



# REAL WORLD TESTING RESULTS REPORT

## INTRODUCTION

This document contains a list of the steps taken to conduct the annual Real World Testing requirements for ONC certification. The Results within this document were reviewed as Screenshots and spreadsheets for their compliance with the criteria defined in the test plan. These artifacts will be maintained by the health IT developer for audit purposes or further requests.

## GENERAL INFORMATION

Plan Report ID Number: [For ONC-Authorized Certification Body use only]

Developer Name: **CompuGroup Medical US**

Product Name(s): **CGM eMDs**

Version Number(s): **Version 10**

Certified Health IT Product List (CHPL) Product Number(s): **15.04.04.2700.eMDs.10.02.1.221227**

Developer Real World Testing Plan Page URL: <https://emds.com/certifications/>

Developer Real World Testing Results Report Page URL: <https://emds.com/certifications/>

## SUMMARY OF TESTING METHODS AND KEY FINDINGS

Consistent with the ONC's recommendation that "Real World Testing verify that deployed Certified Health IT continues to **perform as intended by conducting and measuring observations of interoperability and data exchange**", our original test plan focused on capturing and documenting the number of instances that certified capability was successfully utilized in the real world. In instances where no evidence exists due to low or zero adoption of a certified capability or the inability to capture evidence of successful use for other reasons, we tested and demonstrated the required certified capability in a semi-controlled setting as close to a "real world" implementation as possible.

As per the test plan, we leveraged a 3-fold approach to demonstrate successful real-world implementations.

- Adoption Rate
- Summative Testing
- Interactive Testing

Adoption rate was used to determine if/when certified capability is being used in the real world and to help identify differences in care settings. Evidence of high rates of implementation and usage indicate (but don't by themselves prove) a certified capability's usefulness and practical value. Evidence of low rates of implementation and usage might be accounted for by patient volume,

location or provider preference among other reasons. Note, it is not the goal of this exercise to identify the individual causes of why a given certified capability may have a high or low adoption rate, but rather to identify the users and care settings for which a given test is relevant.

Summative assessments were used to measure which certified actions were performed at the conclusion of a given time period where the minimum time period was 90 days and longer where possible. These results are typically obtained by generating reports and examining audit logs from within the certified health IT module to help demonstrate the frequency of actions within the given time frame, and where possible, whether those actions were successful or unsuccessful. High success rates should be an indicator of a successful implementation of a given certified capability in a real-world setting.

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

This approach allowed for the successful testing and obtaining results for each criterion. Detailed below in the **Metrics and Outcomes** section the reader will find evidential data in the form of a Summative result(s) or Interactive test outcome for each certified criterion for **CGM eMDs**.

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

Both required and voluntary standards updates must be addressed in the Real World Testing plan. Real World Testing plans must include all certified health IT updated to newer versions of standards prior to August 31 of the year in which the updates were made.

Indicate as to whether optional standards, via SVAP and/or USCDI, are leveraged as part of the certification of your health IT product(s).

- Yes, 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)	Updated certification criteria and associated product	CHPL Product Number	Conformance Measure
N/A	N/A	N/A	N/A

## CARE SETTING(S)

CGM eMDs is marketed primarily to ambulatory practices. eMDs does not market differently for different specialties, nor does the certified Health IT function differently in different care settings.

Care Setting	Justification
Primary Care	Specialties are primarily focused on the Family Medicine, Pediatrics and OB/GYN practices.
General Specialties	Serve the ENT, Neurology and Cardiology care settings
Orthopedic Specialties	Serve the Physical Therapy, Orthopedics, Podiatry, etc.
Surgical Specialties	Are deployed in the General Surgery, Plastic Surgery, Hand Surgery, etc. care settings.
Behavioral Health	Server all mental and behavioral health care settings

## METRICS AND OUTCOMES

Within this section is a list of the results collected from the **CGM eMDs v10** Real World Testing measures as defined in their Real World Test Plan. Outcomes are listed as Pass, Pass with Exception, or Fail determined by the success of obtaining testing results. This determination was based on a thorough review by the eMDs team. A link is included within the **Outcomes** column in the table below to a subsequent **Outcomes Details** table. This second table matches each outcome with additional detailed information such as supporting resources and descriptions of the tests that were performed.

