GENERAL INFORMATION

Plan Report ID Number: [For ONC-Authorized Certification Body use only]
Developer Name: David DeBlasio
Product Name(s): Medgen EHR
Version Number(s): Version 9.x
Certified Health IT: Medgen EHR
Product List (CHPL) ID(s): 15.04.04.2984.Medg.09.02.1.220915
Developer Real World Testing Page URL:
https://portal.medgenehr.com/medgenweb/rwt.html
https://portal.medgenehr.com/medgenweb/downloads/ComtronCompleteRWT2025.pdf

JUSTIFICATION FOR REAL WORLD TESTING APPROACH

Medgen EHR has developed a case management system to ensure the timely availability of patient information. The Module is for use in situations where documentation needs to be coordinated between providers and patients both within and outside of a healthcare organization. The shared documentation includes transitions of care documents, healthcare plan documents, health information provided to the patient through a portal, and the export of patient healthcare records. The transitions of care documents are shared between organizations using Edge protocol technology (Direct Project) and with the patient through a portal with the ability to view, download, and transmit.

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

Standard (and version)	N/A
Updated certification criteria and associated product	N/A
Health IT Module CHPL ID	15.04.04.2984.Medg.09.02.1.220915
Method used for standard update	N/A
Date of ONC-ACB notification	N/A
Date of customer notification (SVAP only)	N/A
Conformance measure	170.315(b)(1), 170.315(h)(1), 170.315(e)(1)
USCDI-updated certification criteria (and USCDI version)	USCDI Version 3

MEASURES USED IN OVERALL APPROACH

DESCRIPTION OF MEASUREMENT/METRIC

Measurement/Metric	Description
170.315(b)(1)	This measure is a tracking and accounting of how many transition of care/referral summaries were successfully created and sent from the EHR over a course of a given interval. The interval for this measure will be 3-months.
170.315(h)(1)	This measure is a tracking and accounting of how many transition of care/referral summaries were successfully created and sent from the EHR over a course of a given interval. The interval for this measure will be 3-months.
170.315(e)(1)	This reporting can show how often the patient and their representatives view, download, and transmit to 3rd party within the patient portal.

ASSOCIATED CERTIFICATION CRITERIA

Measurement/Metric	Associated Certification Criteria	Relied Upon Software
170.315(b)(1)	*Transitions of care – Cures Update*	*Updox DIRECT*
170.315(e)(1)	*view, download, and transmit to 3rd party – Cures Update*	*Updox DIRECT*
170.315(h)(1)	*Direct Project*	*Updox DIRECT*

JUSTIFICATION FOR SELECTED MEASUREMENT/METRIC

Measurement/Metric	Justification
170.315(b)(1)	This measure will provide a numeric value to indicate how often this interoperability feature is being used as well as compliance to the requirement. An increment to this measure indicates that the EHR can create a transition of care/referring summary record. Additionally, by sending the CCDA via the DIRECT protocol the EHR demonstrates successful interoperability with transition of care.

170.315(e)(1)	This measure will provide a numeric value to indicate both how often this interoperability feature is being used as well as is compliance to the requirement. An increment to this measure indicates that the EHR patient portal can create C-CDA care document, and have the ability to download or send the CCDA document to a 3rd party email address or DIRECT email. The Real World Testing allows more insight into how often the patients are viewing their chart in the Medgen patient portal, as well as their ability to share their medical chart information with 3rd party health care professionals.
170.315(h)(1)	The measure will provide a numeric value to indicate the successful rate of the Direct email sent and retrieved. This measure will provide assurance of compliance to the EHR Module criteria, specifically ability to connect to the DirectTrust network and send and retrieve Direct message. DirectTrust maintains a secure communication network based on a trust framework for EHRs and HISP and other entities to securely exchange patient health data. Virtually all production systems which utilize Direct messages utilize the DirectTrust network.

CARE SETTING(S)

Care Setting	Justification
General practitioner	Clinicians in this setting can utilize the ability to send patient's PHI via Direct messages. This clinical workflow would not require any adjustment for the measurement.
OBGYN	Clinicians in this setting can utilize the ability to send patient's PHI via Direct messages. This clinical workflow would not require any adjustment for the measurement.

Pediatric	Clinicians in this setting can utilize the ability to send patient's PHI via Direct messages. This clinical workflow would not require any adjustment for the measurement.
Dermatology	Clinicians in this setting can utilize the ability to send patient's PHI via Direct messages. This clinical workflow would not require any adjustment for the measurement.
Podiatry	Clinicians in this setting can utilize the ability to send patient's PHI via Direct messages. This clinical workflow would not require any adjustment for the measurement.

