CY 2022 Real World Testing Report for Picasso

Executive Summary

This is the test report for CY 2022 real world testing for our Picasso certified EHR. This is the companion document to our CY 2022 real world test plan that described our approach for conducting real world testing in CY 2022 and the testing measures we employed.

Our findings show that EHR is working as it was certified. Results do indicate that some certified functionality is widely used, like patient portal and electronic prescription, while other features are not used, such as C-CDA transmission and API usage.

For each our CY 2022 Real World Testing Measures, we have recorded our results and findings. If any non-conformities or errors were encountered, we noted them.

Our signed attestation of compliance with the real world testing requirements is on the following page.

Developer Attestation

This Real World Testing 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: Jim Costa

Authorized Representative Email: JCosta@harriscomputer.com

Authorized Representative Phone: 855-528-4357 x63067

Authorized Representative Signature:

01/31/2023

General Information

Plan Report ID Number: Picasso-RWT-2022

Developer Name: Doc-tor.com

Product Name(s): Picasso

Version Numbers(s): 7

Certified Health IT Criteria: 315(b)(1), (b)(6), (c)(1)-(3), (f)(5), (f)(7), (g)(7)-(9), (h)(1)

Product List (CHPL) ID(s) and Link(s):

- 15.04.04.2985.Pica.07.02.1.210408
- https://chpl.healthit.gov/#/listing/10628

Developer Real World Testing Page URL: https://www.doc-tor.com/

Timeline and Milestones for Real World Testing CY 2022

- Milestone 1Q-2022: Begin communication with clients to ask for their support and participation in real world testing. The goal is to have a sufficient number of clients committed for real world testing by the end of 1Q-2022.
    - STATUS: Delayed until 4Q because of work on Cures certification. Completed in 4Q.
- Milestone 2Q-3Q 2022. During the 2nd and 3rd quarter of CY 2022, the real world testing with clients will be scheduled and performed. It is expected that a preparatory call will be done with clients to prepare them for testing activities. Results will be documented in the test results section of the test methods and ultimately used to build the test report. If any non-compliances are observed, we will notify the ONC-ACB of the findings and make the necessary changes required.
    - STATUS: Delayed until 4Q because of work on Cures certification. Completed in 4Q.
- Milestone 4Q-2022. During the last quarter of the year, the CY 2023 real world test plan will be completed according to ONC and ONC-ACB requirements and expectations. Test plan will be prepared for submission before the end of the year.
    - STATUS: MET
- Milestone 1Q-2023. Submit RWT Test Report to ONC-ACB.
    - STATUS: MET

Standards Version Advancement Process (SVAP) Updates

For CY 2022 RWT testing, we did not do any SVAP updates.

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

RWT Measure #1.   Number of Transition of Care C-CDAs Successfully Sent

Associated Criteria: 315(b)(1)

Testing Methodology: Reporting/Logging

Measurement Description

This measure is tracking and counting how many C-CDAs are created and successfully sent from the EHR Module to a 3rd party during a transition of care event over the course of a given interval.

Care Settings

Our EHR is targeted to a variety of care settings including family practice, internal medicine, general practice, pediatrics, and some other settings in ambulatory care.

Testing Results

Clinics Queried: 2

Reporting Interval: 12 months

Testing Metric/Measurement: Number of C-CDA Successfully Sent

 Total C-CDA Sent for all Clinics: 0

Analysis and Key Findings

Our clients do not regularly share data through C-CDA files so we do not have any records of exchanged C-CDAs. To supplement this, we did conformance testing internally in a production-adjacent environment and verified our Module functionality is still working as certified.

Non-Conformities or Errors Discovered

During our testing, we did not discover any errors or criteria non-conformities. We did not make any changes to this measure from our original test plan.

RWT Measure #2.   Number of Patient Batch Exports Run

Associated Criteria: 315(b)(6)

Testing Methodology: Reporting/Logging

Measurement Description

This measure is tracking and counting how many batch exports of C-CDAs were successfully performed by the EHR Module over the course of a given interval.

Care Settings

Our EHR is targeted to a variety of care settings including family practice, internal medicine, general practice, pediatrics, and some other settings in ambulatory care.

Testing Results

Clinics Queried: 2

Testing Metric/Measurement: Number of Batch C-CDAs Exports Run

*   Total C-CDA Sent for all Clinics: 0*

Analysis and Key Findings

Our clients do not regularly share data through C-CDA files so we do not have any records of batch export C-CDAs. To supplement this, we did conformance testing internally in a production-adjacent environment and verified our Module functionality is still working as certified.

Non-Conformities or Errors Discovered

During our testing, we did not discover any errors or criteria non-conformities. We did not make any changes to this measure from our original test plan.

RWT Measure #3.   Number of Quality Measures Successfully Reported on to CMS

Associated Criteria: 315(c)(1)-(c)(3)

Testing Methodology: Reporting/Logging

Measurement Description

This measure is tracking and counting how many eCQM quality measures were successfully reported on by the EHR Module to CMS during their submission period for MIPS Quality reporting.

