athenahealth

athenaClinicals v20 & v22 2023 Real World Test Results

Contents

General Information

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

Developer Name: athenahealth, Inc

Product Name(s): athenaClinicals

Version Number(s): v20 (withdrawn); v22 (withdrawn); v23

Certified Health IT: 2015 Edition Cures Update

Product List (CHPL) ID(s): 15.04.04.2880.Athe.AM.09.1.230317

Withdrawn Product List (CHPL) ID(s): 15.04.04.2880.Athe.AM.07.1.200312 ; 15.04.04.2880.Athe.AM.08.1.220726

Developer Real World Testing Page URL: https://www.athenahealth.com/onc-certified-health-it

Justification for Real World Testing approach

At this time, athenaClinicals is a Certified electronic health record (EHR) that is sold to primary care, specialty and multi-specialty ambulatory groups. Functionality within the EHR greatly overlaps regardless of care setting, but the Real World Testing plan aims to incorporate data from as diverse a set of these settings as is possible.

As all of the certification criteria apply broadly to the care settings noted above, the Real World Testing plan will incorporate several certification criteria into one plan:

- §170.315(b)(1) – Transitions of Care
- §170.315(b)(2) – Clinical Information Reconciliation and Incorporation
- §170.315(b)(3) – Electronic Prescribing
- §170.315(b)(6) – Data Export
- §170.315(b)(9) – Care Plan
- §170.315(c)(1) – CQMs – Record and Export
- §170.315(c)(2) – CQMs – Import and Calculate
- §170.315(c)(3) – CQMs – Report
- §170.315(e)(1) – View, Download, and Transmit to 3rd Party
- §170.315(f)(1) – Transmission to Immunization Registries
- §170.315(f)(2) – Transmission to Public Health Agencies – Syndromic Surveillance

- §170.315(f)(7) – Transmission to Public Health Agencies – Health Care Surveys
- §170.315(g)(7) – Application Access – Patient Selection
- §170.315(g)(9) – Application Access – All Data Request
- §170.315(g)(10) – Standardized API for patient and population services
- §170.315(h)(1) – Direct Project

Standards Updates (SVAP and USCDI)

Standard (and version)	All standards versions are as specified in 2015 Edition/Cures Update except for:§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
Date of ONC-ACB notification (SVAP or USCDI)	January 2023 (next quarterly attestation)
Date of customer notification (SVAP only)	December 2021
USCDI-updated criteria	Not applicable

Care Setting(s)

See summary of supported care settings listed in the "Justification for Real World Testing Approach" section.

Overall Expected Outcomes

- Real World Testing will demonstrate that the EHR is conformant to the criteria listed in the "Justification for Real World Testing" section.
- See below for measures and outcomes associated with the use cases associated with the listed certification criteria.

Measure Used

Use Case 1 – During the course of ambulatory care, providers share patient records (CCDAs) with each other and where appropriate, reconcile key clinical data elements into the chart.

Certification Criteria	Requirement
§ 170.315 (b)(1) Transition of care	(i) Send and receive via edge protocol…
	(ii) Validate and display…
	(iii) Create…
§ 170.315 (b)(2) Clinical information reconciliation and incorporation	(i) General requirements…
	(iii) Reconciliation…
§ 170.315 (b)(9) Care plan	Enable a user to record, change, access, create, and receive care plan information in accordance with the Care Plan document template…
§ 170.315 (g)(6) Consolidated CDA creation performance	(i) Reference C-CDA match..
	(ii) Document-template conformance…
	(iii) Vocabulary conformance…
	(iv) Completeness verification…
§ 170.315 (h)(1) Direct project	(i) Applicability Statement for Secure Health Transport…
	(ii) Delivery Notification in Direct

Measure 1: Create a valid CCDA – This measure will demonstrate EHR ability to create and send a CCDA that is conformant to the standards outlined in § 170.315 (b)(1) Transition of care and § 170.315 (g)(6) Consolidated CDA creation performance.

- Justification: Other EHRs will expect to successfully receive a CCDA formatted to Release 2.1 with all required data elements from athenaClinicals.
- Test Methodology: A CCDA of each required type (Referral Note, CCD, Care Plan) will be created in athenaClinicals and sent to another EHR via each certified workflow (if applicable). athenaClinicals and the other EHR will be using a production-grade environment configured in a way typical of the marketed care settings. System logs will be reviewed to identify possible errors in transport. A user in the receiving EHR will demonstrate successful display of all required elements.
- Expected Outcomes: Success is when a different EHR receives and recognizes each type of CCDA as conformant.

