WRSHEALTH - REAL WORLD TESTING RESULTS REPORT 2023

CONTENTS

GENERAL INFORMATION

Plan Report ID Number : 20221205wrs
Developer Name : WRS Health
Product Name(s) : WRS Health Web EHR and Practice Management System
Version Number(s) : 7.0
Certified Health IT Product List (CHPL) ID(s) : CHPL Product Number: 15.02.05.2527.WRSH.01.01.1.211214
ONC-ACB Certification ID:15.02.05.2527.WRSH.01.01.1.211214

Developer Real World Testing Page URL : https://www.wrshealth.com/certified-ehr-what-to-look-for

INTRODUCTION

The document outlines the outcomes of WRS Health's Real World Testing plans for the year 2023. The primary focus is on demonstrating the interoperability and functional compliance of WRS - EHR applications, aligning with each certification criterion established in the previous year's real world testing document.

The main objective of this report is to demonstrate the overall performance capability of WRSHeatlh to real world interoperability and continued compliance of its EHR product to certification standards. This document includes summary and key findings of WRSHealth test plan, offering detailed insights into testing outcomes that affirm the product's adherence to certification criteria, required technical standards, and vocabulary code sets. The document also encompasses the results of testing measures, validating the product's capacity to exchange electronic health information (EHI) within care settings.

The testing metrics and use cases defined in the document support the justification of the product's interoperability in a production environment. It further presents the different care settings covered by respective measures. Additionally, the document includes information about compliance with the Standards Version Advancement Process update, along with a timeline and key milestones for completing the real-world testing for the current year.

SUMMARY OF TESTING METHODS AND KEY FINDINGS

We conducted Real-World Testing to assess the interoperability and usability performance of our EHR application in a real-world setting, focusing on meeting the criteria standards outlined in the ONC Certification Program. Employing a relevant testing methodology, our test plan aimed to maintain compliance with certification requirements.

Throughout the testing period from January to December 2023, we consistently tracked attempts to access certified Health IT modules and transactions related to our testing measures, generating logs for analysis. The event logs and system-generated transactions were integral to our manual data audit, ensuring that the information's structure aligns with prescribed data requirements and supplemental elements for each certification criterion.

These logs played a crucial role in creating reports that showcase the availability and utilization of functional and usability requirements for each criterion. The analysis and key findings of each test measure are included in this report to attest our compliance.

The primary challenge we faced was the limited or nonexistent usage of specific features tested as part of the certification requirements. The system did not generate any cancer registry messages due to the lack of client utilization.

Our engagement in real-world testing has yielded valuable insights into the functionality and performance of our EHR system. We emphasize the importance of aligning testing scenarios with real-world provider workflows for a more accurate representation of system usage. Additionally, we recognize the impact of low feature utilization, highlighting the need for targeted user education or system enhancements. These insights inform our ongoing commitment to refining the system based on actual user behavior, addressing potential challenges, and continuously improving the overall user experience.

STANDARDS UPDATES (SVAP and USCDI)

☑ I have products certified with voluntary SVAP or USCDI standards. (If yes, please complete the table below.

☐ No, none of my products include these voluntary standards.

Standard (and version)	All standard versions are as specified in 2015 Edition Cures Update. ● USCDI v1
Updated certification criteria and associated product	(b)(1), (b)(2), (e)(1), (g)(9)
Health IT Module CHPL ID	CHPL Product Number: 15.02.05.2527.WRSH.01.01.1.211214 ONC-ACB Certification ID: 15.02.05.2527.WRSH.01.01.1.211214
Conformance measure	§170.315 (b)(1) - Test Case 1 ● Measure 1 : Metrics on number of CCDA imports ● Measure 2: Metrics on the generated CCDA documents ● Measure 3: Metrics on the views and downloads of CCDA by practice users §170.315 (b)(2) - Test Case 2 ● Measure: Metrics on number of Clinical Information Reconciliation performed §170.315 (e)(1) - Test Case 1 ● Measures 4: Metrics on the access and activity log for viewing, downloading, and transmitting of CCDA by patients §170.315 (g)(9) - Test Case 7 ● Measure: Metrics on API access and activity

Standard (and version)	§170.315(c)(3) – CQMs – Report ● CMS Implementation Guide for Quality Reporting Document Architecture: Category III; Eligible Clinicians and Eligible Professionals Programs; Implementation Guide for 2022 (December 2021) ● 170.205(h)(3) 2022 CMS Implementation Guide for Quality Reporting Document Architecture: Category I; Hospital Quality Reporting; Implementation Guide for 2022 (November 2021)
Updated certification criteria and associated product	§170.315(c)(3)
CHPL Product Number	15.02.05.2527.WRSH.01.01.1.211214
Conformance measure	§170.315(c)(3) - Test Case 5 ● Measure 3: Metrics on QRDA Category I and QRDA Category III activities ● Measure 5: Metrics on CMS and specialty registry submissions

CARE SETTINGS

WRS Health is designed and certified to support multiple clinical specialties in the ambulatory setting. Real World Testing was conducted in all care settings noted below.