EXPECTED OUTCOMES

Measurement/Metric	Expected Outcomes
170.315(b)(1)	The measure will produce numeric results over a given interval. We will utilize various reports and audit logs to determine our measure count. We expected the data collected from the Real World Testing measure will have at least 95% success rate in creating the C-CDA data file, and 95% success rate in sending the C-CDA over direct email. A successful measure increment indicates compliance to the underlying ONC criteria. It will show that the EHR can successfully create C-CDA transition of care summaries. The EHR will demonstrate ability to confirm successful sending the C-CDA via Direct. Successfully completing this measure also implies users have a general understanding of the EHR functional operations for this EHR module and an overall support of the user experience while note completing this measure may indicate the user lack of understanding of possibility lack of use or need for this functionality.

170.315(e)(1)	The measure will produce numeric results over a given interval. We will utilize various reports and audit logs, to determine our measure count. We expect over 95% of the patients will not have issue with view, download, and transmit to a 3rd party. A successful measure increment indicates compliance to the underlying ONC criteria. It will show that the EHR patient portal can view, download and send the C-CDA file via DIRECT protocol. The EHR will demonstrate ability to confirm successful interoperability with a 3rd party system. Successfully completing this measure also implies users have a general understanding of the EHR functional operations for this EHR Module and an overall support for the user experience while not completing this measure may indicate lack of understanding or possibly lack of use or need for this functionality. We will use the measure count to establish a historic baseline of expected interoperability use so it can be used in subsequent real world testing efforts. We will use the measure count to establish a historic baseline of expected interoperability use so it can be used in subsequent real world testing efforts.
170.315(h)(1)	The measure will produce numeric results over a given interval. We will utilize various reports and audit logs, to determine our measure count. The user will create a C-CDA from the patient record and select a destination containing a valid Direct address. We expect 95% of the sending and receiving of the direct messages to be successful within the EHR. Medgen EHR will securely deliver the message to the destination and then receive back a MDN success response. We will also confirm the process and steps done by the user meet the criteria requirements of the EHR Module and works as expected in production as in a controlled test environment.

SCHEDULE OF KEY MILESTONES

Key Milestone	Care Setting	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.	Per the care settings stated above	January 1, 2025
Collection of information as laid out by the plan for the period.	Per the care settings stated above	January 1, 2025
Planned System updates to allow for collection of data after a SVAP update.	Per the care settings stated above	June 1, 2025
Follow-up with providers and authorized representatives on a regular basis to understand any issues arising with the data collection.	Per the care settings stated above	Quarterly, 2025
End of Real-World Testing period/final collection of all data for analysis.	Per the care settings stated above	December 31, 2025
Analysis and report creation.	Per the care settings stated above	January 15, 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.

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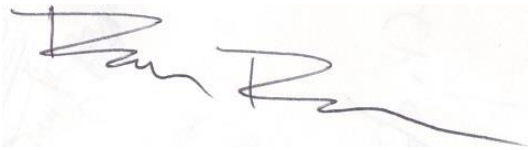

Date: 10/09/2024

GENERAL INFORMATION

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Developer Real World Testing Page URL:
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JUSTIFICATION FOR REAL WORLD TESTING APPROACH

Medgen EHR has developed a case management system to ensure the timely delivery of patient's medication prescription to the pharmacy network. It better serves the patient with their medical needs when there is a reliable electronic prescribing system.

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

Standard (and version)	N/A
Updated certification criteria and associated product	N/A
Health IT Module CHPL ID	15.04.04.2984.Medg.09.02.1.220915
Method used for standard update	N/A
Date of ONC-ACB notification	N/A
Date of customer notification (SVAP only)	N/A
Conformance measure	170.315(b)(3)
USCDI-updated certification criteria (and USCDI version)	N/A

MEASURES USED IN OVERALL APPROACH

DESCRIPTION OF MEASUREMENT/METRIC

Measurement/Metric	Description
170.315(b)(3)	This measure is to track and count the success rate of electronic prescription created and sent over electronically to the pharmacy network.

ASSOCIATED CERTIFICATION CRITERIA

Measurement/Metric	Associated Certification Criteria	Relied Upon Software
170.315(b)(3)	*Electronic prescribing – Cures Update*	*SureScripts & DrFirst*

JUSTIFICATION FOR SELECTED MEASUREMENT/METRIC

Measurement/Metric	Justification
170.315(b)(3)	This measure will provide a numeric value to indicate both the how often this interoperability feature is being used as well as its compliance to the requirement. An increment to this measure indicates that the Medgen EHR can create a medication script and send it over to the pharmacy network. This is confirmed by successfully sending the script and receiving a delivery confirmation. It better serves the patient with their medical needs when there is a reliable electronic prescribing and with delivery confirmation. The EHR demonstrates successful interoperability with the Electronic Prescribing module.

