REAL WORLD TESTING RESULT

FreeChiro 2023 Real World Testing Result

Abstract

This Real-World Testing result enlists result set of each criteria to provide an insight into the extent to which FreeChiro 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.

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REAL WORLD TESTING PLAN

GENERAL INFORMATION

Report ID Number	20221208ps2
Developer Name	PracticeSuite Inc
Product Name(s)	FreeChiro
Version Number(s)	EHR-18.0.0
Certified Health IT Product List (CHPL) ID(s)	15.02.05.2198.FREC.01.02.1.220113
Developer Real World Testing Plan and Results Report Page URL	https://freechiro.com/onc-certification-stage-3/

CHANGES TO ORIGINAL PLAN

There was no change made to our original test plan.

WITHDRAWN PRODUCTS

No certified product was withdrawn by FreeChiro.

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

Standard (and version)	Not Applicable
Updated certification criteria and associated product	Not Applicable
Method used for standard update	Not Applicable
USCDI-updated certification criteria (and USCDI version)	None

SUMMARY OF TESTING METHODS AND KEY FINDINGS

The Certified FreeChiro is marketed in Chiropractic care settings only. For this reason, the Real-World Testing plan specific to interoperability scenario applies to Chiropractic settings.

Though FreeChiro EHR offers all tested features to the users, it is observed that the Chiropractors are not using all interoperability features in their regular practice. This is apparent from the FreeChiro EHR management logs and system logs which were used to determine the frequency and the transport mechanism used by providers for sending/receiving transitions of care using Edge protocols and downloading or transmitting EHI by patients using the patient portal.

CARE SETTING(S)

Chiropractic Care Settings: FreeChiro markets its Modules in Chiropractic care settings only, so this is the only care setting in which Real World Testing is performed.

MEASURES USED IN OVERALL APPROACH

RWT MEASURE #1. INTEROPERABILITY USING C-CDA

DESCRIPTION OF MEASUREMENT/METRIC

The following outlines the measures that have been identified to best demonstrate conformance to multiple certification criteria concerning the sharing of EHI across two use cases demonstrated (single patient and data export).

Use Case 1 (Single Patient) Metrics: As part of the Real-World Testing requirements for § 170.315(b)(1), § 170.315(b)(2), § 170.315(e)(1), and § 170.315(h)(1), the developer has developed the following metrics for their testing plan:

Measure 1: Sharing. This measure will catalogue the use of CCD standard document conformant, and the transport mechanisms used to share transitions of care documents and EHI, as well as track usage of the various transport mechanisms. Associated certification criteria for the EHR system in a multi-specialty care setting include:

Certification Criteria	Requirement
§ 170.315(b)(1) Transitions of care	(i)(A) Send transition of care/referral summaries using Edge Protocol
	(i)(B) Receive transition of care/referral summaries using Edge Protocol.
§ 170.315(e)(1) View, download and transmit	(i)(A)(2) view ambulatory summary or inpatient summary using CCD Template.
	(i)(B)(2) Download ambulatory summary or inpatient summary using CCD Template.
	(i)(B)(3) (inpatient setting only) Download of transition of care/referral summaries.
	(i)(C)(1) Transmit to third party.
	(i)(C)(2) (inpatient setting only) Transmit transition of care/referral summaries.
§ 170.315(h)(1) Direct Project	(1)(i) Send and receive health information including formatted only as a "wrapped" message.
	(1)(ii) Send and receive health information using Direct.
	(2)(i) Able to reconcile and incorporate information from C-CDAs

§ 170.315(b)(2) Clinical information reconciliation and incorporation	(2)(ii) Match a received Transition of Care/referral Summary to the correct patient.

