# REAL WORLD TESTING PLAN

## GENERAL INFORMATION

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

**Developer Name:** NextGen Healthcare
**Product Name:** NextGen® Office
**Version Number:** 5.0
**Certified Health IT Product List (CHPL) ID:** 15.04.04.2054.Medi.05.00.1.180220
**Developer Real World Testing Page URL:** https://www.nextgen.com/certifications

## JUSTIFICATION FOR REAL WORLD TESTING APPROACH

| Topic | Detail |
|---|---|
| Approach Summary | • This plan will cover NextGen Office's approach to Real World Testing for our ambulatory care client base.<br>• Data will be gathered primarily in an automated fashion using production database queries and logs. Where that is not possible, we will engage clients to gather the data in a direct approach.<br>• This analysis will quantify usage of certified workflows over time, as well as demonstrate conformance to standards. No confidential or protected health information will be exposed through this process.<br>• Success will be defined by our ability to highlight how each criterion is being used by providers. Some criteria, for example *(b)(3) ePrescribing*, are going to have a much higher volume of use than *(g)(7-9) API* due purely to the nature of the criterion and its use for daily patient care. |
| Types of Settings | • NextGen Office supports specialties in the ambulatory care setting. All specialties have access to a single web-based instance of the NextGen Office technology that allows for clinical documentation, reporting, and electronic interactions with third parties. |
| Usage Quantification | • The transactional history in the NextGen Office database is the source data. The data can be queried for events indicative of specific certified interoperability workflows. The results will be quantified and summarized. |
| Demonstrate Conformance | • **Explicit validation**: C-CDA files will be validated against an internally hosted Health IT C-CDA validation tool. Events will be quantified and reported.<br>• **Implicit validation**: Standards such as NCPDP (2017 eRx) have XML schema definitions that must be adhered to. A successful transmission and response from SureScripts will be an implied conformance. The QRDA files will also be implied as conformant due to the volume of export and successful submissions to Quality Payment Program during the attestation period of 2023.<br>• **Event rates**: C-CDA validation and other electronic transmission workflows will be quantified and reported accordingly. |

## STANDARDS UPDATES (INCLUDING Standards Version Advancement Process (SVAP) AND UNITED STATES CORE DATA FOR INTEROPERABILITY (USCDI))

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|---|---|
| **Standard (and version)** | 2022 CMS QRDA Category III IG |
| **Updated certification criteria and associated product** | 170.315 (c)(3), NextGen® Office |
| **Health IT Module CHPL ID** | 15.04.04.2054.Medi.05.00.1.180220 |
| **Method used for standard update** | SVAP |
| **Date of ONC ACB notification** | 10/5/2022 |
| **Date of customer notification (SVAP only)** | 10/6/2022 |
| **Conformance measure** | Proctor certification of the following criteria: 170.315 (g)(10)<br><br>Internal walk-through of certification with regulatory team of the following criteria: 170.315(b)(1)<br>170.315 (b)(2)<br>170.315 (e)(1)<br>170.315 (g)(6)<br>170.315 (g)(9) |
| **USCDI updated certification criteria (and USCDI version)** | 170.315 (b)(1)<br>170.315 (b)(2)<br>170.315 (e)(1)<br>170.315 (g)(6)<br>170.315 (g)(9)<br>170.315 (g)(10)<br>USCDI v1 |

## DESCRIPTION OF MEASUREMENT/METRIC

| ID | Measurement/Metric | Description |
|---|---|---|
| 1a | Count of Direct Messages **SENT** with C-CDA Attached / Count of Consults Orders Created | A requirement of **170.315(b)(1)** is the **sending** of C-CDA files for transitions of care. These are triggered from a consult order for the sending of C-CDA files via Direct Message **170.315(h)(1)**. |
| 1b | Count of files with no unexpected validation events in **SENT** C-CDAs attached to Direct Messages from the ett.healthit.gov 2015 Edition Cures Update C-CDA R2.1 Validator tool / Number of C-CDAs validated | A random sampling of the C-CDAs **sent**,**170.315(b)(1)**, will be performed for the practices identified in ID.1a and validated against the ett.healthit.gov tool to evaluate compliance with the C-CDA R2.1 standard and vocabulary code sets. |

