UniversalEHR.com

REAL WORLD TESTING PLAN 2022

TESTED CRITERIA

170.315 (b)(1); 170.315 (b)(2); 170.315 (b)(3); 170.315 (b)(6);
170.315 (c)(1); 170.315 (c)(2); 170.315 (c)(3); 170.315(e)(1);
170.315 (f)(1); 170.315 (f)(2); 170.315(g)(7); 170.315(g)(8);
170.315(g)(9); 170.315(h)(1)

UniversalEHR.com

GENERAL INFORMATION

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

Developer Name: Binh Pham, Si Pham, Harrik Nguyen, Tom Bui

Product Name(s): Universal EHR

Version Number(s): 2.0.0

Certified Health IT: 15.04.04.2478.Univ.02.00.1.180312

Product List (CHPL) ID(s): 15.04.04.2478.Univ.02.00.1.180312

Developer Real World Testing Page URL: https://www.universalehr.com/rwt/default.aspx

JUSTIFICATION FOR REAL WORLD TESTING APPROACH

Provide an explanation for the overall approach to Real World Testing, including an outline of the approach and how data will be used to demonstrate successful Real World Testing[i].

All measures should reasonably align with the elements within a Real World Testing plan, the scope of the certification, the types of settings in which the certified health IT is marketed, and other factors relevant to the implementation of the certified Health IT Module(s). The justification should reflect how each element within the plan is relevant to the developer's overall strategy for meeting the Real World Testing Condition and Maintenance of Certification requirements.

Note: A single Real World Testing plan may address multiple products and certification criteria for multiple care settings.

We will utilize functional testing to demonstrate Real World Testing in an outpatient clinic care setting. By using an actual outpatient clinic to demonstrate and test each measurement/module, we will be able to collect data to demonstrate the overall accuracy and functionality of the system.

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

Both required and voluntary standards updates must be addressed in the Real World Testing plan. Real World Testing plans must include all certified health IT updated to newer versions of standards prior to August 31 of the year in which the updates were made.

Describe approach(es) for demonstrating conformance to all certification requirements using each standard to which the health IT is certified. List each version of a given standard separately. For each version of a standard submit the following:

- ✓ *Identify standard versions*
- ✓ *Indicate what certification criteria in which product(s) has been updated*
- ✓ *If reporting for multiple products, identify the certification criteria that were affected by the update for each of the associated products*
- ✓ *CHPL ID for each Health IT Module*
- ✓ *Method used for standard update (e.g., SVAP)*
- ✓ *Date notification sent to ONC-ACB*
- ✓ *If SVAP, date notification sent to customers*
- ✓ *Measure used to demonstrate conformance with updated standard(s)*
- ✓ *Which certification criteria were updated to USCDI and/or to which version of USCDI was the certification criteria updated?*

For CY 2022, we are not planning to make any version updates on approved standards through the SVAP process.

Standard (and version)	None
Updated certification criteria and associated product	N/A
Health IT Module CHPL ID	N/A
Method used for standard update	N/A
Date of ONC-ACB notification	N/A
Date of customer notification (SVAP only)	N/A
Conformance measure	N/A
The plan documents the support of all USCDI v1 data elements	N/A