- **Justification**: The EHR system includes two functionalities of interest: (A) Send transition of care/referral summaries and (B) Receive transition of care referral summaries. Transitions of care documents are shared using Edge protocols (e.g., SMTP, Direct) while other EHI shared through the patient portal using downloads and encrypted or unencrypted transmissions. This metric provides information on the types of transmissions deployed (e.g., what types of Edge protocols, downloads and unencrypted vs. encrypted transmission) and the frequency of usages. While the received CCDA is also reconciled, this provides reconciliation process (e.g. The population of CCDAs where a reconciliation is performed).

- **Test methodology**: EHR management logs, system logs, and email logs were reviewed to determine the frequency and the transport mechanism used by providers for sending/receiving transitions of care using Edge protocols and downloading or transmitting EHI by patients using the patient portal. Log files obtained during Real World Testing were de-identified and used for analysis in several areas to validate the proper operation of the transport mechanisms and input for the calculation of the metric on the specific types of transport mechanisms used. This test methodology primarily tests the conformant of the implementation.

- **Expected outcome(s):** It is expected that providers and patients (or their authorized representatives) will be able to share EHI using the transmission mechanisms provided. Provider will be able to reconcile clinical document. Error rates will be tracked and trended over time. Documentation evidencing send/receive of C-CDA's via Direct Messaging and reconciliation of C-CDA's into in to the EHR.

CARE SETTING(S)

Chiropractic Care Settings: The Certified FreeChiro markets its Modules in Chiropractic care settings only, so this is the only care setting in which Real World Testing is performed.

Metrics and Outcomes:

RELIED UPON SOFTWARE
- EMR Direct
- Hello Health

This testing was performed on a sample size of 11 practice accounts with above care setting.

1. Number of C-CDAs successfully generated and sent from FreeChiro.

QUARTER	COUNT
Q1 (Jan – Mar 2022)	15
Q2 (Apr – Jun 2022)	22
Q3 (Jul – Sep 2022)	2
Q4 (Oct – Dec 2022)	0

2. Number of C-CDAs received via integrated systems.

QUARTER	COUNT
Q1 (Jan – Mar 2022)	0
Q2 (Apr – Jun 2022)	0
Q3 (Jul – Sep 2022)	0
Q4 (Oct – Dec 2022)	0

The result indicates that certified FreeChiro users don't frequently use the feature to exchange electronic health information. There were no inbound C-CDA imports during this period.

3. Number of successful downloads, views and transmissions of patient C-CDAs within FreeChiro Patient Portal as triggered by a patient's (or their authorized representative) action within our internet-based portal.

QUARTER	COUNT
Q1 (Jan – Mar 2022)	13
Q2 (Apr – Jun 2022)	6
Q3 (Jul – Sep 2022)	2
Q4 (Oct – Dec 2022)	0

Clients aren't using this feature extensively; However usage of the data indicates that clients are successfully using this feature in production and is working as expected.

4. Number of sent and received health information using Direct.

QUARTER	COUNT
Q1 (Jan – Mar 2022)	0
Q2 (Apr – Jun 2022)	0
Q3 (Jul – Sep 2022)	0
Q4 (Oct – Dec 2022)	0

The result indicates that the Direct feature is seldom used. Though in the real-world testing, users haven't used this feature, our internal testing verified that this is working as expected.

Use Case 2 (Data Export): As part of the Real-World Testing requirements for § 170.315(b)(6), the developer has developed the following metrics for their testing plan:

Measure 1: Patient Population Export. This measure will assess the functionality used to export EHI for a patient population. The associated certification criterion is:

Certification Criteria	Requirement
§ 170.315(b)(6) Data export	(ii) Create an export summary file

- **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**: EHR management logs and system logs were reviewed for each period to determine the frequency of use. Log files obtained during Real World Testing were de-identified and used for analysis in several areas to validate the proper operation of the export. This test methodology primarily tests 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 as a set of C-CDA's. Errors in transmission will be tracked and analysed.

CARE SETTING(S)

Chiropractic Care Settings: The Certified FreeChiro markets its Modules in Chiropractic care settings only, so this is the only care setting in which Real World Testing is performed.

