

REAL WORLD TESTING PLAN TEMPLATE

BACKGROUND & INSTRUCTIONS

Under the ONC Health IT Certification Program (**Certification Program**), health IT developers are required to conduct Real World Testing of their certified health IT (45 CFR 170.405). The Office of the National Coordinator for Health Information Technology (ONC) issues Real World Testing resources to clarify health IT developers' responsibilities for conducting Real World Testing, to identify topics and specific elements of Real World Testing that ONC considers a priority, and to assist health IT developers in developing their Real World Testing plans.

Health IT developers have maximum flexibility to develop innovative plans and measures for Real World Testing. As developers are planning how they will execute Real World Testing, they should consider the overall complexity of the workflows and use cases within the care settings in which they market their certified health IT to determine the approaches they will take. This Real World Testing plan template was created to assist health IT developers in organizing the required information that must be submitted for each element in their Real World Testing plan. While the use of this template is voluntary, health IT developers may find it useful in preparing their Real World Testing plans. Health IT developers must submit one plan for each year of Real World Testing (see resources listed below for specific timelines and due dates). ONC does not encourage updating plans outside the submission timeline and will not post updates on the Certified Health IT Product List (CHPL). If adjustments to approaches are made throughout Real World Testing, the health IT developer should reflect these adjustments in their Real World Testing results report. ONC expects that the Real World Testing results report will include a description of these types of changes, the reasons for them, and how intended outcomes were more efficiently met as a result. **While every effort has been made to ensure the accuracy of restatements of 45 CFR Part 170, this template is not a legal document. The official program requirements are contained in the relevant laws and regulations. This resource should be read and understood in conjunction with the following companion resources, which describe in detail many of the Program requirements referenced in this resource.**

- [Real World Testing–What It Means for Health IT Developers – Fact Sheet](#)
- [Real World Testing Resource Guide](#)
- [Real World Testing Certification Companion Guide](#)

Health IT developers should also review the following regulatory materials, which establish the core requirements and responsibilities for Real World Testing under the Certification Program.

- 21st Century Cures Act: Interoperability, Information Blocking, and the ONC Health IT Certification Program final rule, [85 FR 25642](#) (May 1, 2020) (**ONC Cures Act Final Rule**)
 - [Section VII.B.5](#)— “Real World Testing”

TEMPLATE INSTRUCTIONS

The following template is organized by elements required to be submitted in the Real World Testing plan. Each section provides a field for submitting responses and/or explanations for how the health IT developer will address each required element in their Real World Testing approach. These fields serve as a foundation of information required for developing a Real World Testing plan and can be expanded with additional rows or columns to address the specific needs of the Real World Testing plan being submitted.

GENERAL INFORMATION

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

Developer Name: Syntellis Performance Solutions

Product Name(s): Clinical Exchange Communicator

Version Number(s): V.22

Certified Health IT Product List (CHPL) Product Number(s): 15.04.04.3087.Comm.21.01.1.210406

Developer Real World Testing Plan Page URL: <https://www.syntellis.com/about/accreditations-certifications>

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.

The Clinical Exchange Communicator is sold to Health Systems who wish to provide patients a secure, convenient, single point of access to their consolidated healthcare information and the ability to communicate efficiently and conveniently with health systems and their providers to facilitate collaboration between patients and their care teams. The Clinical Exchange Communicator supports the retrieval of patient information for a single patient at a time, so all user scenarios for this product focus on the single patient. The goal of this approach is to demonstrate that both the interoperability and conformance capabilities of the certified application are consistent with the requirements of the §170.315 (e)(1) View, Download, or Transmit (VDT) certification criterion. This will be done through the test scenarios included in the plan, as demonstrated by a real world Health System utilizing the §170.315 (e)(1) View, Download, or Transmit (VDT) functionality within the Clinical Exchange Communicator.

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 Product Number 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?

Standard (and version)	Web Content Accessibility Guidelines (WCAG) 2.0. Developer doesn't plan to update the standard to USCDI V1 until 12/31/2022
Updated certification criteria and associated product	170.315(e)(1) View, Download, or Transmit (VDT) to 3rd party in Clinical Exchange Communicator
CHPL Product Number	15.04.04.3087.Comm.21.01.1.210406
Method used for standard update	Web Content Accessibility Guidelines (WCAG) 2.0
Date of ONC ACB notification	
Date of customer notification (SVAP only)	N/A
Conformance measure	N/A
USCDI updated certification criteria (and USCDI version)	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
Sharing	Track the usage of the transport mechanisms for transmitting health summary data to a 3rd party.
Downloading	Track the usage of downloading/viewing a patient's health summary data documents sent from an inpatient and/or ambulatory care setting
Function Error Rate	Track the error rate associated with the View, download, and transmit module within the product.

Associated Certification Criteria

List certification criteria associated with the measure and if updated to the 2015 Edition Cures Update criteria. If conformance to the criteria depends on any Relied Upon Software, this should be noted in your Real World Testing plan for any metrics that would involve use of that software in testing.

