

EXECUTIVE SUMMARY

InteliChart is honored to continue to be recognized as a participant of the Assistance Secretary for Technology Policy (ASTP)/Office of the National Coordinator's (ONC) Health Information Technology (HIT) Heath IT Certification Program utilizing our robust software solutions. InteliChart has incorporated the Real World Testing Plan for all 2015 and 2015 Cures Updates certification criteria applicable to the Real World Testing Condition and Maintenance Certification requirements as documented in <u>45 CFR</u> <u>170.405</u>.

The Real World Testing Plans are depicted and organized in accordance with the 2015 and the 2015 Cures Update certification criteria with identification of each Certified Health IT Module under which the criteria are certified as published on the Office of the National Coordinators (ONC's) Certified Health IT Certification Program Product List (CHPL). InteliChart has included consolidated scenarios in our test plans for productiveness in compliance with multiple Certified Health IT Modules, where applicable.

As defined by the Health Insurance Portability and Accountability Act of 1996 (HIPPA) no client-specific identifiable information was used or contained in our Real World Testing plan or results. InteliChart affirms that this Real Word Testing Plan is complete with all required elements for the purpose of this document. All data contained here is the most recent published Real World Test Plan.

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GENERAL INFORMATION

ONC-ACB CERTIFICATION ID:	15.04.04.1722.Inte.35.00.1.170921
DEVELOPER NAME:	InteliChart LLC
PRODUCT NAME(S):	InteliChart Patient Portal InteliChart on FHIR
VERSION NUMBER(S):	3.5 1.0
CERTIFIED HEALTH IT PRODUCT LIST (CHLP) PRODUCT NUMBER(S):	<u>15.04.04.1722.Inte.35.00.1.170921</u>
DEVELOPER REAL WORLD TESTING PLAN URL:	https://www.intelichart.com/regulatory-and- compliance- requirements



JUSTIFICATION FOR REAL-WORLD TESTING APPROACHES

InteliChart's robust approach to the Certified Health IT Module for 170.315(b)(10), Electronic Health IT Export process reflects a comprehensive strategy for supporting various care settings, including pediatrics, orthopedics, neurosurgery, and ophthalmology.

The Certified Health IT Module 170.315(e)(1) View, Download, and Transmit to a 3rd party in marketed to various care settings, including pediatric, orthopedic, neurosurgery, ophthalmology, and hospital environments. The Real World Testing Plan will encompass these specialties for this reason. All criteria for § 170.315(e)(1) related to the View, Download, and Transmit to 3rd Parties feature will be applied uniformly across all care settings. A thorough evaluation of all criteria for § 170.315(e)(1) will be conducted.

Additionally, our product supports external API access to patient data for authorized third-party applications. The Application API can process requests that include sufficient information to uniquely identify a patient and respond with patient data for each category listed in the Common Clinical Data Set (CCDS). This data is returned in a computable format, in adherence to the required data standards.

The goal is to demonstrate that the API functionality aligns with the certification criteria of 170.315(g)(7) Application Access-Patient Selection; 170.315(g)(9) Application Access - All Data Requests; and 170.315(g)(10) Standardized API for Patient and Population Services. This will be validated through the test scenarios outlined in the plan, which will show the successful access of patient data via the APIs.

The inclusion of external API access for authorized third-party applications is a strong feature, enabling seamless data sharing while maintaining patient confidentiality. Demonstrating compliance with the certification criteria for 170.315 (b)(10), (e)(1), (g)(7), (g)(9), and (g)(10) through well-defined test scenarios is crucial for validating the functionality of these APIs.



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

Standard (and version)	3.5, USCDI V1	
Updated certification criteria	170.315(b)(10): Electronic Health Information (EHI) Export*	
and associated product	170.315(e)(1): View, Download, and Transmit to 3 rd Party	
	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	
	InteliChart Patient Portal	
	InteliChart on FHIR V1.0, 170.315 (g)(10)	
CHPL Product Number	15.04.04177.Inte.35.001.170921	
Method used for standard update	170.315(b)(10) Attestation*	
	170.315(e)(1) ONC Test procedure V1.4	
	170.315 (g)(7) Attestation	
	170.315(g)(9) ONC Test procedure V1.3	
	170.315 (g)(10) ONC Test procedure V2.1	
Date on ONC ACB notification	Not Applicable	
Date of customer notification	Not Applicable	
(SVAP only)		
Conformance measure	170.315(b)(10) Attestation*	
	170.315(e)(1) Edge Testing Tool, V2.3.47	
	170.315(g)(7) Attestation	
	170.315(g)(9) Edge Testing Tool V2.3.47	
	170.315(g)(10) Inferno V2.2.2	
USCDI updated certification	All are applicable for USCDI V1	
criteria (and USCDI version)	170.315(b)(10) Attestation*	
	170.315(e)(1) Cures Update	
	170.315(g)(7) Attestation	
	170.315(g)(9)	
	170.315(g)(10) ONC Test procedure V2.1	



