



Health IT Certification Program

The Office of the National Coordinator for Health Information Technology

↳ Real World Testing Plan template

GENERAL INFORMATION

Plan Report ID Number: **20221209pem**

Developer Name: **Physicians EMR, LLC**

Product Name(s): **IPClinical**

Version Number(s): **2.1**

Product List (CHPL) ID(s): **15.05.05.2163.PEMR.01.00.1.200123**

Developer Real World Testing Page URL: https://ipclinical.com/IPClinical_RWT_Plan.html

JUSTIFICATION FOR REAL WORLD TESTING APPROACH

This is a Real World Testing Plan for following certification criteria:

§ 170.315(b)(1) - Transitions of care

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

§ 170.315(e)(1) - View, download, and transmit to 3rd party

At this time, the Certified Health IT Module is currently marketed to and used by Cardiology specialty care setting and Internal Medicine specialty care settings. Most of the certification criteria involving the Consolidated Clinical Document Architecture (C-CDA) documents will be tested in this plan. All certification criteria listed in this plan are not part of standard workflow in these settings, still the Certified Health IT Module is capable to Send and Receive CCDA/Referral Note using Edge Protocols (e.g., SMTP, Direct), Incorporate and Reconcile CCDA and View and Download CCDA and Transmit encrypted & unencrypted messages. The approach chosen will identify the frequency of TOC received and sent during the year to further smoothen the process of interoperability and EHI exchange. The frequency of incorporating and reconciling CCDA will be evaluated to increase the process of adding new and referred patients through import.

The goal of this approach is to demonstrate that both the interoperability and conformance capabilities of the Certified Health IT module are consistent with the requirements of the above-mentioned certification criterion.

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

Standard (and version)	<i>HL7® CDA R2 Implementation Guide: C-CDA Templates for Clinical Notes R2.1 Companion Guide, Release 3-US Realm, May 2022</i>
Updated certification criteria and associated product	Updated certification criteria: <i>§ 170.315(b)(1) - Transitions of care</i> <i>§ 170.315(b)(2) - Clinical information reconciliation and incorporation</i> <i>§ 170.315(e)(1) - View, download, and transmit to 3rd party</i> Associated product: IPClinical

Health IT Module CHPL ID	15.05.05.2163.PEMR.01.00.1.200123
Method used for standard update	SVAP
Date of ONC-ACB notification	11/11/2022
Date of customer notification (SVAP only)	11/11/2022
Conformance measure	NA
USCDI-updated certification criteria (and USCDI version)	USCDI Version 1

MEASURES USED IN OVERALL APPROACH

DESCRIPTION OF MEASUREMENT/METRIC

Measurement/Metric	Description
<i>EHI Sharing</i>	<p><i>This measure will identify the frequency of sending/receiving transition of care/referral summary documents, evaluate transmission mechanisms and check compliance of defined standards.</i></p> <p><i>The EHI transmitted through functions of View, Download & Transmit will be evaluated and authorized/unauthorized access will be verified.</i></p> <p><i>Relied-upon software for secure transmission of CCDA is EMR Direct Interoperability Engine (Version 2017).</i></p>
<i>Increase Import & Reconcile</i>	<p><i>This measure will assess the frequency of incorporating and reconciling process used for transitioning and new patients. This metric will identify the frequency of patients added in the system through CCDA import and the frequency of reconciliation performed on existing patient's data. This metric will also evaluate the conformance process with specified standards.</i></p> <p><i>Relied-upon software: None</i></p>

ASSOCIATED CERTIFICATION CRITERIA

Measurement/Metric	Associated Certification Criteria
<i>EHI Sharing</i>	<p>§ 170.315(b)(1) - Transitions of care</p> <p>§ 170.315(e)(1) - View, download, and transmit to 3rd party</p>
<i>Increase Import & Reconcile</i>	§ 170.315(b)(2) - Clinical information reconciliation and incorporation

JUSTIFICATION FOR SELECTED MEASUREMENT/METRIC

Measurement/Metric	Justification
<i>EHI Sharing</i>	<p><i>This measure includes three functionalities i.e., Send TOC/Referral Summaries, Receive TOC/Referral Summaries and EHI access through Patient Portal. Transition of Care documents will be shared through Edge Protocols (e.g., SMTP, Direct) whereas EHI will be shared through patient portal using download and encrypted transmission.</i></p> <p><i>This measure will help evaluate the types of transmission mechanism deployed and validate the proper operation of transport mechanism using Edge protocols.</i></p> <p><i>This measure also includes EHI exchange and access through Patient Portal. This measure will check frequency of EHI exchange through VDT to evaluate adoptability and compliance with standards specified and conformance with certification criteria.</i></p> <p><i>This measure would also provide information on system’s capability to identify authorized/unauthorized access.</i></p> <p><i>This measurement/metric will primarily be applied in Cardiology Specialty Care Setting.</i></p>
<i>Increase Import & Reconcile</i>	<p><i>This metric includes two functionalities i.e., import/incorporate and reconcile. This measure will help us identify number of instances when patients are added into the Certified Health IT Module through CCDA Import.</i></p> <p><i>It will help us increase the adoption rate of adding patient through import CCDA and improve process of incorporating patient and reconciling in case of transition of care.</i></p> <p><i>This test method will also be focusing on testing the conformance of the implementation standards.</i></p> <p><i>This measurement/metric will primarily be applied in Cardiology Specialty Care Setting.</i></p>