Measure 2: Create and send a CCDA: This measure will evaluate the creation and sending of required CCDAs (Referral Note, CCD) at scale across many providers using athenaClinicals in a live production environment.

- Justification: A statistically significant sample size of CCDAs generated and sent by athenaClinicals spanning multiple organizations with expected errors will validate successful use in the real world.
- Test Methodology: System logs will be evaluated for each required type of CCDA that was created and sent.
- Expected Outcomes: Success is defined as CCDAs of each required type successfully being created and sent via Direct with expected errors (e.g. invalid direct address, no response from receiver, etc.)

Measure 3: Receive and display a CCDA – This measure will demonstrate EHR ability to receive and display a CCDA of each required type (Referral Note, CCD, Care Plan) in a live production environment.

- Justification: Two sub-measures will be evaluated: 1) A manual evaluation of several production examples of each required type of CCDA (Referral Note, CCD and Care Plan) will show that athenaClinicals can successfully receive and display CCDAs. 2) An evaluation of a statistically significant number of CCDAs received and displayed by providers using athenaClinicals spanning multiple organizations will validate successful use in the real world.
- Test Methodology: 1) Examples of CCDAs of each type will be randomly selected for manual review spanning various care settings in the athenaClinicals network. 2) System logs will be evaluated to identify the number of CCDAs that were successfully received and displayed.
- Expected Outcomes: Success is defined as:
  1) Chosen examples are successfully received and displayed.
  2) CCDAs successfully received via Direct and displayed with expected errors (e.g. incorrect CCDA format).

Measure 4: Receive and reconcile a CCDA – This measure will demonstrate EHR ability to receive and reconcile a CCDA of each required type (Referral Note, CCD) in a live production environment.

- Justification: An evaluation of reconciliation use spanning a statistically significant number of active users spanning multiple organizations will validate successful use in the real world.
- Test Methodology: System logs will be evaluated to determine the number of users that successfully reconcile a CCDA using CEHRT.
- Expected Outcomes: A high number of users successfully use CEHRT to receive and reconcile data into patient charts.

Use Case 1 Outcomes

No changes from plan.

Measure	Relied Upon Software	Outcomes	Challenges
1: Create a valid CCDA	N/A	Test samples of a CCD and Referral Note were successfully sent via Direct from athenaClinicals and received by the athenaPractice EHR. Receipt and conformance to standards was verified by displaying the documents in athenaPractice.	N/A
2: Create and send a CCDA	N/A	Review of audit logs for Q2 2023 of all athenaClinicals customers yielded validation of 1,238,845 successful Referral Note and 3079 successful CCD Direct message transmissions. The CCD send via Direct feature has low utilization which accounts for the low volume. The failures identified primarily relate to MDN's received as "Unable to process," "Address no longer valid," "Unable to verify trust certificate" or "Certificate is expired."	N/A
3: Receive and display a CCDA	N/A	**Sub-measure 1:** An example Referral Note and CCD sent from the athenaPractice EHR was successfully received and displayed in athenaClinicals. **Sub-measure 2:** Review of audit logs for Q2 2023 of all athenaClinicals customers yielded a validation of 9,516,165 user views of received CCDAs.	N/A

4: Receive and reconcile a CCDA	N/A	Review of audit logs for Q2 2023 of all athenaClinicals customers yielded validation that 113,279 unique users reconciled at least one problem, medication, or allergy from a CCDA.	N/A

Use Case 2 – During the course of ambulatory care, patients access a copy of their record (CCDs) for viewing, downloading and/or transmitting.

Certification Criteria	Requirement
§ 170.315 (e)(1) View, download, and transmit to 3rd party	(i) (A) View…
	(i)(B) Download…
	(i)(C) Transmit to third party…
§ 170.315 (h)(1) Direct project	(i) Applicability Statement for Secure Health Transport…
	(ii) Delivery Notification in Direct

Measure 1: Validate user behavior around view actions – This measure will demonstrate the ability for a patient to preview a CCD document template in a live production environment of the athenaClinicals patient portal (athenaComunicator).

