## REAL WORLD TESTING PLAN

## GENERAL INFORMATION

Plan Report ID Number: 20231211ens

Developer Name: EnSoftek Inc

Product Name(s): DrCloudEHR

Version Number(s): 2025

Certified Health IT: DrCloudEHR

Product List (CHPL) ID(s): 15.02.05.1434.ENST.01.01.1.220218

Developer Real World Testing Page URL: https://www.drcloudemr.com/resources/dr-cloud-ehr-onc-compliant-real-world-testing/

## JUSTIFICATION FOR REAL WORLD TESTING APPROACH

*DrCloudEHR is marketed to behavioral health and human services in the public and private sector all over the US. For this reason, the Real World Testing plan will apply to this specialty care setting. Agencies that use DrCloudEHR provide mental health counseling, behavioral health counseling and substance use disorder treatment services.*

*Our approach to testing is focused on making sure the system is usable for clinical, medical, billing, and reporting purposes by the agencies using DrCloudEHR. A major element of focus in application design is to promote interoperability and sharing of information between agencies and EHRs using industry standard protocols and mechanisms compliant with ONCHIT compliant certification. We will work with selected partner agencies and staff to test the applicable criteria for which DrCloudEHR is certified.*

*All required data elements compliant with certification will be ensured by exporting data in formats we are certified for and any information that is exchanged will be tested to make sure they in compliance with certification requirements.*

The following criteria will be tested:

Care Coordination
- 170.315(b)(1) Transitions of care
- 170.315(b)(2) Clinical information reconciliation and incorporation
- 170.315(b)(3) Electronic prescribing - DrFirst
- §170.315(b)(10) Electronic Health Information export.

Applicable clinical quality measures
- 170.315(c)(1)-(3)

Supported patient engagement criteria:
- 170.315(e)(1) View, download, and transmit to 3rd party.

Following public health criteria
- 170.315(f)(1) Transmission to immunization registries
- 170.315(f)(2) Transmission to public health agencies — syndromic surveillance.

Included measures for the following Application Programming Interfaces (APIs) criteria
- 170.315(g)(7) Application access — patient selection
- 170.315(g)(9) Application access — all data request and the electronic exchange criteria
- §170.315(g)(10) Standardized API for patient and population services
- 170.315(h)(1) Direct project.

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

| | |
|---|---|
| Standard (and version) | USCDI v1 |
| Updated certification criteria and associated product | b1, b2, e1, g9 |
| Health IT Module CHPL ID | 15.02.05.1434.ENST.01.01.1.220218 |
| Method used for standard update | Cures Update |
| Date of ONC-ACB notification | 12/30/2022 |
| Date of customer notification (SVAP only) | N/A |
| Conformance measure | Usability Test for b1, b2, e1 Audit Log Review for g9 |
| USCDI-updated certification criteria (and USCDI version) | b1, b2, e1, g9—USCDI v1 |

## MEASURES USED IN OVERALL APPROACH

### DESCRIPTION OF MEASUREMENT/METRIC

| Measurement/Metric | Description |
|---|---|
| Usability Test | This test will focus on verifying that the functionality is working and providers can use it. |
| Audit Log Review | This measurement will allow us to demonstrate usage of functionality by providers. E.g. who was able to successfully transmit data |
| Data Review | This measurement will enable us to ensure required data fields are populated |

### ASSOCIATED CERTIFICATION CRITERIA

| Measurement/Metric | Associated Certification Criteria |
|---|---|
| Usability Test | § 170.315(b)(1) Transitions of care § 170.315(b)(2) Clinical information reconciliation and incorporation<br>§ 170.315(b)(3) Electronic prescribing - DrFirst<br>§ 170.315(e)(1) View, download, and transmit to 3rd party<br>§ 170.315(f)(1) Transmission to immunization registries<br>§ 170.315(f)(2) Transmission to public health agencies — syndromic surveillance<br>§ 170.315(g)(7) Application access— patient selection<br>§ 170.315(h)(1) Direct Project |
| Audit Log Review | § §170.315(b)(10) Electronic Health Information export<br>§ 170.315(g)(9) Application access— all data request<br>§170.315(g)(10) Standardized API for patient and population services |
| Data Review | § 170.315(c)(1) Record and export<br>§ 170.315(c)(2) Import and calculate<br>§ 170.315(c)(3) Report<br>§ 170.315(f)(1) Transmission to immunization registries<br>§ 170.315(f)(2) Transmission to public health agencies — syndromic surveillance |