- Primary/specialty care
- Urgent care
- Nursing home
- Birth center
- Orthopedic and other rehabilitation centers

METRICS AND OUTCOME

TEST CASE 1 : WRSHealth conducts performance assessment of their system's log files, dashboard metrics and transaction reports collected during the 12-month period of Real-World Testing in 2023, to prove the interoperability compliance of its EHR application under the specified criterion.

Certifications Criteria : **§170.315 (b)(1) - Transitions of Care**
§170.315 (b)(9) - Care Plan
§170.315 (e)(1) - View, download, and transmit to 3rd party
§170.315 (h)(1) - Direct Project

Associated Criterion(s)	Measurement / Metric	Relied Upon Software (if applicable)	Outcomes	Challenges Encountered (if applicable)
§170.315 (b)(1) Transitions of Care	**Measure 1 : Metrics on number of CCDA imports** 1) Total imports of CCDA documents		From: 1/1/2023 to 12/31/2023 1) Total: 7	
§170.315(b)(1) Transition of Care **§170.315 (b)(9)** Care Plan	**Measure 2: Metrics on the generated CCDA documents** 1) Total # of CCDA documents auto generated 2) Total # of CCDA documents generated manually		From: 1/1/2023 to 12/31/2023 1) Total: 1,890,152 2) Total: 30,380 *Note: Documents include Continuity of Care Document, referral note and Care Plan*	
§170.315(b)(1) Transition of Care **§170.315 (b)(9)**: Care Plan	**Measure 3: Metrics on the views and downloads of CCDA by practice users** 1) Number of views of imported and generated CCDA by practices 2) Number of download activities of imported and generated CCDA by practices		From: 1/1/2023 to 12/31/2023 1) Total: 25,205 2) Total: 327,086	
§ 170.315(e)(1) View, download, and transmit to 3rd part	**Measure 4: Metrics on the access and activity log for viewing, downloading, and transmitting of CCDA by patients** 1) Total # of patient portal CCDA views 2) Total # of patient portal CCDA downloads 3) Total # of patient portal CCDA generated 4) Total # of patient portal CCDA sent/transmitted		From: 1/1/2023 to 12/31/2023 1) Total: 42,744 2) Total: 10,435 3) Total: 2,664 4) Total: 40	

Associated Criterion(s)	Measurement / Metric	Relied Upon Software (if applicable)	Outcomes	Challenges Encountered (if applicable)
§170.315 (b)(1) Transitions of Care **§170.315 (b)(9)** Care Plan **§170.315 (e)(1)** View, download, and transmit to 3rd party **§170.315 (h)(1)** Direct Project	**Measure 5: Metrics on the transaction reports of direct messages** 1) Total # messages sent by practices with CCDA 2) Total # messages sent by practices without CCDA 3) Total # messages received by practices with CCDA 4) Total # messages received by practices without CCDA 5) Total # messages sent by patient using Patient Portal to transmit CCDA	*EMR Direct phiMail*	From: 1/1/2023 to 12/31/2023 1) Total: 3,131 2) Total: 122 3) Total: 0 4) Total: 18,039 5) Total: 0	

Analysis and Key Findings for Test Case 1:

The test measures collected for this period demonstrate that the certified module was able to create CCDA documents, match CCDA to a patient, reconcile, allow imports, and be exported. The resulting totals for each measure conform to the expected outcome outlined in our test plan. Regardless of the frequency of use, when users access the patient portal, they are able to successfully generate, view, download and transmit CCDA.

While direct messaging may not be widely adopted across practices, the overall test results indicate that this feature is both active and functional for those who do utilize it. Practice users have demonstrated the successful reception and transmission of CCDA using direct messaging. In a real-world context, these findings affirm that the capability to create and exchange CCDA with other systems is available and adheres to the required standards.