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
- ✓ 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
Measure 1: Send Patient Health Information via Direct Messaging	Universal EHR uses EMR Direct as its direct messaging vendor to send and receive direct messages containing patient health information from other providers for transition and continuity of care events. This measure tracks how many CCDAs are generated and successfully sent from the EHR to a 3rd party using direct messaging over a given time period. Any errors will be recorded and analyzed.
Measure 2: Incorporating Patient Health Information via Direct Messaging	This measure tracks how many CCDAs are successfully received from a 3rd party via direct messaging and incorporated into Universal EHR. Patient data received including medication list, problem list and allergy list will be incorporated and updated into the patient's chart accordingly. Any errors will be recorded and analyzed.
Measure 3: Number of Electronic Prescriptions Successfully Sent	Universal EHR uses NewCropRx as its electronic prescribing vendor for providers to send prescriptions electronically. This measure tracks the rate of successful prescription transmissions from the EHR to pharmacies over a given time period. Any errors will be recorded and analyzed.
Measure 4: Export Patient Data	Authorized users will be able to download and export patient data/clinical summaries through CCDA format. This measure tracks the rate of successful exports. Any errors will be recorded and analyzed.
Measure 5: Report of Clinical Quality Measures	Users will be able to generate a report of Clinical Quality Measures from the Universal EHR that will be reported to CMS during the MIPS reporting period. This measure tracks the rate of successful generation of these reports. Any errors will be recorded and analyzed.
Measure 6: Patient Portal Use	Patients will be given access to the Universal EHR patient portal to view their health information. This measure will track how many patients have logged into the portal over a given time period.
Measure 7: Transmission to Immunization Registries	Patient immunization records are recorded in the EHR and an HL7 immunization message will be generated and sent directly to CAIR (California Immunization Registry). This measure will track the rate of successful transmission of immunization messages from the EHR to the immunization registry over a given time period. Any errors will be recorded and analyzed.
Measure 8: Transmission to Public Health Agencies – Syndromic Surveillance	Users will export syndromic surveillance information from the EHR and export them to the state's registry via HL7 files. This measure will track the rate of successful file creations and transmission. Any errors will be recorded and analyzed.
Measure 9: Compliance of API Resource Query Support	This measure is tracking compliance of the EHR Module criteria functionality of support of API query of patient data resources.
Measure 10: Direct Project	Universal EHR utilizes EMR Direct to electronically transmit health information to a 3rd party via CCDAs. This measure tracks how many CCDAs are sent and received successfully over a given time period. Any errors will be recorded and analyzed.

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
Measure 1: Send Patient Health Information via Direct Messaging	*170.315 (b)(1): Transitions of Care*
Measure 2: Incorporating Patient Health Information via Direct Messaging	*170.315 (b)(2): Clinical Information Reconciliation and Incorporation*
Measure 3: Number of Electronic Prescriptions Successfully Sent	*170.315 (b)(3): Electronic Prescribing*
Measure 4: Export Patient Data	*170.315 (b)(6): Data Export*
Measure 5: Report of Clinical Quality Measures	*170.315 (c)(1): Clinical Quality Measures - Record and Export* *170.315 (c)(2): Clinical Quality Measures - Import and Calculate* *170.315 (c)(3): Clinical Quality Measures - Report*
Measure 6: Patient Portal Use	*170.315(e)(1) View, download, and transmit to 3rd party*
Measure 7: Transmission to Immunization Registries	*170.315 (f)(1): Transmission to Immunization Registries*
Measure 8: Transmission to Public Health Agencies – Syndromic Surveillance	*170.315 (f)(2): Transmission to Public Health Agencies – Syndromic Surveillance*
Measure 9: Compliance of API Resource Query Support	*170.315(g)(7) Application access - patient selection* *170.315(g)(8) Application access - data category request* *170.315(g)(9) Application access - all data request*
Measure 10: Direct Project	*170.315(h)(1) Electronic Exchange – Direct Project*

JUSTIFICATION FOR SELECTED MEASUREMENT/METRIC

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

Measurement/Metric	Justification
Measure 1: Send Patient Health Information via Direct Messaging	Primary care offices typically refer their patients to specialty offices. It is important that patient information is exchanged securely from one office to another so that the transition is communicated effectively. This measure will provide a numeric value on how often this feature is being used and the success rate of the transmission.
Measure 2: Incorporating Patient Health Information via Direct Messaging	Once a user receives CCDA via direct messaging from another referring provider, the patient information will be downloaded and incorporated into the EHR. This is important to ensure that providers maintain up to date information about their patient's health in order to facilitate continuity of care and provide the best quality care. This measure will provide a numeric