## JUSTIFICATION FOR SELECTED MEASUREMENT/METRIC

| Measurement/Metric | Justification |
|---|---|
| *Usability Test* | **For the criteria below:**<br><br>**§ 170.315(b)(1) Transitions of care**<br>**§ 170.315(b)(2) Clinical information reconciliation and incorporation**<br>**§ 170.315(b)(3) Electronic prescribing - DrFirst**<br>**§ 170.315(e)(1) View, download, and transmit to 3rd party**<br>**§ 170.315(f)(1) Transmission to immunization registries**<br>**§ 170.315(f)(2) Transmission to public health agencies — syndromic surveillance**<br>**§ 170.315(g)(7) Application access— patient selection**<br>**§ 170.315(h)(1) Direct Project**<br><br>Users must use the application to visually compare information and use visual tools to accomplish the various functions for these criteria. For e.g. Using the User Interface to search for a specific medication and prescribe it electronically. For each of these criteria options are provided in the Health IT to reconcile clinical information and incorporate it, prescribe electronically, view, download and data, select patients, and share information via the Direct Trust network.<br><br>A usability test will reveal a user being able to complete these actions successfully. |
| *Audit Log Review* | **§ §170.315(b)(10) Electronic Health Information export**<br>**§ 170.315(g)(9) Application access— all data request**<br>**§170.315(g)(10) Standardized API for patient and population services**<br>The application records a user's actions such as access, request, and export data in a compliant audit log. So, reviewing the Audit Log will successfully reveal when a user is successfully able to complete these functions. |
| *Data Review* | **In the cases below,** The application records changes to data via a user's actions such as access, request, update, and export data in the system database. So manual review of the data will successfully reveal when a user is successfully able to complete these functions.<br><br>**§ 170.315(c)(1) Record and export**<br>**§ 170.315(c)(2) Import and calculate**<br>**§ 170.315(c)(3) Report**<br>The objective is to record data for each of the Clinical Quality measures specified and export the same to the cypress tool and then import the results to DrCloudEHR.<br>**§ 170.315(f)(1) Transmission to immunization registries**<br>The objective is to register an Immunization for a patient, Import the immunization to the tool and then Import the message from the tool to DrCloudEHR.<br>**§ 170.315(f)(2) Transmission to public health agencies — syndromic surveillance**<br>The objective is to create syndromic surveillance content using the Test data for each of the test cases and import it to the tool. |

## RELIED UPON SOFTWARE

DrCloudEHR uses relied upon software for the following criteria

| Criteria | Software used |
|---|---|
| • 170.315(b)(2) Clinical information reconciliation and incorporation<br>• § 170.315(b)(3) Electronic prescribing - DrFirst | DrCloudEHR uses DrFirst for electronic prescribing and med reconciliation. |
| • 170.315(b)(1) – Transitions of Care<br>• 170.315(e)(1) View, download, and transmit to 3rd party.<br>• 170.315(h)(1) Direct Project | Some functions use the interface with EMR Direct is used to transmit data via the Direct Project or Direct Trust network to meet these criteria. |

## CARE SETTING(S)

Our clients are using DrCloudEHR certified technology in:

| Care Setting | Justification |
|---|---|
| Behavioral Healthcare | This is the market DrCloudEHR is focused in |
| Integrated Care | This is the market DrCloudEHR is focused in |
| Coordination of Care | This is the market DrCloudEHR is focused in |