EXPECTED OUTCOMES

- *Real World Testing will demonstrate that the Health IT Module is conformant to the following certification criteria: § 170.315(b)(1) Transitions of care, § 170.315(e)(1) View, download, and transmit to 3rd party and.*
- *Real World Testing will demonstrate the ability of the system to perform § 170.315(b)(2) Clinical information reconciliation and incorporation and send or receive CCDA documents using 170.315(h)(1) Direct Project.*
- *Real World Testing will demonstrate the ability to export EHI as described in § 170.315(b)(6).*

Metrics and Outcomes:

Count of EHI exported:

QUARTER	COUNT
Q1 (Jan – Mar 2022)	166
Q2 (Apr – Jun 2022)	1
Q3 (Jul – Sep 2022)	0
Q4 (Oct – Dec 2022)	2444

Our finding is that the usage of C-CDA data export is primarily performed during account transition and the count indicates that the functionality is working as expected in the EHR.

RWT MEASURE #2. ELECTRONIC PRESCRIBING

The following table lists the measures that have been identified to best demonstrate conformance to certification criteria concerning the electronic prescription.

Use Case 1 (ePrescription): As part of the Real-World Testing requirements for § 170.315(b)(3) the developer has developed the following metrics for their testing plan:

Measure 1: This measure will demonstrate the electronic transmission of all prescription related transaction. Associated certification criteria for the EHR system in a multi-specialty care setting include:

Certification Criteria	Requirement
§ 170.315(b)(3): Electronic prescribing	*(ii)(A) Send and Receive prescription transactions electronically per the NCPD SCRIPT Standard and using RxNorm codes.*
	(ii)(C) Send the reason for prescription using diagnosis elements along with prescription.

- **Justification:** The EHR system includes all prescription related electronic transactions like creation, update, cancellation, and refill in accordance with the National Council for Prescription Drug Programs (NCPDP) SCRIPT standard version 10.6. system also have the provision to send the reason for prescription as diagnosis elements while prescribing. The population of prescription data and the transmission/receipt acknowledgement will be reviewed using system logs and activity data. We will also engage our partner NewCrop to verify the conformances of NCPD standards and transmission statistics.

Test methodology: Querying of Data files, activity table and reviewing of Log files obtained during Real World Testing were de-identified and used for analysis of prescription data. We engaged our eRx partner to get the matrix of standard conformance and transmission matrix. A combination of the above reports and logs were reviewed to test the conformance of the criteria.

- **Expected outcome(s):** It is expected that a user can create prescription and transmit electronically per the standard. Errors in transmission will be tracked and analysed.

CARE SETTING(S)

Chiropractic Care Settings: The Certified FreeChiro markets its Modules in Chiropractic care settings only, so this is the only care setting in which Real World Testing is performed.

EXPECTED OUTCOMES

- *Real World Testing will demonstrate the following for § 170.315(b)(3): Electronic prescribing:*
  - *Electronic prescriptions can be created, edited, cancelled, and refilled.*
  - *Reason for prescription can be sent along with prescription as diagnosis elements.*

Metrics and Outcomes:

RELIED UPON SOFTWARE
- NewCrop

This testing was performed on a sample size of 16 practice accounts.
   a) Count of eRx prescribed

QUARTER	COUNT
Q1 (Jan – Mar 2022)	0
Q2 (Apr – Jun 2022)	0
Q3 (Jul – Sep 2022)	0
Q4 (Oct – Dec 2022)	6

   b) Count of eRx Cancelled/Discontinued

QUARTER	COUNT
Q1 (Jan – Mar 2022)	0
Q2 (Apr – Jun 2022)	0
Q3 (Jul – Sep 2022)	0
Q4 (Oct – Dec 2022)	0

The result indicates that e-prescription feature was sparingly used by FreeChiro EHR users. However, a prescription count in Q4 verified that this is working as expected.

RWT Measure #3. clinical quality measures (cqm)

The following table lists the measures that have been identified to best demonstrate conformance to multiple certification criteria concerning the Clinical Quality Measures.

