2024 Real World Testing Plan

Greenway Health | August 2023

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Real World Testing & Reporting Program Overview

Under the ONC Health IT Certification Program (**Program**), Health IT Developers are required to conduct Real World Testing of their Certified Health IT (45 CFR 170.556 and 170.523(i)). 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 to develop 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 for 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 which approaches they will take. Health IT Developers must submit one plan for each year of Real-World Testing.

Product Information

Developer Name: Greenway Health, LLC
Developer Real World Testing Page URL: https://www.greenwayhealth.com/about/awards-and-certifications

Product Name	Product Type	Version Number	Certified Health IT Product List (CHPL) ID
Prime Suite	EHR	v21	15.04.04.2913.Gree.21.02.1.220831
Intergy	EHR	v21	15.04.04.2913.Gree.21.04.0.220831
Greenway Insights	Regulatory Reporting	v22	15.04.04.2913.GINS.22.01.1.221101

Relied Upon Software Usage

The following relied upon software will be involved in the use of the software with these specific criteria and functional requirements:

Product	Criteria	Relied Upon Software Notes
Prime Suite	170.315(b)(1) 170.315(h)(1)	Updox provides the user interface for sending direct messages (to address, subject and body). Additionally, an API call is made by Updox back to the EHR to build the CCDA attachment for the message. This functionality will be used in testing the Send functionality.
Greenway Insights	170.315(c)(1)	Greenway EHR's (Intergy or Prime Suite) are relied upon for the record actions of clinical activity to capture the data needed to calculate the measures.
Greenway Patient Portal	170.315(e)(1)	Greenway EHR's (Intergy or Prime Suite) are relied upon for the creation of the CCDA's and provided to the patient portal via API calls.

Standards Updates

Greenway plans to update to the CMS required 2023 standards (QRDA 1 & 3), using the SVAP process to support our regulatory clients for reporting year 2023. No other standards updates are planned at this time.

Product Name	Product Type	Planned Standard Updates
Prime Suite	EHR	None
Intergy	EHR	None
Greenway Insights	Regulatory Reporting	QRDA 1 & 3
Greenway Patient Portal	Patient Portal	None

Product	Greenway Insights (2023 Regulatory Reporting)
Standard (and version)	QRDA I Release 1, STU Release 5.3, Supports QDM 5.6
Updated certification criteria	170.315(c)(1) 170.315(c)(2)
Regulatory Text Citation	170.205(h)(2)
Method used for standard update	Testing will be done in Cypress and with annual certification of eCQM's with our ONC-ACB
Planned Certification/SVAP	2023-Q4, for client attestation availability 2024-Q1

Product	Greenway Insights (2023 Regulatory Reporting)
Standard (and version)	CMS Implementation Guide for Quality Reporting Document Architecture Category III Eligible Clinicians Programs Implementation Guide for 2023, Version 1.1
Updated certification criteria	170.315(c)(3)
Regulatory Text Citation	170.205(k)(3)
Method used for standard update	Testing will be done in Cypress and with annual certification of eCQM's with our ONC-ACB
Planned Certification/SVAP	2023-Q4, for client attestation availability 2024-Q1

Justification for Real World Testing Approach

Consistent with the ONC's recommendation that "Real World Testing verify that deployed Certified Health IT continues to ***perform as intended by conducting and measuring observations of interoperability and data exchange***", this test plan focuses on capturing and documenting the number of instances that certified capability is successfully utilized in the real world. In instances where no evidence exists due to zero adoption of a certified capability or the inability to capture evidence of successful use for other reasons, we will demonstrate the required certified capability in a semi-controlled setting as close to a "real world" implementation as possible.
It is important to note that Real World Testing is only one component of the Health IT Certification program used to demonstrate compliance with the program requirements. Real World Testing should augment and support testing that was conducted prior to certification being granted. It is not intended to duplicate the methods or results previously demonstrated. Instead, this test plan was developed to demonstrate that the certified capabilities have been successfully deployed for providers to use at their discretion in live settings.

We are using a 3-fold approach to demonstrate successful real-world implementations.

- Adoption Rates
- Summative Assessments
- Interactive Testing

Adoption rate will be used to determine if/when certified capability is being used in the real world and to help identify differences in care settings. Evidence of high rates of implementation and usage indicate (but don't by themselves prove) a certified capability's usefulness and practical value. Note, it is not the goal of this exercise to identify the individual causes of why a given certified capability may have a high or low adoption rate, but rather to identify the users and care settings for which a given test is relevant.

Summative assessments will be used to measure which certified actions were performed at the conclusion of a given time period. These will be conducted by generating reports and examining audit logs from within the certified health IT module to help demonstrate the frequency of actions within the given time frame, and where possible, whether those actions were successful or unsuccessful. High success rates should be an indicator of a successful implementation of a given certified capability in a real-world setting.