Care Settings

Our EHR is targeted to a variety of care settings including family practice, internal medicine, general practice, pediatrics, and some other settings in ambulatory care.

Testing Results

Clinics Queried: 2

Reporting Interval: 12 months

Testing Metric/Measurement: Number Quality Measures Reported

  Average Number Submitted per Clinic: 6

Analysis and Key Findings

Our clients were able to submit their top six scoring eCQMs for their MIPS Quality Reporting category without error or issue. Our clinic customers do use a 3rd party that is not part of our EHR's certification, MIPS Pro, to submit CQMs to CMS, but this testing does show our integration is working for our customers and allows them to complete this real world activity.

Non-Conformities or Errors Discovered

During our testing, we did not discover any errors or criteria non-conformities. We did not make any changes to this measure from our original test plan.

RWT Measure #4.   Number of Cancer Case Messages Successfully Sent to Public Registries

Associated Criteria: 315(f)(5)

Testing Methodology: Reporting/Logging

Measurement Description

This measure is tracking and counting how many cancer case messages are created and successfully sent from the EHR Module to a registry over the course of a given interval.

Care Settings

Our EHR is targeted to a variety of care settings including family practice, internal medicine, general practice, pediatrics, and some other settings in ambulatory care.

Testing Results

Clinics Queried: 2

Testing Metric/Measurement: Number of Cancer Messages Sent to PHA

Total Cancer Messages Sent for all Clinics: 3,849

Analysis and Key Findings

For some of clients, this is their most widely used certified feature and it plays an important part in their clinical care to their patient population.

Non-Conformities or Errors Discovered

During our testing, we did not discover any errors or criteria non-conformities. We did not make any changes to this measure from our original test plan.

RWT Measure #5.   Number of Health Care Survey Messages Successfully Sent

Associated Criteria: 315(f)(7)

Testing Methodology: Reporting/Logging

Measurement Description

This measure is tracking and counting how many health care survey messages are created and successfully sent from the EHR Module to a public health registry over the course of a given interval.

Care Settings

Our EHR is targeted to a variety of care settings including family practice, internal medicine, general practice, pediatrics, and some other settings in ambulatory care.

Testing Results

We queried our customer base and inquired if any are reporting on NAMCS health care surveys to local or state registries.

Results indicate that our clients are connecting to multiple PHAs with health care survey responses.

Analysis and Key Findings

Based on our testing, we do have several customers reporting health care surveys to their local public health agencies.

Non-Conformities or Errors Discovered

During our testing, we did not discover any errors or criteria non-conformities. We did not make any changes to this measure from our original test plan.

RWT Measure #6.   Number of Direct Messages Successfully Sent

Associated Criteria: 315(h)(1)

Testing Methodology: Reporting/Logging

Measurement Description

This measure is tracking and counting how many Direct messages were successfully sent from the EHR Module to a 3rd party over the course of a given interval.

Care Settings

Our EHR is targeted to a variety of care settings including family practice, internal medicine, general practice, pediatrics, and some other settings in ambulatory care.

Testing Results

Clinics Queried: 2

Reporting Interval: 12 months

Testing Metric/Measurement: Number of Direct Messages Successfully Sent

   Total Sent for all Clinics: 0

Analysis and Key Findings

Our clients do not regularly share data through C-CDA files so we do not have any records of exchanged C-CDAs via Direct. However, our 3rd party HISP MaxMD Direct mdEmail is fully integrated and working with our EHR.

Non-Conformities or Errors Discovered

During our testing, we did not discover any errors or criteria non-conformities. We did not make any changes to this measure from our original test plan.

RWT Measure #7.   Number of Direct Messages Successfully Received

Associated Criteria: 315(h)(1)

Testing Methodology: Reporting/Logging

Measurement Description

This measure is tracking and counting how many Direct messages were successfully received by the EHR Module from a 3rd party over the course of a given interval.

We will capture this measure for a minimum of three (3) months.

Care Settings

Our EHR is targeted to a variety of care settings including family practice, internal medicine, general practice, pediatrics, and some other settings in ambulatory care.

Testing Results

Clinics Queried: 2

Reporting Interval: 12 months

Testing Metric/Measurement: Number of Direct Messages Successfully Received

> *Total Sent for all Clinics: 0*

Analysis and Key Findings

Our clients do not regularly share data through C-CDA files so we do not have any records of exchanged C-CDAs via Direct. However, our 3rd party HISP MaxMD Direct mdEmail is fully integrated and working with our EHR.

Non-Conformities or Errors Discovered

During our testing, we did not discover any errors or criteria non-conformities. We did not make any changes to this measure from our original test plan.

RWT Measure #8. Compliance of C-CDA Creation and C-CDA Scorecard Average

Associated Criteria: 315(b)(1)

Testing Methodology: Compliance and Tool

Measurement Description

This measure is tracking compliance the EHR Module criteria functionality of creating a C-CDA and measuring its C-CDA Scorecard average.

Care Settings

Our EHR is targeted to a variety of care settings including family practice, internal medicine, general practice, pediatrics, and some other settings in ambulatory care.