Key components include:

- Customer created a comprehensive Test Results Report which details customer environment, patient data utilized for tests, locations of testing
- Customer attempted Summative and/or Interactive Testing
- Customer collected audit logs to support spreadsheets and as necessary, screen shots

that demonstrate proof of Interactive Testing for each criterion with “0” values in Summative Testing. These files are referenced and remain on file with CGM eMDs.

The following metrics were measured by querying data either from CGM eMDs customers hosted by CGM (247 sites) over a 90-day period or – in the case of eprescribing metrics -- from transaction data collected by CGM Platform Services which is responsible for routing eprescribing messages. The resultant reports were then saved to show the usage of the criterion.

(from 85 FR 25766)

Associated Criterion(a)	Measurement / Metric	Relied Upon Software (if applicable)	Outcomes	Challenges Encountered (if applicable)
170.315(b)(1) Transitions of care	Over a 90-day period: 1) Number of CCDAs created 2) Number of CCDAs sent via edge protocols	Updox	<a href="#">Pass</a> 1) 49,955 2) 2029	
170.315(b)(2) Clinical information reconciliation and incorporation	Over a 90-day period: 1) Number of times a user reconciled medication list data from a received CCDA 2) Number of times a user reconciled allergies and intolerance list data from a received CCDA 3) Number of times a user reconciled problem list data from a received CCDA		<a href="#">Pass</a> 1) 16,041 2) 1,125 3) 42,158	Recorded only reconciliations with changes, since a reconciliation without changes could also be noted for record-keeping even if a CCDA was not present. As such, these numbers do not represent all instances but are sufficient to demonstrate the functionality is operational.
170.315(b)(3) Electronic prescribing	Over a 90-day period: 1) Number of prescriptions created 2) Number of prescriptions changed 3) Number of prescriptions canceled 4) Number of prescriptions renewed	First Databank	<a href="#">Pass</a> 1) 6,970,152 2) 68,871 3) 697,224 4) 1,510,836	
170.315(b)(6) Data export	Over a 90-day period: 1) Number of times a data export was performed for a patient		<a href="#">Pass</a> 1. 28,402	This represents the total number of data exports regardless of whether they were exported individually or in bulk. Both methods were verified as functional and compliant in interactive

				testing.
170.315(b)(9) Care Plan	Over a 90-day period: 1) Number of times a Care Plan CCDA was produced	Updox	<a href="#">Pass</a> 1. 23,816	
170.315(f)(1) Transmission to immunization registries	Over a 90-day period: 1) Number of immunization records submitted to the immunization registry 2) Number of immunization history records received by the Health IT module from the registry		<a href="#">Pass</a> 1. 64,912 2. 19	The ability to receive immunization history records from an immunization registry still has low adoption in our hosted environment (the source of our reporting sample). As a result, only a few records were received during the sample period. However, this is sufficient to show that the functionality is operational in a production environment.
170.315(g)(7) Application access — patient selection	eMDs will create 3 test patients in the API, to represent 3 different care settings: Primary Care, Specialty, Surgical eMDs will then use PostMan to send queries, representing an app that we expect to see patients use to perform the following functions to show that they are available and ready to be used in the Real World.		<a href="#">Pass</a>	
170.315(g)(8) Application access — data category request	1. Provide credentials to identify the patient to the API, and receive a token in return		<a href="#">Pass</a>	
170.315(g)(9) Application access — all data request	2. Use those credentials to query for setting-relevant data categories for the test patient for each setting 3. Use those credentials again to query for a CCDA document		<a href="#">Pass</a>	

**OUTCOME DETAILS**

The following sections contain additional descriptions and test results supporting documentation to provide more context for the testing outcomes defined in the **Metrics and Outcomes** table above.

### 170.315(b)(1) Transitions of care

Summary Description	
<b>Pass</b>	<b>Method: Summative Testing</b>
<p>The purpose of this test was to show that CDA documents are able to be created and exported.</p> <p>A query of 247 hosted sites' historical audit logs for a 90-day period was performed for the 170.315(b)(1) criterion. This number of sites accurately represents all Care Settings listed above. The resulting totals show that this module was active throughout the period and therefore demonstrates a compliant result.</p>	
Justification	
<p>This criterion requires the ability of a certified Health IT module to create CCDAs according to specified standards and vocabulary code sets, as well as send CCDAs via edge protocols. However, it is not possible to consistently and reliably demonstrate that all required standards and code sets were used because not all CCDAs created in a real-world setting contain all the necessary data elements. Furthermore, it is not feasible to obtain copies of CCDA documents from "outside" developers or providers who have no incentive to participate in this exercise. Therefore, we intend to demonstrate the required certified capabilities by demonstrating how often CCDAs are created and sent to other systems to demonstrate the certified capability is available and effective, regardless of the frequency it is used. Our expectation is there will be moderate utilization by providers with a high success rate.</p>	
Results Supporting Documents	
<p>Please contact the CGM eMDs team for any results spreadsheets, recordings and workflow screenshots if needed.</p>	

