

# CY 2025 Real World Testing Plan for TenEleven Group electronic Clinical Record

## Executive Summary

This is the real world test plan for CY 2025 for TenEleven Group certified EHR solution, electronic Clinical Record (eCR). 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 which it is targeted for use.

We have included our timeline and milestones for completing the real world testing in CY 2025, and information about compliance with the Standards Version Advancement Process updates.

A table of contents is provided later in the plan 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:

Catherine Baker

Authorized Representative Signature:

*Catherine Baker*

[SIGNATURE]

October 9, 2024

DATE

Executive Summary.....	1
Developer Attestation.....	2
General Information .....	4
Timeline and Milestones for Real World Testing CY 2025.....	5
Standards Version Advancement Process (SVAP) Updates .....	6
Real World Testing Measurements .....	7
Testing Methodologies .....	7
Care and Practice Settings Targeted .....	7
RWT Measure #1.    Number of Transition of Care C-CDAs Successfully Sent .....	8
RWT Measure #2.    Number of C-CDAs Received and/or Incorporated.....	10
RWT Measure #3.    Number of NewRx Prescriptions Messages Successfully Sent .....	11
RWT Measure #4.    Number of Quality Measures Successfully Reported on to CMS .....	12
RWT Measure #5.    Number of Patients Given Access to Portal .....	13
RWT Measure #6.    Number of Immunization Registries Engaged .....	14
RWT Measure #7.    Number of Syndromic Surveillance Registries Engaged .....	15
RWT Measure #8.    Number of Electronic Reportable Lab Registries Engaged .....	16
RWT Measure #9.    Number of Electronic Case Reporting Registries Engaged .....	17
RWT Measure #10.    Number of Applications/3rd Party Systems using API Capabilities .....	18
RWT Measure #11.    Number of EHI Exports Run .....	19
RWT Measure #12.    Compliance of Privacy Security Tag Features .....	20
RWT Measure #13.    Compliance of Care Plan C-CDA.....	21

# General Information

Plan Report ID Number: eCR-RWT-2025

Developer Name: TenEleven Group

Product Name(s): electronic Clinical Record (eCR)

Version Numbers(s): 2.4

Certified Health IT Criteria: 315(b)(1)-(3), (b)(7)-(9), (b)(10); (c)(1)-(3); (e)(1); (f)(1)-(3), (f)(5); (g)(7), (9), (10)

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

- 15.04.04.2861.Elec.24.01.1.221231
- <https://chpl.healthit.gov/#/listing/11200>

Developer Real World Testing Page URL: <https://10e11.com/onc-real-world-test/>

## Timeline and Milestones for Real World Testing CY 2025

- 1Q-2025: Health IT system is fully enabled for use in real world testing.
- 3Q-2025. Begin making plans to collect data for RWT measures. If necessary, engage clients to ask for their support and participation in real world testing.
- 4Q-2025. During the last quarter of the year, the CY 2025 real world test results will be captured according to our test plan. We also complete work for next year's Real World Test Plan and submit it by November 1, 2025.
- February 1, 2026. Real World Test Report will be completed and submitted according to ONC and ONC-ACB requirements and expectations.

## Standards Version Advancement Process (SVAP) Updates

Currently, we are using all required [ONC Certification Program](#) standard version(s) unless noted differently below. Next year we will be updating our EHR to support the new standard versions according to the HTI-1 rule, including USCDI v3, and based on when we complete these updates, new SVAP version(s) may be captured in our CY 2025 RWT test results, and if so, we will note that in our CY 2025 RWT test report.

Standard (and version)	All standards versions including USCDI v1 are those specified in ONC Certification Program criteria.
Method used for standard update	N/A
Date of ONC-ACB notification	N/A
Date of customer notification (SVAP only)	N/A
USCDI-updated criteria	This plan documents the support of all USCDI v1 data elements.

For our eCQM submission to CMS, we will be updating to the newest CMS implementation guide before the end of CY 2024.

Standard (and version)	CMS Implementation Guide for Quality Reporting Document Architecture: Category III; Eligible Clinicians and Eligible Professionals Programs; Implementation Guide for 2024 (November 2023)
Method used for standard update	SVAP
Date of ONC-ACB notification	Before end of CY 2024
Date of customer notification (SVAP only)	Before end of CY 2024

# 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 evaluate, 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 EHR to examine functionality performed in the system. A typical example of this is the measure reporting done for the automated 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.