	value on how often this feature is being used and the success rate of receiving and incorporating data.
Measure 3: Number of Electronic Prescriptions Successfully Sent	Prescribing medications is an important aspect of health care and is a common form of treatment. The ability to send prescriptions electronically to patient's preferred pharmacy makes it more efficient for all parties involved. This measure will provide a numeric value on the success rate of prescription transmission from the EHR to pharmacies.
Measure 4: Export Patient Data	Batch data export enables authorized users to download data for multiple patients via CCDA and sending it to another care setting. This measure will provide a numeric value on the success rate of exporting patient data.
Measure 5: Report of Clinical Quality Measures	Providers enrolled in CMS (Medicare) are required to submit clinical quality measures for MIPS reporting annually. Users will generate a report from the EHR database that will satisfy the quality measure requirements to submit to CMS. This measure will provide a numeric value on the success rate of generating these reports.
Measure 6: Patient Portal Use	The use of patient portals enhances patient engagement by enabling patients to access their electronic medical records and facilitating secure patient-provider communication. This measure will provide a numeric value on how many patients logged into the portal and compare it to the number of patients seen over the same given time period.
Measure 7: Transmission to Immunization Registries	Some providers are required to report immunizations to their state immunization registry. This measure will provide a numeric value on the success rate of transmitting immunization messages via HL7 files from the EHR to the immunization registry.
Measure 8: Transmission to Public Health Agencies – Syndromic Surveillance	While Universal EHR has the capability to transmit HL7 messages and report to outside registries, to date we have not been asked to set up a real world connection to any such agency. In the meantime, we will conduct internal testing to ensure compliance.
Measure 9: Compliance of API Resource Query Support	Because our API is not actively being used by clients, we will conduct real world testing using test patients to ensure compliance.
Measure 10: Direct Project	The ability to transmit (send and receive) health information from one provider to another is important for transition of care events. This measure will provide a numeric value on how often this feature is being used and the success rate of the transmission.

CARE SETTING(S)

The expectation is that a developer's Real World Testing plan will address each type of clinical setting in which their certified health IT is marketed. Health IT developers are not required to test their certified health IT in every setting in which it is marketed for use. Developers should address their choice of care and/or practice settings to test and provide a justification for the chosen approach.

Note: Health IT developers may bundle products by care setting, criteria, etc. and design one plan to address each, or they may submit any combination of multiple plans that collectively address their products and the care settings in which they are marketed

List each care setting which is covered by the measure and an explanation for why it is included.

Care Setting	Justification
Outpatient Clinic	At this time, Universal EHR markets to outpatient clinic settings only. Therefore, we will focus on an outpatient primary care clinic for Real World Testing.

EXPECTED OUTCOMES

Health IT developers should detail how the approaches chosen will successfully demonstrate that the certified health IT:

(1) is compliant with the certification criteria, including the required technical standards and vocabulary codes sets;

(2) is exchanging electronic health information (EHI) in the care and practice settings for which it is marketed for use; and/or,

(3) EHI is received by and used in the certified health IT.

(from 85 FR 25766)

Not all of the expected outcomes listed above will be applicable to every certified Health IT Module, and health IT developers may add an additional description of how their measurement approach best addresses the ongoing interoperability functionality of their product(s). Health IT developers could also detail outcomes that should not result from their measurement approach if that better describes their efforts.

Within this section, health IT developers should also describe how the specific data collected from their Real World Testing measures demonstrate expected results. Expected outcomes and specific measures do not necessarily have to include performance targets or benchmarks, but health IT developers should provide context for why specific measures were selected and how the metrics demonstrate individual criterion functionality, EHI exchange, and/or use of EHI within certified health IT, as appropriate.