Interactive testing will be used to demonstrate conformance to requirements where the adoption rate of a given certified capability is zero and to demonstrate ongoing compliance with updated standards and code sets (SVAP). Interactive tests will require a live test as opposed to examining historical usage statistics. The goal is to allow a user to demonstrate the certified Health IT module being used in a way consistent with their own practice or care setting.

Care Settings

Product	Justification
Prime Suite & Greenway Insights	• Prime Suite is marketed to a wide range of providers, primarily focusing on Ob-Gyn / Primary Care clients. • Functionality to be tested is the same across all care settings.
Intergy & Greenway Insights	• Intergy is marketed to a wide range of providers including, but not limited to: Primary Care, Cardiology, Orthopedics, Pediatrics, FQHC/CHCs, Tribal Health communities, Gastroenterology, Multi-Specialty groups, and Neurology. • Functionality to be tested is the same across all care settings.

Adoption Rates

The following metrics are applicable to all criteria and all care settings. These metrics will not be used directly to demonstrate interoperability or conformance to certification criteria. Instead, they will primarily be used to help determine the participants that will be in scope for this evaluation. They can also aid with the justification for other metrics by providing additional context (i.e., extremely low adoption rates for certain certified capabilities will necessitate a different approach to testing).

Metric	Description
Certified capabilities that are licensed separately	Identify which certified capabilities are licensed separately from the base EHR license.
% of installs/clients who licensed a certified capability	Where applicable, identify the % of licensed installs/clients of a given certified capability.

Applicable Criteria: Measures, Justification and Expected Outcomes

170.315(b)(1) Transitions Of Care

Products	Intergy EHR Prime Suite EHR
Date Range of Metrics:	Over a 90-day period
Adoption Rate:	% of Intergy EHR clients licensed for Direct Messaging % of Prime Suite EHR clients licensed for Direct Messaging
Method:	Summative Testing from Audit Logs and SureScripts Transaction Logs

Testing Justification and Expected Outcome:
This criterion requires the ability of a certified Health IT module to create CCDAs according to specified standards and vocabulary code sets, as well as send and receive CCDAs via edge protocols. However, it is not possible to consistently and reliably demonstrate that all required standards and code sets were used because not all CCDAs created in a real-world setting contain all the necessary data elements. Furthermore, it is not feasible to obtain copies of CCDA documents from "outside" developers or providers who have no incentive to participate in this exercise. Finally, we do not differentiate between Direct Messages that do or do not contain an attachment in CCDA format. Therefore, we intend to demonstrate the required certified capabilities by demonstrating how often CCDAs are created and sent to other systems and when Direct Messages are received to demonstrate the certified capability is available and effective, regardless of the frequency it is used. Our expectation is there will be moderate utilization by providers with a high success rate.

Measures
Number of CCDAs created
Number of CCDAs sent via edge protocols
Number of Direct Messages received via edge protocols, whether with or without CCDAs attached

170.315(b)(2) Clinical Information Reconciliation and Incorporation

Products	Intergy EHR Prime Suite EHR
Date Range of Metrics:	Over a 90-day period
Adoption Rate:	100% as functionality included in base software
Method:	Summative Testing from Audit Logs

Testing Justification and Expected Outcome:
This criterion requires the ability of a certified Health IT module to take a CCDA received via an outside system and match it to the correct patient; reconcile the medication, allergy, and problem lists; and then incorporate the lists into the patient record. The expectation is each of these steps is done electronically within the certified Health IT module. While this certified capability is available to our users, most providers in the real world typically prefer to perform these steps manually and elect to save any outside received CCDAs as attachments to the patient record. Therefore, we intend to record the frequency that providers are electronically reconciling and incorporating CCDAs that were received from outside providers to demonstrate the certified capability is available and effective, regardless of the frequency it is used. Our expectation is there will be a very low utilization by providers with a high success rate.

Measures
Number of times a user reconciled medication list data from a received CCDA
Number of times a user reconciled allergies and intolerance list data from a received CCDA
Number of times a user reconciled problem list data from a received CCDA

170.315(b)(3) Electronic Prescribing

Products	Intergy EHR Prime Suite EHR
Date Range of Metrics:	Over a 2 month period
Adoption Rate:	% of Intergy EHR clients licensed for e-Prescribing % of Prime Suite EHR clients licensed for e-Prescribing
Method:	Summative Testing from SureScripts Transaction Logs & Message Dashboard

Testing Justification and Expected Outcome:
This criterion requires the ability of a certified Health IT module to perform prescription-related electronic transactions (eRx) using required standards. However, it is not possible to demonstrate the correct standards were used because it is not feasible to obtain copies of eRx documents from "outside" companies or pharmacies who have no incentive to participate. Therefore, we intend to demonstrate the required certified capabilities are effective by demonstrating how often eRx transactions are performed by examining reports from our eRx partner. This will demonstrate that not only are the eRx transactions sent from the certified Health IT module, but that the transactions are successfully received by the eRx clearinghouse. Our expectation is there will be high utilization by providers with a high success rate.