## EXPECTED OUTCOMES

*Real World Testing will demonstrate that DrCloudEHR is conformant to the following certification criteria:*

- *§170.315(b)(1) – Transitions of Care*
- *§170.315(b)(2) – Clinical Information Reconciliation and Incorporation*
- *§170.315(b)(3) – Electronic prescribing - DrFirst*
- *§170.315(b)(10) Electronic Health Information export*
- *§170.315(c)(1) – Clinical Quality Measures (CQMs) – Record and Export*
- *§170.315(c)(2) – Clinical Quality Measures (CQMs) – Import and Calculate*
- *§170.315(c)(3) – Clinical Quality Measures (CQMs) - Report*
- *§170.315(e)(1) – View, Download, and Transmit to 3rd Party*
- *§170.315(f)(1) – Transmission to Immunization Registries*
- *§170.315(f)(2) – Transmission to Public Health Agencies- Syndromic Surveillance*
- *§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*
- *§170.315(g)(10) Standardized API for patient and population services*
- *§170.315(h)(1) – Direct Project*

## §170.315(B)(1) – TRANSITIONS OF CARE

## DESCRIPTION OF MEASUREMENT/METRIC

The following measures will demonstrate the ability to send and receive transitions of care/referral summaries across multiple protocols and/or networks.

- Number of XDR/XDM referral messages sent within a 90-day period. (EMRDirect Inbox)
- Number of XDR/XDM referral messages received withing a 90-day period. (EMRDirect Inbox)
- Number of successful CCD retrievals from external organizations within a 90-day period.
- Number of successful CCDs provided to external organizations within a 90-day period.

## ASSOCIATED CERTIFICATION CRITERIA

| **§170.315(b)(1) Transitions of Care** | *§170.315(b)(1)(i)(A)* |
| --- | --- |
| | *§170.315(b)(1)(i)(B)* |

## JUSTIFICATION FOR SELECTED MEASUREMENT/METRIC

The measurements selected demonstrate that referral messages can successfully be exchanged with external organizations using XDR/XDM direct messages. The measurements also show that an organization may successfully exchange CCDs upon request utilizing the EMRDirect network.

## TEST METHODOLOGY

Logs will be reviewed to determine the frequency and the transport mechanism used by providers for sending/receiving transitions of care using Edge protocols. 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 measure on the specific types of transport mechanisms used. This test methodology will primarily test the conformance of the implementation.

### *Care setting(s)*

| Care Setting | Justification |
| --- | --- |
| Behavioral health care specialty setting | This measure was designed to test the behavioral health care facilities we support and target with this certified product. We will pull data to test over a 90-day time period. |

## EXPECTED OUTCOMES

It is expected that providers 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.

## §170.315(B)(2) – CLINICAL INFORMATION RECONCILIATION AND INCORPORATION

## DESCRIPTION OF MEASUREMENT/METRIC

The measure will demonstrate the certified products ability to capture, reconcile, and incorporate clinical information within the client systems as needed.

- Numerator: Number of Clinical Reconciliations completed
- Denominator: Number of unique Patients with a completed Clinical Reconciliation

### *Associated Certification Criteria*

| § 170.315 (b)(2) Clinical information and reconciliation and incorporation | § 170.315 (b)(2)(i) |
|---|---|
| | § 170.315 (b)(2)(iii) |

## JUSTIFICATION FOR SELECTED MEASUREMENT/METRIC

Clinical Information Reconciliation may be completed multiple times in a given period on a single patient. This measure will demonstrate the volume from both an end-user perspective (Numerator), and a Patient perspective (Denominator).

## TEST METHODOLOGY

Our platform utilizes a centralized module for these transactions, with logging, monitoring, and reporting capabilities. We will be able to report on these measures from the data made available by this centralized module.

## CARE SETTING(S)

| Care Setting | Justification |
|---|---|
| Behavioral health care facilities | This measure was designed to test the behavioral health care facilities we support and target with this certified product. We will pull data to test over a 12-month time period. |

## EXPECTED OUTCOMES

End Users will be able to utilize Clinical Information Reconciliation & Incorporation to ingest data from transitions of care/referrals.

