Prime Clinical Systems
2025 Real World Testing Plan

Contents

General Information

Plan Report ID Number	20241010PCS
Developer Name	Prime Clinical Systems, Inc.
Product Name	Patient Chart Manager
Version Number	7.1
Certified Health IT Product List (CHPL) Product Number(s)	15.02.05.2206.PRIC.01.03.1.220114
Developer Real-World Testing Page URL	http://www.primeclinical.com/primeclinical_real_world_testing.html

Justification for Real World Testing Approach

This test plan will use the Reporting/Logging methodology for all measures tested.

PHI will not be exposed through this process.

The data will be gathered automatically to include our entire client base using production based database queries and logs. The gathered data will be queried for events indicative for specific certified workflows that occurred over specified time, for example; over a 3 month period (or more).

In some instances we may also utilize other reports, such as audit logs, database logs or Automated Measure (170.315.g.2) reports to compare the collected data, if necessary.

Successful transmissions and error rates will be tracked and trended over time.

The results will be quantified and summarized

In addition to the Reporting/Logging methodology, if we find specific criteria not widely used by our customer base, we may test the respective measure in our own production-sandbox environment.

Standards Updates (SVAP)

None of our products include voluntary SVAP standards.

Care/Practice Settings

Prime Clinical Systems Patient Chart Manager EHR is designed for and supports medical clinics in an ambulatory care setting. All measures outlined in the Real World Testing are designed for and will be performed within the ambulatory care setting.

Measures Used In Overall Approach

The measurements for our real-world testing plan are described below, each measurement contains:

- Description of the measurement/metric
- Associated certification criteria
- Justification for selected measurement/metric
- Care setting addressed
- Expected outcomes

For each evaluated measurement, we provide a detailed justification for its selection and the anticipated outcomes. All measurements were chosen to best assess compliance with certification criteria and the interoperability of exchanging electronic health information (EHI) within the certified EHR

RWT Measure #1. Transitions of Care

Description	During testing, a report will be produced over a specified period to include the number of C-CDAs created and successfully sent to a third party via Direct messaging during transitions of care
Associated Certification Criteria	170.315(b)(1) Transitions of Care, (h)(1) Direct Project
Relied Upon Software	(b)(1) Backbeach Software AND Newcrop LLC (h)(1) Newcrop LLC
Justification	An increase in this measure will demonstrate the successful creation of a C-CDA, encompassing the recording of all clinical data elements. By sending the C-CDA, successful interoperability with a third party will be demonstrated. This will also demonstrate support for the Direct Edge protocol in connecting to a HISP for effective transmission
Care Settings	All measures outlined in this Real World Testing are designed for and will be performed within the ambulatory care setting.
Expected Outcome	Successful Transition of Care implies users have a general understanding of this functionality and will demonstrate our adherence to certification criteria by supporting CCDA 2.1 with USCDI standards, during transition of care, and demonstrating the exchange of electronic health information (EHI) in the intended care and practice settings

RWT Measure #2. Clinical Information Reconciliation and Incorporation

Description	During testing, a report will be generated over a specified period to include the number of C-CDAs received and successfully incorporated from a third party via Direct messaging during a referral/transition of care patient encounters, where the clinician performs clinical information reconciliation for medications, medication allergies, and the current problem list
Associated Certification Criteria	170.315(b)(2) Clinical Information Reconciliation and Incorporation
Relied Upon Software	N/A
Justification	An increase in this measure will demonstrate the successful incorporation of a C-CDA, where the clinician has performed clinical information reconciliation for medications, medication allergies, and the current problem list By receiving and incorporating the C-CDA, successful interoperability with a third party will be demonstrated. This will also demonstrate support for the Direct Edge protocol in connecting to a HISP for effective transmission
Care Settings	All measures outlined in this Real World Testing are designed for and will be performed within the ambulatory care setting.
Expected Outcome	Successful Clinical Information Reconciliation implies users have a general understanding of this functionality and will demonstrate our adherence to certification criteria by supporting CCDA 2.1 with USCDI standards, by demonstrating that a user can simultaneously display a patient's active data and its attributes from the following sources: medication list, allergies and problem list and use the information to perform successful clinical information reconciliation and incorporation