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

Summary Description	
<b>Pass</b>	<b>Method: Summative Testing</b>
<p>The purpose of this test was to show that CDA documents are able to be imported, matched to a patient, and reconciled.</p> <p>A query of 247 hosted sites' historical audit logs for a 90-day period was performed for the 170.315(b)(2) criterion. The resulting totals show that this module was active throughout the period and therefore demonstrates a compliant result.</p>	
Justification	
<p>This criterion requires the ability of a certified Health IT module to take a CCDA received via an outside system and match it to the correct patient; reconcile the medication, allergy, and problem lists; and then incorporate the lists into the patient record. The expectation is each of these steps is done electronically within the certified Health IT module. While this certified capability is available to our users, most providers in the real world typically prefer to perform these steps manually and elect to save any outside received CCDAs as attachments to the patient record. Therefore, we intend to record the frequency that providers are electronically reconciling and incorporating CCDAs that were received from outside providers to demonstrate the certified capability is available and effective, regardless of the frequency it is used. Our expectation is there will be low utilization by providers with a high success rate</p>	
Results Supporting Documents	



### 170.315(f)(1) Transmission to Immunization Registries

Summary Description	
<b>Pass</b>	<b>Method: Summative Testing</b>
<p>The purpose of this test was to show that the EHR is able to transmit immunization data to a registry and meets the reporting requirement for the designated care settings.</p> <p>A query of 247 hosted sites' historical audit logs for a 90-day period was performed for the 170.315(f)(1) criterion. The resulting totals show that this module was active throughout the period and therefore demonstrates a compliant result.</p>	
Justification	
<p>This criterion requires the ability of a certified Health IT module to transmit immunization data to a registry using a specified format. We intend to record the frequency that immunization data is submitted to registries by providers to demonstrate the certified capability is available and effective, regardless of the frequency it is used. Our expectation is there will be low utilization by providers with a high success rate.</p>	
Results Supporting Documents	
<p>Please contact the CGM eMDs team for any results spreadsheets, recordings and workflow screenshots if needed.</p>	

### 170.315(g)(7) Application Access — Patient Selection

Summary Description	
<b>Pass</b>	<b>Method: Interactive Testing</b>
<p>The purpose of this test was to show that the EHR is able to fulfill an API request that enables external applications to request a unique patient identifier from the certified Health IT module that can be used to request additional patient data.</p> <p>Due to low or zero adoption of this criteria, health IT developer demonstrated the module function in their system as an interactive test demonstrating a compliant result.</p> <p>eMDs created 3 test patients in a production version of the API, to represent 3 different care settings: Primary Care, Specialty, Surgical</p> <p>eMDs then used PostMan to send queries, representing an app that we expect to see patients use to perform the following functions to show that they are available and ready to be used in the Real World.</p> <ol style="list-style-type: none"> <li>1. Provide credentials to identify the patient to the API, and receive a token in return</li> <li>2. Use those credentials to query for setting-relevant data categories for the test patient for each setting</li> <li>3. Use those credentials again to query for a CCD document</li> </ol>	
Justification	
<p>This criterion requires the certified Health IT module to provide an API and supporting documentation that enable external applications to request a unique patient identifier from the certified Health IT module that can be used to request additional patient data.</p>	
Results Supporting Documents	
<p>Please contact CGM eMDs for a recording of this interactive test if needed.</p>	