Numerator will be larger than Denominator due to the ability to complete multiple Clinical Information Reconciliations on a single Patient in a given time period.

## §170.315(B)(3) – ELECTRONIC PRESCRIBING - DRFIRST

## DESCRIPTION OF MEASUREMENT/METRIC

The measure will demonstrate the certified products ability to Create and send new prescription (NewRx), Receive prescription change request, Create and send prescription change response, receive fill status notification, send request to cancel prescription, receive request to renew prescription, send a request for a medication history and receive a response to a request for a medication history.

- Numerator: Number of prescriptions queried for a drug formulary check.
- Denominator: Number of prescriptions written during a reporting period

### Associated Certification Criteria

| § 170.315 (b)(3) Electronic prescribing - DrFirst | | § 170.315 (b)(3)(ii) |
|---|---|---|
| | | |

## JUSTIFICATION FOR SELECTED MEASUREMENT/METRIC

Electronic prescribing may be done multiple times in a given period on a single patient. This measure will demonstrate the volume from both an end-user perspective (Numerator), and a Patient perspective (Denominator).

## TEST METHODOLOGY

Our platform utilizes a centralized module for these transactions, with logging, monitoring, and reporting capabilities. We will be able to report on these measures from the data made available by this centralized module.

## CARE SETTING(S)

| Care Setting | Justification |
|---|---|
| Behavioral health care facilities | This measure was designed to test the behavioral health care facilities we support and target with this certified product. We will pull data to test over a 12-month time period. |

## EXPECTED OUTCOMES

End Users will be able to utilize electronic prescribing-DrFirst to Create and send new prescription (NewRx), Receive prescription change request, Create and send prescription change response, receive fill status notification, send request to cancel prescription, receive request to renew prescription, send a request for a medication history and receive a response to a request for a medication history.

Numerator will be larger than Denominator due to the ability to complete multiple prescriptions on a single Patient in a given time period.

## §170.315(B)(10) ELECTRONIC HEALTH INFORMATION EXPORT

### DESCRIPTION OF MEASUREMENT/METRIC

This measure will demonstrate the end user's ability to create export summaries on an as needed basis.

- Numerator: # of scheduled batch jobs for patient data export summaries
- Denominator: # of total patient data export summaries generated

*Associated Certification Criteria*

| §170.315(b)(10) Electronic Health Information export | § 170.315 (b)(10)(i) |
| --- | --- |
| | § 170.315 (b)(10)(ii) |
| | § 170.315 (b)(10)(iii) |

### JUSTIFICATION FOR SELECTED MEASUREMENT/METRIC

The measurement selected demonstrates providers are able to generate a batch of CCDs for given criteria for a subset of their client population or a single client population. In addition, this measurement will demonstrate the ability to schedule batch patient data export for generation.

### TEST METHODOLOGY

Log files will provide audit of batches generated and user access. Database tables within the certified product application contain a record of all scheduled jobs created. If there's no record of client usage, then we will utilize internal testing systems to demonstrate the ability to generate batch patient data export summaries.

### CARE SETTING(S)

| Care Setting | Justification |
| --- | --- |
| Behavioral health care specialty setting | This measure was designed to test the behavioral health care facilities we support and target with this certified product. We will pull data to test over a 12-month time period. |

### EXPECTED OUTCOMES

We anticipate this measure will demonstrate the ability to view the number of patient data export summaries generated via a schedule in relation to the total number of patient data export summaries generated. It is expected that End Users will be record EHI in the system and have that data available for use in calculation of CQM results 100% of the time.

## §170.315(C)(1) – CLINICAL QUALITY MEASURES (CQMS) – RECORD AND EXPORT

### DESCRIPTION OF MEASUREMENT/METRIC

This measure will demonstrate the certified products ability to record transactions in the record.