Use Case 1 (CQM): As part of the Real-World Testing requirements for § 170.315(c)(1), § 170.315(c)(2) and § 170.315(c)(3), the developer has developed the following metrics for their testing plan:

Measure 1: This measure will demonstrate the Clinical Quality Measure Reporting system that calculates and generate the aggregate report in both human readable and QRDA III file format for each CQM's based on the deduplicated clinical data that recorded in the EHR system and that imported to the system in QRDA I format. Also, system allows to export the CQM data in QRDA I file format. Associated certification criteria for the EHR system in a multi-specialty care setting include:

Certification Criteria	Requirement
§ 170.315(c)(1): Clinical Quality Measures (CQMs) - Record and Export	(C)(1)(i) Record all necessary data to calculate CQMs
	(C)(1)(ii) Export CQM data file in QRDA I format for one or more patients that includes all necessary data recorded for report calculation.
§ 170.315(c)(2): Clinical quality measures (CQMs) - Import and Calculate	(C)(2)(i) Import a CQM data file in QRDA I format for one or more patients that includes all necessary data for calculating an aggregate report.
	(C)(2)(ii) Calculates aggregate report for each CQM's based on the data recorded and received on the system
§ 170.315(c)(3): Clinical quality measures (CQMs) - Report	(C)(3)(i) Electronically create a CQM data file for transmission of clinical quality measurement data in QRDA III format.

- **Justification**: The EHR system can calculate and generate the report for various Clinical Quality Measures based on the clinical data recorded on the EHR system. Also, system have the functionality to Import and Export Clinical Quality Measure in QRDA I file format. The report is generated in both human readable and QRDA III file format based on both clinical data recorded on the EHR system as well as that received/imported to the system. While the record of all necessary data required for CQM's are recorded automatically during user input (during charting, user input etc), it is the time when a user generates QRDA import the system we will be able to determine the format and performance test. The generated QRDA samples collected during the testing process is verified against the conformant standards.

- **Test methodology** EHR management logs, system logs, and activity logs, sample QRDA collected were reviewed to determine the frequency used by providers for generating reports and sending/receiving CQM data files. Log files obtained during Real World Testing were de-identified and used for analysis in several areas to validate the proper operation of CQM and input for the calculation of the metric..

- **Expected outcome(s)**: It is expected that providers will be able to Record, Import, Export, Calculate and Generate the CQM reports without any developer assistance. Documentation evidencing the ability of the EHR to export. Error rates will be tracked and trended over time.

CARE SETTING(S)

Chiropractic Care Settings: The Certified FreeChiro markets its Modules in Chiropractic care settings only, so this is the only care setting in which Real World Testing is performed.

EXPECTED OUTCOMES

- *Real World Testing will demonstrate the ability of the EHR system to record necessary data required to calculate the CQM's and to export CQM date in QRDA I format [§ 170.315(c)(1)]*
- *Real World Testing will demonstrate the ability of the system to import CQM data in QRDA I format. [§ 170.315(c)(2)]*
  Real World Testing will demonstrate the ability to calculate and generate the CQM report electronically in QRDA III file format. [§ 170.315(c)(3)]

Metrics and Outcomes:

Quality Id	eCQM	Description
478	None	**Functional Status Change for Patients with Neck Impairments**

The sampling was of 11 practice accounts and 1 CQM data appeared in the result which indicates that the FreeChiro users can Record, Import, Export, Calculate and Generate the CQM reports without any developer assistance. This demonstrates that EHR can record necessary data required to calculate the CQM's and to export CQM data in QRDA I format.

RWT Measure #4. transmit to immunization registeries & public health agencies

The following list of measures have been identified to best demonstrate conformance to multiple certification criteria concerning the transmission to public registries.

Use Case: As part of the Real-World Testing requirements for §170.315(f)(1) and §170.315(f)(2), the developer has developed the following metrics for their testing plan.