- Justification: The CCD document template contains all required data elements in § 170.315 (e)(1)(i)(A).
- Test Methodology: System logs will be evaluated to identify patients with a successful CCD document view in athenaCommunicator.
- Expected Outcomes: Success is defined by the number of patients with successful CCD document previews.

Measure 2: Validate user behavior around download actions – This measure will demonstrate the ability for a patient to download a CCD document template in a live production environment of athenaCommunicator.

- Justification: An evaluation of a statistically significant number of CCD document downloads spanning multiple organizations will demonstrate the successful real world use of the download feature.
- Test Methodology: System logs will be evaluated to identify patients with a successful CCD document download in athenaCommunicator.
- Expected Outcomes: Success is defined as the number of patients that can successfully download CCD documents.

Measure 3: Validate user behavior around transmit actions – This measure will demonstrate the ability for a patient to transmit a CCD document template to a third party in a live production environment of athenaCommunicator.

- Justification: An evaluation of a statistically significant number of CCD document transmissions spanning multiple organizations will demonstrate the successful real world use of the transmit feature.
- Test Methodology: System logs will be evaluated to identify CCD documents successfully transmitted from athenaCommunicator. The analysis will breakout transmission via either Direct or email.
- Expected Outcomes: Success is defined as:
  - CCD documents successfully sent via Direct with expected errors (e.g. invalid Direct address, lack of response, etc.)
  - CCD documents successfully sent via email with expected errors (e.g. invalid email address, etc.)

Use Case 2 Outcomes

No changes from plan.

Measure	Relied Upon Software	Outcomes	Challenges
1: Validate user behavior around view actions	athenaCommunicator	Review of audit logs for 6/14/23 – 9/12/23 for 5092 customers yielded validation of 452,448 successful views and 149 failures. Note – A view requires the download of a CCDA which is why the data is aligned to Measure 2 below.	N/A
2: Validate user behavior around download actions		Review of audit logs for 6/14/23 – 9/12/23 for 5092 customers yielded validation of 452,448 successful views and only 149 failures.	N/A
3: Validate user behavior around transmit actions		Review of audit logs for 6/14/23 – 9/12/23 yielded validation as follows: • Transmit via email: 121,699 successful transmits spanning 5979 customers with 8 errors. • Transmit via Direct: 1776 successful transmits spanning 567 customers with 0 errors.	N/A

Use Case 3 – EHR users export CCDAs for one or many patients for the purpose of sharing with providers, patients or other third-parties under the purview of HIPAA.

Certification Criteria	Requirement
§ 170.315 (b)(6) Data export	(i) General requirements for export summary configuration…
	(ii) Creation…
	(iii) Timeframe configuration…
	(iv) Location configuration…

Measure 1: Single/Multi patient export – This measure will assess functionality used to export EHI for a single patient and multiple patients in a production environment.

- <u>Justification:</u> The evaluation of a statistically significant number of exports by users spanning multiple organizations using athenaClinicals will demonstrate the real world utility of the data export.
- <u>Test Methodology:</u> System logs will be reviewed to determine the volume of exports generated in various configurations (e.g. single-patient, multi-patient, etc.) and only by authorized users.
- <u>Expected Outcomes:</u> Only authorized users will be able to successfully create export summaries and there will be evidence of successful exports using various configurations (e.g. single-patient, multi-patient, etc.)

Use Case 3 Outcomes

No changes from plan.

Measure	Relied Upon Software	Outcomes	Challenges
1: Single/Multi patient export	N/A	Review of audit logs of all athenaClinicals customers for January through November 2023 yielded validation as follows (only authorized users): • 1-10 patients: 1917 total export requests spanning 77 customers with 17,076 CCDAs generated. • 10-120 patients: 938 total export requests spanning 108 customers with 746,402 CCDAs generated. • All patients: 712 total export requests spanning 110 customers with 29,097,141 CCDAs generated.	N/A

Use Case 4 – Clinicians electronically prescribe medications.

Certification Criteria	Requirement
§ 170.315 (b)(3) Electronic prescribing	(i)(A) Enable a user to perform the following prescription-related electronic transactions…
	(i)(C) For the following transactions, the technology must be able to receive and transmit the reason for the prescription…

Measure 1: Transaction success rates – This measure will evaluate athenaClinicals successful use of required eRx transaction types (via Surescripts).