Testing Results and Changes for this Measure from Original RWT Test Plan

Testing Metric/Measurement: C-CDA Creation and C-CDA Scorecard Average Metric

Tested multiple C-CDA Records.

Average Scorecard Result – 76

Errors Detected – 0

Analysis and Key Findings

This test was done using simulated patient data in mirrored production settings. Our results reveal this certified EHR module is working as certified and scores at average value compared to the industry benchmark.

Non-Conformities or Errors Discovered

During our testing, we did not discover any errors or criteria non-conformities.

RWT Measure #9.   Compliance of C-CDA Error Detection

Associated Criteria: 315(b)(1)

Testing Methodology: Compliance

Measurement Description

This measure is tracking compliance of the EHR Module criteria functionality of detecting errors within a received or imported C-CDA.

Care Settings

Our EHR is targeted to a variety of care settings including family practice, internal medicine, general practice, pediatrics, and some other settings in ambulatory care.

Testing Results and Changes for this Measure from Original RWT Test Plan

Testing Metric/Measurement: C-CDA Error Detection

Tested multiple C-CDA Records.

All Errors Detected

Analysis and Key Findings

This test was done using simulated patient data in mirrored production settings. We modified patient data to have specific errors in them and then imported them into our EHR. Our error detection found the intentional C-CDA errors as designed.

Non-Conformities or Errors Discovered

During our testing, we did not discover any errors or criteria non-conformities.

RWT Measure #10.   Compliance of DirectTrust and Certificate Discovery/Authorization

Associated Criteria: 315(h)(1)

Testing Methodology: Compliance and Tool

Measurement Description

This measure is tracking compliance of the EHR Module criteria functionality of compliance with DirecTrust network and certificate discovery/authorization.

Care Settings

Our EHR is targeted to a variety of care settings including family practice, internal medicine, general practice, pediatrics, and some other settings in ambulatory care.

Testing Results

Testing Metric/Measurement: DirectTrust Certificate is Compliant with DirectTrust CA Discover and Authorization

> *Confirmed*

Analysis and Key Findings

While our clients do not regularly share data through C-CDA via Direct, our 3rd party HISP MaxMD Direct mdEmail is fully integrated and working with our EHR and has its DirectTrust CA certificate installed in our production system.

Non-Conformities or Errors Discovered

During our testing, we did not discover any errors or criteria non-conformities. We did not make any changes to this measure from our original test plan.

RWT Measure #11.   Do you use batch patient data export to obtain large volumes of patient data?

Associated Criteria: 315(b)(6)

Testing Methodology: Survey/User Reported

Measurement Description

This is a survey measure to determine how often you are using the batch patient data export feature.

Care Settings

Our EHR is targeted to a variety of care settings including family practice, internal medicine, general practice, pediatrics, and some other settings in ambulatory care.

Testing Results

Testing Metric/Measurement: Queried users: "do you use batch patient data export to obtain large volumes of patient data"

> *No clinics reported using this feature.*

Analysis and Key Findings

Our clients do not regularly share data through C-CDA files so it is not surprising that they do not do batch export of C-CDAs.

Non-Conformities or Errors Discovered

During our testing, we did not discover any errors or criteria non-conformities. We did not make any changes to this measure from our original test plan.

RWT Measure #12.   Do you successfully record, calculate, and submit clinical quality measures to CMS using the EHR and if so, which CQMs were submitted?

Associated Criteria: 315(c)(1)-(c)(3)

Testing Methodology: Survey/User Reported

Measurement Description

This is a survey/user reported measure to determine if users were able to successfully submit CQMs to CMS using EHR CEHRT functionality.

Care Settings

Our EHR is targeted to a variety of care settings including family practice, internal medicine, general practice, pediatrics, and some other settings in ambulatory care.

Testing Results

Testing Metric/Measurement: Queried users: "what eCQMs do you submit to CMS"

User responses: CMS39, CMS47, CMS111, CMS112, CMS128, CMS134, CMS182,

Analysis and Key Findings

Our clients were able to submit their eCQMs for their MIPS Quality Reporting category without error or issue. They do use a 3rd party that is not part of our EHR's certification to submit CQMs to CMS, but this testing does show our integration is working for our customers and allows them to complete this real world activity.

Non-Conformities or Errors Discovered

During our testing, we did not discover any errors or criteria non-conformities. We did not make any changes to this measure from our original test plan.

RWT Measure #13. How many different applications/3rd party systems are using your API capabilities?

Associated Criteria: 315(g)(7)-(g)(9)

Testing Methodology: Survey/User Reported

Measurement Description

This is a survey measure to determine how many different systems or applications are connecting to your EHR via the API.

Care Settings

Our EHR is targeted to a variety of care settings including family practice, internal medicine, general practice, pediatrics, and some other settings in ambulatory care.

Testing Results

Testing Metric/Measurement: Queried users: "how many different applications/3rd party systems are using your API capabilities"

User responses: 0

Analysis and Key Findings

Our clients are not using the ONC API interface as no one has reached out to register their application to use it.

Non-Conformities or Errors Discovered

During our testing, we did not discover any errors or criteria non-conformities. We did not make any changes to this measure from our original test plan.