CARE SETTING(S)

Care Setting	Justification
Internal Medicine	Clinicians in this setting can utilize the ability to track electronic medication sent successfully with confirmation. This clinical workflow would not require any adjustment for the measurement.
OBGYN	Clinicians in this setting can utilize the ability to track electronic medication sent successfully with confirmation. This clinical

	workflow would not require any adjustment for the measurement.
Pediatric	Clinicians in this setting can utilize the ability to track electronic medication sent successfully with confirmation. This clinical workflow would not require any adjustment for the measurement.
Dermatology	Clinicians in this setting can utilize the ability to track electronic medication sent successfully with confirmation. This clinical workflow would not require any adjustment for the measurement
Podiatry	Clinicians in this setting can utilize the ability to track electronic medication sent successfully with confirmation. This clinical workflow would not require any adjustment for the measurement.

EXPECTED OUTCOMES

Measurement/Metric	Expected Outcomes
170.315(b)(3)	The measurement will produce numeric results over a given interval. We will utilize various reports and audit logs, to determine our measure count. We expect 99% of the e-script sends out will be successful and will receive delivery confirmation. A successful measure increment indicates compliance to the underlying ONC criteria. It will show that the EHR can create the medication script and send over to the pharmacy network, such as a new script, or refill request. In sending the new Rx, or Rx-refill, and getting delivery confirmation. The EHR will demonstrate ability to confirm successful interoperability with Electronic Prescribing. Successfully completing this measure also implies users have a general understanding of the EHR functional operations for this EHR Module and an overall support for the user experience while not completing this measure may indicate lack of understanding or possibly lack of use or need for this

	functionality. We will use the measure count to establish a historic baseline of expected interoperability use so it can be used in subsequent real world testing efforts.

SCHEDULE OF KEY MILESTONES

Key Milestone	Care Setting	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.	Per the care settings stated above	January 1, 2025
Collection of information as laid out by the plan for the period.	Per the care settings stated above	January 1, 2025
Planned System updates to allow for collection of data after a SVAP update.	Per the care settings stated above	June 1, 2025
Follow-up with providers and authorized representatives on a regular basis to understand any issues arising with the data collection.	Per the care settings stated above	Quarterly, 2025
End of Real-World Testing period/final collection of all data for analysis.	Per the care settings stated above	December 31, 2025
Analysis and report creation.	Per the care settings stated above	January 15, 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.

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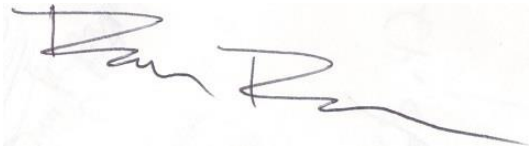

Date: 10/09/2024

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JUSTIFICATION FOR REAL WORLD TESTING APPROACH

Medgen EHR has developed a case management reporting system to ensure the successful transmission of patient's immunization records IIS/immunization registry, public health agencies The module indicates that the Medgen EHR can create a patient immunization record and successfully send it to a 3rd party registry via direct transmission or upload to the registry portal.

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

Standard (and version)	N/A
Updated certification criteria and associated product	N/A
Health IT Module CHPL ID	15.04.04.2984.Medg.09.02.1.220915
Method used for standard update	N/A
Date of ONC-ACB notification	N/A
Date of customer notification (SVAP only)	N/A
Conformance measure	170.315(f)(1), 170.315(f)(2), 170.315(f)(7)
USCDI-updated certification criteria (and USCDI version)	N/A

MEASURES USED IN OVERALL APPROACH

DESCRIPTION OF MEASUREMENT/METRIC

Measurement/Metric	Description
170.315(f)(1)	This measure is tracking and counting how many patient immunization records are created and successfully sent from the EHR Module to an IIS/immunization registry over the course of a given interval. The measure will also track successful query messages sent to a 3rd party registry to review patient historical immunization.
170.315(f)(2)	This is a reporting measure to determine how often and the success rate of generating and transmitting patient health information as it relates to syndromic surveillance to a public health registry.
170.315(f)(7)	This is a reporting measure to determine how often and the success rate of generating and transmitting patient health information as it relates to health care Survey to a public health registry.

ASSOCIATED CERTIFICATION CRITERIA

Measurement/Metric	Associated Certification Criteria	Relied Upon Software
170.315(f)(1)	*Transmission to immunization registries*	*N/A*
170.315(f)(2)	*Transmission to public health agencies — syndromic surveillance*	*N/A*
170.315(f)(7)	*Transmission to public health agencies — health care surveys*	*N/A*

JUSTIFICATION FOR SELECTED MEASUREMENT/METRIC

Measurement/Metric	Justification
170.315(f)(1)	This report will provide a numeric value to indicate both the how often this interoperability feature is being used as well as its compliance to the requirement. An increment to this measure indicates that the EHR can create a patient immunization record and successfully send it to a 3rd party registry via direct transmission or upload to the registry portal. With successful transmission or successful uploading, the EHR demonstrates successful interoperability with an IIS/immunization registry. The successful query of patient historical immunization will confirm Medgen's ability to communicate with outside registries.
170.315(f)(2)	This report can determine real world interoperability and usability, specifically how often patient data for syndromic surveillance is sent to the public health agencies. The test plan will confirm successful generation of public health data as a valid HL7 file and successful transmission to a state registry. The reporting will show the frequency and success rate the transmission occurs. The transmission is done automatically by the EHR, which will log any errors it encounters related to invalid file format or unsuccessful submission.
170.315(f)(7)	This report can determine real world interoperability and usability; specifically, how often patient data for health care survey is sent to the public health agencies. The test plan will confirm successful generation of public health data as a valid HL7 file and successful transmission to a state registry. The reporting will show the frequency and success rate the transmission occurs. The transmission is done automatically by the EHR which will log any errors it encounters related to invalid file format or unsuccessful submission.