Measures
Number of prescriptions created (NewRx)
Number of prescriptions changed (RxChangeResponse)
Number of prescriptions canceled (CancelRx)
Number of prescriptions renewed (RxRenewalResponse)

170.315(b)(6) Data Export

Products	Intergy EHR Prime Suite EHR
Date Range of Metrics:	Over a 90-day period
Adoption Rate:	100% as functionality included in base software
Method:	Summative Testing from Audit Logs

Testing Justification and Expected Outcome:
This criterion requires the ability of a certified Health IT module to export a summary of a patient's record in CCDA format according to specified standards and vocabulary code sets. However, it is not possible to consistently and reliably demonstrate that all required standards and code sets were used because not all CCDAs created in a real-world setting contain all the necessary data elements. Therefore, we intend to demonstrate the certified capability is available and effective, regardless of the frequency it is used. Our expectation is there will be very low utilization by providers with a high success rate.

Measure
Number of times a data export was performed

170.315(b)(9) Care Plan

Products	Intergy EHR Prime Suite EHR
Date Range of Metrics:	Over a 90-day period
Adoption Rate:	100% as functionality included in base software
Method:	Summative Testing from Audit Logs

Testing Justification and Expected Outcome:
This criterion requires the ability of a certified Health IT module to record, change, access, create, and receive care plan information according to the specified format. We intend to record the frequency that record, change, and access care plan information to demonstrate the certified capability is available and effective, regardless of the frequency it is used. Our expectation is there will be medium utilization by providers with a high success rate.

Measures
Number of care plans recorded
Number of care plans changed
Number of care plans accessed

170.315(c)(1) Clinical quality measures (CQMs)-Record and Export
170.315(c)(2) Clinical quality measures (CQMs)-Import and Calculate
170.315(c)(3) Clinical quality measures (CQMs)-Report

Product	Greenway Insights (Regulatory Reporting tool for Intergy and Prime Suite EHR's)
Date Range of Metrics:	Over a 90-day period
Adoption Rate:	% of Intergy EHR clients onboarded to the regulatory reporting dashboard % of Prime Suite EHR clients onboarded to the regulatory reporting dashboard
Method:	Summative Testing from Audit Logs Interactive Testing where Summative resulted in 0 adoption

Testing Justification and Expected Outcome:
C1 requires a certified Health IT module to record required data, calculate CQMs from the recorded data, and export the data in a QRDA 1. C2 requires a certified Health IT module must be able to import data from a QRDA 1 and calculate the CQMs based on that data. C3 requires a must be able to create a QRDA 1 and a QRDA 3 to be used for transmitting CQM data to CMS. We intend to record the frequency that QRDA files are imported and/or exported by providers to demonstrate the certified capability is available and effective, regardless of the frequency it is used. Our expectation is there will be high utilization of QRDA 3 exports by providers with a high success rate. Additionally, our expectation is there will be low utilization of QRDA 1 exports and imports in the ambulatory space.

Criteria	Measures
170.315(c)(1)	Number of measures recorded during the period
170.315(c)(1)	Number of QRDA Category 1 files exported
170.315(c)(2)	Number of QRDA Category 1 files imported
170.315(c)(3)	Number of QRDA Category 3 aggregate report(s) created over the period

170.315(e)(1) View, Download & Transmit to Third Party

Products	Greenway Patient Portal (Patient Portal application for Intergy and Prime Suite EHR's)
Date Range of Metrics:	Over a 90-day period
Adoption Rate:	% of Intergy EHR clients onboarded to the Greenway Patient Portal % of Prime Suite EHR clients onboarded to the Greenway Patient Portal
Method:	Summative Testing from Audit Logs

Testing Justification and Expected Outcome:
This criterion requires the ability of a certified Health IT module to provide patients access to a patient portal with the ability to view, download, and send their health care records to other providers via encrypted or unencrypted transmission methods in CCDA format. We intend to record the frequency that patients are viewing, downloading, and transmitting their records from the portal using the certified capabilities to demonstrate the certified capability is available and effective, regardless of the frequency it is used. Our expectation is there will be moderate utilization by patients for view and lower utilization for download and transmit with a high success rate for all certified capabilities.