**Compliance and/or Tool:** This methodology uses inspection to evaluate if EHR is compliant to the ONC criteria requirements. It can be done through 1-v-1 inspection testing or utilize various tools to measure or evaluate compliance and interoperability. If an Health IT Module capabilities is not widely used in production by current users, compliance inspection can provide assurance criteria is working as previously certified.

## Care and Practice Settings Targeted

Our EHR is primarily targeted to general ambulatory and behavioral health practices, and our measures were design for this setting in mind. In each measure, we do also address the care settings targeted and note any necessary adjustment or specific factor to consider with this specific measure.

## 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 Health IT Module to a 3<sup>rd</sup> party via Direct messaging during a transition of care event over the course of a given interval.

The interval for this measure will be a minimum of 3 months.

### Measurement Justification

This measure will provide a numeric value to indicate both how often this interoperability feature is being used as well as its compliance to the requirement. An increment to this measure indicates that the EHR can create a C-CDA patient summary record, including ability to record all clinical data elements, and by sending the C-CDA patient summary record, the EHR demonstrates successful interoperability of an exchanged patient record with a 3<sup>rd</sup> party. This measurement shows support for Direct Edge protocol in connecting to a HISP for successful transmission.

### Measurement Expected Outcome

The measurement will produce numeric results over a given interval. We will utilize various reports and audit logs, including Automated Measure (315.g.2) reports, to determine our measure count.

A successful measure increment indicates compliance to the underlying ONC criteria. It will show that the EHR can create the C-CDA patient summary record, including record required clinical data elements. In sending the C-CDA patient summary record, the EHR will demonstrate ability to confirm successful interoperability of an exchanged patient record with a 3<sup>rd</sup> party, including support for Direct Edge protocol in connecting to our HISP, MaxDirect. Successfully completing this measure also implies users have a general understanding of the EHR functional operations for this Health IT Module and an overall support for the user experience 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 count to establish a historic baseline of expected interoperability use so it can be used in subsequent real world testing efforts.



## Care Settings

We designed this measure to test the ambulatory and behavioral health practices that we support and target.

## RWT Measure #2. Number of C-CDAs Received and/or Incorporated

Associated Criteria: 315(b)(2)

Testing Methodology: Reporting/Logging

### Measurement Description

This measure is tracking and counting how many C-CDAs are successfully received and/or incorporated upon receipt from a 3rd party via Direct messaging during a transition of care event over the course of a given interval.

The interval for this measure will be a minimum of 3 months.

### Measurement Justification

This measure will provide a numeric value to indicate both how often this interoperability feature is being used as well as its compliance to the requirement. An increment to this measure indicates that the EHR can receive a C-CDA patient summary record, and by incorporating the C-CDA patient summary record, the EHR demonstrates successful interoperability of problems, medications, and medication allergies of patient record with a 3rd party. This measurement shows support for Direct Edge protocol in connecting to a HISP for successful transmission.

### Measurement Expected Outcome

The measurement will produce numeric results over a given interval. We will utilize various reports and audit logs, including Automated Measure (315.g.2) reports, to determine our measure count.

A successful measure increment indicates compliance to the underlying ONC criteria. It will show that the EHR can receive a C-CDA patient summary record. In incorporating the C-CDA patient summary record, the EHR will demonstrate successful interoperability of problems, medications, and medication allergies of patient record with a 3rd party, including support for Direct Edge protocol in connecting to a HISP. Successfully completing this measure also implies users have a general understanding of the EHR functional operations for this Health IT Module and an overall support for the user experience 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 count to establish a historic baseline of expected interoperability use so it can be used in subsequent real world testing efforts.

### Care Settings

We designed this measure to test the ambulatory and behavioral health practices that we support and target.

## RWT Measure #3. Number of NewRx Prescriptions Messages Successfully Sent

Associated Criteria: 315(b)(3)

Testing Methodology: Reporting/Logging

### Measurement Description

This measure is tracking and counting how many NewRx electronic prescriptions were created and successfully sent from the Health IT Module to a pharmacy destination over the course of a given interval.

The interval for this measure will be a minimum of 3 months.