RWT Measure #3. Electronic Prescribing

Description	During testing, a report will be generated over a specified period to include the number electronic prescriptions created and successfully sent to a pharmacy destination using NCPDP SCRIPT Standard
Associated Certification Criteria	170.315(b)(3) Electronic Prescribing
Relied Upon Software	Newcrop LLC
Justification	An increase in this measure will demonstrate successful transmissions of electronic prescriptions to pharmacies via Surescripts Network as well as successful integration with our ePrescribing partner NewCrop
Care Settings	All measures outlined in this Real World Testing are designed for and will be performed within the ambulatory care setting.
Expected Outcome	Successful electronic prescription transmissions to pharmacies implies users have a general understanding of this functionality and will demonstrate our adherence to certification criteria using NCPDP SCRIPT Standard, using the Surescripts network and integration with Newcrop

RWT Measure #4. Electronic Health Information Export

Description	During testing, a report will be generated over a specified period to include the number times either a single patient or patient population C-CDA files are exported.
Associated Certification Criteria	170.315(b)(10) Electronic Health Information Export
Relied Upon Software	N/A
Justification	An increase in this measure will indicate successful C-CDA exports for both single patient and patient population
Care Settings	All measures outlined in this Real World Testing are designed for and will be performed within the ambulatory care setting.
Expected Outcome	Successful Electronic Health Information Export implies users have a general understanding of this functionality and will demonstrate our adherence to certification criteria by supporting CCDA 2.1 with USCDI standards, by demonstrating that C-CDA may be exported for single patient or entire patient population.

RWT Measure #5. Clinical Quality Measures

Description	During testing, a report will be generated over a specified period, to identify which of the 14 currently supported clinical quality measure reports are successfully exported to during the CMS submission period for MIPS Quality Reporting The CQM criteria 170.315(c)(1)-(c)(3), collectively function within the eCQM module, this measurement applies to all three
Associated Certification Criteria	170.315(c)(1) Clinical Quality Measures- Record and Export 170.315(c)(2) Clinical Quality Measures- Import and Calculate 170.315(c)(3) Clinical Quality Measures- Record
Relied Upon Software	N/A
Justification	Exporting these clinical quality measure reports will indicate the successful recording, calculation, and export of these measures. The exported reports will then be submitted to CMS for programs like MIPS, which offer significant financial incentives to providers for accurate reporting
Care Settings	All measures outlined in this Real World Testing are designed for and will be performed within the ambulatory care setting.
Expected Outcome	Successful exporting of these reports implies users have a general understanding of this functionality and will demonstrate our adherence to certification criteria, supporting QRDA I for Record and Export and Import and Calculate and QRDA III for Reporting

RWT Measure #6. View, download, and transmit to 3rd party

Description	During testing, a report will be generated over a specified period to include the number of patients who successfully login into their Patient Portal account, this will also log the number of times the following actions are taken by the patient during each of the logins; Share Summary, Download Summary, or View Summary
Associated Certification Criteria	170.315(e)(1) View, Download and Transmit to 3rd Party
Relied Upon Software	Newcrop LLC
Justification	An increase in this measure along with the logging of the patients' actions (Share Summary, Download Summary, or View Summary) will demonstrate successful patient engagement via their Patient Portal Account.
Care Settings	All measures outlined in this Real World Testing are designed for and will be performed within the ambulatory care setting.
Expected Outcome	Successful actions done by the patient or authorized patient representative via Patient Portal implies users have a general understanding of this functionality and will demonstrate our adherence to certification criteria by supporting CCDA 2.1 with USCDI standards, by demonstrating that C-CDA may be viewed, downloaded and transmitted to a 3rd party

