Real World Testing Plan

GENERAL INFORMATION

Plan Report ID Number:

Developer Name: Cyfluent

Product Name(s): Cyfluent

Version Number(s): 3.2.9

Certified Health IT: 0015ET7SML1PUC3

Product List (CHPL) ID(s): 15.04.04.2975.Cyfl.03.00.1.190813

Developer Real World Testing Page URL: https://www.cyfluentphr.com/_Files/CURES/

REAL WORLD TESTING SUMMARY

- Justification: The export of the health information associated with a patient population is another way to share health information with an external organization. It is typically used for research or quality purposes to look for specific trends on patient population. Export of a patient population is an administrative function only available to credentialed users. It is assumed that this function will be run as a scheduled activity as it will have significant impact on the Health IT Module. This will provide a metric on the use of the export of EHI for a patient population associated with the Health IT Module.
- Test Methodology: Case management logs and system logs will be reviewed to ensure the export function is operating properly and to determine the frequency of use. Log files obtained during Real World Testing will be used for analysis in several areas to validate the proper operation of the export. This test methodology will primarily test the conformance of the implementation.
- Expected Outcome(s): It is expected that authorized users will be able to share EHI for a patient population using the export function. Errors in transmission will be tracked and analyzed.

JUSTIFICATION FOR REAL WORLD TESTING APPROACH

Use Case 1 Overview: Application Programming Interfaces. Cyfluent's data extracts will be serviced indirectly by Planned Systems International.

Planned Systems International (PSI) is a leading healthcare and defense contractor for the federal government. As a part of their compliance needs, they need to be able to represent the ability to consume a modern/Cures-compliant API as a success story for future project initiatives. PSI has a number of customers, concerning which they hope to be able to issue SVAP instructions/migration steps

following this Real World Test. In addition, PSI hopes to build a sample API client that will work with any FHIR/USCDI API as a potential vehicle for revenue.

This client will also be made available to Cyfluent's customers, in case any tech-savvy customer would like to customize a data extract beyond the scenarios already supported. Such a client will also serve as a more secure option to ad-hoc reporting. All of this will allow Cyfluent to market itself more rigorously in the healthcare industry.

In the event no data extracts are requested by Cyfluent's customers during the relevant time window, Cyfluent will use a scrambled database for these tests as an emergency backup. Cyfluent already has NDAs, Business Associate Agreements, etc, in place with PSI.

- Cyfluent will bolster API performance and compliance because a third party (PSI) will be comparing its API consumption with other electronic healthcare vendors. This will help to highlight any variableness across implementations. This will also allow Cyfluent to better align itself with the spirit behind the information blocking rule set forth in CURES, which attempts to make all data exposure uniform.

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

Standard (and version)	All standards versions are those specified in USCDI v1. The developer plans to use SVAP to update its (e)(1) module to support the new version of the Direct transport protocol (now known as Secure Health Transport) during the testing period.
Method used for standard update	SVAP
Date of ONC-ACB notification	April 2022
Date of customer notification (SVAP only)	April 2022
USCDI-updated criteria	The plan documents the support of all USCDI v1 data elements.

Measurement/Metric	Description	
§ 170.315(b)(6) *Data export* - Measuring Success/Error Rates	*i.*	*General requirements for export summary configuration*
	ii.	*Creation*
	iii.	*Timeframe configuration*

	iv.	*Location configuration*

The following outlines the measures that have been identified to best demonstrate conformance to multiple certification criteria that are relevant to PSI's efforts to build a universal API client:

As part of the Real World Testing requirements for § 170.315(b)(6), § 170.315(b)(9), § 170.315(g)(7), § 170.315(g)(8), § 170.315(g)(9), § 170.315(g)(10), § 170.315(f)(4), and § 170.315(f)(5), the developer has developed the following metrics for their testing plan:

Use Case 1 Single Patient: Payload Compliance and Sharing. API response payloads will be confirmed to not error out, not respond when credentials are missing, comply to new formatting standards, include new data concepts (especially in relation to Care Plan), and return in a timely manner that doesn't lock up the API's system from a scalability standpoint.

Use Case 2 Multiple Patients: The same as Use Case 1, only with multiple/bulk patient requests. Included in this use case is the ability to query a patient seen in a date range. This would validate the API's ability to meet the needs of any health information exchange.

Associated Certification criteria

Certification criteria associated with the measure and if updated to the 2015 Edition Cures Update criteria.

Measurement/Metric	Associated Certification Criteria
§ 170.315(b)(9) Care plan	*i. Record, change, access* *ii. Create* *iii. Receive*
§ 170.315(g)(7) Application access— patient selection	*i. Receive, identify, return token* *ii. Document*
§ 170.315(g)(8) Application access— data category request	*i. Respond* *ii. Document*
§ 170.315(g)(9) Application access— all data request	*i. Respond to request* *ii. Document*
§ 170.315(g)(10) - Standardized API for patient and population services	*i. Data response single patient* *ii. Data response multiple patient*
§170.315(f)(4): Transmission to Cancer Registries	*i. Create* *ii. Transmit*

§170.315 (f)(5) *Transmission to public health agencies – electronic case reporting*	*i.*	*Consume, maintain, and determine reportability*
	ii.	*Create case report*
	iii.	*Transmit*

Justification for selected measurement/metric

The export of the health information associated with a patient population is another way to share health information with an external organization. It is typically used for research or quality purposes to look for specific trends on patient population. Export of a patient population is an administrative function only available to credentialed users. It is assumed that this function will be run as a scheduled activity as it will have significant impact on the Health IT Module. This will provide a metric on the use of the export of EHI for a patient population associated with the Health IT Module.

Care Setting

Care Setting	Justification
Ambulatory Care	The API client that PSI finalizes will be made available to Cyfluent's customer base, which includes (but is not limited to) Ophthalmology, Family Practice, and Pediatrics. Moving forward, all data extracts will be performed with this newer API instead of the legacy oData version.

Expected outcomes

- Payload formatting will be confirmed
- API compliance will be validated and compared to competing systems
- Data extracts will be achieved via modern API in lieu of legacy monolithic code

Key Milestone	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.	December 2022
Collection of information as laid out by the plan for the period.	January 2023
Planned System updates to allow for collection of data after a SVAP update	February 2023
Follow-up with providers and authorized representatives to understand any issues arising with the data collection.	Quarterly 2023
End of Real World Testing period/final collection of all data for analysis	January 2024
Analysis and report creation	January 2024
Submit Real World Testing report to ACB (Drummond)	February 2024

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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Dan Schneider (Dec 14, 2022 17:04 EST)

Date: 12/14/2021

Real World Test Plan_b6 2022

Final Audit Report 2022-12-14

Created:	2022-12-14
By:	Gwen Thomas (gthomas@plan-sys.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAe-0tIFCpCkYTXV-1b-xkD66qkRv2GkNP

"Real World Test Plan_b6 2022" History

Document created by Gwen Thomas (gthomas@plan-sys.com)
2022-12-14 - 9:54:19 PM GMT- IP address: 24.42.202.39

Document emailed to dschneider@plan-sys.com for signature
2022-12-14 - 9:54:47 PM GMT

Email viewed by dschneider@plan-sys.com
2022-12-14 - 9:59:57 PM GMT- IP address: 104.47.73.254

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2022-12-14 - 10:04:23 PM GMT- IP address: 96.249.228.14

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Signature Date: 2022-12-14 - 10:04:25 PM GMT - Time Source: server- IP address: 96.249.228.14

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