TEST CASE 2 : The activity logs concerning Clinical Information reconciliation were thoroughly examined and analyzed to assess the system's performance in executing the prescribed operations for Clinical Information Reconciliation and Incorporation, as outlined in §170.315 (b)(2). This encompassed a comprehensive review of associated implementation guides, ensuring the validation and verification of all required data elements were adequately supported.

Certifications Criteria : §170.315 (b)(2) - Clinical Information Reconciliation and Incorporation

Associated Criterion(s)	Measurement / Metric	Relied Upon Software (if applicable)	Outcomes	Challenges Encountered (if applicable)
§ 170.315 (b)(2) Clinical Information Reconciliation and Incorporation	**Measure: Metrics on number of Clinical Information Reconciliation performed.** Total # of Clinical information reconciliation performed		From 1/1/2023 through 12/31/2023 Total: 3,858,267	

Analysis and Key Findings for Test Case 2:

The examination of test measures derived from the system's log files, specifically focused on Clinical Information Reconciliation and Incorporation, affirms the system's capability to facilitate the reconciliation of clinical data from two distinct sources.

This feature is an administrative function and was expected to be used occasionally by practice, but the resulting high number of usage indicates that practice users prefer to reconcile medical information electronically and are able to utilize the feature efficiently.

TEST CASE 3 : The examination of eRx transaction logs confirms the proper functionality of Electronic Prescribing, meeting the required operational standards. The assessment also reveals a significant frequency of electronic prescribing usage within the system. Log files, including the count of eRx messages transmitted, demonstrate conformity with the specified standards of §170.315 (b)(3) - Electronic Prescribing. We closely monitored and addressed prescription handling issues.

Certifications Criteria : §170.315 (b)(3) - Electronic Prescribing

Associated Criterion(a)	Measurement / Metric	Relied Upon Software (if applicable)	Outcomes	Challenges Encountered (if applicable)
§ 170.315 (b)(3) Electronic Prescribing and NCPDP SCRIPT 2017071 standards	**Measure: transaction reports from Surescripts** Metrics on the number of 1) NewRx 2) RxChange 3) CancelRx 4) Prescriptions renewed 5) RxFill 6) Medication History	MDToolBox	From 1/1/2023 through 12/31/2023 1) 1,891,323 2) 20,164 3) 9,138 4) 352,014 5) 558 6) 588,197	

Analysis and Key Findings for Test Case 3:

The transaction log files, containing the total number of eRx messages transmitted, were gathered to assess compliance with Electronic Prescribing standards. The eRx transaction logs confirm the feature's ability to send prescription information to pharmacies, showcasing consistent activity throughout the year.

TEST CASE 4 : The test approach employs performance analysis of the system's functionalities, enabling practices to conduct export-enabled permissions for patients' clinical data. The method used demonstrates that the export function works properly, and the system can be configured according to the specific user preferences mentioned in §170.315 (b)(6): Data Export. The review of export logs was conducted to evaluate proper credentialing and validate the required export operations.

Certifications Criteria : **§170.315 (b)(6) - Data Export**

Associated Criterion(a)	Measurement / Metric	Relied Upon Software (if applicable)	Outcomes	Challenges Encountered (if applicable)
§ 170.315 (b)(6) Data Export	**Measure: dashboard for export reports** 1) Total # of users given permissions to the function (Export) 2) Total # of export reports generated by practices 3) Total # number of patients included in the reports 4) Total # of CCDA generated		From 1/1/2023 through 12/31/2023 1) Total: 11,714 2) Total: 153 3) Total: 262,009 4) Total: 1,920,532 (manual and auto generated)	

Analysis and Key Findings for Test Case 4:

The data extracted from the log files indicates that when permission is granted, practice users are able to generate reports with diverse configurations and filtering options. Users can also review patients included in the export, as well as download CCDA documents in bulk. Despite a high number of users being granted permission, the actual number of export functions performed is low. Regardless of the total usage, the system was able to demonstrate the availability and compliance of the feature to the required standards. The high number of CCDA documents generated, both manually and automatically, suggests active usage and efficiency of the Data Export feature.

TEST CASE 5 : The metrics dashboard was used to review and analyze activities and transactions associated with various Clinical Quality Measure (CQM) generated reports. This analysis aimed to test the system's conformance capability with the prescribed methods and standards of Clinical Quality Measures.

