



Welligent REAL WORLD TESTING PLAN 2023

GENERAL INFORMATION

Plan Report ID Number	[For ONC-Authorized Certification Body use only]
Developer Name	Charles Sutelan
Product Name(s)	Welligent part of ContinuumCloud
Version Number(s)	8MU3
Certified Health IT Product List (CHPL) ID(s)	15.02.05.2536.WELL.01.01.1.220201
Developer Real World Testing Plan Page URL	https://www.welligent.com/solutions/meaningful-health/



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.

Criteria	Care Setting	Measurement Period	Planned Date	Date Verified/ Tested	Key Milestones	Results/ Notes
Care Coordination						
§ 170.315(b)(1) Transitions of care § 170.315(h)(1) Direct Project: from the Electronic Exchange Category	Behavioral Health	03/01/2023 - 03/01/2024			• Begin collection data as laid out in the RWT Plan.	
			1/1/23			
				February-23	<ul style="list-style-type: none"> • Confirm Trading Partner • Confirm ability to send and receive clinical documents • Confirm with TP that production data will be used, whether in an actual live environment or a copy of a live environment 	
				Quarterly, 2023	<ul style="list-style-type: none"> • Care provider selects recipient from directory of Direct addresses and initiates sending of Clinical Document. The user is able to create a C-CDA Release 2.1 that also includes the reason for referral, and the referring or transitioning provider's name and office contact information. • C-CDA Care Referral or Referral Note is triggered to send via Direct Protocol • Care provider reviews the Direct Status screen (under Direct Outgoing menu choice) to ensure Clinical Document was successfully transmitted. 	
				Quarterly, 2023	Recipient uses scorecard to grade C-CDA	
				Quarterly, 2023	<ul style="list-style-type: none"> • Tester uses Document Center to locate Clinical Document. • Care provider reviews the Direct Status screen (under Direct Outgoing menu choice). • Recipient validates that Social History section of C-CDA is flagged as restricted 	
				Quarterly, 2023	Calculate and compile metrics	
§ 170.315(b)(2) Clinical information reconciliation and incorporation	Behavioral Health	03/01/2023 - 03/01/2024			Import live patient data	
				February-23		
				Quarterly, 2023	Confirm role access limits Verify imported patient data to existing patient match	
				Quarterly, 2023	Reconcile imported allergy, medication, and problem data with existing data	
				Quarterly, 2023	Calculate and compile metrics	
§ 170.315(b)(6) Data export	Behavioral Health	03/01/2023 - 03/01/2024			Use the Edge Test Tool to check validity of output file	
				February-23		
				Quarterly, 2023	Export summary was created and completed successfully	
				Quarterly, 2023	Calculate and compile metrics	
Application Programming Interfaces						
§ 170.315(g)(7) Application access— patient selection § 170.315(g)(9) Application access— all data request	Behavioral Health	03/01/2023 - 03/01/2024			<ul style="list-style-type: none"> • Partner with PHR or identify existing PHR that can receive patient clinical data as described in this RWT plan. • Ensure that PHR has functionality to access the Dynamic FHIR API, as described here. • Partner with EHR that is integrated with the Dynamic FHIR API and Patient Portal modules of ConnectEHR. 	
				February-23		
				February-23	Encounter is created and visually confirmed	
				February-23	<ul style="list-style-type: none"> • Dynamic FHIR API has transformed C-CDA into FHIR resources. • PHR app consumes FHIR resources to populate EHR data 	
				February-23	Visually validate Assessment, Plan of Treatment and Health Concerns narrative text	
Electronic Exchange						
§ 170.315(h)(1) Direct Project (Included with (b)(1),(b)(7),(b)(8) in the CareCoordination Category)	Behavioral Health	03/01/2023 - 03/01/2024	SEE CARE COORDINATION		SEE CARE COORDINATION	

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

Standard (and version)	All standards are the 2015 Edition standards. No updates were made.
Updated certification criteria and associated product	N/A
Health IT Module CHPL ID	N/A
Method used for standard update	N/A
Date of ONC ACB notification	N/A
Date of customer notification (SVAP only)	N/A
Conformance measure	N/A
USCDI updated certification criteria (and USCDI version)	N/A

Care Setting(s)

Ambulatory care services provided in behavioral health, substance use treatment, child & family services, I/DD and ASD, emergency and transitional residential shelter, education and school-based care

Overall Expected Outcome(s)

- Real World Testing will demonstrate that Welligent' electronic health record (EHR) is conformant to the following certification criteria: § 170.315(b)(1) Transitions of care, § 170.315(b)(2) Clinical information reconciliation and incorporation, § 170.315(b)(6) Data export, § 170.315(g)(7) Application access— patient selection, § 170.315(g)(9) Application access— all data request, and § 170.315(h)(1) Direct Project.