CARE SETTING(S)

Care Setting	Justification
<i>Cardiology Specialty Care Setting</i>	<i>This Certified Health IT is currently marketed to and used by Cardiologists in Cardiology Specialty Care Setting. At this time, there are more than three providers from this setting using our Certified Health IT.</i>
<i>Internal Medicine Specialty Care Setting</i>	<i>Another care setting where this Certified Health IT is deployed is the Internal Medicine Specialty Care Setting. The product is also marketed to Internal Medicine Specialty Care Setting.</i>

EXPECTED OUTCOMES

Measurement/Metric	Expected Outcomes
<i>EHI Sharing</i>	<ul style="list-style-type: none"> It is expected that the Real World Testing approach will measure that these Certified Health IT modules comply with certification criteria, required technical standards and vocabulary code sets. The Providers will be able to send/receive Transition of care using the Edge protocols and patients (or their authorized representatives) will be able to share EHI using transmission mechanisms provided as per certification criteria. The real world testing approach will also evaluate the adoption rate of EHI exchange through all mechanisms and help us improve the process, where required. The error rates and validation issues encountered during the real world testing will be tracked, analyzed and addressed accordingly.
<i>Increase Import & Reconcile</i>	<ul style="list-style-type: none"> Real World Testing will show the compliance of Incorporating and Reconciling mechanism with specified standards and vocabulary code sets. The process of incorporating and reconciling EHI into the system will be evaluated and improved. The approach chosen will also examine the frequency of Import and Reconcile process and will identify steps to increase adoption rate of this process. Error rates and validation issues will be faced during the testing will be tracked, analyzed and trended over time.

SCHEDULE OF KEY MILESTONES

Key Milestone	Care Setting	Date/Timeframe
<i>Release of Real World Testing plan documentation shared with office staff and providers using Certified Health IT module.</i>	<i>Cardiology Specialty Care Setting/ Internal Medicine Specialty Care Setting</i>	<i>December 15, 2022</i>
<i>Collection and Analysis of real patient data for real-world testing.</i>	<i>Cardiology Specialty Care Setting/ Internal Medicine Specialty Care Setting</i>	<i>January, 2023</i>
<i>Evaluate the transport mechanism used by providers for EHI exchange. Also identify the frequency of each mechanism.</i>	<i>Cardiology Specialty Care Setting/ Internal Medicine Specialty Care Setting</i>	<i>Quarterly, 2023</i>
<i>Check the frequency of CCDA Import & Reconcile and validate the process to confirm compliance.</i>	<i>Cardiology Specialty Care Setting/ Internal Medicine Specialty Care Setting</i>	<i>Quarterly, 2023</i>

<i>End of Real-World Testing period/final collection of all data for analysis.</i>	<i>Cardiology Specialty Care Setting/ Internal Medicine Specialty Care Setting</i>	<i>December 31, 2023</i>
<i>Analysis and Real World Testing report creation.</i>	<i>Cardiology Specialty Care Setting/ Internal Medicine Specialty Care Setting</i>	<i>January, 2024</i>
<i>Submit Real World Testing report to ACB (per their instructions).</i>	<i>Cardiology Specialty Care Setting/ Internal Medicine Specialty Care Setting</i>	<i>January 15, 2024</i>

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: **Rana Fahad Arshad**

Authorized Representative Email: rfahad@pembr.com

Authorized Representative Phone: **(407) 605-3666**

Authorized Representative Signature:



Date: **11/11/2022**

↳ Real World Testing Plan template

GENERAL INFORMATION

Plan Report ID Number: **20221209pem**

Developer Name: **Physicians EMR, LLC**

Product Name(s): **IPClinical**

Version Number(s): **2.1**

Product List (CHPL) ID(s): **15.05.05.2163.PEMR.01.00.1.200123**

Developer Real World Testing Page URL: https://ipclinical.com/IPClinical_RWT_Plan.html

JUSTIFICATION FOR REAL WORLD TESTING APPROACH

This Real World Testing Plan contains two certification criteria:

§ 170.315(b)(9) - Care plan

§ 170.315(h)(1) – Direct Project

The Certified Health IT Module is currently used by and marketed to Cardiology specialty care setting and Internal Medicine specialty care settings. Care Plan module is used quite rarely by both settings in real world but the Certified Health IT is completely capable to record all the elements of Care Plan and transmit it according to standards. The real world test plan will demonstrate data collection under each component of Care Plan and the association of all components with each other. System’s ability to import and export Care Plan as per standards will also be evaluated. All these actions will be performed using real patient data.

