CY 2022 Real World Testing Plan for Navigating Cancer

Executive Summary

This is the real world test plan for CY 2022 for Navigating Cancer certified EHR solution. It provides the real world test measurements and metrics that meet the intent and objectives of ONC's Condition of Certification and Maintenance of Certification requirement for real world testing (§ 170.405 Real world testing) to evaluate compliance with the certification criteria and interoperability of exchanging electronic health information (EHI) within the care and practice setting in which it is targeted for use.

As ONC has stated in its rule, "The objective of real world testing is to verify the extent to which certified health IT deployed in operational production settings is demonstrating continued compliance to certification criteria and functioning with the intended use cases as part of the overall maintenance of a health IT's certification." We have worked toward this objective in designing our test plan and its subsequent real world testing measurements and metrics.

This document builds toward the final testing measurements and metrics we will use to evaluate our product interoperability within production settings. Within each use case, we document our testing methodology for the measure/metric we plan to employ. We also include the associated ONC criteria, our justification for measurement selection, our expected outcomes from the testing, the care settings applied for this measure, and if applicable the number of clients to use in our real world testing.

We have included our timeline and milestones for completing the real world testing in CY 2022, and information about compliance with the Standards Version Advancement Process updates.

A table of contents is provided later in the plan to give quick access to any document section, including the testing measurements and metrics found at the end of this document. Our signed attestation of compliance with the real world testing requirements is on the following page.

Developer 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.

Authorized Representative Name: Jacqueline Fontaine

Authorized Representative Email: jfontaine@navigatingcancer.com

Authorized Representative Phone: 989-948-4555

Authorized Representative Signature:

Jacqueline Fontaine

DATE 11/12/2021

General Information

Plan Report ID Number: NavigatingCancer-RWT-2022

Developer Name: Navigating Cancer, Inc.

Product Name(s): Navigating Care

Version Numbers(s): 6.0

Certified Health IT Criteria: 315(e)(1), (g)(7)-(9)

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

- 15.04.04.2034.Navi.06.00.1.171228
- https://chpl.healthit.gov/#/listing/9112

Developer Real World Testing Page URL:
https://www.navigatingcancer.com/requirements-incentives/

Timeline and Milestones for Real World Testing CY 2022

- 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.
- 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.
- 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.
- 1Q-2023. Submit RWT Test Report to ONC-ACB.

Standards Version Advancement Process (SVAP) Updates

For CY 2022, we are not planning to make any version updates on approved standards through the SVAP process. We plan on implementing USCDI v1 in our C-CDAs and API support during CY 2022, but we have not finalized an exact date for rollout.

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

Real World Testing Measurements

The measurements for our real world testing plan are described below. Each measurement contains:

- Associated ONC criteria
- Testing Methodology used
- Description of the measurement/metric
- Justification for the measurement/metric
- Expected outcomes in testing for the measurement/metric
- Number of client sites to use in testing (if applicable)
- Care settings which are targeted with the measurement/metric

In each measurement use case, we elaborate specifically on our justification for choosing this measure and the expected outcomes. All measurements were chosen to best evaluate compliance with the certification criteria and interoperability of exchanging electronic health information (EHI) within the certified EHR.

Testing Methodologies

For each measurement, a testing methodology is used. For our test plan, we use the following methodologies.

> Reporting/Logging: This methodology uses the logging or reporting capabilities of the Navigating Cancer patient portal to examine functionality performed in the system. A typical example of this is the measure reporting done for the automate measure calculation required in 315(g)(2), but it can also be aspects of the audit log or customized reports from the EHR. This methodology often provides historical measurement reports which can be accessed at different times of the year and evaluate interoperability of EHR functionality, and it can serve as a benchmark for evaluating real world testing over multiple time intervals.
>
> Workflow Inspection: This methodology uses inspection to evaluate if EHR is compliant to the ONC criteria requirements within a user's typical workflow. It can be done through 1-v-1 inspection testing or utilize various tools to measure or evaluate compliance and interoperability. If an EHR Module's capabilities are not widely used in production by current users, workflow inspection can provide assurance criteria is working as previously certified.

Number of Clients Sites

Within each measure, we note the minimum number of clients or client sites we plan to use for this measure evaluation. The numbers vary depending on the methodology as well as overall use of the associated EHR Module criteria by our users. For criteria that are not widely used by our customer base, we may test the respective measure in our own production-sandbox environment given lack of customer experience with the criteria functionality.