Schedule of Key Milestones

Key Milestone	Date/Timeframe
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.	January, 2023
Collection of information as laid out by the plan for the period.	January, 2023
Planned System updates to allow for collection of data after an update.	March, 2023
Follow-up with providers and authorized representatives on a regular basis to understand any issues arising with the data collection.	Quarterly, 2023
End of Real-World Testing period/final collection of all data for analysis.	January 1, 2024
Analysis and report creation.	January 15, 2024
Submit Real World Testing report to ACB (per their instructions)	February 1, 2024

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.

Description of Measurement/Metric

Measures Used

Associated Certification Criteria:

§ 170.315(b)(1) Transition of Care (Cures Update)

- Relied-upon Software: ConnectEHR

§ 170.315(h)(1) Direct Project

- Relied-upon Software: MaxMD

The following outlines the measures that have been identified to best demonstrate conformance to multiple certification criteria concerning the § 170.315(b)(1) Transition of Care (Cures Update) and § 170.315(h)(1) Direct Project, across two use cases (single patient and population services).

Measure Description:

Send and receive Transition of Care (TOC) messages with other providers to close the referral loop. The patient's ePHI will be exchanged using a C-CDA 2.1 Care Referral or Referral Note and DIRECT secure messaging for data transport.

Measurement/Metric	Description
Outbound TOC's received by HISP	100 percent of outbound TOC's successfully received by HISP
C-CDA scorecard	Average C-CDA grade from scorecard for C-CDAs generated from ConnectEHR is a "C" or better
C-CDA's flagged as restricted received flagged as restricted per the trading partner	75 percent of C-CDAs flagged as restricted were received in restricted status based on confirmed receipt from trading partner
Trading Partner's TOC C-CDAs received by ConnectEHR	75 percent of trading partner's TOC C-CDAs successfully received by ConnectEHR.

Justification for Selected Measurement/Metric

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

Justification
<p>Justification:</p> <ol style="list-style-type: none"> 1. Showcase ConnectEHR's streamlined approach to provider-to-provider patient referrals and transitions of care with the goal being higher quality patient care. 2. Reduce risk of manual data entry referral errors by transmitting patient data securely and electronically. 3. Improved efficiency by reducing necessary manual data entry. 4. Ensure private and secure transmission of patients' PHI. 5. Increased interoperability between disparate HIT systems.



Test Step:	Testing Procedure:	Expected Outcomes:	Key Milestone Date Completed	Outcomes:	Comments:
1	Identify Trading Partner (TP) and coordinate with TP for sending/receiving clinical documents using production data as described in this RWT plan.	<ul style="list-style-type: none"> • Confirm Trading Partner • Confirm ability to send and receive clinical documents • Confirm with TP that production data will be used, whether in an actual live environment or a copy of a live environment 			
2		<ul style="list-style-type: none"> • USCDIV1 data elements captured in EHR (system under test) • Care provider selects Clinical Document to be transmitted. • Care provider is able to create a C-CDA Release 2.1 that also includes the reason for referral, and the referring or transitioning provider's name and office contact information. • Care provider flags the document as restricted and subject to restrictions on re-disclosure. 			
3	Care provider initiates TOC to TP EHR in EHR	<ul style="list-style-type: none"> • Care provider selects recipient from directory of Direct addresses and initiates sending of Clinical Document. The user is able to create a C-CDA Release 2.1 that also includes the reason for referral, and the referring or transitioning provider's name and office contact information. • C-CDA Care Referral or Referral Note is triggered to send via Direct Protocol • Care provider reviews the Direct Status screen (under Direct Outgoing menu choice) to ensure Clinical Document was successfully transmitted. 			
4	Validate that C-CDA for Patient A contains USCDIV1 data elements.	Recipient uses scorecard to grade C-CDA			
5	Trading partner refers Patient B from TP EHR to system under test by generating C-CDA Clinical Document or Referral Note.	<ul style="list-style-type: none"> • Care provider flags Social History section of C-CDA as restricted. • Care provider selects recipient from directory of Direct addresses and initiates sending of Clinical Document. 			
6	In system under test, tester acknowledges receipt of valid Clinical Document.	<ul style="list-style-type: none"> • Tester uses Document Center to locate Clinical Document. • Care provider reviews the Direct Status screen (under Direct Outgoing menu choice). • Recipient validates that Social History section of C-CDA is flagged as restricted 			
7	Calculate and compile metrics				

Description of Measurement/Metric

Measures Used

Associated Certification Criteria:

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

- Relied-upon Software: ConnectEHR

The following outlines the measures that have been identified to best demonstrate conformance to multiple certification criteria concerning the § 170.315(b)(2) Clinical information reconciliation and incorporation across two use cases (single patient and population services).