Regarding § 170.315(h)(1) – Direct Project, the Cardiology specialty care setting has real-world scenario of receiving patient CCDAs from hospitals through Direct protocols. The Real World Testing Plan will demonstrate that the messages are received in wrapped format using given Applicability Statement standards and accurate delivery notification is sent back by Security/Trust Agents (STAs). Currently, the Certified Health IT do not send but only receives health information through Direct protocols in real-world but the standards are implemented for sending as well and this plan would also evaluate the system’s ability to send Direct Message and receive Message Delivery Notification (MDN). Different aspects will be verified such as associated certificates, encryption, trust verification, delivery notifications etc.

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

Standard (and version)	<i>HL7® CDA R2 Implementation Guide: C-CDA Templates for Clinical Notes R2.1 Companion Guide, Release 3-US Realm, May 2022</i>
Updated certification criteria and associated product	Updated certification criteria: <i>§ 170.315(b)(9) - Care plan</i> <i>§ 170.315(h)(1) - Direct Project</i> Associated product: <i>IPClinical</i>

Health IT Module CHPL ID	15.05.05.2163.PEMR.01.00.1.200123
Method used for standard update	SVAP
Date of ONC-ACB notification	11/11/2022
Date of customer notification (SVAP only)	11/11/2022
Conformance measure	NA
USCDI-updated certification criteria (and USCDI version)	USCDI Version 1

MEASURES USED IN OVERALL APPROACH

DESCRIPTION OF MEASUREMENT/METRIC

Measurement/Metric	Description
<i>Care plan Components Relationship</i>	<i>This measure has been chosen to explain the relationship between components of Care plan and how important it is to effectively associate the information added under each component with other component. This measure will also identify mechanisms to improve process of recording data in each component. Relied-upon software: None</i>
<i>Secure and Successful Transmission</i>	<i>This measure will classify the processes involved in receiving health information through Direct and evaluate them in terms of security and compliance. Relied-upon software for secure transmission of health information is EMR Direct Interoperability Engine (Version 2017).</i>

ASSOCIATED CERTIFICATION CRITERIA

Measurement/Metric	Associated Certification Criteria
<i>Care plan Components Relationship</i>	<i>§ 170.315(b)(9) - Care plan</i>
<i>Secure and Successful Transmission</i>	<i>§ 170.315(h)(1) - Direct Project</i>

JUSTIFICATION FOR SELECTED MEASUREMENT/METRIC



Health IT Certification Program

The Office of the National Coordinator for Health Information Technology

Measurement/Metric	Justification
<i>Care plan Components Relationship</i>	<p><i>This measure will make evident the effective association between Care plan components such as Health Concerns relation with Observation, Intervention relation with goals evaluated outcome relation with goal.</i></p> <p><i>The relationship between components will be evaluated both in the system and in the CCD A file format exported for transmission.</i></p> <p><i>Another reason for selecting this measure is because it will help us evaluate the efficiency of data collection in each care plan component.</i></p> <p><i>This measurement/metric will primarily be applied in Cardiology Specialty Care Setting.</i></p>
<i>Secure and Successful Transmission</i>	<p><i>The reason for selecting this measure is because this criterion evolves around secure and encrypted transmission of patient health information and this measure will identify the security and compliance of process in real world data exchange.</i></p> <p><i>This measure will identify that security measures are applied to the code and to critical aspects of the data associated with the Security/Trust Agent (STA), including private keys, trust anchors, and other configurations. Certificate verification process will also be evaluated.</i></p> <p><i>The metric chosen will demonstrate successful transmission in terms of delivery notification process. Interaction between sending and receiving STA will be evaluated to examine the process.</i></p> <p><i>This measurement/metric will primarily be applied in Cardiology Specialty Care Setting.</i></p>

CARE SETTING(S)

Care Setting	Justification
<i>Cardiology Specialty Care Setting</i>	<i>This Certified Health IT is currently marketed to and used by Cardiologists in Cardiology Specialty Care Setting. At this time, there are more than three providers from this setting using our Certified Health IT.</i>
<i>Internal Medicine Specialty Care Setting</i>	<i>Another care setting where this Certified Health IT is deployed is the Internal Medicine Specialty Care Setting. The product is also marketed to Internal Medicine Specialty Care Setting.</i>