### Measurement Justification

This measure will provide a numeric value to indicate both how often this interoperability feature is being used as well as its compliance to the requirement. An increment to this measure indicates that the EHR can create a NewRx SCRIPT electronic prescription message and transmit it to a pharmacy, typically via the Surescripts Network.

### Measurement Expected Outcome

The measurement will produce numeric results over a given interval. We will utilize various reports and audit logs, including Automated Measure (315.g.2) reports, to determine our measure count.

A successful measure increment indicates compliance to the underlying ONC criteria. It will show that the EHR can create the NewRx message using its relied upon software, NewCrop, and send it over a production network, like the Surescripts Network, to a pharmacy. Successfully completing this measure also implies users have a general understanding of the EHR functional operations for this Health IT Module and an overall support for the user experience 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 count to establish a historic baseline of expected interoperability use so it can be used in subsequent real world testing efforts.

### Care Settings

We designed this measure to test the ambulatory and behavioral health practices that we support and target.

## RWT Measure #4. 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 Health IT Module to CMS over the course of a given interval.

### Measurement Justification

This measure will provide a count and list of electronic clinical quality measures (eCQMs) which are calculated and submitted to CMS for a given program, like MIPS. Clinical quality measures are only used for the respective CMS programs and any production measures should utilize submission to CMS. Because CQM criteria, 315(c)(1)-(c)(3), all work collectively together in the eCQM functionality of the Health IT Module, this measurement is used for all three.

### Measurement Expected Outcome

The measurement will count and list of eCQMs submitted to CMS over a given interval. We will utilize various reports and audit logs to determine our measure count.

A successful measure submission indicates compliance to the underlying ONC criteria. It will show that the EHR can do calculations on the eCQM and that they are accepted by CMS. Successfully completing this measure also implies users have a general understanding of the EHR functional operations for this Health IT Module and an overall support for the user experience 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 result to establish a historic baseline of expected interoperability use so it can be used in subsequent real world testing efforts.

### Care Settings

We designed this measure to test the ambulatory and behavioral health practices that we support and target.

## RWT Measure #5. 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 given login access to their patient portal account over the course of a given interval.

The interval for this measure will be a minimum of 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 the EHR can supply patient health data to the patient portal and provide an account for the patient to use in accessing this data.

### Measurement Expected Outcome

The measurement will produce numeric results over a given interval. We will utilize various reports and audit logs, including Automated Measure (315.g.2) reports, to determine our measure count.

A successful measure increment indicates compliance to the underlying ONC criteria. It will show that the EHR and its relied upon software, MaxDirect, can submit patient health data to the patient portal on a regular and consistent basis as well provide an account for the patient to use in accessing this data. Successfully completing this measure also implies users have a general understanding of the EHR functional operations for this Health IT Module and an overall support for the user experience 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 count to establish a historic baseline of expected interoperability use so it can be used in subsequent real world testing efforts.

### Care Settings

We designed this measure to test the ambulatory and behavioral health practices that we support and target.

## RWT Measure #6. Number of Immunization Registries Engaged

Associated Criteria: 315(f)(1)

Testing Methodology: Reporting/Logging

### Measurement Description

This measure is tracking and counting how many immunization public health registries are engaged and exchanging data with the client site.

### Measurement Justification

This measure will provide a numeric value to indicate both how often this interoperability feature is being used as well as its compliance to the requirement. An increment to this measure indicates that the EHR has established and can maintain a bi-direction exchange with the public health registry. This engagement demonstrates the Health IT Module's compliance with the ONC criteria and meeting real world use for client customers.

### 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.

We expect any public health registry to be able to successfully connect and exchange with the EHR and observing these connections will indicate compliance to the underlying ONC criteria. It will show that the EHR can create the HL7 immunization record, including the ability to record the required clinical data elements. In sending the message, the EHR will demonstrate the ability to confirm successful interoperability of patient's data to the public health registry.

For connected IIS/immunization registries, we expect very few errors or downtime due to the Health IT Module's functionality.

### Care Settings

We designed this measure to test the ambulatory and behavioral health practices that we support and target.

## RWT Measure #7. Number of Syndromic Surveillance Registries Engaged

Associated Criteria: 315(f)(2)

Testing Methodology: Reporting/Logging

### Measurement Description

This measure is tracking and counting how many syndromic surveillance public health registries are engaged and exchanging data with the client site.