Measurement/Metric	Expected Outcomes
Measure 1: Send Patient Health Information via Direct Messaging	This measure will track the number of CCDA files sent electronically to 3rd parties via direct messaging. There will be a numeric result and the number of CCDAs will be reported over a 3-month period.
Measure 2: Incorporating Patient Health Information via Direct Messaging	This measure will track the success rate of receiving patient health information from a 3rd party in CCDA format and incorporating the information into the patient's chart. Once the CCDA has been received and downloaded, it is expected that the user will reconcile the CCDA and update, at minimum, the medication and allergy lists in the patient's chart. This will produce numeric results and be reported over a 3-month period.
Measure 3: Number of Electronic Prescriptions Successfully Sent	It is expected that all prescribed medication should be created and transmitted to the pharmacy through NewCropRx with no errors. This measurement will track the success rate of the prescription transmission and produce numeric results over a given time period.
Measure 4: Export Patient Data	It is expected that authorized users will be able to successfully download and export patient data for multiple patients at a time. This measurement will produce a numeric result on the success rate of exporting patient data.
Measure 5: Report of Clinical Quality Measures	It is expected that the Clinical Quality Measures (CQM) report will be generated and exported successfully without any errors. This measurement will track the success rate of generating and exporting such reports and produce numeric results over a given time period.
Measure 6: Patient Portal Use	It is expected that patients will be able to successfully log in to their patient portal to securely view, download or transmit their health information. This measurement will track the number of patients who logged in to the portal and compare it to the number of patients seen during given time period. This will produce numeric results.
Measure 7: Transmission to Immunization Registries	It is expected that HL7 immunization messages will export successfully and be transmitted to CAIR (CA Immunization Registry) with no errors. The transmitted information is expected to match the information on the patient's chart and the information that will be displayed by CAIR. This

	measurement will track the success rate of the immunization message transmission and produce numeric results over a 3-month period.
Measure 8: Transmission to Public Health Agencies – Syndromic Surveillance	We will conduct internal testing to ensure compliance by testing the capability to send HL7 messages containing syndromic data. It is expected that the HL7 messages will be exported and transmitted successfully without errors. This measurement will track the success rate of the message transmission and produce numeric results over a 3-month period.
Measure 9: Compliance of API Resource Query Support	The 3rd party user will be given access to the EHR through a client application via the API. The user must enter in the correct credentials in order to access the patient data. We expect that the API will return the appropriate data for the specific patient requested.
Measure 10: Direct Project	This measure will track the number of CCDA files sent and received electronically to and from 3rd parties via direct messaging. There will be a numeric result and the number of CCDAs will be reported over a 3-month period.

SCHEDULE OF KEY MILESTONES

Include steps within the Real World Testing plan that establish milestones within the process. Include details on how and when the developer will implement measures and collect data. Key milestones should be relevant and directly related to expected outcomes discussed in the next section.

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
Release of documentation for Real World Testing to be provided to authorized representatives and providers testing the measurements/metrics.	Outpatient Clinic	12/1/2021
Begin collection of information.	Outpatient Clinic	1/1/2022
Meet with providers and authorized representatives to ensure Real World Testing protocols are effective.	Outpatient Clinic	2/1/2022
Follow-up with providers and authorized representatives regarding data collection.	Outpatient Clinic	Quarterly, 2022
Data collection and review.	Outpatient Clinic	Quarterly, 2022
End of Real World Testing period, finalize collection of all data for analysis.	Outpatient Clinic	1/1/2023

Analysis and report creation.	Outpatient Clinic	1/15/2023
Submit Real World Testing report	Outpatient Clinic	2/1/2023

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.[ii]

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: Binh Pham

Authorized Representative Email: binhpham@universalehr.com

Authorized Representative Phone: (714) 799-5005

Authorized Representative Signature: *Binh Pham*

Date: 11/23/2021

[i] Certified health IT continues to be compliant with the certification criteria, including the required technical standards and vocabulary codes sets; certified health IT is exchanging EHI in the care and practice settings for which it is marketed for use; and EHI is received by and used in the certified health IT. (85 FR 25766)

[ii] https://www.federalregister.gov/d/2020-07419/p-3582