EXPECTED OUTCOMES

Measurement/Metric	Expected Outcomes
--------------------	-------------------

<p><i>Care plan Components Relationship</i></p>	<ul style="list-style-type: none"> • <i>The Real World Testing approach will measure that the Certified Health IT module of Care Plan comply with certification criteria, specified standards and Implementation Guides.</i> • <i>This approach will make us evaluate Certified Health IT's capability of recording and exchanging a Care plan for any care settings including the ones implemented and marketed.</i> • <i>Real patient data will be recorded and exchanged as part of care plan between both care settings to ensure successful exchange and use of EHI.</i> • <i>Issues faced during the process will be addressed and steps will be taken to streamline the process, where required.</i>
<p><i>Secure and Successful Transmission</i></p>	<ul style="list-style-type: none"> • <i>It is expected that the Real World Testing approach will measure that the Certified Health IT module comply with certification criteria, specified standards and Implementation Guides.</i> • <i>This measure will illustrate the exchange of electronic health information (EHI) in selected Cardiology care settings.</i> • <i>Security protocols will be explained that result in secure transmission.</i> • <i>Successful exchange will be demonstrated by incorporating and using electronic health information (EHI) received.</i> • <i>Errors confronted during the process will be tracked and fixed to assure secure and successful transmission.</i>

SCHEDULE OF KEY MILESTONES

Key Milestone	Care Setting	Date/Timeframe
<p><i>Release of Real World Testing plan documentation shared with office staff and providers using Certified Health IT module.</i></p>	<p><i>Cardiology Specialty Care Setting/ Internal Medicine Specialty Care Setting</i></p>	<p><i>December 15, 2022</i></p>
<p><i>Collection of real-world patient data to perform Real-World Testing measures.</i></p>	<p><i>Cardiology Specialty Care Setting/ Internal Medicine Specialty Care Setting</i></p>	<p><i>January, 2023</i></p>
<p><i>Send and receive process evaluation in terms of security and successful transmission for Direct Project.</i></p>	<p><i>Cardiology Specialty Care Setting/ Internal Medicine Specialty Care Setting</i></p>	<p><i>Quarterly, 2023</i></p>
<p><i>Record and exchange Care plan to evaluate the process and streamline, if required.</i></p>	<p><i>Cardiology Specialty Care Setting/ Internal Medicine Specialty Care Setting</i></p>	<p><i>Quarterly, 2023</i></p>
<p><i>End of Real-World Testing period/final collection of all data for analysis.</i></p>	<p><i>Cardiology Specialty Care Setting/ Internal Medicine Specialty Care Setting</i></p>	<p><i>December 31, 2023</i></p>

<i>Analysis and Real World Testing report creation.</i>	<i>Cardiology Specialty Care Setting/ Internal Medicine Specialty Care Setting</i>	<i>January, 2024</i>
<i>Submit Real World Testing report to ACB (per their instructions).</i>	<i>Cardiology Specialty Care Setting/ Internal Medicine Specialty Care Setting</i>	<i>January 15, 2024</i>

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: **Rana Fahad Arshad**

Authorized Representative Email: rfahad@pembr.com

Authorized Representative Phone: **(407) 605-3666**

Authorized Representative Signature:



Date: **11/11/2022**

↳ Real World Testing Plan template

GENERAL INFORMATION

Plan Report ID Number: **20221209pem**

Developer Name: **Physicians EMR, LLC**

Product Name(s): **IPClinical**

Version Number(s): **2.1**

Product List (CHPL) ID(s): **15.05.05.2163.PEMR.01.00.1.200123**

Developer Real World Testing Page URL: https://ipclinical.com/IPClinical_RWT_Plan.html

JUSTIFICATION FOR REAL WORLD TESTING APPROACH

This is a Real-World Testing Plan for the following certification criteria:
§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
The Certified Health IT is currently marketed to and used by providers from Cardiology Care settings and Internal Medicine settings. At this moment, providers from both care settings are using these Certified Health IT modules to report CMS programs like MIPS and APM. The Real-World Testing approach will explain how the functionalities of import, export, calculate and report comply with certification criteria and technical standards. It will demonstrate the data recorded in patient record in real world, calculation performed for each eCQM, export of patient data in QRDA I format for data exchange or migration and export of QRDA III format to reporting programs. Real-World Testing approach will also demonstrate our Certified Health IT capability of performing all these steps without subsequent developer assistance.

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

Standard (and version)	<i>CMS Implementation Guide for Quality Reporting Document Architecture: Category III; Eligible Clinicians and Eligible Professionals Programs; Implementation Guide for 2022 (December 2021)</i>
Updated certification criteria and associated product	Updated Certification Criteria: § 170.315(c)(3) Clinical quality measures (CQMs) — report Associated product: IPClinical
Health IT Module CHPL ID	15.05.05.2163.PEMR.01.00.1.200123
Method used for standard update	SVAP
Date of ONC-ACB notification	11/11/2022

Date of customer notification (SVAP only)	11/11/2022
Conformance measure	NA
USCDI-updated certification criteria (and USCDI version)	NA