Certifications Criteria : **§170.315 (c)(1) - Clinical Quality Measures - Record and Export**
§170.315 (c)(2) - Clinical Quality Measures - Import and Calculate
§170.315 (c)(3) - Clinical Quality Measures – Report

Associated Criterion(a)	Measurement / Metric	Relied Upon Software (if applicable)	Outcomes	Challenges Encountered (if applicable)
§ 170.315 (c)(1) Clinical Quality Measures - Record and Export	**Measure 1: Metrics on number of recorded clinical data** Total # of recorded clinical data		From 1/1/2023 through 12/31/2023 Total: 26,396,869	
§ 170.315 (c)(2) Clinical Quality Measures - Import and Calculate	**Measure 2: Metrics on the generated CQM reports** Total # of CQM generated by practices		From 1/1/2023 through 12/31/2023 Total: 2,948	
§ 170.315 (c)(1) Clinical Quality Measures - Record and Export **§ 170.315 (c)(3)** Clinical Quality Measures - Report I and QRDA Category III data files.	**Measure 3: Metrics on QRDA Category I and QRDA Category III activities** 1) Total # of users requested for QRDA Category I data files 2) Total # of system-generated QRDA Category I data files for registry submission 3) Total # of downloaded QRDA Category III files		From 1/1/2023 through 12/31/2023 1) Total: 80 2) Total: 1,319 3) Total: 228	
§ 170.315 (c)(2): Clinical Quality Measures - Import and Calculate	**Measure 4: Metrics on the QRDA Category I import performed** Total # of import performed for QRDA Category I		From 1/1/2023 through 12/31/2023 Total: 7 files	
§ 170.315 (c)(1) Clinical Quality Measures - Record and Export **§ 170.315 (c)(2)** Clinical Quality Measures - Import and Calculate **§ 170.315 (c)(3)** Clinical Quality Measures - Report,	**Measure 5: Metrics on CMS and specialty registry submissions** 1) Total # practices/providers that have successfully downloaded QRDA Category III data files from WRS 2) Total # of QRDA Category III data files uploaded to and accepted by CMS 3) Total # of CQM performance scorecards from specialty registries reflecting successful generation 4) Total # QRDA Category I data files export		From 1/1/2023 through 12/31/2023 1) Total: 31 2) Total: 31 3) Total: 14 4) Total: 20	

Analysis and Key Findings for Test Case 5:

To demonstrate the capability of the health IT module to CQM reporting, record and export, import and calculate, data from the event logs were collected. The data collected from the event logs provides strong evidence of the EHR system's capabilities in supporting CQM reporting, data recording, export, import, and calculate. The consistent and high volume of usage across these functionalities reflects the system's effectiveness in meeting the needs of healthcare providers for comprehensive clinical data management and reporting. EHR providers consistently utilize this feature, affirming its

reliability for clinical data reporting. The captured clinical data aligns with the prescribed standards outlined in the CMS implementation guide.

For CQM import and calculate, the total number of generated CQM reports demonstrate that the feature is available and is used by providers to submit their CQM reports on a regular frequency.

The data collected on QRDA Category I and Category III activities demonstrates the EHR module's capability to generate valid data files and effectively transmit clinical data measures to registries. There is a low number of import and export performed for QRDA Category I data files as this function is not commonly used by providers as part of their regular workflow. Regardless of the frequency of usage, the feature is available and consumed for CQM reporting and therefore confirms its compliance with the required standards.

TEST CASE 6: Generated log files, transaction reports and reports coming from external partners was examined to assess conformance validity of the capability of WRS system to process electronic transmission as required in the following criteria:

§170.315 (f)(1): Transmission to Immunization Registries - WRS reviewed the immunization message transaction reports from Iron Bridge providing detailed insights into the transactions exchanged with state immunization registries.

§170.315 (f)(2): Transmission to Public Health Agencies - Syndromic Surveillance - Reports detailing the number of syndromic surveillance messages successfully generated serve as evidence of WRS's conformity in creating syndrome-based public health surveillance information for electronic transmission.

§170.315 (f)(4): Transmission to Cancer Registries
The log files containing the number of cancer registry messages successfully generated by the system as conclusive evidence to show that the system supports the electronic submission of cancer case information.