### 170.315(g)(8) Application Access — Data Category Request

Summary Description	
<b>Pass</b>	<b>Method: Interactive Testing</b>
<p>The purpose of this test was to show that the EHR is able to fulfill an API request that enables external applications to request patient data categories from the certified Health IT module.</p> <p>Due to low or zero adoption of this criteria, health IT developer demonstrated the module function in their system as an interactive test demonstrating a compliant result.</p> <p>eMDs created 3 test patients in a production version of the API, to represent 3 different care settings: Primary Care, Specialty, Surgical</p> <p>eMDs then used PostMan to send queries, representing an app that we expect to see patients use to perform the following functions to show that they are available and ready to be used in the Real World.</p> <ol style="list-style-type: none"> <li>1. Provide credentials to identify the patient to the API, and receive a token in return</li> <li>2. Use those credentials to query for setting-relevant data categories for the test patient for each setting</li> <li>3. Use those credentials again to query for a CCDA document</li> </ol>	
Justification	
<p>This criterion requires the certified Health IT module to provide an API and supporting documentation that enable external applications to request patient data by category from the certified Health IT module.</p>	
Results Supporting Documents	
<p>Please contact CGM eMDs for a recording of this interactive test if needed.</p>	

### 170.315(g)(9) Application Access — All Data Request

Summary Description	
<b>Pass</b>	<b>Method: Interactive Testing</b>
<p>The purpose of this test was to show that the EHR is able to fulfill an API request that enables external applications to request all categories of patient data defined in the CCDA from the certified Health IT module.</p> <p>Due to low or zero adoption of this criteria, health IT developer demonstrated the module function in their system as an interactive test demonstrating a compliant result.</p> <p>eMDs created 3 test patients in a production version of the API, to represent 3 different care settings: Primary Care, Specialty, Surgical</p> <p>eMDs then used PostMan to send queries, representing an app that we expect to see patients use to perform the following functions to show that they are available and ready to be used in the Real World.</p> <ol style="list-style-type: none"> <li>1. Provide credentials to identify the patient to the API, and receive a token in return</li> <li>2. Use those credentials to query for setting-relevant data categories for the test patient for each setting</li> <li>3. Use those credentials again to query for a CCDA document</li> </ol>	
Justification	
<p>This criterion requires the certified Health IT module to provide an API and supporting documentation that enable external applications to request all categories of patient data defined in the CCDS from the certified Health IT module.</p>	

**Results Supporting Documents**

Please contact CGM eMDs for a recording of this interactive test if needed.

**KEY MILESTONES**

Includes a list of key milestones that were met during the Real World Testing process. Includes details on how and when CGM eMDs implemented measures and collected data.

Key Milestone	Care Setting	Date/Timeframe
Scheduling and logistics	Primary Care -General Specialties -Orthopedic Specialties -Surgical Specialties -Behavioral Health	01/02/2023 – 07/30/2023
Data collection	Primary Care -General Specialties -Orthopedic Specialties -Surgical Specialties -Behavioral Health	10/01/2023-12/31/2023
Review Data	Primary Care -General Specialties -Orthopedic Specialties -Surgical Specialties -Behavioral Health	01/01/2024-01/31/2024
Writing Report	Primary Care -General Specialties -Orthopedic Specialties -Surgical Specialties -Behavioral Health	01/01/2024-01/25/2024
CGM eMDs executed summative testing to show that the criteria are functional. The following metrics were pulled from transaction logs as detailed in the outcomes section above: <ul style="list-style-type: none"> <li>170.315 (b)(1) Transitions of care</li> <li>170.315 (b)(2) Clinical Information Reconciliation and Incorporation</li> <li>170.315 (b)(3) Electronic Prescribing</li> <li>170.315 (b)(6) Data Export</li> <li>170.315 (b)(9) Care Plan</li> <li>170.315 (f)(1) Transmission to immunization registries</li> </ul>	Primary Care -General Specialties -Orthopedic Specialties -Surgical Specialties -Behavioral Health	10/01/2023-12/31/2023
CGM eMDs executed interactive testing to show that the criterion are functional. The following metrics were tested interactively as detailed in the outcomes section above: <ul style="list-style-type: none"> <li>170.315(g)(7) Application access—patient selection</li> <li>170.315(g)(8) Application access—data category request</li> <li>170.315(g)(9) Application access—all data request</li> </ul>	-Primary Care -General Specialties -Orthopedic Specialties -Surgical Specialties -Behavioral Health	09/01/2023-11/01/2023



## ATTESTATION

This Real World Testing Results Report is complete with all required elements, including measures that address all certification criteria and care settings. All information in this plan is up to date and fully addresses the Health IT Developer's Real World Testing requirements.

Authorized Representative Name: Samuel Frank, Director of Product Management, CGM US

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Authorized Representative Signature:

A handwritten signature in black ink that reads "Samuel Frank". The signature is written in a cursive style.

Date: 01/31/2024

<sup>[i]</sup> <https://www.federalregister.gov/d/2020-07419/p-3582>