Care and Practice Settings Targeted

Our EHR is primarily targeted to connect to cancer centers and oncologists to support the patient engagement of their cancer patients. Our measures were designed for this setting in mind.

RWT Measure #1. Number of Patients Given Access to Portal

Associated Criteria: 315(e)(1)

Testing Methodology: Reporting/Logging

Measurement Description

This measure is tracking and counting how many patients are sent invitations to create their patient portal account and how many patients successfully create an account over the course of a given interval.

The interval for this measure will be three (3) months.

Measurement Justification

This measure will provide a numeric value to indicate how often this interoperability feature is being used. An increment to this measure indicates that Navigating Cancer received patient appointment data and sent the patient an invitation to create a patient portal account.

Measurement Expected Outcome

The measurement will produce numeric results over a given interval. We will utilize various reports and audit logs to determine our measure count.

A successful measure increment indicates compliance to the underlying ONC criteria. It will show that an EHR can submit patient health data to Navigating Cancer on a regular and consistent basis as well as provide an account for the patient to use in accessing this data. Successfully completing this measure also implies users have a general understanding of how to submit data to Navigating Cancer while not completing this measure may indicate lack of understanding or possibly lack of use or need for this functionality.

We will use the measure counts to establish a historic baseline of expected interoperability use so it can be used in subsequent real world testing efforts.

Care Settings and Number of Clients to Test

We designed this measure for cancer centers and oncologists that we target. We will test a minimum of five (5) client practices. This number covers a sufficient percentage of existing practices to provide a viable sample of users of the certified EHRs.

RWT Measure #2. Number of applications/third party systems using API capabilities

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

Testing Methodology: Reporting/Logging

Measurement Description

This measure metric is counting how many different systems or applications are connecting to the portal via the API.

The interval for this measure will be three (3) months.

Measurement Justification

This measure is quantifying how many clients or other parties are using (or have used) the Patient Portal's API. This metric will indicate the adoption and interoperability of our API interface.

Because API criteria, 315(g)(7)-(g)(9), all work collectively together in the API functionality of the Patient Portal Module, this measurement is used for all three.

Measurement Expected Outcome

The measurement will produce a numeric result over a given interval. We will utilize various reports and audit logs and other means including feedback from our users to obtain our metric.

A successful measure increment indicates use of the underlying ONC criteria. Because this feature is not regularly used by our clients, we expect the increment to be small. This measure should be viewed in conjunction with measure #3.

We will use the measure to establish a historic baseline of expected interoperability use so it can be used in subsequent real world testing efforts.

Care Settings and Number of Clients to Test

We designed this measure for cancer centers and oncologists that we target. We will include all current customers in our reporting.

RWT Measure #3. Compliance of API Resource Query Support

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

Testing Methodology: Workflow Inspection

Measurement Description

This measure is tracking compliance of the Patient Portal Module criteria functionality of support of API query of patient data resources.

Measurement Justification

This measure will provide assurance of compliance to the Patient Portal Module criteria, specifically ability to connect to the Patient Portal's API resources and query patient clinical data through the API. This measure will also query the patient's C-CDA through the API.

Because API criteria, 315(g)(7)-(g)(9), all work collectively together in the API functionality of the Patient Portal Module, this measurement is used for all three.

To avoid disclosing PHI, we will only work with test patients from the actual production environment or an appropriately production-mirrored environment to best evaluate production capabilities available to end users.

Measurement Expected Outcome

The user connects to Navigating Cancer's APIs through any HTTP client that supports HTTPS, specifically HTTP over TLS v1.0-1.2, and is prompted for credentials and authentication according to the Navigating Cancer's publicly available API documented specification. After supplying the correct credentials, the portal returns a valid ID or token for the API Client to access the patient data. The user will query the patient clinical data resources via the API and receive access to them through the client application. We will also confirm the process and steps done by the user meet the criteria requirements of the Patient Portal Module and works as expected in production as in a controlled test environment.

Care Settings and Number of Clients to Test

We designed this measure for cancer centers and oncologists that we target. Because this feature is not regularly used by our clients, we will test this capability in production-type system either with a physician client who is able or internally, but either way this will verify certified functionality is working for end users.