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| 2a | Count of outside C-CDAs saved to a patient chart / Count of Direct Messages **RECEIVED** with C-CDA files attached | A requirement of **170.315(b)(1)** is the **receiving** of transitions of care via direct messages, 170.315(h)(1), with C-CDAs attached. These C-CDAs should be matched to a patient chart, **170.315(b)(2).** |
| 2b | Count of Imported C-CDAs | A requirement of **170.315(b)(2)** is the outside C-CDA can be imported, and clinical information reconciled. |
| 3a | Count of all Direct Messages **SENT** by Status | A requirement of **170.315(h)(1)** is sending Direct messages. Direct messages are **sent** through our partner SureScripts. |
| 4a | Count of Scheduled CCD Bulk Exports | A requirement of **170.315 (b)(6)** is for users to create a schedule for exporting CCDs in bulk. |
| 4b | Count of Created CCD Data Files | A requirement of **170.315 (b)(6)** is for the scheduled CCDs (4a) to be created and available to download. |
| 4c | Count files with no unexpected validation events in CCDs scheduled files, 4b, from the ett.healthit.gov C-CDA R2.1 Validator tool / Number of CCDs validated | A random sampling of the CCDs in the zip file from 4b will be performed and validated against the internal Health IT validation tool. |
| 5a | Count of QRDA I Exports | A requirement of **170.315 (c)(1)** is QRDA I files can be exported. |
| 6a | Count of Patient Portal audit log of View, Download, and Transmit activity | Using the ONC2015 compliant audit log a quantification of View, Download, and Transmit (VDT) events will be performed. |
| 6b | Count of files with no unexpected validation events in patient portal CCDs, 6a, from the Health IT C-CDA R2.1 Validator tool / Number of C-CDAs validated | A random sampling of the CCDs exported from the patient portal (6a) will be performed across all practices and validated against the internally hosted Health IT tool to evaluate compliance with the C-CDA R2.1 standard. |
| 7a | Count of QRDA I Imports | A requirement of **170.315 (c)(2)** is a QRDA I can be imported and included in eCQM evaluation. |
| 8a | Count of QRDA III Exports | Clients from the 8b measure will be selected and the number of QRDA III exports will be quantified. |
| 8b | Count Successful QRDA III Uploads to QPP | A random selection of clients will occur and contacted to validate the QRDA file was accepted by QPP. |
| 9a | Count of eRx Message Type by Delivery Status / Response | Message types of NewRx, RxChangeRequest, RxChangeResponse, RxFill, CancelRx, CancelRxResponse, RxRenewalRequest, RxRenewalResponse will be counted by status. |

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| 9b | Count RxHistory Response / Count RxHistory Request | The message types of RxHistoryRequest, RxHistoryResponse will be counted. RxHistoryReponse is returned by our partner NewCrop. |
| 10a | Count of Immunization messages **SENT** to registries | A requirement of **170.315 (f)(1)** is to send messages to immunization registries. |
| 10b | Count of Immunization History requests / Count of patients with Imported immunization records | A requirement of **170.315 (f)(1)** is practices can request immunization histories and import to a patient chart. |
| 11a | Count of API audit log events by resource type | Using the ONC 2015 compliant audit log, a quantification of FHIR API events will be performed. |

## ASSOCIATED CERTIFICATION CRITERIA

| ID | Measurement/Metric | Associated Certification Criteria |
|---|---|---|
| 1a | Count of Direct Messages **SENT** with C-CDA Attached / Count of Consults Orders Created | • **170.315(b)(1) - Transitions of Care**<br>• **170.315(h)(1) - Direct Message** |
| 1b | Count of files with no unexpected validation events in **SENT** C-CDAs attached to direct messages from the ett.healthit.gov 2015 Edition Cures Update C-CDA R2.1 Validator tool / Number of C-CDAs validated | • **170.315(b)(1) - Transitions of Care** |
| 2a | Count of outside C-CDAs saved to a patient chart / Count of Direct Messages **RECEIVED** with C-CDA files attached | • **170.315(b)(1) - Transitions of Care**<br>• **170.315(h)(1) - Direct Message**<br>• **170.315(b)(2) - Clinical Information Reconciliation** |
| 2b | Count of Imported C-CDAs | • **170.315(b)(2) - Clinical Information Reconciliation** |
| 3a | Count of all Direct Messages **SENT** by Status | • **170.315(h)(1) - Direct Message** |
| 4a | Count of Scheduled CCD Bulk Exports | • **170.315(b)(6) - Data Export** |
| 4b | Count of Created CCD Data Files | • **170.315(b)(6) - Data Export** |
| 4c | Count files with no unexpected validation events in CCDs scheduled files, 4b, from the ett.healthit.gov C-CDA R2.1 Validator tool / Number of CCDs validated | • **170.315(b)(6) - Data Export** |
| 5a | Count of QRDA I Exports | • **170.315(c)(1) - Clinical Quality Measures - Record and Export** |