Certifications Criteria : **§170.315 (f)(1): Transmission to Immunization Registries**
§170.315 (f)(2): Transmission to Public Health Agencies - Syndromic Surveillance
§170.315 (f)(4): Transmission to Cancer Registries

Associated Criterion(a)	Measurement / Metric	Relied Upon Software (if applicable)	Outcomes	Challenges Encountered (if applicable)
§ 170.315 (f)(1) Transmission to Immunization Registries and HL7 specifications	**Measure 1: transaction reports from Iron Bridge** Total # of transactions exchanged with state immunization registries		From 1/1/2023 through 12/31/2023 Total: 1,195	

Associated Criterion(a)	Measurement / Metric	Relied Upon Software (if applicable)	Outcomes	Challenges Encountered (if applicable)
§ 170.315 (f)(2) Transmission to Public Health Agencies - Syndromic Surveillance	**Measure 2: metrics on generated syndromic surveillance messages** Total # of generated syndromic surveillance messages.		From 1/1/2023 through 12/31/2023 Total: 10,648	
§ 170.315 (f)(4) Transmission to Cancer Registries	**Measure 3: metrics on generated cancer registry messages** Total # of generated cancer registry messages		From 1/1/2023 through 12/31/2023 Total: 0	Non-usage of functionality by current client base.

Analysis and Key Findings for Test Case 6:

Internal and external log reports were thoroughly analyzed to assess the system's ability to transmit medical information to registries, with a focus on the specific requirements outlined in §170.315 (f). The transaction reports obtained from Iron Bridge served as key evidence, demonstrating the module's proficiency in meeting the necessary standards for transmitting data to state immunization registries.

The higher volume of outbound messages from WRS to state registries is expected, since the majority of the practices using the system only have outbound connections.

There were no attempts from the system to generate reporting messages for cancer registry as none of our clients are treating cancer patients.

TEST CASE 7 : The test approach includes the examination and assessment of the activity logs and review of API documentations to demonstrate that the API services of WRS is compliant and conforms to the operational standards in the following:

§170.315 (g)(7): Application Access - Patient - Patient's activity logs were utilized to determine the total number of patients accessing the system. The logs also demonstrate the capability of the API to search and uniquely identify authorized patients. The API documentation was also examined for proper adherence to the required standards specified under this criterion.

§170.315 (g)(9): Application Access - All Data Request - The activity logs were used to examine the details of the API responses as patients made data category requests in the system. Furthermore, the logs served the purpose of verifying errors and statuses associated with the API responses.

Certifications Criteria : **§170.315 (g)(7): Application Access - Patient**
§170.315 (g)(9): Application Access - All Data Request

Associated Criterion(a)	Measurement / Metric	Relied Upon Software (if applicable)	Outcomes	Challenges Encountered (if applicable)
§ 170.315 (g)(7) Application Access - Patient	**Measure: metrics on API access and activity** 1) Total # of requests for a Patient ID or Token 2) Total # of requests that provided sufficient information to provide a valid response 3) Total # of follow-up requests made using the provided patient ID or token		From 1/1/2023 through 12/31/2023 1) Total: 0 2) Total: 0 3) Total: 0	Non-usage of functionality by current client base
§ 170.315 (g)(9) Application Access - All Data Request	**Measure: metrics on API access and activity** 1) Total # of requests for a patient's Summary Record made by an application via an all data category request using a valid patient ID or token 2) Total # of requests for a patient's Summary Record made by an application via an all data category request using a valid patient ID or token for a specific date range		From 1/1/2023 through 12/31/2023 1) Total: 0 2) Total: 0	Non-usage of functionality by current client base

Analysis and Key Findings for Test Case 7:

Our certified APIs are accessible to independent vendors, as well as WRS clients and their users for requesting patient information. The corresponding technical documentation for these APIs is readily available through a public URL.

To demonstrate that our certified APIs fulfills the requirements against each criterion, we collect the API transaction logs. Due to zero or no requests made in production, our test cases are executed manually to demonstrate the availability and usability requirements for each test measure. Our internal tests have successfully verified that our API services are compliant against each measure.

KEY MILESTONES

The list of key milestones that were met during the course of implementing our Real World Testing plans is based on our schedule. The key milestones include details on how and when the developer implemented measures and collected data.

Key Milestone	Care Setting	Date / Time Frame
Communicating with our customers how we intend to conduct the RealWorld Testing.	All	January 2023
Start collection of necessary data, transaction reports, submission statistics, relevant documents as laid out in the test plan.	All	January 2023 (Throughout the year)
End of Real World Testing period data collection/analysis	All	December 2023
Submit Real World Testing report to ACB	All	January 15, 2024