### Measurement Justification

This measure will provide a numeric value to indicate both how often this interoperability feature is being used as well as its compliance to the requirement. An increment to this measure indicates that the EHR has established and can maintain an exchange with the public health registry. This engagement demonstrates the Health IT Module's compliance with the ONC criteria and meeting real world use for client customers.

### 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.

We expect any public health registry to be able to successfully connect and exchange with the EHR and observing these connections will indicate compliance to the underlying ONC criteria. It will show that the EHR can create the HL7 syndromic surveillance record, including the ability to record the required clinical data elements. In sending the message, the EHR will demonstrate the ability to confirm successful interoperability of patient's data to the public health registry.

For connected registries, we expect very few errors or downtime due to the Health IT Module's functionality.

### Care Settings

We designed this measure to test the ambulatory and behavioral health practices that we support and target.

## RWT Measure #8. Number of Electronic Reportable Lab Registries Engaged

Associated Criteria: 315(f)(3)

Testing Methodology: Reporting/Logging

### Measurement Description

This measure is tracking and counting how many reportable lab public health registries are engaged and exchanging data with the client site.

### Measurement Justification

This measure will provide a numeric value to indicate both how often this interoperability feature is being used as well as its compliance to the requirement. An increment to this measure indicates that the EHR has established and can maintain an exchange with the public health registry. This engagement demonstrates the Health IT Module's compliance with the ONC criteria and meeting real world use for client customers.

### 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.

We expect any public health registry to be able to successfully connect and exchange with the EHR and observing these connections will indicate compliance to the underlying ONC criteria. It will show that the EHR can create the HL7 electronic reportable lab record, including the ability to record the required clinical data elements. In sending the message, the EHR will demonstrate the ability to confirm successful interoperability of patient's data to the public health registry.

For connected registries, we expect very few errors or downtime due to the Health IT Module's functionality.

### Care Settings

We designed this measure to test the ambulatory and behavioral health practices that we support and target.



## RWT Measure #9. Number of Electronic Case Reporting Registries Engaged

Associated Criteria: 315(f)(5)

Testing Methodology: Reporting/Logging

### Measurement Description

This measure is tracking and counting how many electronic case reporting public health registries are engaged and exchanging data with the client site.

### Measurement Justification

This measure will provide a numeric value to indicate both how often this interoperability feature is being used as well as its compliance to the requirement. An increment to this measure indicates that the EHR has established and can maintain a direction exchange with the public health registry. This engagement demonstrates the Health IT Module's compliance with the ONC criteria and meeting real world use for client customers.

### 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.

We expect any public health registry to be able to successfully connect and exchange with the EHR and observing these connections will indicate compliance to the underlying ONC criteria. It will show that the EHR can create the electronic case reporting message, including ability to record the required clinical data elements. In sending the message, the EHR will demonstrate the ability to confirm successful interoperability of patient's data to the public health registry.

For connected registries, we expect very few errors or downtime due to the Health IT Module's functionality.

### Care Settings

We designed this measure to test the ambulatory and behavioral health practices that we support and target.

## RWT Measure #10. Number of Applications/3rd Party Systems using API Capabilities

Associated Criteria: 315(g)(7), (g)(9)-(g)(10)

Testing Methodology: Reporting/Logging and Survey/Self-Test

### Measurement Description

This measure will determine how many 3<sup>rd</sup> party systems or applications are integrated and using the EHR's FHIR API interface. This measure will allow us to verify our certified API is working with 3<sup>rd</sup> party applications to access USCDI patient data.

### Measurement Justification

This measure will determine how many 3<sup>rd</sup> party systems or applications are integrated and using the EHR's FHIR API interface. This measure will allow us to verify our certified API is working with 3<sup>rd</sup> party applications to access USCDI patient data.

### Measurement Expected Outcome

The measurement will provide a count of FHIR applications which have registered with our server for access as well as applications actively connecting to our FHIR server, our relied upon software ConnectEHR +BulkFHIR (Version FHIR4-B). We will utilize our FHIR API form which developers use to request API access as well as additional reports and audit logs to determine the number of API applications enabled for our system. We will also query users to determine the API applications they have approved for use on their system.