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| 6a | Count of Patient Portal Audit Log of View, Download, and Transmit Activity | • **170.315(e)(1) - View, Download, and Transmit to 3rd Party** |
| 6b | Count of files with no unexpected validation events in patient portal CCDs, 6a, from the Health IT C-CDA R2.1 Validator tool / Number of C-CDAs validated | • **170.315 (e)(1) - View, Download, and Transmit to 3rd Party** |
| 7a | Count of QRDA I Imports | • **170.315 (c)(2) - Clinical Quality Measures - Import and Calculate** |
| 8a | Count of QRDA III Exports | • **170.315 (c)(3) - Clinical Quality Measures - Report** |
| 8b | Count Successful QRDA III Uploads to QPP | • **170.315 (c)(3) - Clinical Quality Measures - Report** |
| 9a | Count of eRx Message Type by Delivery Status / Response | • **170.315(b)(3) - Electronic Prescribing** |
| 9b | Count RxHistory Response / Count Rx History Request | • **170.315(b)(3) - Electronic Prescribing** |
| 10a | Count of Immunization messages **SENT** to registries | • **170.315 (f)(1) - Transmission to Immunization Registries** |
| 10b | Count of Immunization History requests / Count of patients with Imported immunization records | • **170.315 (f)(1) - Transmission to Immunization Registries** |
| 11a | Count of API audit log events by resource type | • **170.315 (g)(7) - Application Access - Patient Selection**<br>• **170.315(g)(8) - Application Access - Data Category Request**<br>• **170.315(g)(9) - Application Access – All Data Request** |

## JUSTIFICATION FOR SELECTED MEASUREMENT/METRIC

| ID | Measurement/Metric | Justification |
|---|---|---|
| 1a | Count of Direct Messages **SENT** with C-CDA Attached / Count of Consults Orders Created | Counting the number of consult orders created compared to the count of direct messages **sent** with C-CDAs attached will demonstrate compliance with real world interoperability. |
| 1b | Count of files with no unexpected validation events in **SENT** C-CDAs attached to Direct Messages from the ett.healthit.gov 2015 Edition Cures Update C-CDA R2.1 Validator tool / Number of C-CDAs validated | Validating random C-CDAs **sent** will demonstrate compliance with C-CDA R2.1 standard and vocabulary code sets. |
| 2a | Count of outside C-CDAs saved to a patient chart / Count of Direct Messages | Counting of Direct Messages **received** with C-CDAs attached, and saved to a chart, will prove EHI **received** is used in the product. Comparing these counts will validate the number of successful patient matches. |

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| | **RECEIVED** with C-CDA files attached | |
| 2b | Count of Imported C-CDAs | Counting the imported C-CDAs will confirm EHI can be **received** and used in product. |
| 3a | Count of all Direct Messages **SENT** by Status | Counting the number of Direct Messages **sent** by status will prove the number of successful messages and compliance with interoperability standards. |
| 4a | Count of Scheduled CCD Bulk Exports | Counting the scheduled records will demonstrate compliance with certification requirements. |
| 4b | Count of Created CCD Data Files | Counting of the created CCD zip files will demonstrate compliance with certification requirements. |
| 4c | Count files with no unexpected validation events in CCDs scheduled files, 4b, from the ett.healthit.gov C-CDA R2.1 Validator tool / Number of CCDs validated | Validating random CCDs from the Data Export (4b) will demonstrate compliance with C-CDA R2.1 standard and vocabulary code sets. |
| 5a | Count of QRDA I Exports | Counting the number of exports will demonstrate compliance with the certification requirements. |
| 6a | Count of Patient Portal Audit Log of View, Download, and Transmit Activity | Counting the number of VDT events will demonstrate compliance with real world interoperability. |
| 6b | Count of files with no unexpected validation events in patient portal CCDs, 6a, from the Health IT C-CDA R2.1 Validator tool / Number of C-CDAs validated | Validating random CCDs will demonstrate compliance with C-CDA R2.1 standard and vocabulary code sets from the patient portal. |
| 7a | Count of QRDA I Imports | Counting the number of imports will demonstrate compliance with import and calculate. |
| 8a | Count of QRDA III Exports | Counting the number of exports will demonstrate compliance with certification requirements. |
| 8b | Count successful QRDA III uploads to QPP | The ultimate success is knowing clients that have uploaded to QPP and attested with no issues. |
| 9a | Count of eRx Message Type by Delivery Status / Response | Counting the message types by delivery status or response will demonstrate real world interoperability. |
| 9b | Count RxHistory Response / Count Rx History Request | Counting RxHistory transactions will demonstrate success with real world interoperability. |
| 10a | Count of Immunization messages **SENT** to registries | Counting immunization messages **sent** to registries will demonstrate compliance with real-world interoperability. |
| 10b | Count of Immunization History requests / Count of | Counting immunization history requests **sent** comparative to the number of imports will demonstrate compliance with real-world interoperability. |