- Justification: A statistically significant sample size of electronic prescriptions spanning multiple organizations using athenaClinicals will demonstrate the real world utility of the feature.
- Test Methodology: System logs will be reviewed to determine success rate for each transaction type relative to the listed benchmark.
- Expected Outcomes: Transactions are successfully delivered with expected errors (e.g. pharmacy does not support electronic transactions, etc.) and achieving the following transaction success rates:
  - NewRx – 99%
  - RxChange – 99%
  - CancelRx – 99%
  - RxRenewal – 99%
  - RxFill – 99%
  - Medication History – 99%

Use Case 4 Outcomes

No changes from plan.

Measure	Relied Upon Software	Outcomes	Challenges

1: Transaction success rates	Surescripts	Review of audit logs of all athenaClinicals customers yielded the following results. Goals are noted above.
		
		• Range: 7/15/23 – 8/15/23
		    o **NewRx:** 99.93% success rate
		    o **RxChange:** 99.34% success rate
		    o **CancelRx:** 99.99% success rate
		    o **RxRenewal:** 99.94% success rate
		    o **RxFill:** 100% success rate
		• Range: Q2 2023
		    o **Medication History:** 99.91% success rate
		
		Notes on analysis:
		• **RxNew** transactions with a response that indicate the pharmacy record is inactive, item is not in stock, a duplicate or does not support the transaction are considered numerator compliant.
		• Surescripts does not support non-electronic **RxChange** requests, so those requests submitted from non-interface are excluded.
		• Prescriber responses to a **RxChange** request from the pharmacy with a subsequent pharmacy response of "prescription not on file" or "prescription cancelled," was approved by prescriber with changes (prior authorizations), the request is a duplicate or where RxChange transaction is not supported are considered numerator compliant.
		• Pharmacy responses that indicate the pharmacy record is inactive, the request is a duplicate or **CancelRx** transaction is not supported are considered numerator compliant.
		• Prescriber responses to a **RxRenewal** request from a pharmacy with a subsequent pharmacy response of "prescription not on file," "prescription cancelled," the request is a duplicate or where the RxRenewal transaction is not supported are considered numerator compliant.
		• **RxFill** messages that don't have enough information to process, such as the identification information are excluded.
			N/A

Use Case 5 – EHR users generate QRDA files that comply with the latest specifications for submission to CMS and other quality reporting needs.

Certification Criteria	Requirement
	(i) Record…

§ 170.315 (c)(1) CQMs – record and export	(ii) Export…
§ 170.315 (c)(2) CQMs – import and calculate	(i) Import…
	(ii) Calculate each and every clinical quality measure…
§ 170.315 (c)(3) – report	Enable a user to electronically create a data file for transmission…

For each measure below, test will ensure use of relevant relied upon software including:

- Snowflake

Measure 1: eCQM calculation success rates – This measure will validate the correct calculation of implemented eCQMs relative to measure specifications.

- Justification: Using live customer data to validate the accurate calculation of eCQMs is difficult due to the variability of data inputs. A better approach is to have a controlled production-grade environment with known eCQM data inputs that can be regularly run to evaluate the accurate calculation of the eCQMs over time.
- Test Methodology: A comprehensive test tool previously developed by the EHR vendor for the same purpose will be leveraged to assure the accurate calculation of eCQMs. We will leverage the end to end testing framework for eCQMs using production test cases for each scenario (namely IPP, Denominator, Numerator, Exclusions and Exceptions) and the various workflows which satisfy in EHR.
- Expected Outcomes: Test cases pass at a rate greater than 99%.

Measure 2: QRDA file export conformance – This measure will validate successful user generation of 1) QRDA I files and 2) QRDA III files using athenaClinicals.

- Justification: Evidence of QRDA I and III files generated by athenaClinicals spanning multiple organizations will validate successful use in the real world.
- Test Methodology: System logs will be evaluated to determine the count of practices that have created 1) at least one QRDA I file and 2) at least one QRDA III file.
- Expected Outcomes: Success is defined as 1) evidence of QRDA I file generation by users and 2) evidence of QRDA III file generation by users.

Measure 3: QRDA file import conformance – This measure will validate successful user import of QRDA I files into athenaClinicals.