### Care Settings

We designed this measure to test the ambulatory and behavioral health practices that we support and target.

## RWT Measure #11. Number of EHI Exports Run

Associated Criteria: 315(b)(10)

Testing Methodology: Reporting/Logging

### Measurement Description

This measure is tracking and counting how many patients requested and received EHI exports of their health information by the EHR Module over the course of a given interval.

### Measurement Justification

Exporting patient EHI is necessary for patients to have a comprehensive view of their health information. This measure will provide a numeric value, include both success and errors, to indicate how often this interoperability feature is being used as well as its compliance to the requirement, namely that the EHR can create an export of patient EHI in a computable format.

### Measurement Expected Outcome

The measurement will produce numeric results of attempted and completed EHI Export of Patient EHI, both success and error, by the EHR Module over a given interval. We will likely utilize a database report to determine our measure count.

We expect this test will be completed with few, if any, technical errors, although we may observe some user-driven errors unrelated to the functionality of the EHR software. We will examine results to evaluate the performance of the EHR Module.

A successful export indicates compliance with the underlying ONC criteria and that the EHR can create an export of all patient's EHI. Successfully completing this measure also implies users have a general understanding of the EHR functional operations for this EHR Module and an overall support for the user experience. Any observed errors may indicate either lack of understanding by the user, configuration setup issues, or product errors, and we will investigate as necessary.

If none of our chosen sites have records of any patient requested EHI Exports, we will substitute a test with synthetic patient data in an environment that mirrors production use.

### Care Settings

We designed this measure to test the ambulatory and behavioral health practices that we support and target.

## RWT Measure #12. Compliance of Privacy Security Tag Features

Associated Criteria: 315(b)(7)-(b)(8)

Testing Methodology: Compliance

### Measurement Description

This measure is tracking compliance of the Health IT Module criteria functionality of creating a C-CDA with privacy security tags.

### Measurement Justification

To our knowledge, our customers rarely, if ever, use this Health IT Module so we will evaluate it via a compliance inspection.

This measure will provide assurance of compliance to the Health IT Module criteria, specifically the ability to create a C-CDA with document-level privacy tags to restrict content access.

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

### Measurement Expected Outcome

The user will use the EHR functions to enable document-level security or select a patient with this setting enabled. The user exports a C-CDA CCD from the patient record, and the EHR creates the CCD with document-level tagged restricted content according to the HL7 Implementation Guide: Data Segmentation for Privacy (DS4P), Release 1. We will also confirm the process and steps done by the user meet the criteria requirements of the Health IT Module and works as expected in production as in a controlled test environment.

### Care Settings

We designed this measure to test the ambulatory and behavioral health practices that we support and target.

## RWT Measure #13. Compliance of Care Plan C-CDA

Associated Criteria: 315(b)(9)

Testing Methodology: Compliance and Tool

### Measurement Description

This measure is tracking compliance of the Health IT Module criteria functionality of creating a Care Plan C-CDA.

### Measurement Justification

To our knowledge, our customers rarely, if ever, use this Health IT Module so we will evaluate it via a compliance inspection.

This measure will provide assurance of compliance to the Health IT Module criteria, specifically the ability to create a Care Plan document C-CDA, which represents a patient's and care team members' prioritized concerns, goals, and planned interventions. We will also evaluate it against the [ONC C-CDA Scorecard tool](#). The C-CDA scorecard is designed for production use and measures how artifacts created by health IT compare against the HL7 C-CDA implementation guide and HL7 best practices.

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

### Measurement Expected Outcome

The user will have the EHR create Care Plan document C-CDA from a patient record containing clinical data elements required in the criteria, specifically information associated with a care plan including goals, health concerns, health status, outcomes, and intervention information. User can access and change this information before saving the content. We will run C-CDA through the Scorecard tool to obtain a result. We will also confirm the process and steps done by the user meet the criteria requirements of the Health IT Module and works as expected in production as in a controlled test environment.

A high score from the Scorecard indicates strong support for interoperability, and a lower score indicates opportunity for improvement. We will use this measure to establish a historic baseline of expected interoperability use so it can be used in subsequent real world testing efforts.

### Care Settings

We designed this measure to test the ambulatory and behavioral health practices that we support and target.