MEASURES USED IN OVERALL APPROACH

DESCRIPTION OF MEASUREMENT/METRIC

Measurement/Metric	Description
<i>Data Collection</i>	<p><i>This measure will demonstrate how the is data recorded throughout the year and the export process performed without subsequent developer assistance. This metric will help understand yearly data collection and it's aggregate reporting.</i></p> <p><i>Relied-upon software: None</i></p>
<i>Import & Calculate</i>	<p><i>This measurement/metric will show Certified Health IT capability to import single or multiple patients' data into the system and place it in related clinical components with yearly updated codes and value sets.</i></p> <p><i>Relied-upon software: None</i></p>

ASSOCIATED CERTIFICATION CRITERIA

Measurement/Metric	Associated Certification Criteria
<i>Record, Export and Report</i>	<p>§ 170.315(c)(1) Clinical quality measures (CQMs) – record and export</p> <p>§ 170.315(c)(3) Clinical quality measures (CQMs) – report</p>
<i>Import & Calculate</i>	§ 170.315(c)(2) Clinical quality measures (CQMs) – import and calculate

JUSTIFICATION FOR SELECTED MEASUREMENT/METRIC

Measurement/Metric	Justification
<i>Record, Export and Report</i>	<p><i>This metric includes three functionalities: Record patient data, Export single and batch patients and report aggregated data.</i></p> <p><i>This measure will evaluate patient data recorded throughout the year in real world environment and exported in case of data exchange or migration to another system.</i></p>

	<p><i>The aggregated report is generated for data submission to CMS. This metric will explain how the data needs to be recorded in relative modules, exported with updated value sets and aggregated with accurate information.</i></p> <p><i>This measurement/metric will primarily be applied in Cardiology Specialty Care Setting.</i></p>
<i>Import & Calculate</i>	<p><i>This metric includes two functionalities named Import and Calculate. Data is imported for single or multiple patients into Certified Health IT and calculation takes place after import. This metric will identify that QRDA I file received for import contains clinical information as per latest eCQM Specifications.</i></p> <p><i>Secondly, it will evaluate system's capability to calculate imported data and display accordingly in population criteria.</i></p> <p><i>This metric will also define system's ability of running such workflows place without subsequent developer assistance.</i></p> <p><i>This measurement/metric will primarily be applied in Cardiology Specialty Care Setting.</i></p>

CARE SETTING(S)

Care Setting	Justification
<i>Cardiology Specialty Care Setting</i>	<i>This Certified Health IT is currently marketed to and used by Cardiologists in Cardiology Specialty Care Setting. At this time, there are more than three providers from this setting using our Certified Health IT.</i>
<i>Internal Medicine Specialty Care Setting</i>	<i>Another care setting where this Certified Health IT is deployed is the Internal Medicine Specialty Care Setting. The product is also marketed to Internal Medicine Specialty Care Setting.</i>

EXPECTED OUTCOMES

Measurement/Metric	Expected Outcomes
<i>Record, Export and Report</i>	<ul style="list-style-type: none"> <i>Real World Testing will demonstrate that the Health IT Module is conformant to the following certification criteria: §170.315(c)(1) Clinical quality measures (CQMs) — record and export and §170.315(c)(3) Clinical quality measures (CQMs).</i> <i>Real World Testing will demonstrate the ability of Certified Health IT to export EHI in QRDA I format for single/multiple patients to be used by external organization.</i> <i>Real World Testing will also demonstrate Certified Health IT compliance with QRDA III standards to transmit aggregate patient population and CQMs data to CMS.</i>

Health IT Certification Program



The Office of the National Coordinator for Health Information Technology

	<ul style="list-style-type: none"> Issues occurred during QRDA I export will be evaluated and addressed to comply. Validation issues arising during QRDA III file submission to CMS will also be fixed as part of this approach.
Import & Calculate	<ul style="list-style-type: none"> Real World Testing will demonstrate that the Health IT Module is conformant to the following certification criteria: §170.315(c)(2) Clinical quality measures (CQMs) — import and calculate. Real World Testing will demonstrate capability of Health IT Module to receive patient’s EHI from external organization through successful import of QRDA I file. Validation errors that will occur during import mechanism will be evaluated and fixed under this real world testing approach. The calculation methodology will also be reviewed to assure accurate results.

SCHEDULE OF KEY MILESTONES

Key Milestone	Care Setting	Date/Timeframe
Release of Real-World Testing plan documentation to office staff and providers using Certified Health IT module.	Cardiology Specialty Care Setting/ Internal Medicine Specialty Care Setting	December 15, 2022
Generate aggregate QRDA III report with calculated summary data for the patient population of CQMs selected for reporting to CMS.	Cardiology Specialty Care Setting/ Internal Medicine Specialty Care Setting	January 1, 2023 – March 31, 2023
Follow-up with providers and clinical staff on regular basis to discuss any issues arising with recording data.	Cardiology Specialty Care Setting/ Internal Medicine Specialty Care Setting	Quarterly, 2023
Analysis on import/export of QRDA I from/to external organization.	Cardiology Specialty Care Setting/ Internal Medicine Specialty Care Setting	December, 2023
Analysis and Real-World Testing report creation.	Cardiology Specialty Care Setting/ Internal Medicine Specialty Care Setting	January, 2024
Submit Real World Testing report to ACB (per their instructions).	Cardiology Specialty Care Setting/ Internal Medicine Specialty Care Setting	January 15, 2024