Measures
Number of views of health information by a patient or authorized representative
Number of downloads of health information by a patient or authorized representative
Number of transmissions of health information by a patient or authorized representative, using unencrypted email
Number of transmissions of health information by a patient or authorized representative, using encrypted(Direct) method

170.315(f)(1) Transmission to Immunization Registries

Products	Intergy EHR Prime Suite EHR
Date Range of Metrics:	Over a 90-day period
Adoption Rate:	% of Intergy EHR clients licensed for an immunization registry connection % of Prime Suite EHR clients licensed for an immunization registry connection
Method:	Summative Testing from Transmission Logs

Testing Justification and Expected Outcome:
This criterion requires the ability of a certified Health IT module to transmit immunization data to a registry using a specified format. We intend to record the frequency that immunization data is submitted to registries by providers to demonstrate the certified capability is available and effective, regardless of the frequency it is used. Our expectation is there will be low utilization by providers with a high success rate.

Measure
Number of immunization records submitted to the immunization registry

170.315(g)(7) Application Access-Patient selection
170.315(g)(9) Application Access-All Data Request

Products	Intergy EHR Prime Suite EHR
Date Range of Metrics:	n/a, testing event will be interactive
Adoption Rate:	100% as functionality included in base software
Method:	Interactive Testing from Client Live Training Environment

Testing Justification and Expected Outcome:
This criterion requires the certified Health IT module to provide an API and supporting documentation that enable external applications to request a unique patient identifier and return a CCD document for the patient. Our expectation is there will be zero adoption of this certified capability by our users, as there's been no efforts by 3rd party developers to leverage due to fact the API is proprietary to Greenway. We anticipate future API use will pivot to 170.315(g)(10) FHIR standards. We will execute interactive testing methodology for these capabilities to the test plan below to demonstrate the feature is available and functions as expected should any users elect to begin using this feature.

High Level Interactive Test Plan	
Test Environment	Greenway will work with 1 Prime Suite/Intergy customer provider in their live training environment, which is a full production mirror of their live production environment, to enter 2 mock patients using the data that is typical of that Real World setting and then use postman to: • Query for the patient's token • Query for the patient's data as a CCD document
Expected Outcomes	• Patient query identifiers are accepted and token is returned. • Patient data is visible is returned correctly for both patients as a CCD document

170.315(g)(10) Standardized API for patient and population services

Products	Intergy EHR Prime Suite EHR
Date Range of Metrics:	Over a 90-day period
Adoption Rate:	% of Intergy EHR clients elected to onboard for FHIR % of Prime Suite EHR clients elected to onboard for FHIR
Method:	Summative Testing from Transmission Logs Registered Applications on Developer Platform

Testing Justification and Expected Outcome:
This criterion requires the ability of a certified Health IT module to respond to requests for patient data thru FHIR standards from authorized/registered applications. We intend to record the frequency that data is requested thru FHIR applications to demonstrate the certified capability is available and effective, regardless of the frequency it is used. Our expectation is there will be low utilization with a high success rate.

Measures
Number of authorized Patient Applications
Number of authorized Provider Applications
Number of authorized Bulk Applications
Number of patient data requests

170.315(h)(1) Direct Project

Products	Intergy EHR Prime Suite EHR
Date Range of Metrics:	Over a 90-day period
Adoption Rate:	% of Intergy EHR clients are licensed for Direct Messaging % of Prime Suite EHR clients are licensed for Direct Messaging
Method:	Summative Testing from SureScripts Transaction Logs

Testing Justification and Expected Outcome:
This criterion requires the ability of a certified Health IT module to record the frequency that direct messages are sent and received by providers, along with how often MDNs are sent and received. Since not all systems respond with MDNs, we cannot reliably use that metric to define success. Furthermore, it is not feasible to obtain copies of Direct Messages from "outside" developers or providers who have no incentive to participate in this exercise. Therefore, we intend to demonstrate the required certified capabilities by demonstrating how often Direct Messages are exchanged with other systems to demonstrate the certified capability is available and effective, regardless of the frequency it is used. Our expectation is there will be moderate utilization by providers with a high success rate.

Measures
Number of Direct Messages sent
Number of Delivery Notifications received
Number of Direct Messages received
Number of Delivery Notifications sent

Schedule of Key Milestones

Key Milestones	Timeframe
Develop 170.315(g)(10) logging changes identified during plan creation for result execution	Q4 2023
Scheduling and logistics	Q1 2024
Executed Summative Testing	Q2-Q3 2024
Executed Interactive Testing	Q2-Q3 2024
Review and Collate Data from Adoption Rates, Summative Assessment and Interactive Testing	Q4 2024
Writing Result Report	Q4 2024
Identifying 2025 Plan Adjustments based on 2024 Results, CHPL changes, etc.	Q4 2024

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:

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