- Justification: Evidence of QRDA I files imported into athenaClinicals spanning multiple organizations will validate successful use in the real world.
- Test Methodology: System logs will be evaluated to determine the count of practices that have imported at least one QRDA I file.
- Expected Outcomes: Success is defined as evidence of QRDA I file import by users.

Use Case 5 Outcomes

No changes from plan.

Measure	Relied Upon Software	Outcomes	Challenges
1: eCQM calculation success rates	Snowflake	99.23% of 2023 automated tests returned successfully.	N/A
2: QRDA file export conformance	Snowflake	**Sub-measure 1:** 118 practices exported at least one QRDA I file through 8/21/23. **Sub-measure 2:** 142 practices exported at least one QRDA III file through 8/21/23.	N/A
3: QRDA file import conformance	Snowflake	9 practices imported at least 1 QRDA I file through 8/21/23.	N/A

Use Case 6 – Data is appropriately triggered and submitted to relevant public health agencies.

Certification Criteria	Requirement
§ 170.315 (f)(1) Transmission to immunization registries	Create immunization information for electronic transmission…
§ 170.315 (f)(2) Transmission to public health agencies – syndromic surveillance	Create syndrome-based public health surveillance information…
§ 170.315 (f)(7) Transmission to public health agencies – health care surveys	Create health care survey information for electronic transmission…

Measure 1: Immunization message success – This measure will evaluate the ability for athenaClinicals to submit conformant immunization messages.

- Justification: The evaluation of a statistically significant number of immunization messages spanning multiple organizations using athenaClinicals will demonstrate the real world utility of the capability.
- Test Methodology: System logs will be evaluated for different message types including administered (VXU V04 message), historical and forecast query (QBP Q11, RSP K11 Query message).
- Expected Outcomes: Success is defined as (with expected errors including no response from registry, formatting error beyond the scope of CEHRT specification requirements, etc.):
  - Administered vaccines (VXU V04 message) successfully sent to immunization registry.
  - Historical and forecast query requests (QBP Q11 Query message) successfully sent to registry and historical immunizations and forecast (RSP K11 Response message) returned from registry.

Measure 2: Syndromic surveillance message success – This measure will evaluate the ability for athenaClinicals to submit conformant syndromic surveillance messages in the urgent care setting.

- <u>Justification:</u> The evaluation of a statistically significant number of syndromic surveillance messages spanning multiple organizations using athenaClinicals will demonstrate the real world utility of the capability. Although these messages apply to urgent care, emergency department and inpatient settings, athenaClinicals only serves the urgent care setting.
- <u>Test Methodology:</u> System logs will be evaluated for all applicable messages sent to registries.
- <u>Expected Outcomes:</u> Success is defined as the successful message submission to and receipt by all actively engaged registries, with expected errors (e.g. no response from registry, formatting error beyond scope of CEHRT specification requirement, etc.)

Measure 3: Healthcare survey generation success – This measure will evaluate the ability for athenaClinicals to generate conformant healthcare survey CCDA documents in the ambulatory setting.

- <u>Justification:</u> The evaluation of documents spanning multiple organizations using athenaClinicals will demonstrate the real world utility of the capability.
- <u>Test Methodology:</u> System logs will be evaluated for all applicable CCDA documents.
- <u>Expected Outcomes:</u> Surveys successfully generated and accepted by National Center for Health Statistics (NCHS) with expected errors (e.g. formatting error beyond the scope of CEHRT specification requirement, etc.)

Use Case 6 Outcomes

No changes from plan.

Measure	Relied Upon Software	Outcomes	Challenges
1: Immunization message success	N/A	Review of audit logs for June to August 2023 for all athenaClinicals customers validated the following: • Administered vaccines (VXU V04 message): 75,209,026 successful messages with 77,554 errors that must be managed directly by customers. 4597 errors are due to EHR database to file mapping updates required because of individual registry requirements. • Historical and forecast query requests (QBP Q11 Query message): 206,023,437 successful messages with 39,690 errors that must be managed directly by customers. 1302 errors are due to EHR database to file mapping updates required because of individual registry requirements. • Historical immunizations and forecast (RSP K11 Response message): 213,939,127 successful messages with 6936 errors that must be managed directly by customers. 25 errors are due to EHR database to file mapping updates required because of individual registry requirements.	N/A
2: Syndromic surveillance message success	N/A	Review of audit logs for June to August 2023 for all athenaClinicals customers validated 2,171,930 successful messages sent. There were 222 errors, all of which must be managed directly by customers.	N/A

3: Healthcare survey generation success	N/A	Review of audit logs for Q2 of 2023 for all athenaClinicals customers validated 303,598 successful messages sent.	N/A

Use Case 7 – Independent vendors, as well as athenahealth customers and partners of our Marketplace Program use certified APIs for both patient and provider-oriented use cases.