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: **Rana Fahad Arshad**

Authorized Representative Email: rfahad@pemr.com

Authorized Representative Phone: **(407) 605-3666**

Authorized Representative Signature:

Date: **11/11/2022**



Health IT Certification Program

The Office of the National Coordinator for Health Information Technology

↳ Real World Testing Plan template

GENERAL INFORMATION

Plan Report ID Number: **20221209pem**

Developer Name: **Physicians EMR, LLC**

Product Name(s): **IPClinical**

Version Number(s): **2.1**

Product List (CHPL) ID(s): **15.05.05.2163.PEMR.01.00.1.200123**

Developer Real World Testing Page URL: https://ipclinical.com/IPClinical_RWT_Plan.html

JUSTIFICATION FOR REAL WORLD TESTING APPROACH

*This is a Real World Testing Plan for the following two certification criteria:
§ 170.315(f)(1) - Transmission to immunization registries
§ 170.315(f)(2) - Transmission to public health agencies - syndromic surveillance
The Certified Health IT Module is currently used by and marketed to Cardiology specialty care setting and Internal Medicine specialty care settings. Though the Certified Health IT has not integrated with any Public Health and Clinical Data Registry for any of the care settings but it is compliant to content exchange and vocabulary standards. This Certified Health IT Module has not been utilized in real-world since the care settings do not have a great frequency of immunizations information and syndromic surveillance data sharing. Therefore, the approach chosen for Real World Testing Plan will test system's capability to record complete immunization information, generate appropriate HL7 messages for both Immunization and syndromic surveillance, receive & process acknowledgement messages and cover all applicable scenarios of certification criteria. The Real World Testing Plan will also analyze the frequency of immunization and syndromic surveillance data exchange in case of integration with Public Health and Clinical Data Registry and what measure can be taken to streamline the process.*

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

Standard (and version)	NA
Updated certification criteria and associated product	NA
Health IT Module CHPL ID	15.05.05.2163.PEMR.01.00.1.200123
Method used for standard update	NA
Date of ONC-ACB notification	NA

Date of customer notification (SVAP only)	NA
Conformance measure	NA
USCDI-updated certification criteria (and USCDI version)	NA

MEASURES USED IN OVERALL APPROACH

DESCRIPTION OF MEASUREMENT/METRIC

Measurement/Metric	Description
<i>Send and Receive Mechanism</i>	<i>This measure will examine the format and authenticity of HL7 messages generated by Health IT module. This measure will also evaluate the transmission and processing of both Immunization and Syndromic Surveillance information. Message and Profile Pairs will be verified to confirm accuracy of information sent and received. Relied-upon software: None</i>
<i>Applicable Scenarios</i>	<i>This measure will verify that the Health IT module is capable of handling all possible scenario of sending and receiving Immunization and Syndromic Surveillance information. The measure would evaluate that the system is able to effectively record, update and send both immunization and syndromic surveillance information. Relied-upon software: None</i>

ASSOCIATED CERTIFICATION CRITERIA

Measurement/Metric	Associated Certification Criteria
<i>Send and Receive Mechanism</i>	<i>§ 170.315(f)(1) - Transmission to immunization registries § 170.315(f)(2) - Transmission to public health agencies - syndromic surveillance</i>
<i>Applicable Scenarios</i>	<i>§ 170.315(f)(1) - Transmission to immunization registries § 170.315(f)(2) - Transmission to public health agencies - syndromic surveillance</i>

JUSTIFICATION FOR SELECTED MEASUREMENT/METRIC

Measurement/Metric	Justification
--------------------	---------------

<i>Send and Receive Mechanism</i>	<p><i>This measure mainly involves two functionalities i.e., generate and send HL7 messages and receive HL7 response against the message/request sent. Purpose of this measure is to verify the HL7 message infrastructure that it includes all segments defined by HL7 messaging specifications such as MSH, PID, OBX, RXA etc. and that each segment contains all the required information. The HL7 message infrastructure will be verified using real patient data. Moreover, this measure will help evaluate system’s capability of using correct Message Type, Profile and Acknowledgement code. Response to query of Z42 and Z33 messages will also be examined with this metric. This measurement/metric will primarily be applied in Cardiology Specialty Care Setting.</i></p>
<i>Applicable Scenarios</i>	<p><i>This measure will specify that the Health IT module is able to record and send complete Demographic information, Registry Information, Observations and mostly importantly, Vaccine Administration Information. The main purpose of this measure is to make sure that Health IT module sends complete and accurate information in the message and receives appropriate response. Another purpose of this measure is to examine that the system accurately processes all the information received in response to a query of Evaluated History and Forecast and all the information received is accurately displayed in the system. This measurement/metric will primarily be applied in Cardiology Specialty Care Setting.</i></p>