***Measure 1:** Transmission to immunization registries. This measure will catalogue the use of HL7 V2 standard document conformant, and the ability of the system to transmit to state immunization registry. The associated certification criterion is to be tested in the primary care and pediatrics care setting.*

Certification Criteria	Requirements
§170.315(f)(1) Transmission to immunization registries	i) *Create immunization information according to the IG) IM Release 1.5, and the July 2015 Addendum, using CVX codes for historical vaccines and NDC codes for newly administered vaccines.*
	ii) *Transmit the immunization message to the connected organization.*

Measure 2: *Transmission to public health agencies — syndromic surveillance. This measure will assess the conformance of the certified syndromic surveillance transmission using the FreeChiro Application to any of the public agencies. The associated certification criterion in the pediatric care setting listed below.*

Certification Criteria	Requirements
§170.315(f)(2) Transmission to public health agencies — syndromic surveillance	i) *Create syndrome-based public health surveillance information for electronic transmission according to the HL7 2.5.1 standard.*
	ii) *Transmit the syndrome-based public health surveillance message to the connected agencies.*

JUSTIFICATION FOR SELECTED MEASUREMENT/METRIC

- **Justification**: This immunization registry test is targeted in Chiropractic care setting providers who are intends to report on to meet Objective 8: Public Health and Clinical Data Registry Reporting. It is a known fact that each state has their own way of submission of data. While the periodicity of the submission and transport standard requirement are not set by ONC, it will be difficult the find out the registry settings practices might be submitting. As the health IT developer our intention in this real-world testing scenario is to check if immunization and syndromic files are generated in the system and are formatted according to the adopted standards referenced by the certification criteria. This will be verified through the review of the data tables, activity tables and log files.

- **Test methodology**: Querying of Data files, activity table and reviewing of Log files obtained during Real World Testing were de-identified and used for analysis of the output files generated. The HL7 samples collected were also tested with a validation tool for conformance of standards. This test methodology primarily tests the conformance of the implementation.

- **Expected outcome(s)**: It is expected that providers will be able to create and transmit the immunization and syndrome-based public health surveillance information to the authorized government and public agencies.

CARE SETTING(S)

Chiropractic Care Settings: The Certified FreeChiro markets its Modules in Chiropractic care settings only, so this is the only care setting in which Real World Testing is performed.

EXPECTED OUTCOMES

- *Real World Testing will demonstrate that the Health IT Module is conformant to the certification criteria "§170.315(f)(1) Transmission to immunization registries" and "§170.315(f)(2) - Transmission to public health agencies — syndromic surveillance"*

- *Real World Testing will demonstrate the ability of the system to generate and transmit electronically to the government and public health agencies according to the HL7 2.5.1 standard*

Metrics and Outcomes:

This testing was performed on a sample size of 16 practice accounts with above care setting.

    a.   Immunization Registry transferred data Count.

QUARTER	COUNT
Q1 (Jan – Mar 2022)	0
Q2 (Apr – Jun 2022)	0
Q3 (Jul – Sep 2022)	0
Q4 (Oct – Dec 2022)	0

    b.   Syndromic Surveillance Count

QUARTER	COUNT
Q1 (Jan – Mar 2022)	0
Q2 (Apr – Jun 2022)	0
Q3 (Jul – Sep 2022)	0
Q4 (Oct – Dec 2022)	0

The result derived over four quarters indicates that the immunization and Syndromic Surveillance Information was not pushed by users in 2023. However, our internal testing verified that this is working as expected.

RWT Measure #5. Application access and standardized API

The following outlines the measures that have been identified to best demonstrate conformance to multiple criteria concerning the sharing of EHI using API.