- Numerator: Number of transactions written from DrCloudEHR
- Denominator: Number of unique DrCloudEHR Instances that submitted transactions

*Associated Certification Criteria*

| § 170.315 (c)(1) Clinical Quality Measures (CQMs) – Record and Export | *§170.315(c)(1)(i)* |
|---|---|
| | *§170.315(c)(1)(ii)* |

## JUSTIFICATION FOR SELECTED MEASUREMENT/METRIC

DrCloudEHR logs all entries in the audit log. This measure will provide information on the volume of transactions recorded, and the breadth of our client base utilizing this functionality.

## TEST METHODOLOGY

Our platform utilizes a centralized platform for these transactions, with logging, monitoring, and reporting capabilities. We will be able to report on these measures from the data made available by this centralized platform.

## CARE SETTING(S)

| Care Setting | Justification |
|---|---|
| Behavioral health care specialty setting | This measure was designed to test the behavioral health care facilities we support and target with this certified product. We will pull data to test over a 12-month time period. |

## EXPECTED OUTCOMES

It is expected that End Users will be able to record EHI in the System and have that data available for use in calculation of CQM Results 100% of the time.

## §170.315(C)(2) – CLINICAL QUALITY MEASURES (CQMS) – IMPORT AND CALCULATE

## DESCRIPTION OF MEASUREMENT/METRIC

This measure will demonstrate the certified product's ability to import and calculate CQMs per patient.

- Numerator: Sum of CQMs calculated on imported patients
- Denominator: Number of unique Patients imported

## ASSOCIATED CERTIFICATION CRITERIA

| § 170.315 (c)(2) Clinical Quality Measures (CQMs) – Import & Calculate | *§170.315(c)(2)(i)* |
|---|---|

## JUSTIFICATION FOR SELECTED MEASUREMENT/METRIC

We don't have any clients utilizing this feature. Therefore, we will be testing using the Cypress tool, noted below in the Test Methodology section.

## TEST METHODOLOGY

We will utilize Cypress to generate QRDA CAT-I files for import, and generate results based on that clinical data, across multiple CQMs.

## CARE SETTING(S)

| Care Setting | Justification |
|---|---|
| Behavioral health care specialty setting | This measure was designed to test the behavioral health care facilities we support and target with this certified product. We will run the required test during the 2023 calendar year. |

## EXPECTED OUTCOMES

Import QRDA CAT-I files into Measures Reporting system, process data and remove any potential duplicates, and generate results across multiple CQMs. It is expected that End Users will be export the applicable recorded PHI into QRDA CAT-I files 100% of the time.

## §170.315(C)(3) – CLINICAL QUALITY MEASURES (CQMS) - REPORT

## DESCRIPTION OF MEASUREMENT/METRIC

This measure will demonstrate the ability to export the required QRDA CAT-III File on demand.

- Numerator: Number of Clients (Agencies) to export a QRDA CAT-III File
- Denominator: Number of Clients (Agencies) to generate a QRDA CAT-III File

*Associated Certification Criteria*

| § 170.315 (c)(3) Clinical Quality Measures (CQMs) – Report | *§170.315(c)(3)(i)* |
|---|---|
| | *§170.315(c)(3)(ii)* |

## JUSTIFICATION FOR SELECTED MEASUREMENT/METRIC

The Measures Reporting System, Care Pathways will generate a QRDA CAT-III file for each Certified CQM calculation, however Agencies will only download that file when the results are being utilized to upload into QPP and/or State-based portals.

## TEST METHODOLOGY

Internal tooling is available for monitoring and reporting QRDA CAT-III file generation and exporting, to track how many agencies are utilizing our measures on a day-to-day basis vs. when they are being used to attest with generated CAT-III files. Reporting is available to calculate this measure.

## CARE SETTING(S)

| Care Setting | Justification |
|---|---|
| Behavioral health care specialty setting | This measure was designed to test the behavioral health care facilities we support and target with this certified product. We will pull data to test over a 12-month time period. |

## EXPECTED OUTCOMES

Agencies will calculate CQM results on a frequent basis, however, will only export their QRDA CATIII file on an annual basis. Denominator will be much larger than Numerator.