CARE SETTING(S)

Care Setting	Justification
<i>Cardiology Specialty Care Setting</i>	<p><i>This Certified Health IT is currently marketed to and used by Cardiologists in Cardiology Specialty Care Setting. At this time, there are more than three providers from this setting using our Certified Health IT.</i></p>
<i>Internal Medicine Specialty Care Setting</i>	<p><i>Another care setting where this Certified Health IT is deployed is the Internal Medicine Specialty Care Setting. The product is also marketed to Internal Medicine Specialty Care Setting.</i></p>

EXPECTED OUTCOMES

Measurement/Metric	Expected Outcomes
<i>Send and Receive Mechanism</i>	<ul style="list-style-type: none"> <i>It is expected that the Real World Testing approach will measure that the Certified Health IT module comply with certification criteria, required technical standards and vocabulary code sets.</i>

	<ul style="list-style-type: none"> • The metric chosen will identify any issue with structure of file formats and transmission mechanism to address them. • Though the Health IT has not integrated with a Public Health and Clinical Data Registry, but the Real-World Testing will test Health IT conformance with standards required to integrate. • Real-World testing will evaluate the processing of incoming messages to confirm appropriate response for meeting interoperability. • Most importantly, this approach will track the issues occurred during transmission process to address them accordingly.
<i>Applicable Scenarios</i>	<ul style="list-style-type: none"> • The Real World Testing approach will measure that the Certified Health IT module is conformant and capable to record and send all the information required for generating an HL7 message. • The approach chosen will specify that the Health IT module supports all possible scenarios of sharing Immunization and Syndromic Surveillance information. • This approach will evaluate the efficiency of Health IT module to record all required information for transmission. The issues confronted during the process will be analyzed and addressed to make sure the transmission is smooth when integrating with a Public Health and Clinical Data Registry.

SCHEDULE OF KEY MILESTONES

Key Milestone	Care Setting	Date/Timeframe
<i>Release of Real World Testing plan documentation shared with office staff and providers using Certified Health IT module.</i>	<i>Cardiology Specialty Care Setting/ Internal Medicine Specialty Care Setting</i>	<i>December 15, 2022</i>
<i>Collection of real-world patient data for testing.</i>	<i>Cardiology Specialty Care Setting/ Internal Medicine Specialty Care Setting</i>	<i>January 1, 2023</i>
<i>System and transmission process evaluation as per Real-World Testing approach.</i>	<i>Cardiology Specialty Care Setting/ Internal Medicine Specialty Care Setting</i>	<i>Quarterly, 2023</i>
<i>End of Real-World Testing period/final collection of all data for analysis.</i>	<i>Cardiology Specialty Care Setting/ Internal Medicine Specialty Care Setting</i>	<i>December, 2023</i>
<i>Analysis and Real World Testing report creation.</i>	<i>Cardiology Specialty Care Setting/ Internal Medicine Specialty Care Setting</i>	<i>January, 2024</i>



Health IT Certification Program

The Office of the National Coordinator for Health Information Technology

<i>Submit Real World Testing report to ACB (per their instructions).</i>	<i>Cardiology Specialty Care Setting/ Internal Medicine Specialty Care Setting</i>	<i>January 15, 2024</i>
--	--	-------------------------

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: **Rana Fahad Arshad**

Authorized Representative Email: rfahad@pemr.com

Authorized Representative Phone: **(407) 605-3666**

Authorized Representative Signature:

Date: **11/11/2022**



Health IT Certification Program

The Office of the National Coordinator for Health Information Technology

↳ Real World Testing Plan template

GENERAL INFORMATION

Plan Report ID Number: **20221209pem**

Developer Name: **Physicians EMR, LLC**

Product Name(s): **IPClinical**

Version Number(s): **2.1**

Product List (CHPL) ID(s): **15.05.05.2163.PEMR.01.00.1.200123**

Developer Real World Testing Page URL: https://ipclinical.com/IPClinical_RWT_Plan.html

JUSTIFICATION FOR REAL WORLD TESTING APPROACH

This is a Real World Testing Plan for following certification criteria:

§ 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

At this time, the Certified Health IT Module is only marketed to and used by the Cardiology specialty care setting and Internal Medicine specialty care settings. The Certified Health IT has implemented an Application Programming Interface (API) capable to integrate with platforms (Websites, Applications) requiring patient demographic and clinical information. Currently, the Certified Health IT has not integrated its API with any platform to share patient information but it is still conformant to all above-mentioned certification criteria. The Real-World testing will specify Health IT module’s API capability to receive requests using OAuth 2.0 protocol authentication process, then uniquely identify a patient and return a token for access to patient information or individual data categories as per initiated request. The Real-World testing will also demonstrate the API conformance to the request of all data categories as specified in the Common Clinical Data Set (CCDS) and the ability to return response based on specific data or date range.