Measure Description:

Reconcile and incorporate specific information from C-CDAs formatted to both C-CDA Releases 1.1 and 2.1.

- Demographics for patient matching
- Problems
- Medication
- Allergies

Measurement/Metric	Description
Patient Data Matching	100 Percent of patient data can be matched to an existing patient.
Patient Data Reconciliation	Ability to reconcile data for an existing patient.

Justification for Selected Measurement/Metric

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

Justification
<p>Justification:</p> <ol style="list-style-type: none"> 1. Demonstrate ability to match received patient data accurately and match to the correct patient 2. Demonstrate the user's ability to reconcile patient medications, allergies, and problem lists to the patient's record

Test Step:	Testing Procedure:	Expected Outcomes:	Key Milestone Date:	Outcomes:	Comment(s):
1	Using production data in an actual live environment or copy of live environment, demonstrate the ability to import medication, allergy, and problem data for a specified client.	*Specified client can be selected through the UI. *Medication, allergy, and problem data is sent through UI.	Start test plan execution: October, 2023		
2	Demonstrate the ability to limit the set of users who can import data.	Logging in as a User with Admin Profile will allow data to be imported.			
3	Confirm user roles that have been denied import access cannot create import summaries	Logging in as a User with a Non-Admin Profile will not allow access to the export functionality			
4	Verify imported client information matches existing patient in Welligent.	Match the client demographic information to an existing client			
5	Reconcile the medication data imported with medications for the existing patient	Visually verify through a single view which medications match those existing in Welligent for the specific patient and those which do not			
6	Reconcile the allergy data imported with allergy data for the existing patient	Visually verify through a single view which allergies match those existing in Welligent for the specific patient and those which do not			
7	Reconcile the problem data imported with problem data for the existing patient	Visually verify through a single view which medications match those existing in Welligent for the specific patient and those which do not			
8	Calculate and compile metrics		Complete test execution: November, 2023		

Description of Measurement/Metric

Measures Used

Associated Certification Criteria:

§ 170.315(b)(6) - Data export

- Relied-upon Software: None

The following outlines the measures that have been identified to best demonstrate conformance to multiple certification criteria concerning the § 170.315(b)(6) - Data export across two use cases (single patient and population services).

Measure Description:

Export all available data elements from the Common Clinical Dataset (CCDS) for a population of patients for use in a different health information technology product or a third-party system. This export can be used for many purposes, including data portability when a physician practice switches to a new EHR platform.

Measurement/Metric	Description
Exports Accurate Timing	100 Percent of Exports ran at the correct time.
C-CDA Count Accuracy	C-CDA count matches actual patient count for requested date range.
Random C-CDA Scorecard	Spot-checked C-CDAs pass scorecard with average overall grade of "C" or better.

Justification for Selected Measurement/Metric

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

Justification

Justification:

1. Demonstrate ConnectEHR's ability to export batches of patient data efficiently.
2. Facilitate interoperability by providing the exported data in the form of valid CCD files that conform to the HL7 standards as described in the HL7 Implementation Guide for CDA® Release 2: Consolidated CDA Templates for Clinical Notes (US Realm).

Test Step:	Testing Procedure:	Expected Outcomes:	Key Milestone Date:	Outcomes:	Comment(s):
1	Using production data in an actual live environment or copy of live environment, demonstrate the ability to configure data export configurations for Timeframe and Location	<ul style="list-style-type: none"> • Date and time ranges can be configurable via the UI • Targeted Practices can be configurable via the UI • Patients exported can be configurable via the UI 	Start test plan execution: October, 2023		
2	Demonstrate the ability to limit the set of users who can create export summaries	Logging in as a VendorAdmin will allow access to the export functionality			
3	Confirm users roles that have been denied export summary access cannot create export summaries	Logging in as a non-VendorAdmin will not allow access to the export functionality			
4	Create and validate an export for a single patient	Use the Edge Test Tool to check validity of output file			
5	Create an export summary for data within a entered date and time range	<ul style="list-style-type: none"> • Data was available for the entered date and time range • The export summary contained data only within that date and time range 			
6	Create an export summary in real time	Export summary was created and completed successfully			
7	Create an export summary based on a relative date and time (Ex. Every first of every month @ 7 AM)	The scheduled export summary would be display and be visually validated			
8	Create an export summary for a specific date/time (Ex. 07/16/2021 @ 3:30 PM)	<ul style="list-style-type: none"> • The scheduled export summary was created successfully • The specific date/time would be in the near future so the export could be confirmed 			
9	Save the export summary to a preferred location at the time of export.	<ul style="list-style-type: none"> • Saving to a preferred location is allowed • Visually confirming the export after save is performed and successful 			
10	Calculate and compile metrics		Complete test execution: November, 2023		