MEASURES USED IN OVERALL APPROACH

REAL WORLD TEST PLAN 170.315(b)(10)

MEASUREMENT / METRIC	
SHARING EHI	DESCRIPTION
PATIENT ENGAGEMENT	Validate the adoption of as defined by <u>HealthIT.gov</u>

ASSOCIATED CERTIFICATION CRITERIA (2015 CURES UPDATE)

	ASSOCIATED CERTIFICATION	RELIED UPON SOFTWARE
MEASUREMENT / METRIC	CRITERIA	(IF APPLICABLE)
170.315(b)(10) Electronic Health	170.315(b)(10) Electronic Health	Not Applicable
Information (EHI) Export	Information (EHI) Export	
	functionality.	

JUSTIFICATION FOR SELECTED MEASUREMENT/METRIC

MEASUREMENT / METRIC	DESCRIPTION	
170.315(B)(10) ELECTRONIC HEALTH	Criteria will be evaluated separately as defined by HealthIT.gov which will cover both	
INFORMATION (EHI) EXPORT	single and bulk data requests for all criteria. The Real World Testing plan will	
	demonstrate the ability of these combined modules performance in the production	
	environment.	

TESTING METHODOLOGY		
MEASUREMENT / METRIC	DESCRIPTION	
170.315(B)(10) ELECTRONIC HEALTH	Patient Portal utilization logs, for patients of each care setting, will be	
INFORMATION (EHI) EXPORT	captured on a monthly frequency to determine the volume of patient views,	
	downloads and transmits of EHI that were attempted and successfully	
	completed during each month during the year under test. Any failed attempts will also	
	be recorded for each monthly period. Data collected from the monthly testing will be	
	deidentified and used to determine monthly	
	utilization, volume, and error rates of the implementation. This test	
	methodology will primarily evaluate the conformance of the implementation and	
	identify any problems with utilization.	



CARE SETTING(S)			
CARE SETTING	JUSTIFICATION		
PEDIATRIC	Criteria will be evaluated separately as defined by HealthIT.gov which will cover both		
	single and bulk data requests for all criteria. The Real World Testing plan will		
	demonstrate the ability of these combined modules performance in the production environment.		
ORTHOPEDIC	Criteria will be evaluated separately as defined by HealthIT.gov which will cover both		
	single and bulk data requests for all criteria. The Real World Testing plan will		
	demonstrate the ability of these combined modules performance in the production		
	environment.		
NEUROSURGERY	CRITERIA WILL BE TESTED SEPARATELY AS DEFINED BY HEALTHIT.GOV WHICH WILL		
	COVER BOTH SINGLE AND BULK DATA REQUESTS FOR ALL CRITERIA. THE REAL		
	WORLD TESTING PLAN WILL DEMONSTRATE THE ABILITY OF THESE COMBINED		
	MODULES PERFORMANCE IN THE PRODUCTION ENVIRONMENT.		
OPHTHALMOLOGY	Criteria will be evaluated separately as defined by HealthIT.gov which will cover both		
	single and bulk data requests for all criteria. The Real World Testing plan will		
	demonstrate the ability of these combined modules performance in the production		
	environment.		
HOSPITAL	Criteria will be evaluated separately as defined by HealthIT.gov which will cover both		
	single and bulk data requests for all criteria. The Real World Testing plan will		
	demonstrate the ability of these combined modules performance in the production		
	environment.		

EXPECTED OUTCOMES	
MEASUREMENT/METRIC	DESCRIPTION
170.315(B)(10) ELECTRONIC HEALTH INFORMATION (EHI) EXPORT	Criteria will be evaluated separately as defined by HealthIT.gov which will cover both single and bulk data requests for all criteria. The Real World Testing plan will demonstrate the ability of these combined modules performance in the production environment.