CARE SETTING(S)

Care Setting	Justification
Primary Care	Clinicians in this setting can utilize their immunization record send to IIS/Immunization registry. This clinical workflow would not require any adjustment for the measurement.
Pediatric	Clinicians in this setting can utilize their immunization record send to IIS/Immunization registry. This clinical workflow would not require any adjustment for the measurement.

EXPECTED OUTCOMES

Measurement/Metric	Expected Outcomes
170.315(f)(1)	The measurement will produce numeric results over a given interval. We will utilize various reports and audit logs, to determine our measure count. We expect over 95% of the time the practice can send immunization records to the registry either by direct transmission or upload to the registry portal. A successful measure increment indicates compliance to the underlying ONC criteria. It will show that the EHR can create the HL7 immunization record of a patient. In sending the immunization message or performing an immunization query, the EHR will demonstrate ability to confirm successful interoperability with an IIS/immunization registry. Successfully completing this measure also implies users have a general understanding of the EHR functional operations for this EHR Module and an overall support for the user experience while not completing this measure may indicate lack of understanding or possibly lack of use or need for this functionality. We will use the measure count to establish a historic baseline of expected interoperability use so it can be used in subsequent real world testing efforts.
170.315(f)(2)	We expect over 95% of the transmission will be successful to the public health agencies. A successful increment indicates compliance to the underlying ONC criteria. It will show that the EHR can generate a valid file and successfully send the patient data to public health agencies. While not passing this measure

	may indicate the practice lacks the need for this functionality or additional training may be required.
170.315(f)(7)	We expect over 95% of the transmission will be successful to the public health agencies. A successful increment indicates compliance to the underlying ONC criteria. It will show that the EHR can generate a valid file and successfully send the patient data to public health agencies. While not completing this measure may show no need of this functionality or additional training may be required.

SCHEDULE OF KEY MILESTONES

Key Milestone	Care Setting	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.	Per the care settings stated above	January 1, 2025
Collection of information as laid out by the plan for the period.	Per the care settings stated above	January 1, 2025
Planned System updates to allow for collection of data after a SVAP update.	Per the care settings stated above	June 1, 2025
Follow-up with providers and authorized representatives on a regular basis to understand any issues arising with the data collection.	Per the care settings stated above	Quarterly, 2025
End of Real-World Testing period/final collection of all data for analysis.	Per the care settings stated above	December 31, 2025

Analysis and report creation.	Per the care settings stated above	January 15, 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.

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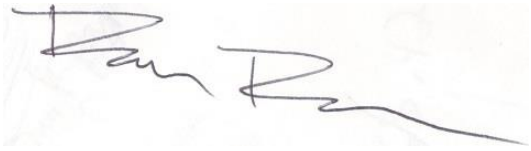

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https://portal.medgenehr.com/medgenweb/downloads/ComtronCompleteRWT2025.pdf

JUSTIFICATION FOR REAL WORLD TESTING APPROACH

Medgen EHR has developed a case management reporting system to ensure the clinical quality measure successfully created and exported. The modules also allow clinical quality measure imported into Medgen from other 3rd party system. This module also tracks electronically created data file for transmission of clinical quality measure data in QRDA-III data structure based on HL7 standard. QRDA-III creates a method to report quality measure results and can be used to exchange clinical quality measure data between systems.

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

Standard (and version)	N/A
Updated certification criteria and associated product	N/A
Health IT Module CHPL ID	15.04.04.2984.Medg.09.02.1.220915
Method used for standard update	N/A
Date of ONC-ACB notification	N/A
Date of customer notification (SVAP only)	N/A
Conformance measure	170.315(c)(1), 170.315(c)(2), 170.315(c)(3)
USCDI-updated certification criteria (and USCDI version)	N/A

MEASURES USED IN OVERALL APPROACH

DESCRIPTION OF MEASUREMENT/METRIC

Measurement/Metric	Description
170.315(c)(1)	This measure tracks and count how many patients have clinical quality measure successfully created and exported.
170.315(c)(2)	This is a survey measure to determine how often you are using the Clinical Quality Measure Import and Calculate feature
170.315(c)(3)	This measure tracks electronically created data file for transmission of clinical quality measure data in QRDA-III data structure based on HL7 standard. QRDA-III creates a method to report quality measure results and can be used to exchange clinical quality measure data between systems.