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

Standard (and version)	<i>HL7® CDA R2 Implementation Guide: C-CDA Templates for Clinical Notes R2.1 Companion Guide, Release 3-US Realm, May 2022</i>
Updated certification criteria and associated product	Updated certification criteria: <i>§ 170.315(g)(9) - Application access — all data request</i> Associated product: <i>IPClinical</i>
Health IT Module CHPL ID	<i>15.05.05.2163.PEMR.01.00.1.200123</i>
Method used for standard update	SVAP

Date of ONC-ACB notification	11/11/2022
Date of customer notification (SVAP only)	11/11/2022
Conformance measure	NA
USCDI-updated certification criteria (and USCDI version)	USCDI Version 1

MEASURES USED IN OVERALL APPROACH

DESCRIPTION OF MEASUREMENT/METRIC

Measurement/Metric	Description
<i>Completeness of Response</i>	<p><i>This metric will be used to identify and explain the response generated for each type of request including patient selection, data category and all data. This measure will request both complete patient data and individual elements along with specific date range to check authenticity and completeness of response. Real-world patient data will be requested to examine all the response.</i></p> <p><i>Relied-upon software: None</i></p>

ASSOCIATED CERTIFICATION CRITERIA

Measurement/Metric	Associated Certification Criteria
<i>Completeness of Response</i>	<p><i>§ 170.315(g)(7) - Application access — patient selection</i></p> <p><i>§ 170.315(g)(8) - Application access — data category request</i></p> <p><i>§ 170.315(g)(9) - Application access — all data request</i></p>

JUSTIFICATION FOR SELECTED MEASUREMENT/METRIC

Measurement/Metric	Justification
<i>Completeness of Response</i>	<p><i>The reason for selecting this measure is because it would help us identify that correct parameter are entered and return variables are being used with their data types for appropriate response.</i></p> <p><i>This metric will also verify that meaningful responses are returned to queries so it is easy to identify what patient data is available.</i></p> <p><i>This measure will help us examine the completeness of response for individual data category and all patient data request.</i></p>

	<p><i>Different date ranges will be used in this measure to evaluate system's ability of generating accurate and complete response.</i></p> <p><i>This measurement/metric will primarily be applied in Cardiology Specialty Care Setting.</i></p>
--	---

CARE SETTING(S)

Care Setting	Justification
<i>Cardiology Specialty Care Setting</i>	<i>This Certified Health IT is currently marketed to and used by Cardiologists in Cardiology Specialty Care Setting. At this time, there are more than three providers from this setting using our Certified Health IT.</i>
<i>Internal Medicine Specialty Care Setting</i>	<i>Another care setting where this Certified Health IT is deployed is the Internal Medicine Specialty Care Setting. The product is also marketed to Internal Medicine Specialty Care Setting.</i>

EXPECTED OUTCOMES

Measurement/Metric	Expected Outcomes
<i>Completeness of Response</i>	<ul style="list-style-type: none"> <i>It is expected that the Real World Testing approach will measure that the Certified Health IT comply with certification criteria and required technical standards.</i> <i>The Real World Testing will mainly identify system's capability of sharing real-world patient data as per defined standards.</i> <i>Accuracy and completeness of data response will be evaluated based on different requests with different date ranges.</i> <i>It will also conform Health IT's capability to integrate with any system for sharing Patient Electronic Health Information.</i> <i>Issues faced during the process will tracked and trended over time.</i>

SCHEDULE OF KEY MILESTONES

Key Milestone	Care Setting	Date/Timeframe
<i>Release of Real World Testing plan documentation shared with office staff and providers using Certified Health IT module.</i>	<i>Cardiology Specialty Care Setting/ Internal Medicine Specialty Care Setting</i>	<i>December 15, 2022</i>

<i>Collection of real-world patient data for testing.</i>	<i>Cardiology Specialty Care Setting/ Internal Medicine Specialty Care Setting</i>	<i>January 1, 2023</i>
<i>API transmission process evaluation as per Real-World Testing approach.</i>	<i>Cardiology Specialty Care Setting/ Internal Medicine Specialty Care Setting</i>	<i>Quarterly, 2023</i>
<i>End of Real-World Testing period/final collection of all data for analysis.</i>	<i>Cardiology Specialty Care Setting/ Internal Medicine Specialty Care Setting</i>	<i>December, 2023</i>
<i>Analysis and Real World Testing report creation.</i>	<i>Cardiology Specialty Care Setting/ Internal Medicine Specialty Care Setting</i>	<i>January, 2024</i>
<i>Submit Real World Testing report to ACB (per their instructions).</i>	<i>Cardiology Specialty Care Setting/ Internal Medicine Specialty Care Setting</i>	<i>January 15, 2024</i>

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: **Rana Fahad Arshad**

Authorized Representative Email: rfahad@pemr.com

Authorized Representative Phone: **(407) 605-3666**

Authorized Representative Signature:



Date: **11/11/2022**