



# REAL WORLD TESTING PLAN

Interoperability using CCDs

## Abstract

This Real-World Testing plan demonstrate FreeChiro's interoperability and functionality in real world settings and scenarios.

**REAL WORLD TESTING PLAN**

**GENERAL INFORMATION**

Plan Report ID Number: **20211020FRE**

Developer Name: **PracticeSuite, Inc**

Product Name(s): **FreeChiro**

Version Number(s): **EHR-18.0.0**

Product List (CHPL) ID(s): **15.02.02.2198.A072.01.01.1.180621**

Developer Real World Testing Page URL: <https://freechiro.com/onc-certification-stage-3/#real-world-testing-plan-2022>

**JUSTIFICATION FOR REAL WORLD TESTING APPROACH**

The Certified Heal IT Module is marketed in Chiropractic care settings only. For this reason, the Real-World Testing plan specific to interoperability scenario applies to Chiropractic settings. Since the EHR/patient portal system works on all types of documents, there are several certification criteria that can be tested simultaneously. All criteria involving the Consolidated Clinical Document Architecture (C-CDA) documents will be tested, including § 170.315(b)(1) Transitions of care, § 170.315(b)(2) Clinical information reconciliation and incorporation, § 170.315(h)(1) Direct Project and § 170.315(e)(1) View, download, and transmit to 3rd party. Verification of the transmitted patient record does require interaction with a system external to the organization.

Additionally, the EHR management system does support the export of EHI, so Real World Testing has been included for the criterion, § 170.315(b)(6) Electronic Health Information export.

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

Standard (and version)	Not Applicable
Updated certification criteria and associated product	Not Applicable
Method used for standard update	Not Applicable
USCDI-updated certification criteria (and USCDI version)	None

**MEASURES USED IN OVERALL APPROACH**

**DESCRIPTION OF MEASUREMENT/METRIC**

The following outlines the measures that have been identified to best demonstrate conformance to multiple certification criteria concerning the sharing of EHI across two use cases demonstrated (single patient and data export).

**Use Case 1 (Single Patient) Metrics:** As part of the Real-World Testing requirements for § 170.315(b)(1), § 170.315(b)(2), § 170.315(e)(1), and § 170.315(h)(1), the developer has developed the following metrics for their testing plan:

**Measure 1: Sharing.** This measure will catalogue the use of CCD standard document conformant, and the transport mechanisms used to share transitions of care documents and EHI, as well as track usage of the various transport mechanisms. Associated certification criteria for the EHR system in a Chiropractic care setting include:

Certification Criteria	Requirement
§ 170.315(b)(1) Transitions of care	(i)(A) Send transition of care/referral summaries using Edge Protocol
	(i)(B) Receive transition of care/referral summaries using Edge Protocol.
§ 170.315(e)(1) View, download and transmit	(i)(A)(2) view ambulatory summary or inpatient summary using CCD Template.
	(i)(B)(2) Download ambulatory summary or inpatient summary using CCD Template.
	(i)(B)(3) (inpatient setting only) Download of transition of care/referral summaries.
	(i)(C)(1) Transmit to third party.
	(i)(C)(2) (inpatient setting only) Transmit transition of care/referral summaries.
§ 170.315(h)(1) Direct Project	(1)(i) Send and receive health information including formatted only as a “wrapped” message.
	(1)(ii) Send and receive health information using Direct.
§ 170.315(b)(2) Clinical information reconciliation and incorporation	(2)(i) Able to reconcile and incorporate information from C-CDAs
	(2)(ii) Match a received Transition of Care/referral Summary to the correct patient.

- Justification:** The EHR system includes two functionalities of interest: (A) Send transition of care/referral summaries and (B) Receive transition of care referral summaries. Transitions of care documents are shared using Edge protocols (e.g., SMTP, Direct) while other EHI may be shared through the patient portal using downloads and encrypted or unencrypted transmissions. This metric will provide information on the types of transmissions deployed (e.g., what types of Edge protocols, downloads and unencrypted vs. encrypted transmission) and the frequency of usages. While the received CCDAs is also reconciled, this matric will also provide reconciliation process (eg. The population of CCDAs where a reconciliation is performed).
- Test methodology:** EHR management logs, system logs, and email logs will be reviewed to determine the frequency and the transport mechanism used by providers for sending/receiving transitions of care using Edge protocols and downloading or transmitting EHI by patients using the patient portal. Log files obtained during Real World Testing will be de-identified and used for analysis in several areas to validate the proper operation of the transport mechanisms and input for the calculation of the metric on the specific types of transport mechanisms used. This test methodology will primarily test the conformant of the implementation.

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

**Use Case 2 (Data Export):** As part of the Real-World Testing requirements for § 170.315(b)(6), the developer has developed the following metrics for their testing plan:

Measure 1: Patient Population Export. This measure will assess the functionality used to export EHI for a patient population. The associated certification criterion is:

Certification Criteria	Requirement
§ 170.315(b)(6) Data export	(ii) Create an export summary file

- **Justification:** The export of the health information associated with a patient population is another way to share health information with an external organization. It is typically used for research or quality purposes to look for specific trends on patient population. Export of a patient population is an administrative function only available to credentialed users. It is assumed that this function will be run as a scheduled activity as it will have significant impact on the Health IT Module. This will provide a metric on the use of the export of EHI for a patient population associated with the Health IT Module.
- **Test Methodology:** EHR management logs and system logs will be reviewed for each period to determine the frequency of use. Log files obtained during Real World Testing will be de-identified and used for analysis in several areas to validate the proper operation of the export. This test methodology will primarily test the conformance of the implementation.
- **Expected outcome(s):** It is expected that authorized users will be able to share EHI for a patient population using the export function. Errors in transmission will be tracked and analyzed.

**CARE SETTING(S)**

Chiropractic Care Settings: The Certified Health IT Developer markets its Modules in Chiropractic care settings only, so this is the only care setting in which Real World Testing will occur.

**EXPECTED OUTCOMES**

- *Real World Testing will demonstrate that the Health IT Module is conformant to the following certification criteria: § 170.315(b)(1) Transitions of care, § 170.315(e)(1) View, download, and transmit to 3rd party and.*
- *Real World Testing will demonstrate the ability of the system to perform § 170.315(b)(2) Clinical information reconciliation and incorporation and send or receive CCD documents using 170.315(h)(1) Direct Project.*
- *Real World Testing will demonstrate the ability to export EHI as described in § 170.315(b)(6).*

**SCHEDULE OF KEY MILESTONES**

Key Milestone	Date/Timeframe
<i>Release of documentation for the Real-World Testing to be provided to authorized representatives and providers. This includes surveys, specific instructions on what to look for, how to record issues encountered, and Customer Agreements.</i>	Jan 31, 2022
<i>Collection of information as laid out by the plan for the period.</i>	January 15, 2022
<i>Meet with previously identified providers and authorized representatives to ensure that Real World Testing protocols are effective.</i>	Mar 2022
<i>Follow-up with providers and authorized representatives on a regular basis to understand any issues arising with the data collection.</i>	Quarterly, 2022
<i>End of Real-World Testing period/final collection of all data for analysis.</i>	January 1, 2023
<i>Analysis and report creation.</i>	Jan 15, 2023
<i>Submit Real World Testing report to ACB (per their instructions)</i>	Feb 1, 2023

**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.

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