ASSOCIATED CERTIFICATION CRITERIA

Measurement/Metric	Associated Certification Criteria	Relied Upon Software
170.315(c)(1)	*Clinical quality measures (CQMs) — record and export*	*N/A*
170.315(c)(2)	*Clinical quality measures (CQMs) — import and calculate*	*N/A*
170.315(c)(3)	*Clinical quality measures (CQMs) — report – Cures Update*	*N/A*

JUSTIFICATION FOR SELECTED MEASUREMENT/METRIC

Measurement/Metric	Justification
170.315(c)(1)	This measure will provide a numeric value to indicate both the how often this interoperability feature is being used as well as its compliance to the requirement. An increment to this measure indicates that the EHR can successfully create Clinical Quality and export the measure to QRDA-I format. By verifying successful generation and validation of patient records as QRDA-I files this test plan will confirm Medgen EMRs ability to export practice CQM information for the purpose of ingesting to a 3rd party software or registry.
170.315(c)(2)	This measure will survey users to determine real world interoperability and usability, specifically how often are Clinical

	Quality Measure received from 3rd parties incorporated into the patient record and then updating the CQM data. A survey can often provide more information on the impact and value of an interoperability element than a standard software test evaluation. This survey measure will reveal if users are using the QRDA format to import and calculate feature of their EHR to update their patient's record with current or new information from another source. The measure will also record the total number of successful file imports that have been completed by a particular practice.
170.315(c)(3)	This measure will provide a tool for reporting the eCQM between systems using QRDA-III format. Successfully reporting the patient data in QRDA-III data structure to a different data exchange systems indicate both the how often this interoperability feature is being used as well as its compliance to the requirement. An increment to this measure indicates that the EHR can successfully report QRDA-III to different data exchanges. We will track the total number of providers that successfully load a QRDA-III file to ONC's attestation tool during the 2022 attestation window that takes place during the first quarter of 2025.

CARE SETTING(S)

Care Setting	Justification
Internal Medicine	Clinicians in this setting can utilize this reporting tool to measure the clinical quality measure.
OBGYN	Clinicians in this setting can utilize this reporting tool to measure the clinical quality measure
Pediatric	Clinicians in this setting can utilize this reporting tool to measure the clinical quality measure
Dermatology	Clinicians in this setting can utilize this reporting tool to measure the clinical quality measure.

EXPECTED OUTCOMES

Measurement/Metric	Expected Outcomes
170.315(c)(1)	The measurement will produce numeric results over a given interval. We will utilize various reports and audit logs, to determine our measure count. A successful measure increment indicates compliance to the underlying ONC criteria. It will show that the EHR can create the QRDA-I Clinical quality measure file, and successfully export the file. The module will consider successful if 95% of the clinical quality measure were successfully export to QRDA-I format. Successfully completing this measure also implies users have a general understanding of the EHR functional operations for this EHR Module and an overall support for the user experience while not completing this measure may indicate lack of understanding or possibly lack of use or need for this functionality. We will use the measure count to establish a historic baseline of expected interoperability use so it can be used in subsequent real world testing efforts.
170.315(c)(2)	The measure will produce survey results over a given interval. We will utilize various survey questions to determine our measure count. We expected the survey collected from the Real World Testing measure will have at least 95% of the surveys completed. The success rate is determined by the high average survey scores; In terms of the module usage frequency, success and fail rate when utilizing the module, and lastly the efficacy the module added to their workflow. While not completing this measure may indicate the user lack of understanding of possibility lack of use or need for this functionality. We will also generate numeric results over a given interval to track successful import of files. The module will consider successful if 95% of the clinical quality measure were successfully imported from QRDA-I format.
170.315(c)(3)	The tool will produce numeric results over a given interval. We will utilize various reports and audit logs, to determine our measure count. We expect a successful rate of 95%. A successful measure increment indicates compliance to the underlying ONC

	criteria. It will show that the EHR can create the QRDAIII Clinical quality measure file, and successfully report to the data exchange. Successfully completing this measure also implies users have a general understanding of the EHR functional operations for this EHR Module and an overall support for the user experience while not completing this measure may indicate lack of understanding or possibly lack of use or need for this functionality. We will use the measure count to establish a historic baseline of expected interoperability use so it can be used in subsequent real world testing efforts.