Certification Criteria	Requirement
§ 170.315 (g)(7) Application access – patient selection	(i) Functional requirement. The technology must be able to receive a request with sufficient information to uniquely identify a patient and return an ID or other token that can be used by an application to subsequently execute requests for that patient's data.
§ 170.315 (g)(9) Application access – all data request	(i) Functional requirements Respond to an API request to output the patient's data in a CCDA
§170.315(g)(10) Standardized API for Patient and Population Services	(i) Functional requirements…

Measure 1: Request success rate for certified APIs – This measure will evaluate the successful use of all certified APIs under (g)(7), (g)(9) and (g)(10) certification criteria (https://docs.athenahealth.com/api/resources/complete_list_athena_apis) through the lens of individual transaction requests by request, API Information Source and API Users.

- Justification: The evaluation of a statistically significant sample size of API requests in the production system spanning a broad spectrum of API Information Sources demonstrates real-world request volume from external applications. Tracking success and failure rates of our API responses by HTTP response status codes further validates the results of APIs against real-world use cases. The measures also demonstrate the ability to provide sufficient supporting API documentation (https://docs.athenahealth.com/api/certified-apis?f=cert) to enable external API developers to integrate with athenaClinicals. Finally, capturing API response rate for 3-legged Personal Health Record applications shows results for allowing patients to use third-party apps to request their health records.
- Test Methodology: Production system logs of external API usage will be reviewed to determine the success rates for the following:
  - API Requests Served (not including OAuth calls)
    - Numerator: # of successful responses
    - Denominator: Total requests of certified API(s)
  - OAuth Requests Served
    - Numerator: # of successful responses
    - Denominator: Total OAuth requests

- API Information Sources with at least one successful response – Validates successful API use spanning current API Information Sources
    - Numerator: Total API Information Sources with at least one successful response
    - Denominator: Total API Information Sources with at least one request
- API Users with at least one successful response – Validates successful API use spanning current API Users
    - Numerator: Total API Users with at least one successful response
    - Denominator: Total API Users with at least one request
- 3-legged Personal Health Record (PHR) Apps with at least one successful response – Validates successful API use spanning current 3-legged PHR Apps
    - Numerator: Total 3-legged PHR Apps with at least one successful response
    - Denominator: Total 3-legged PHR Apps with at least one request
- Notes:
    - External API usage is defined as API traffic initiated by our customers, partners and vendors. API calls generated by athenaClinicals internal services will be excluded.
    - 3-legged PHR API User is defined as applications using 3-legged OAuth to allow patient authorization of access to their health records in athenaClinicals.
- Expected Outcomes: We expect to see performance of >99% on the above measures

Use Case 7 Outcomes

Changes from plan: Results below are combined spanning (g)(7), (g)(9) and (g)(10) APIs to simplify reporting.

Measure	Relied Upon Software	Outcomes	Challenges
1: Request success rate for certified APIs	N/A	Review of audit logs for August 2023 for all athenaClinicals customers validated the following results. Goals are noted above. • **API Requests Served (not including OAuth calls):** 99.92% success • **OAuth Requests Served:** 100% success • **API Information Sources:** 100% success • **API Users:** 100% success • **PHR Apps:** 100% success **Notes on analysis:** • In addition to "2xx" (Success) responses, "4xx" (Client Error) responses are considered "success" for the purpose of numerator calculation.	N/A

Schedule of key milestones

Key Milestones	Date/Timeframe

Start of collection of necessary data as laid out by plan (will vary by measure)	January 2023
End of collection of necessary data as laid out by plan (will vary by measure)	January 2024
Analysis of data (will vary by measure)	On-going 2023
Submit Real World Testing report to ACB	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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Date: 2/23/2024