RWT Measure #7. Transmission to Immunization Registries

Description	During testing, a monthly immunization statistic report will be generated to include the number of immunization records being created and successfully sent to an IIS/immunization registry
Associated Certification Criteria	170.315(f)(1) Transmission to Immunization Registries
Relied Upon Software	N/A
Justification	The monthly immunization statistic reports will provide a numeric value to indicate the number of messages sent, number accepted, number accepted with errors, number rejected. Successful messages in these reports will demonstrate successful interoperability with an IIS/immunization registry.
Care Settings	All measures outlined in this Real World Testing are designed for and will be performed within the ambulatory care setting.
Expected Outcome	Successful exporting of immunization records for transmission to immunization registries implies users have a general understanding of this functionality and will demonstrate our adherence to certification criteria

RWT Measure #8. Syndromic Surveillance Registries

Description	During testing, a report will be generated over a specified period, to identify the number of syndromic surveillance records and the specific type of message; Registration, Discharge, and Update reports exported from an urgent/non-urgent care setting
Associated Certification Criteria	170.315(f)(2) Syndromic Surveillance Registries
Relied Upon Software	N/A
Justification	An increment to this measure indicates successful creation and export of syndromic surveillance C-CDA message and successful interoperability with a public health registry
Care Settings	All measures outlined in this Real World Testing are designed for and will be performed within the ambulatory care setting.
Expected Outcome	Successful exporting of surveillance records; Registration, Discharge, and Update from an urgent/non-urgent care setting implies users have a general understanding of this functionality and will demonstrate our adherence to certification criteria

RWT Measure #9. Cancer Registries

Description	During testing, a report will be generated over a specified period, to identify the number of cancer case data records exported
Associated Certification Criteria	170.315(f)(4) Transmission to Cancer Registries
Relied Upon Software	N/A
Justification	An increment to this measure indicates successful creation and export of cancer specific C-CDA message and successful interoperability with a public health registry
Care Settings	All measures outlined in this Real World Testing are designed for and will be performed within the ambulatory care setting.
Expected Outcome	Successful exporting of cancer case data records implies users have a general understanding of this functionality and will demonstrate our adherence to certification criteria

RWT Measure #10. Standardized API for Patient and Population Services

Description	Prime Clinical FHIR® API allows other health IT applications to make read-only data requests for patient health information that is part of USCDIv1. §170.315(g)(7), §170.315(g)(9) and §170.315(g)(10) - API interface is to allow a request for "all" the patient data, or specific "by specific data category." During testing, clients who are registered for usage of FHIR resources will be logged via our registered user's log, a report will be generated over a specified period, to identify the number of times patient data is accessed.
Associated Certification Criteria	170.315(g)(7) Application Access- Patient Selection 170.315(g)(9) Application Access- All Data Request 170.315(g)(10) Standardized API for Patient and Population Services
Relied Upon Software	Dynamic Health IT FHIR Server for (g)(10) N/A for (g)(7), (g)(9)
Justification	This measure will look at API request data request usage to determine real world interoperability and usability, specifically how many 3rd party systems or applications are integrated and using the EHR's API interface.
Care Settings	All measures outlined in this Real World Testing are designed for and will be performed within the ambulatory care setting.
Expected Outcome	Successfully completing this measure implies users have a general understanding of this functionality and will demonstrate our adherence to certification criteria

Schedule of Key Milestones

Key Milestone	Care Setting	Date/Timeframe
Real World Testing Results for CY 2024: Final data collection for analysis	Ambulatory	Q1 2025
Real World Testing Results for CY 2024: Report creation and results submission to SLI by February 1, 2025	Ambulatory	Q1 2025 January 2025
Real World Testing CY 2025: Commence data collection as outlined in this plan	Ambulatory	January 2025
Real World Testing CY 2025: Collect and review data as outlined in this plan.	Ambulatory	Quarterly, 2025
Real World Testing CY 2025: Gather collected data for analysis and observation as outlined in this plan	Ambulatory	Q3-Q4 2025
Real World Testing CY 2026: Start preparing the Real World Test Plan for CY 2026 for submission to SLI by October 15, 2025	Ambulatory	Q4-2025

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	Clifford Ermshar
Authorized Representative Email	cepcm@primeclinical.com
Authorized Representative Phone	760-892-1583
Authorized Representative Signature	Clifford Ermshar
Date	October 10, 2024