SCHEDULE OF KEY MILESTONES

Key Milestone	Care Setting	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.	Per the care settings stated above	January 1, 2025
Collection of information as laid out by the plan for the period.	Per the care settings stated above	January 1, 2025
Review provider 2022 attestations performed during the ONC attestation window in 2025	Per the care settings stated above	End of First Quarter 2025
Planned System updates to allow for collection of data after a SVAP update.	Per the care settings stated above	June 1, 2025

Follow-up with providers and authorized representatives on a regular basis to understand any issues arising with the data collection.	Per the care settings stated above	Quarterly, 2025
End of Real-World Testing period/final collection of all data foranalysis.	Per the care settings stated above	December 31, 2025
Analysis and report creation.	Per the care settings stated above	January 15, 2025

ATTESTATION

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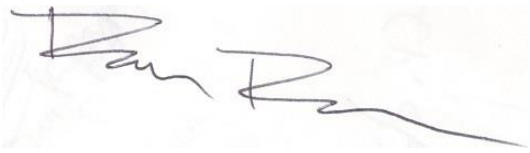

Date: 10/09/2024

GENERAL INFORMATION

Plan Report ID Number: [For ONC-Authorized Certification Body use only]
Developer Name: David DeBlasio

Product Name(s): Medgen EHR
Version Number(s): Version 9.x
Certified Health IT: Medgen EHR
Product List (CHPL) ID(s): 15.04.04.2984.Medg.09.02.1.220915
Developer Real World Testing Page URL:
https://portal.medgenehr.com/medgenweb/rwt.html
https://portal.medgenehr.com/medgenweb/downloads/ComtronCompleteRWT2025.pdf

JUSTIFICATION FOR REAL WORLD TESTING APPROACH

Medgen EHR has developed a module to receive of the C-CDA from 3rd party and incorporate into the patient record. The module is for in situations where documents needs to be coordinated between providers and patients within and outside of a healthcare organization. The Medgen EHR reconciliation module allows the updating the patient's record from the 3rd party seamlessly to increase workflow efficacy.

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

Standard (and version)	N/A
Updated certification criteria and associated product	N/A
Health IT Module CHPL ID	15.04.04.2984.Medg.09.02.1.220915
Method used for standard update	N/A
Date of ONC-ACB notification	N/A
Date of customer notification (SVAP only)	N/A
Conformance measure	170.315(b)(2)
USCDI-updated certification criteria (and USCDI version)	USCDI Version 3

MEASURES USED IN OVERALL APPROACH

DESCRIPTION OF MEASUREMENT/METRIC

Measurement/Metric	Description
170.315(b)(2)	This measure tracks and counts how many patients have had a successful clinical reconciliation performed.

ASSOCIATED CERTIFICATION CRITERIA

Measurement/Metric	Associated Certification Criteria	Relied Upon Software
170.315(b)(2)	*Clinical information reconciliation – Cures Update*	*Updox DIRECT*

JUSTIFICATION FOR SELECTED MEASUREMENT/METRIC

Measurement/Metric	Justification
170.315(b)(2)	This measure will track to determine the real world interoperability and usability, specifically how often are C-CDAs received from 3rd party incorporated into the patient record and then updating the patient's problem list, medication list, and medication allergy list with clinical data contained in the C-CDA. The audit log will consist of flags regarding how often the practice uses the module, the frequency of successful rate when reconciliation the patient chart, and the efficiency it adds to their workflow. An increment to this measure indicates that the EHR can receive and incorporate a patient summary record into the patient chart. Additionally, by receiving a CCDA via the DIRECT protocol the EHR demonstrates successful interoperability with clinical reconciliation. This measure will reveal if users are using the C-CDA incorporate feature of their EHR to update their patient's record with current or new information from an outside source.

CARE SETTING(S)

Care Setting	Justification
General practitioner	Clinicians in this setting can utilize the ability to receive patient's PHI via Direct messages and reconciliation to the Medgen EHR. This clinical workflow would not require any adjustment for the measurement.

OBGYN	Clinicians in this setting can utilize the ability to receive patient's PHI via Direct messages and reconciliation to the Medgen EHR. This clinical workflow would not require any adjustment for the measurement.
Pediatric	Clinicians in this setting can utilize the ability to receive patient's PHI via Direct messages and reconciliation to the Medgen EHR. This clinical workflow would not require any adjustment for the measurement.
Dermatology	Clinicians in this setting can utilize the ability to receive patient's PHI via Direct messages and reconciliation to the Medgen EHR. This clinical workflow would not require any adjustment for the measurement.
Podiatry	Clinicians in this setting can utilize the ability to receive patient's PHI via Direct messages and reconciliation to the Medgen EHR. This clinical workflow would not require any adjustment for the measurement.

EXPECTED OUTCOMES

Measurement/Metric	Expected Outcomes
170.315(b)(2)	The measure will produce numerical results over a given interval. We will utilize our audit to determine our measure count. We expect the results collected from the Real World Testing measure will have at least 95% of the clinical reconciliations successfully completed. While not completing this measure may indicate the user lack of understanding or possibility lack of use or need for this functionality.

SCHEDULE OF KEY MILESTONES

Key Milestone	Care Setting	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.	Per the care settings stated above	January 1, 2025
Collection of information as laid out by the plan for the period.	Per the care settings stated above	January 1, 2025
Planned System updates to allow for collection of data after a SVAP update.	Per the care settings stated above	June 1, 2025
Follow-up with providers and authorized representatives on a regular basis to understand any issues arising with the data collection.	Per the care settings stated above	Quarterly, 2025
End of Real-World Testing period/final collection of all data for analysis.	Per the care settings stated above	December 31, 2025
Analysis and report creation.	Per the care settings stated above	January 15, 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.