MEASURES USED IN OVERALL APPROACH

REAL WORLD TEST PLAN 170.315(e)(1)

Measurement / Metric	DESCRIPTION
SHARING EHI	
Patient Engagement	Validate the adoption of View, Downland and Transmit functionality as defined by
	HealthIT.gov using Approach 1.

ASSOCIATED CERTIFICATION CRITERIA (2015 CURES UPDATE)

	Associated Certification	Relied Upon Software
Measurement / Metric	Criteria	(If applicable)
170.315(e)(1) View, Download	170.315(e)(1) Validate the adoption	Not Applicable
and Transmit to Third-Party	of View, Download and Transmit to	
	Third-Party functionality.	

JUSTIFICATION FOR SELECTED MEASUREMENT / METRIC

Measurement / Metric	Description
170.315(e)(1) View, Download and	EHI may be shared through the Patient Portal for viewing, downloads and
Transmit to Third-Party	encrypted or unencrypted transmissions. This metric will provide information on the
	types of transmissions deployed, viewing EHI, downloads and unencrypted vs.
	encrypted transmission and the frequency of usages.
	Privacy and security of products as defined by the ONC
	Patients (and their authorized representatives) can view, download, and transmit
	their health information to a third party via internet-based technology consistent
	with one of the WCAG 2.0 Levels A or AA.



TESTING METHODOLOGY	
Measurement / Metric	Description
170.315(e)(1) View, Download and	Patient Portal utilization logs, for patients of each care setting, will be
Transmit to Third-Party	captured on a monthly frequency to determine the volume of patient views,
	downloads and transmits of EHI that were attempted and successfully
	completed during each month during the year under test. Any failed attempts will also
	be recorded for each monthly period. Data collected from the monthly testing will be
	deidentified and used to determine monthly
	utilization, volume, and error rates of the implementation. This test
	methodology will primarily evaluate the conformance of the implementation and
	identify any problems with utilization.

CARE SETTING(S)	
Care Setting	Justification
Pediatric	EHI may be shared through the patient portal for viewing, downloads and
	encrypted or unencrypted transmissions. this metric will provide information
	on the types of transmissions deployed, viewing EHI, downloads and
	unencrypted vs. encrypted transmission and the frequency of usages.
Orthopedic	EHI may be shared through the Patient Portal for viewing, downloads and encrypted
	or unencrypted transmissions. This metric will provide information on the types of
	transmissions deployed, viewing EHI, downloads and unencrypted vs, encrypted
	transmission, and the frequency of usages.
Neurosurgery	EHI may be shared through the Patient Portal for viewing, downloads and encrypted
	or unencrypted transmissions. This metric will provide information on the types of
	transmissions deployed, viewing EHI, downloads and unencrypted vs, encrypted
	transmission, and the frequency of usages.
Ophthalmology	EHI may be shared through the Patient Portal for viewing, downloads and encrypted
	or unencrypted transmissions. This metric will provide information on the types of
	transmissions deployed, viewing EHI, downloads and unencrypted vs, encrypted
	transmission, and the frequency of usages.
Hospital	EHI may be shared through the Patient Portal for viewing, downloads and encrypted
	or unencrypted transmissions. This metric will provide information on the types of
	transmissions deployed, viewing EHI, downloads and unencrypted vs, encrypted
	transmission, and the frequency of usages.



EXPECTED OUTCOMES		
Measurement/Metric	Description	
170.315(e)(1) View, Download and Transmit to Third-Party	By capturing and analyzing utilization rates, volume counts and error rates monthly during this testing period, it is expected that the resultant data will verify that patients (or their authorized representatives) are able to successfully view, download, and share EHI on a consistent basis throughout the testing period, using the production implementation, across each of the sample care settings included in the test.	

MEASURES USED IN OVERALL APPROACHES

REAL WORLD TEST PLANS FOR 170.315(g)(7), (g)(9) and (g)(10)

Measurement / Metric	Description
Interoperability and Data Exchanges	These multiple measures will be evaluated together to validate interoperability and
	the API capabilities to exchange patient data from our product to a third-party
	application.