Use Case (Application Access): As part of the Real-World Testing requirements for "Application Access § 170.315(g)(7), § 170.315(g)(9), § 170.315(g)(10), the developer has developed the following metrics for their testing plan:

Measure 1: This measure will test the conformance of access of the patient identifier using the FreeChiro Application through a published API. This API will accept sufficient information to uniquely identify a patient and return the patient ID to the external system. The associated certification criterion in the selected care setting is listed below. Since API access is independent of any care settings, this functionality is applicable to all care settings where this is marketed. Associated certification criteria includes the following:

Certification Criteria	Requirements

§170.315(g)(7) Application access — patient selection	**(i)** The health IT can 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)(A)** The API must be able to respond to requests for patient data (using an ID or other token) for all of the data categories specified in the United States Core Data for Interoperability Standard (USCDI) at one time in a summary record formatted according to the Consolidated CDA Release 2.1 Continuity of Care Document (CCD) template.
§170.315(g)(10) Standardized API for patient and population services	**(i)(A)** The API must be able to respond to requests for patient data (using an ID or other token) for each of the individual categories listed in the Common Clinical Data Set and return the full set of data for that category, according to the required data standards in a computable format.

- **Justification**: FreeChiro application has a centralized API interface services that caters the access to patient data. This will provide a metric on the use of APIs to access patient data. Additionally, credentialling requirements will be tested indirectly, as only authorized users will have access to the patient data. Each practice settings also have the access log which logs request and the requester information. This the metric will be further verified through the review of the log files and by the audit tables.

- **Test methodology**: Spot check of evidence in production environment API log will be checked. This test methodology primarily tests the conformance of the implementation.

- **Expected outcome(s)**: Documentation evidencing a patient's ability to request and retrieve a C-CDA from the EHR's FHIR R2 API into a 3rd party application. It is expected that FreeChiro will be conformant to application access criteria for §170.315(g)(7), §170.315(g)(9) and §170.315(g)(10). Error rates will be tracked and trended over time.

CARE SETTING(S)

Chiropractic Care Settings: The Certified FreeChiro markets its Modules in Chiropractic care settings only, so this is the only care setting in which Real World Testing is performed.

EXPECTED OUTCOMES

- *Real World Testing will demonstrate that the Health IT Module is conformant to the certification criteria "§170.315(g)(7) Application access — patient selection", "§170.315(g)(9) Application access — all data request and §170.315(g)(10) Standardized API for patient and population services".*
- *Real World Testing will demonstrate the ability of the system to accept the external request through an API and respond with the patient data formatted according to the Consolidated CDA Release 2.1 Continuity of Care Document (CCD) template.*

Metrics and Outcomes:

This testing was performed on a sample size of 11 practice accounts with above care setting.

Count of patient health data pushed via API

QUARTER	COUNT
Q1	0
Q2	0
Q3	0
Q4	0

The test outcome indicates that the EHR users haven't used the API feature in 2023. However, our internal testing verified that this feature is working as expected.

SCHEDULE OF KEY MILESTONES

Key Milestone	Care Setting	Date/Timeframe
Release Documentation for the Real-World Testing to authorized representatives and providers. This included surveys, specific instructions on what to look for, how to record issues encountered, and Customer Agreements.	Chiropractic Care	January, 2023
Collection of Information as laid out by the plan for the period.	Chiropractic Care	March, 2023 June, 2023 Sep, 2023 Dec, 2023
Meeting with previously identified providers and authorized representatives to ensure that Real World Testing protocols are effective.	Chiropractic Care	March, 2023
End of Real-World Testing period/final collection of all data for analysis.	Chiropractic Care	January 1, 2024
Analysis and report creation.	Chiropractic Care	Jan 30, 2024
Submit Real World Testing report to ACB (per their instructions)	Chiropractic Care	Feb 12, 2024

ATTESTATION

This Real-World Testing Result Rport is complete with all required elements, including measures that address all certification criteria and care settings. All information in this result report is up to date and fully addresses the health IT developer's Real World Testing requirements.

Authorized Representative Name: Deepesh Damodaran

Authorized Representative Email: ehrinfo@FreeChiro.com

Authorized Representative Phone: (813)607-2800

Authorized Representative Signature: *Deepesh Damodaran*

Date:2/12/2024