## §170.315(E)(1) – VIEW, DOWNLOAD, AND TRANSMIT TO 3ᴿᴰ PARTY

## DESCRIPTION OF MEASUREMENT/METRIC

The measures identified will encompass the Number of Views, downloads, and transmits of patient chart summaries over number of successful views, downloads and transmits.

- View Chart summary
    - Numerator: # of views of the chart summary
    - Denominator: # of clients that had an encounter during the reporting period
- Download of chart summary
    - Numerator: # of downloads of chart summary
    - Denominator: # of clients that had an encounter during the reporting period
- Transmission of chart summary
    - Numerator: # of transmissions of chart summary
    - Denominator: # of clients that had an encounter during the reporting period

*Associated Certification Criteria*

| | §170.315(e)(i)(A) |
|---|---|
| | |

| § 170.315 (e)(1) View, Download, and Transmit to 3rd Party | §170.315(e)(i)(B) |
| | §170.315(e)(i)(C) |

## JUSTIFICATION FOR SELECTED MEASUREMENT/METRIC

The measurements selected demonstrate that chart summaries can successfully be viewed and downloaded by patients and that they are able to successfully transmit to external parties.

## TEST METHODOLOGY

We will utilize a partner product, EMRDirect, to transmit the CCDA files. We also log all views, download and transmit request in our audit log to capture the relevant data points.

## CARE SETTING(S)

| Care Setting | Justification |
|---|---|
| Behavioral health care specialty setting | This measure was designed to test the behavioral health care facilities we support and target with this certified product. We will pull data to test over a 12-month time period. |

## EXPECTED OUTCOMES

It is expected that patients (or their authorized representatives) will be able to view, download and transmit their chart summaries using the mechanisms provided. Error rates will be tracked and trended over time.

## §170.315(F)(1) – TRANSMISSION TO IMMUNIZATION REGISTRIES

## DESCRIPTION OF MEASUREMENT/METRIC

This measure will demonstrate the ability to transmit data to immunization registries as required for compliance purposes.

- Numerator: Number of distinct immunization records in the denominator that sent recorded immunizations to an immunization registry
- Denominator: Number of distinct immunization records in a given month period

*Associated Certification Criteria*

| § 170.315 (f)(1) Transmission to Immunization Registries | §170.315(f)(1)(i) |
| | §170.315(f)(1)(ii) |

## JUSTIFICATION FOR SELECTED MEASUREMENT/METRIC

This measure will provide information on the number of patients within a client's facility whose information is being sent to an immunization registry. Currently, there is only one known client utilizing the DrCloudEHR certified products to send immunizations to a registry.

## TEST METHODOLOGY

The denominator will pull directly from the client database based on the parameters identified. The numerator will come from our interface which facilitates the connection between the EHR and Immunization registry.

## CARE SETTING(S)

| Care Setting | Justification |
|---|---|
| Behavioral health care specialty setting | This measure was designed to test the behavioral health care facilities we support and target with this certified product. The |
| | DrCloudEHR certified product only has one client currently sending information to immunization registries. This client is the one that will be utilized to demonstrate compliance. |

## EXPECTED OUTCOMES

The identified measure will document the percentage of patients at the facility with immunization records being sent to an immunization registry. It is expected End Users will be able to export 100% of the applicable data to the registry.

## §170.315(F)(2) – TRANSMISSION TO PUBLIC HEALTH AGENCIES- SYNDROMIC SURVEILLANCE

## DESCRIPTION OF MEASUREMENT/METRIC

The measure will demonstrate the ability to send syndromic surveillance records to public health agencies.