ASSOCIATED CERTIFICAITON CRITERIA

Measurement/Metric	Associate Certification Criteria
170.315(g)(7)	Application Access – Patient Selection
170.315 (g)(9)	Application Access - All Data Request (Cures Update) replaced (g)(8) which has been retired
170.315(g)(10)	Standardized API for Patient and Population Services (Cures Update)

JUSTIFICATION FOR SELECTED MEASUREMENT / METRIC

Measurement/Metric	Justification
170.315(g)(7) 170.315 (g)(9) 170.315(g)(10)	There are no clients actively using this certified functionality in the real world; testing will be performed against the production installation of the Open-API and synthetic data from a production installation of the Patient Portal. The same Production API installation services all Care settings equally, then the artificial testing will be assumed to be applicable to all Care settings who may elect to utilize the capability in the future.



ESTING METHODOLOGY	
Measurement/Metric	Testing Methodology
170.315(g)(7) 170.315 (g)(9) 170.315(g)(10)	In the absence of any real-world usage of the production implementation of the Open-API, manual testing will be performed quarterly against the production installation of the Open-API, to verify the successful authentication, request, and delivery of EHI for both a single encounter and for a date range of encounters, using a representative test harness (Simulated Third-Party application) and artificial test data. Success or failure of each API method called in the sequence of credentialing will be recorded, and manual validation will be performed to verify that the expected single encounter and the expected date range of encounters are returned as asked. Results and any errors will be recorded quarterly for each API method and summarized at the end of the test period.

CARE SETTING(S)	
Care Setting	Justification
Pediatric	There are no clients actively using this certified functionality in the real world; testing
	will be performed against the production installation of the Open-API and synthetic
	data from a production installation of the Patient Portal. The same Production API
	installation services all Care settings equally, then the artificial testing will be assumed
	to apply to all Care settings who may elect to utilize the capability in the future.

EXPECTED OUTCOMES		
Measurement / Metric	Expected Outcomes	
170.315(g)(7) 170.315 (g)(9) 170.315(g)(10)	By manually stressing each method of the production implementation of the Open-API on a quarterly basis, it is expected that the testing will validate and verify that the Open-API and each of its applicable methods are available and functioning as expected throughout the test period, for any real Third-Party application vendors who may elect to utilize it in real world application of data interoperability as required by 170.315(g)(7), 170.315(g)(9) and 170.315(g)(10), at any time during the test period.	



SCHEDULED KEY MILESTONES

Key Milestones	Care Settings	Due Dates
Submitted Real- World Test Plan to ACB	pediatric, orthopedic, neurosurgery, ophthalmology, and hospital care	October 23, 2024
Real- World Test Results Begins	pediatric, orthopedic, neurosurgery, ophthalmology, and hospital care	December 1, 2024
Submit (b)(11) Decision Support Interventions Attestation	pediatric, orthopedic, neurosurgery, ophthalmology, and hospital care	December 1, 2024
Determine testing partners	pediatric, orthopedic, neurosurgery, ophthalmology, and hospital care	December 15, 2024
Publish customers service base URL information (FHIR Endpoints) according to specific adopted standards.	pediatric, orthopedic, neurosurgery, ophthalmology, and hospital care	December 31, 2024
Quarterly Attestation	pediatric, orthopedic, neurosurgery, ophthalmology, and hospital care	January Q1 2025
Data collection will begin with each partner	pediatric, orthopedic, neurosurgery, ophthalmology, and hospital care	January 3, 2025
End of Real-World Testing period /final collection	pediatric, orthopedic, neurosurgery, ophthalmology, and hospital care	Quarterly 2025
Analysis and report creation	pediatric, orthopedic, neurosurgery, ophthalmology, and hospital care	January 11, 2025
Submit Real-World Testing Results Report to ACB	pediatric, orthopedic, neurosurgery, ophthalmology, and hospital care	February 3, 2025
Submit Q1 Attestation	ACB	April 1, 2025
Submit Semi-Annual Attestation	CHLP	April 15, 2025
Submit Q2 Attestation	ACB	July 1, 2025
Submit Q3 Attestations	ACB	October 7, 2025
Submit Semi-Annual Attestation	CHLP	October 15, 2025
Submit Real-World Test	ACB	November 1, 2025, for 2026
USCDI v3 Implementation	ACB	January 1, 2026



ATTESTATION

The Real-World Testing Plan for 2025 is finalized and includes all essential components, with measures that fully address the Cures certification criteria across the required care settings. All information in this plan is current and aligns with the health IT developer's requirements for our Real-World Testing Plan of 2025.

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Real World Test Planning November 2025 V1

Final Audit Report

2024-10-24

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