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| | patients with Imported immunization records | |
| 11a | Count of API audit log events by resource type | Counting audit activities will validate the token exchange occurred (g7) and quantify the types of transactions performed. Audit log includes category requests (g8) and CCD requests (g9). This method will demonstrate compliance with interoperability standards |

## EXPECTED OUTCOMES

| ID | Measurement/Metric | Expected Outcome |
|---|---|---|
| 1a | Count of Direct Messages **SENT** with C-CDA Attached / Count of Consults Orders Created | Greater than 60% of clients queried will have Direct Messages with C-CDA attached for consult orders created |
| 1b | Count of files with no unexpected validation events in **SENT** C-CDAs attached to direct messages from the ett.healthit.gov 2015 Edition Cures Update C-CDA R2.1 Validator tool / Number of C-CDAs validated | 100% - No unexpected validation events. |
| 2a | Count of outside C-CDAs saved to a patient chart / Count of Direct Messages **RECEIVED** with C-CDA files attached | Greater than Greater than 1.2% of **received** Direct Messages will be saved to a patient chart. |
| 2b | Count of Imported C-CDAs | Greater than 51. |
| 3a | Count of all Direct Messages **SENT** by Status | Greater than 90% of Direct Messages will be successful. |
| 4a | Count of Scheduled CCD Bulk Exports | Less than 100 recurring schedules will be created. |
| 4b | Count of Created CCD Data Files | Less than 200 zip files will be created from the recurring schedules. |
| 4c | Count files with no unexpected validation events in CCDs scheduled files, 4b, from the ett.healthit.gov C-CDA R2.1 Validator tool / Number of CCDs validated | 100% - No unexpected validation events |
| 5a | Count of QRDA I Exports | Less than 300 QRDA I files will be exported. |

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| 6a | Count of Patient Portal Audit Log of View, Download, and Transmit Activity | Download = less than 300, Transmit = less than 20, View = greater than 15,000. |
| 6b | Count of files with no unexpected validation events in patient portal CCDs, 6a, from the Health IT C-CDA R2.1 Validator tool / Number of C-CDAs validated | 100% - No unexpected validation events. |
| 7a | Count of QRDA I Imports | Successful demonstration of import and aggregation in eCQM evaluation |
| 8a | Count of QRDA III Exports | Successful exports will be reported. |
| 8b | Count Successful QRDA III Uploads to QPP | Successful attestations will be reported. |
| 9a | Count of acknowledgement of eRx Message Type by Delivery Status | Quantification of **sent** eRx messages with >90% successful acknowledgment status response rate for applicable message |
| 9b | Count of Acknowledgement of RxHistory Response / Count Rx History Request | Quantification of requests and >90% successful |
| 10a | Count of Immunization messages **SENT** to registries | Successful quantification of real-world interoperability with immunization registries. |
| 10b | Count of Immunization History requests / Count of patients with Imported immunization records | Successful quantification of real-world interoperability with immunization history requests. |
| 11a | Count of API audit log events by resource type | Successful quantification of interoperability events. |

## CARE SETTING

| Care Setting | Justification |
|---|---|
| Ambulatory | NextGen Office supports specialties in ambulatory care. All specialties have access to the single web-based instance of the NextGen Office technology that allows for clinical documentation, reporting, and electronic interactions with third parties. |

## KEY MILESTONES

| Key Milestones | Care Setting | Date/Timeframe |
|---|---|---|
| Finalize Real World Test Plan and Submit to the ONC- ACB (Drummond) | Ambulatory Setting | October 2022 |
| Identify Clients for Participations where applicable | Ambulatory Setting | Q1 2023 |
| Data collection and or observation from client systems | Ambulatory Setting | Q1-Q3 2023 |
| Validation and analysis of data and metrics created | Ambulatory Setting | Q3 2023 |

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| Report created and submitted to ONC-ACB (Drummond) | Ambulatory Setting | Q4 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.

Authorized Representative Name: Dr. John Ellis

Authorized Representative Email: jwellis@nextgen.com

Authorized Representative Phone: 215-657-7010

Authorized Representative Signature: DocuSigned by: John Ellis 285515A718454BD...

Date: 10/18/2023 | 07:04:24 PDT