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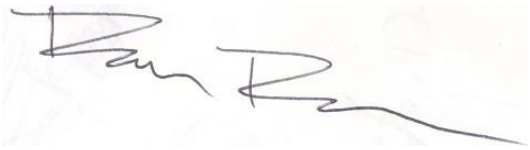

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GENERAL INFORMATION

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Developer Name: David DeBlasio
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Developer Real World Testing Page URL:
https://portal.medgenehr.com/medgenweb/rwt.html
https://portal.medgenehr.com/medgenweb/downloads/ComtronCompleteRWT2025.pdf

JUSTIFICATION FOR REAL WORLD TESTING APPROACH

Medgen EHR has developed a data export utility tool to export one or multiple patient data. The data export tool also utility also utilizes the Medgen API. The data export tool allows the practice to export patient data to their local storage without the intervention from Medgen support staff. The office user can select based on single patient, multiple patients. The goal of this approach is to demonstrate that the interoperability and conformance capabilities of the Certified API technology are consistent with the requirements 170.315(g)(7) & 170.315(g)(9) certification criterion. This is demonstrated by use of the data export application and a reliance on the certified API technology.

Medgen has also developed a FHIR API that is consistent with the requirements of 170.315(g)(10). Through the FHIR API and the Medgen developer registration portal a user may access patient records as well as the clinical data elements stored for both single patient and bulk patient retrieval. This may be demonstrated by the use of ONC Inferno tool as well as through direct vendor access to the Medgen FHIR API.

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

Standard (and version)	N/A
Updated certification criteria and associated product	N/A
Health IT Module CHPL ID	15.04.04.2984.Medg.09.02.1.220915
Method used for standard update	N/A
Date of ONC-ACB notification	N/A
Date of customer notification (SVAP only)	N/A
Conformance measure	170.315(b)(10), 170.315(g)(7), 170.315(g)(9), 170.315(g)(10)

USCDI-updated certification criteria (and USCDI version)	USCDI Version 3

MEASURES USED IN OVERALL APPROACH

DESCRIPTION OF MEASUREMENT/METRIC

Measurement/Metric	Description
170.315(b)(10)	This measure will report through audit to determine real world interoperability and usability, specifically how often they use the data export program to backup patient clinical data in bulk to their local storage or using the module built within the Medgen EMR system for single patient export. The data export program can be accessed by specific users, and can schedule a data export at the user's choosing. The audits will provide information on the impact and value of an interoperability element as well as the success rate of successful data download. It will reveal if users are using the Data Export incorporate feature of their EHR. It will help confirm that the Medgen Data Export program can be accessed and successfully utilized without intervention from Medgen Staff.
170.315(g)(7)	This measure will report through audit to determine real world interoperability and usability, It will determine how often a user is using the API module of the Medgen EHR.
170.315(g)(9)	This measure will report through audit to determine real world interoperability and usability. It will determine how often a user is using the API module of the Medgen EHR.
170.315(g)(10)	This measure will report through audit to determine real world interoperability and usability. It will determine how many user transactions are completed through the Medgen FHIR API. The ONC Inferno tool will also be used to replicate a test vendor to ensure that the Medgen FHIR API confirms to all requirements established under this measure.

ASSOCIATED CERTIFICATION CRITERIA

Measurement/Metric	Associated Certification Criteria	Relied Upon Software
170.315(b)(10)	*Electronic Health Information Export*	*N/A*
170.315(g)(7)	*Application access — patient selection*	*N/A*
170.315(g)(9)	*Application access — all data request – Cures Update*	*N/A*
170.315(g)(10)	*Standardized API for patient and population services*	*N/A*

JUSTIFICATION FOR SELECTED MEASUREMENT/METRIC

Measurement/Metric	Justification
170.315(b)(10)	This measure will audit users to determine real world interoperability and usability, specifically how often they use the data export program to backup patient clinical data in their local storage for bulk exports or the Medgen EMR system for single patient export. The data export program can be accessed by specific users, and can schedule a data export at the user's choosing. This audit will reveal if users are using the Data Export incorporate feature of their EHR. It will help confirm that the Medgen Data Export program can be accessed and successfully utilized without intervention from Medgen Staff.
170.315(g)(7)	This measure will audit users to determine real world interoperability and usability, specifically how often they use the data export program to backup patient clinical data in their local storage. The data export program utilizes the EHR API and has the ability to selection patients, request data categories, and all data request. The audit will provide information on the impact and value of an interoperability element. This audit measure will reveal if users are using the API feature incorporated in the EHR with the data export program. It will help confirm that the Medgen API can be accessed and successfully utilized without intervention from Medgen staff.
170.315(g)(9)	This measure will audit users to determine real world interoperability and usability, specifically how often they use the data export program to backup patient clinical data in their local