- Numerator: Number of distinct syndromic surveillance records in the denominator that sent syndromic surveillance records to a public health agency
- Denominator: Number of distinct syndromic surveillance records in a given month period

## ASSOCIATED CERTIFICATION CRITERIA

| § 170.315 (f)(2) Transmission to public health agencies -syndromic surveillance | §170.315(f)(2) |
|---|---|

## JUSTIFICATION FOR SELECTED MEASUREMENT/METRIC

This measure will provide information on the number of distinct syndromic surveillance records within a client's facility whose records have been sent to a public health agency. Currently, no client utilizing the DrCloudEHR certified product is sending syndromic surveillance records to public health agencies.

## TEST METHODOLOGY

The denominator will pull directly from the client database based on the parameters identified. The numerator will come from CareConnect tool which facilitates the connection between the EHR and a public health agency.

## CARE SETTING(S)

| Care Setting | Justification |
|---|---|
| Behavioral health care specialty setting | The DrCloudEHR certified product only has one client currently sending information to public health agencies. This client is the one that will be utilized to demonstrate compliance. |

## EXPECTED OUTCOMES

The identified measure will document the percentage of syndromic surveillance records being sent to public health agencies. It is expected End Users will be able to export 100% of the applicable data to the registry.

## §170.315(G)(7) – APPLICATION ACCESS – PATIENT SELECTION

## DESCRIPTION OF MEASUREMENT/METRIC

This measure will demonstrate utilization of the FHIR R4 resources to search for patients.

• Number of Patient searches conducted using the FHIR R4 Patient endpoint during a 90-day window.

## ASSOCIATED CERTIFICATION CRITERIA

| § 170.315 (g)(7) Application Access – Patient Selection | §170.315(g)(7)(i) |
|---|---|
| | §170.315(g)(7)(ii) |

## JUSTIFICATION FOR SELECTED MEASUREMENT/METRIC

The FHIR R4 Patient endpoint will provide a variety of search parameters to support identification of a patient for subsequent searches. This measure will demonstrate that the search capability is available and utilized.

## TEST METHODOLOGY

Internal monitoring tools will provide utilization over the specified time period.

### *Care Setting(s)*

| Care Setting | Justification |
|---|---|

| Behavioral health care specialty setting | This measure was designed to test the behavioral health care facilities we support and target with this certified product. We will pull data to test over a 90-day time period. |
|---|---|

## EXPECTED OUTCOMES

We expect to see within the 90-day period utilization of the FHIR R4 Patient endpoint to search for a patient. The searches will result in a "searchset" Bundle listing all Patients that match the provided criteria. When no matches are found an empty Bundle will be returned to the requestor. It is expected that API users will be able request and receive the stored PHI data 100% of the time.

## §170.315(G)(9) – APPLICATION ACCESS- ALL DATA REQUEST

## DESCRIPTION OF MEASUREMENT/METRIC

This measure will demonstrate utilization of the FHIR R4 document reference resource to generate or retrieve CCDs.

• Number of successful CCD retrievals using either the certified CCD or the FHIR R4 DocumentReference endpoints within a 90-day period.

## ASSOCIATED CERTIFICATION CRITERIA

| § 170.315 (g)(9) Application Access – All Data Request | §170.315(g)(9)(i) |
|---|---|
| | §170.315(g)(9)(ii) |

## JUSTIFICATION FOR SELECTED MEASUREMENT/METRIC

The certified CCD and the FHIR R4 Document Reference endpoint will provide a generated CCD upon request based on the supplied parameters. This measure will demonstrate that the capability is available and can be utilized.

### *Test Methodology*

Internal monitoring tools will provide utilization over time.

## CARE SETTING(S)

| Care Setting | Justification |
|---|---|
| Behavioral health care specialty setting | This measure was designed to test the behavioral health care facilities we support and target with this certified product. We will pull data to test over a 90-day time period. |

## EXPECTED OUTCOMES

We expect to see within the 90-day period utilization of the certified CCD and/or FHIR R4 Document Reference endpoints to generate a CCD. The certified CCD endpoint will provide the generated CCD as XML. The FHIR R4 Document Reference will provide the CCD as a Base64 encoded string attachment. It is expected to export the applicable PHI data for the specified period 100% of the time.

