numerator for total successfully reconciled and denominator of total reconciled.
  - numerator for successfully download and denominator of total downloaded.

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)(10) Electronic Health Information export.

Measure 2: Single/Population Patient Export. This measure will assess functionality used to export EHI for a single or group of patients using a Health Information Data Export Screen. The associated certification criterion is:

Certification Criteria	Requirement	Relied upon software
§170.315(b)(10) Electronic Health Information Export	(b)(10)(i) Single patient export no development involved	None
	(b)(10)(ii) Export all patient data	None
	(b)(10)(iii) Show ability to access historical exported data	None

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 or group of 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 share EHI using the export function provided successfully (no errors) for 99% or higher of the data exports; where the numerator is the total successfully exported data requests and denominator is total export requests.

USE CASE 3: Real World Testing will demonstrate that Enablemypractice is conformant to the following certification criteria and ability for patients, providers, health organizations, and third party developer apps to query for patients, access and retrieve patient clinical data and other clinical information for individual patients, group of patients or in bulk as defined in §170.315(g)(7, 9 and10) 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 Standardized API for patient and population services §170.315(g)(10) and All Data Access §170.315(g)(9). This measure will test the conformance of the FHIR API technology using the Enablemyhealth app. The associated certification criterion in the ambulatory clinical setting is:

Certification Criteria	Requirement	Relied upon software
§ 170.315(g)(7) Application Access- Patient Selection	(i) Identify patient	None
	(ii)(A)(1-3) API documentation & Agreement	None
	(v)(B) Provisioning Technical Documentation	None
§ 170.315(g)(9) Application access — all data request	(g)(9)(i)(A) Request Patient ID for all data	None
	(g)(9)(i)(B)Date specific response	None
	(g)(9)(ii)(A)(1) API documentation	None
	(g)(9)(ii)(B) Public hyperlink	None
§ 170.315(g)(10) Standardized API for patient and population services (patient services only)	(g) (10)(i) A. Data Response one patient	None
	(g) (10)(i) B. Data Response all	None

	patients	
	(g) (10)(ii) A. Search Criteria one patient	None
	(g) (10)(ii) B. Search Criteria all patients	None
	(g) (10)(iii) Application registration	None
	(g) (10)(iv) A. Secure patient app connection	None
	(g) (10)(iv) B. Secure practitioner backend app connection	None
	(g) (10)(iv) A. Authentication and authorization for patient an end use app	None
	(g) (10)(v) A.1 First Time Connection patient	None
	(g) (10)(v) A.2 Subsequent Connection patient	None
	(g) (10)(v) B Valid Backend Access Key	None
	(g) (10)(vi) Revoke Key	None
	(g) (10)(viii) A API Documentation	None
	(g) (10)(viii) B API Documentation access via public link	None

Justification: These criteria allow Enabledoc EHR to comply with the Cures Act requirements to unrestricted, yet secure sharing of patient clinical data. 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. Allows patient Ids to be located based on common search criteria. 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: Using FHIR APIs to search for one, multiple or all patients, requesting patient data using binary C=CDA g(9) and patient information as specified data g(10) will be logged to track successful and errored data. For FHIR® APIs, this includes proper credentialing and validation that all required USCDI version 1 data elements are supported.

Expected outcome(s): It is expected that data requested using the FHIR g(7), g(9) and g(10) mechanisms shall be provided with success (no errors) 99% or higher of the data requested transaction as specified by:
- ○ numerator for successful patient query and response with patient ID as defined in g(7)
- ○ numerator for successfully retrieved binary C-CDA data and denominator of total binary requests as specified in g (9)
- ○ numerator for successfully FHIR get requests for g(10) dataset transactions and denominator of total requested g(10) dataset transactions.

USE CASE 4: 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).

Measure 1: Quality Measures. This measure tests the generation of clinical population data for a group of measures using ONC provided Cypress test tool. 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	None
	(c)(1)(ii) Export CQM	None
§170.315(c)(2)Clinical quality measures - import and calculate	(c)(2)(i) Import QRDA	None
	(c)(2)(ii) Calculate QRDA	None
§170.315(c)(3)Clinical quality measures (CQMs) — report	(C)(3) Report	None

- *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 QRDAI files for each selected measure. Customers export this data for approved measures for the MIPS program. Each measure export will be logged as successful or errored.
- *Expected outcome(s):* Each file provided is expected to generate for customer selected measures. It is expected that each measure data file shall be provided with success (no errors) 99% or higher of the data requested transaction as specified by:
  - numerator for successfully generating each selected measure and denominator of the total number of times a measure was generated.

USE CASE 5: 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	Relied upon software
§170.315(f)(1) Transmission to Immunization Registry	(i) Create immunizations with CVX codes	None.
	(2) Send Immunizations in HL7 2.5.1 format.	None.

- *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 2.51. format and specifications. It is expected that data sent shall be provided with success (no errors) 99% or higher of the data requested transaction as specified by:

- ○ numerator totaling successful number of transmissions of immunization data and denominator of total immunization transactions sent.

6 OVERALL EXPECTED OUTCOMES

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

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 3rd party.
- 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)(10) Health Information 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 patients category or all as defined in: §170.315(g)(7, 9 and 10) Standardized API for patient and population services.
- 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 specialties. There is no functional difference in the operation of these features.
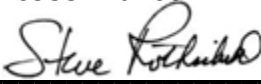
Key Milestone	Date/Time Frame
Release of documentation for the Real-World Testing to be provided to authorized representatives and providers. This includes surveys, specific instructions on what to look for, how to record issues encountered, and Customer Agreements.	Jan 31, 2023
Establish data collection structure and	March 1, 2023

reporting using exported audit logs.	
Release all measure SVAP updates with data collection methods	NA
Follow-up with providers and staff quarterly and gather input	June 30, 2023
Follow-up with providers and staff quarterly and gather input	September 30, 2023
Real World Testing is completed and all data is collected and reported on	January 1, 2024
Analysis and Report Completed	January 10, 2024
Submit Real World Test Report to ACB	January 15, 2024

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 Enabledoc LLC's Real World Testing requirements.

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Date: November 16, 2022