Measurement/Metric	Associated Certification Criteria	Relied Upon Software (if applicable)
Sharing	170.315(e)(1) View, download and transmit	Sharing
Downloading	170.315(e)(1) View, download and transmit	Downloading
Function Error Rate	170.315(e)(1) View, download and transmit	Function Error Rate

Justification for Selected Measurement/Metric

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

Measurement/Metric	Justification
Sharing	EHI documents are shared into the Clinical Exchange Communicator product from inpatient and ambulatory care settings. This metric will combine all the care settings the product services. These documents are then available to be shared to a 3rd party via Edge protocols (e.g., SMTP, Direct). Tacking the number of transmissions in the Clinical Exchange Communicator product will show this feature is available and functioning in a real-world setting, regardless of volume.
Downloading	EHI documents are shared into the Clinical Exchange Communicator product from inpatient and ambulatory care settings. This metric will combine all the care settings the product services. These documents are then available to be downloaded/viewed. Tacking the number of downloads/views of these documents in the Clinical Exchange Communicator product will show this feature is available and functioning in a real-world setting, regardless of volume.
Function Error Rate	EHI documents are shared into the Clinical Exchange Communicator product from inpatient and ambulatory care settings. This metric will combine all the care settings the product services. These documents are then available to be shared to a 3 rd party via Edge protocols (e.g., SMTP, Direct) and available to be downloaded/viewed. Tacking the error rate of downloading, viewing, and transmitting in the Clinical Exchange Communicator product will show this feature is available and functioning in a real-world setting, regardless of volume.

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
Inpatient care setting	Clinical Exchange Communicator Real World Testing plan will apply to this care setting as it is sold in this care setting. Clinical Exchange Communicator is a product that is SAAS based and thus uses a single instance of the deployed capability to serve our customers' care settings. The certification criteria 170.315(e)(1) View, download, and transmit to 3rd party is a patient engagement metric and the metric will be from a patient perspective. The metric chosen will combine all the care settings the product services.
Ambulatory Care Setting	Clinical Exchange Communicator Real World Testing plan will apply to this care setting as it is sold in this care setting. Clinical Exchange Communicator is a product that is SAAS based and thus uses a single instance of the deployed capability to serve our customers' care settings. The certification criteria 170.315(e)(1) View, download, and transmit to 3rd party is a patient engagement metric and the metric will be from a patient perspective. The metric chosen will combine all the care settings the product services.

Relied Upon Software

- MEDITECH Client/Server Medical and Practice Management (MPM) Electronic Health Record OR
- Allscripts Touchworks EHR OR
- MEDITECH Client/Server Electronic Health Record Core HCIS OR
- EpicCare Inpatient EHR Suite OR
- AthenaClinicals for Hospitals and Health Systems OR
- ARIA oncology information system (for Medical Oncology) OR
- Sunrise Acute Care for Hospital-based Providers OR
- MEDITECH MAGIC Medical and Practice Management (MPM) Electronic Health Record OR
- Touchworks EHR OR
- athenaClinicals OR
- MOSAIQ OR
- MEDHOST Enterprise-Clinicals OR
- MEDITECH 6.0 Electronic Health Record Core HCIS OR
- Epic Ambulatory EHR Suite OR
- MEDITECH Expanse (6.16) Ambulatory OR

Relied Upon Software (Cont.)

- NextGen Enterprise EHR OR
- NextGen Ambulatory EHR OR
- Soarian Clinicals OR
- MEDITECH 6.1 Electronic Health Record Core OR
- Sunrise Acute Care OR
- eClinicalWorks OR
- PowerChart (Clinical) OR
- Sunrise Ambulatory Care OR
- MEDITECH Expanse (6.16) Core HCIS OR
- EpicCare Inpatient Base OR
- Centricity EMR OR
- Millennium CD (Clinical) OR
- EpicCare Ambulatory Base OR
- MEDITECH MAGIC Electronic Health Record Core HCIS OR
- e-MDs Solution Series OR
- Practice Partner OR
- Allscripts Professional EHR OR
- ARIA oncology information system (for Radiation Oncology) OR
- Paragon for Hospitals 2015 Certified EHR

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
Sharing	It is expected to have occurrences for transmitting of these documents in the Clinical Exchange Communicator. Any volume seen would substantiate this feature is available and functioning in a real-world setting, regardless of volume.
Downloading	It is expected to have occurrences for downloads/views of these documents in the Clinical Exchange Communicator. Any volume seen would substantiate this feature is available and functioning in a real-world setting, regardless of volume.
Function Error Rate	It is expected that issues are rare and that the functionalities identified in the above criteria perform without errors. Error rates will be tracked across these functions to ensure this feature is available and functioning in a real-world setting, regardless of usage volume.

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
Submit Real World Testing plan to ACB (per their instructions)	Inpatient & Ambulatory	Nov 15, 2022
Collection of information as laid out by the plan for the period	Inpatient & Ambulatory	April 1, 2023
End of Real-World Testing period/final collection of all data for analysis	Inpatient & Ambulatory	July 29, 2023
Analysis and report creation		January 15, 2024
Submit Real World Testing report to ACB (per their instructions)		February 15, 2024

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:	Jacqueline Muller
Authorized Representative Email:	jmuller@syntellis.com
Authorized Representative Phone:	503.320.6510
Authorized Representative Signature:	Jacqueline Muller

Date: 10/26/2022

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>