## §170.315(G)(10) STANDARDIZED API FOR PATIENT AND POPULATION SERVICES

### DESCRIPTION OF MEASUREMENT/METRIC

This measure will demonstrate utilization of the FHIR API with refresh tokens is capable of storing the refresh token in a secure manner similar to the requirements of storing a secret for confidential apps.

- Native application refresh tokens are valid for 3 months before they must be renewed.
- Native applications will receive a new refresh token every time they are renewed.
- Native applications can only communicate with DrCloudEHR over a TLS secured channel in order to ensure the safe transmission of the refresh token.

### ASSOCIATED CERTIFICATION CRITERIA

| § 170.315 (g)(10) Standardized API for patient and population services | §170.315(g)(10)(iii) |
| --- | --- |
| | §170.315(g)(10)(iv) |

### JUSTIFICATION FOR SELECTED MEASUREMENT/METRIC

- The DrCloudEHR server uses HTTPS to ensure a secure data connection.
- Parameters are passed to the API scripts using POST variables.
- Most of the API calls return their result as an XML file.
- The script that handles MU3 data request returns a JSON file.

### TEST METHODOLOGY

Internal monitoring tools will provide utilization over the specified time period.

*Care Setting(s)*

| Care Setting | Justification |
| --- | --- |
| Behavioral health care specialty setting | This measure was designed to test the behavioral health care facilities we support and target with this certified product. We will pull data to test over a 90-day time period. |

### EXPECTED OUTCOMES

We expect to see within the 90-day period fresh tokens are generated and the application will receive a new refresh token every time they are renewed.

## §170.315(H)(1) – DIRECT PROJECT

## DESCRIPTION OF MEASUREMENT/METRIC

This measure will demonstrate the ability to send and receive direct project messages.

- Number of XDR/XDM direct message sent and received by type within a 90-day period.

## ASSOCIATED CERTIFICATION CRITERIA

| § 170.315 (h)(1) Direct Project | §170.315(h)(1)(i) |
|---|---|
| | §170.315(h)(1)(ii) |

### *Justification for Selected Measurement/Metric*

This measure will demonstrate the types of messages that are supported for direct messaging.

## TEST METHODOLOGY

Logs will be reviewed to determine the frequency and the transport mechanism used by providers for sending/receiving transitions of care using Edge protocols. 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 measure on the specific types of transport mechanisms used. This test methodology will primarily test the conformance of the implementation.

### *Care Setting(s)*

| Care Setting | Justification |
|---|---|
| Behavioral health care specialty setting | This measure was designed to test the behavioral health care facilities we support and target with this certified product. We will pull data to test over a 90-day time period. |

### Expected Outcomes

We expect to see messages successfully sent and received of the following types during the reporting window 100% of the time:

- Message
- Notification
- Referral
- Referral Response

| Measurement/Metric | Expected Outcomes |
|---|---|
| *Usability Test* | *Test user is able to complete the function successfully.* |
| *Audit Log Review* | *Entries are made into the log for each criterion. This can be verified by reviewing the Audit Log Report in DrCloudEHR.* |
| *Data Review* | *Entries are made into the respective data tables for each criterion. This can be verified by reviewing the tables in question using SQL Query Tool or the Quick DB queries option in DrCloudEHR.* |

## SCHEDULE OF KEY MILESTONES

| Key Milestone | Care Setting | Date/Timeframe |
|---|---|---|
| Identify users to be part of testing | - Behavioral Healthcare | Q2 2024 |
| Conduct testing | - Behavioral Healthcare | Q3 2024 |
| Publish results of Testing | - Behavioral Healthcare | 01/10/2025 |
| Submit Report to ACB | | 01/15/2025 |

## 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: Ramesh Nagul

Authorized Representative Email: info@drcloudehr.com

Authorized Representative Phone: (503) 643 1226

Authorized Representative Signature: Ramesh Nagul

Date: 12/01/2023