Description of Measurement/Metric

Measures Used

Associated Certification Criteria:

§ 170.315(g)(7) Application access— patient selection

- Relied-upon Software: Dynamic FHIR API

§ 170.315(g)(9) Application access— all data request

- Relied-upon Software: Dynamic FHIR API

The following outlines the measures that have been identified to best demonstrate conformance to multiple certification criteria concerning the § 170.315(g)(7) Application access— patient selection and § 170.315(g)(9) Application access— all data request across two use cases (single patient and population services).

Measure Description:

Enable a patient’s access their electronic health data through a Personal Health Record (PHR) app on their smartphone. They have had a healthcare encounter with a provider using an EHR that is integrated with the Dynamic FHIR API and Patient Portal modules of ConnectEHR. They would like to view the results from that encounter along with the rest of their electronic health record.

Measurement/Metric	Description
PHR Access	Patient can retrieve FHIR API data from PHR app for 100 percent of encounters.
PHR Data Accuracy	In 100 percent of encounters from Step #1, PHR data matches data from EHR. This will be confirmed by visual validation of the following FHIR resources: <ul style="list-style-type: none"> - Demographics - Problems - Medications - Allergies

Justification for Selected Measurement/Metric

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

Justification
Justification: Making an electronic copy of the health record available empowers patients to become more involved and knowledgeable of their health care. This allows communication and collaboration with the patient’s medical providers leading to improvement in overall population health.

Test Step:	Testing Procedure:	Expected Outcomes:	Key Milestone Date:	Outcomes:	Comment(s)
1	Identify Trading Partner (TP) and coordinate with TP for providing patients timely access to their ePHI using production data as described in this RWT plan.	<ul style="list-style-type: none"> Partner with PHR or identify existing PHR that can receive patient clinical data as described in this RWT plan. Ensure that PHR has functionality to access the Dynamic FHIR API, as described here. Partner with EHR that is integrated with the Dynamic FHIR API and Patient Portal modules of ConnectEHR. 			
2	Patient A has encounter with care provider who uses EHR described above.	Encounter is created and visually confirmed			
3	Provider captures USCDIv1 data elements in EHR	USCDIv1 data elements are validated in the system			
4	Provider manually generates Care/Referral Summary C-CDA post-visit or ensures that the EHR generates one automatically.	C-CDA is confirmed for the specified patient			
5	Patient A uses Dynamic Patient Portal login to view clinical information	<ul style="list-style-type: none"> Patient Portal automatically sends email reminder that Patient A has a new clinical document available. Email reminder has a URL/hyperlink to the patient portal. If patient hasn't already activated their portal account, portal account can be activated via Welcome Email or by an Administrator user 			
6	Patient A uses portal login credentials to log into PHR app	Specific patient ID and token are returned for authentication and data requests			
		Dynamic FHIR API has transformed C-			
7	PHR app displays full set of data for all data categories	<ul style="list-style-type: none"> CDA into FHIR resources. PHR app consumes FHIR resources to populate EHR data 			
8	PHR app returns full set of data for a given category	PHR app will display and all data to be displayed for each data category			
9	PHR app returns data in a computable format using specified standards.	Data is confirmed to be in XML or JSON format			
10	PHR app returns full and accurate data for a specific date and specific date range	<ul style="list-style-type: none"> Step 10 is optional, if PHR app has the capability to filter by date range Filtering data by a specific date returns data accurately and as expected Filtering data by a specific date range returns data accurately and as expected 			
11	Via visual inspection of PHR app, the data is verified to include Assessment, Plan of Treatment and Health concerns are specified as narrative text	Visually validate Assessment, Plan of Treatment and Health Concerns narrative text			
12	Calculate and compile metrics				

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	Charles Sutelan
Authorized Representative Email	csutelan@continuumcloud.com
Authorized Representative Phone	888.871.1631
Authorized Representative Signature	<i>Charles Sutelan</i>
Date	12/5/2022

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>