	storage. The data export program utilizes the EHR API and has the ability to selection patients, request data categories, and all data request. The audit will provide information on the impact and value of an interoperability element. This audit measure will reveal if users are using the API feature incorporated in the EHR with the data export program. It will help confirm that the Medgen API can be accessed and successfully utilized without intervention from Medgen staff.
170.315(g)(10)	This measure will audit users to determine real world interoperability and usability, specifically how many transactions are being completed through the Medgen FHIR API. The audit will provide information on the impact and value of an interoperability element. This audit measure will reveal if users are using the Medgen FHIR API to access their patient records. Quarterly testing will be completed using the ONC Inferno tool and mock developer registration to ensure that the API conforms to all requirements. This will help confirm that the Medgen FHIR API can be accessed and successfully utilized without intervention from Medgen staff.

CARE SETTING(S)

Care Setting	Justification
Internal Medicine	Clinicians in this setting can utilize the data export, which utilities the API feature to store extract patient data locally. This survey question would not require any adjustment for the measurement
OBGYN	Clinicians in this setting can utilize the data export, which utilities the API feature to store extract patient data locally. This survey question would not require any adjustment for the measurement.
Pediatric	Clinicians in this setting can utilize the data export, which utilities the API feature to store extract patient data locally. This survey question would not require any adjustment for the measurement.
Dermatology	Clinicians in this setting can utilize the data export, which utilities the API feature to store extract patient data locally. This survey question would not require any adjustment for the measurement.
Podiatry	Clinicians in this setting can utilize the data export, which utilities the API feature to store extract patient data locally. This survey question would not require any adjustment for the measurement.

EXPECTED OUTCOMES

Measurement/Metric	Expected Outcomes
170.315(b)(10)	The measure will produce numeric results over a given interval. We will utilize various audits to determine our measure count. We expected the data collected from the Real World Testing measure will have at least 95% successful download of patient data using the Data Export program via the Medgen API or through direct download from the EMR system. The success rate is determined by the high average successful downloads; In terms of the module usage frequency, success and fail rate when utilizing the module, and lastly the efficacy the module added to their workflow. While not utilizing this measure may indicate the user lack of understanding of possibility lack of use or need for this functionality.
170.315(g)(7)	The measure will produce numeric results over a given interval. We will utilize various audits to determine our measure count. We expected the data collected from the Real World Testing measure will have at least 95% successful download of patient data using the Data Export program via the Medgen API. The success rate is determined by the high average successful downloads; In terms of the module usage frequency, success and fail rate when utilizing the module, and lastly the efficacy the module added to their workflow. While not utilizing this measure may indicate the user lack of understanding of possibility lack of use or need for this functionality.
170.315(g)(9)	The measure will produce numeric results over a given interval. We will utilize various audits to determine our measure count. We expected the data collected from the Real World Testing measure will have at least 95% successful download of patient data using the Data Export program via the Medgen API. The success rate is determined by the high average successful downloads; In terms of the module usage frequency, success and fail rate when utilizing the module, and lastly the efficacy the module added to their workflow. While not utilizing this measure may indicate the user lack of understanding of possibility lack of use or need for this functionality.

170.315(g)(10)	The measure will produce numeric results over a given interval. We will utilize various audits to determine our transaction count. We expect the data collected from the Real World Testing measure will have a 95% successful transaction response rate. The success rate is determined by the high average successful transactions; In terms of the module usage frequency, success and fail rate when utilizing the module, and lastly the efficacy the module added to their workflow. While not utilizing this measure may indicate the user lack of understanding of possibility lack of use or need for this functionality. The quarterly ONC Inferno test tool results will also be captured and reported with a Pass/Fail to indicate that the Medgen FHIR tool is able to successfully complete the pre-determined test cases.

SCHEDULE OF KEY MILESTONES

Key Milestone	Care Setting	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.	Per the care settings stated above	January 1, 2025
Collection of information as laid out by the plan for the period.	Per the care settings stated above	January 1, 2025
Planned System updates to allow for collection of data after a SVAP update.	Per the care settings stated above	June 1, 2025

Follow-up with providers and authorized representatives on a regular basis to understand any issues arising with the data collection.	Per the care settings stated above	Quarterly, 2025
Complete ONC Inferno Tool test plan with Medgen FHIR API.	Per the care settings stated above	Quarterly, 2025
End of Real-World Testing period/final collection of all data for analysis.	Per the care settings stated above	December 31, 2025
Analysis and report creation.	Per the care settings stated above	January 15, 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.

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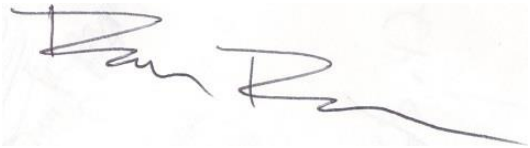

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