



# Health IT Certification Program

The Office of the National Coordinator for Health Information Technology

## REAL WORLD TESTING RESULTS

### GENERAL INFORMATION

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

Developer Name: WellStack, INC

Product Name(s): Empower™ Patient Portal and Engagement Suite

Version Number(s): 6.4

Certified Health IT Product List (CHPL) Product Number(s): 15.07.09.1681.IN02.06.02.1.221230

Developer Real World Testing Plan Page URL: <https://wellstack.ai/onc-certification/>

Developer Real World Testing Results Report Page URL [if different from above]:

### [OPTIONAL] CHANGES TO ORIGINAL PLAN

*If a developer has made any changes to their approach for Real World Testing that differs from what was outlined in their plan, note these changes here.*

Summary of Change [Summarize each element that changed between the plan and actual execution of Real World Testing]	Reason [Describe the reason this change occurred]	Impact [Describe what impact this change had on the execution of your Real World Testing activities]

### [OPTIONAL] WITHDRAWN PRODUCTS

*If a developer withdrew any products within the past year that were previously included in their Real World Testing plan, please provide the following information.*

Product Name(s):	None. As listed above the certification ID has changed due to change in ONC-ACB
Version Number(s):	
CHPL Product Number(s):	



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<b>Date(s) Withdrawn:</b>	
<b>Inclusion of Data in Results Report:</b> [Provide a statement as to whether any data was captured on the withdrawn products. If so, this data should be identified in the results report.]	

**SUMMARY OF TESTING METHODS AND KEY FINDINGS**

*Provide a summary of the Real World Testing methods deployed to demonstrate real-world interoperability, including any challenges or lessons learned from the chosen approach. Summarize how the results that will be shared in this report demonstrate real-world interoperability.*

*If any non-conformities were discovered and Note: A single Real World Testing results report may address multiple products and certification criteria for multiple care settings.*

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**TESTING SCOPE**

Testing was conducted in accordance with the Empower™ Patient Portal and Engagement Suite as described in CY 2024 Real-World Testing document located at (<https://wellstack.ai/onc-certification/>).

**SYSTEM UNDER TEST**

Testing was performed using the Empower™ Patient Portal and Engagement Suite Version 6.4 software.

**TESTING ENVIRONMENT**

Testing was performed with in customer production Empower™ Patient Portal and Engagement Suite Version 6.4 software solution implementations.

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

*Both required and voluntary standards updates must be addressed in the Real World Testing plan. Real World Testing plans must include all certified health IT updated to newer versions of standards prior to August 31 of the year in which the updates were made.*

*Indicate as to whether optional standards, via SVAP and/or USCDI, are leveraged as part of the certification of your health IT product(s).*

Yes, I have products certified with voluntary SVAP or USCDI standards. (If yes, please complete the table below.

No, none of my products include these voluntary standards.



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<b>Standard (and version)</b>	
<b>Updated certification criteria and associated product</b>	
<b>CHPL Product Number</b>	
<b>Conformance measure</b>	
<b>USCDI updated certification criteria (and USCDI version)</b>	170.315 (e)(1) Cures: View, Download, and Transmit to 3rd Party 170.315 (g)(6) Cures: Consolidated CDA creation performance 170.315 (g)(9) Cures: Application Access – All Data Request USCDI version 1

## Care Setting(s)

*The expectation is that a developer’s Real World Testing is conducted within each type of clinical setting in which their certified health IT is marketed. Health IT developers are not required to test their certified health IT in every setting in which it is marketed for use.*

*List each care setting that was tested.*

Empower™ Patient Portal & Engagement Suite specializes in Inpatient as well as Outpatient / Ambulatory care settings. While the clinical workflow may be different between different care settings, the use of the certified criteria is the same.

*Each care setting that was tested is listed below.*

Care Setting	Justification
Inpatient, Outpatient / Ambulatory	The product is extensively used in these care setting, thereby allowing the performing of real-world testing without any hindrances.

## Metrics and Outcomes

*Health IT developers should detail outcomes from their testing that successfully demonstrate that the certified health IT:*

1. is compliant with the certification criteria, including the required technical standards and vocabulary codes sets;
2. is exchanging electronic health information (EHI) in the care and practice settings for which it is marketed for use; and/or,
3. EHI is received by and used in the certified health IT.



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Health IT developers could also detail outcomes that did not result from their measurement approach if that better describes their efforts.

Within this section, health IT developers should also describe how the specific data collected from their Real World Testing measures demonstrate their results. Where possible, context should be provided to the measures and results to understand the number of sites/users/transactions tested for the specified measures (i.e., the denominator for comparison to the reported results). If applicable, any Relied Upon Software that is used to meet a criterion's requirements should be included in this section.

## USE CASE 1: REAL WORLD TEST PLAN - 170.315 (e)(1)

Measurement /Metric	Associated Criterion(a)	Relied Upon Software (if applicable)	Expected Outcomes	Challenges Encountered (if applicable)
Patient Engagement	170.315 (e)(1)	EMR Direct, Version 2023 and Medline Plus, version updated on May 7, 2018	Patient (or Patient Representative) views, downloads, and transmits (via encrypted or unencrypted method) CCDA information. Data is tracked by frequency of usage over time.	

## USE CASE 1: REAL WORLD TEST PLAN - 170.315 (e)(1)

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

Certification Criteria	Requirement
170.315(e)(1) View, download, and transmit to 3rd party	This criterion requires the certified Health IT module to provide Patients (and their authorized representatives) must be able to use internet-based technology to view, download, and transmit their health information to a third party.

## DESCRIPTION OF MEASUREMENT/METRICS

The following outlines the measures that were identified to best demonstrate conformance to certification criteria 170.315(e)(1) view, download, and transmit to 3rd party.



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## RELIED UPON SOFTWARE (if applicable)

EMR Direct, Version 2023 and Medline Plus, version updated on May 7, 2018

## FUNCTIONAL REQUIREMENT

This criterion requires the certified Health IT module to provide application functionality to permit authorized user the ability to view, download, and transmit to 3rd party health information provided withing the Empower™ Patient Portal and Engagement Suite.

## FUNCTIONAL CRITERION / MEASUREMENT

We record each occurrence of a user's action when they View, download, and transmit to 3rd party health information provided withing the Empower™ Patient Portal and Engagement Suite as part of our standard audit process.

### *Measure 1: Number of requests to view, download, and transmit to 3rd party health information.*

This measure demonstrates that the User has made the initial request to view, download, and transmit to 3rd party health information.

### *Measure 2: Number of requests that provided sufficient information to provide a valid response.*

This measure demonstrates that the User has provided sufficient information from the initial request to view, download, and transmit to 3rd party health information to return a successful response by the Empower Patient Portal application and database.

### *Measure 3: Number of follow-up requests made using the provided patient ID or token.*

This measure demonstrates that the User has made additional requests to view, download, and transmit to 3rd party health information to return a successful response by the Empower Patient Portal application and database.

## OUTCOMES

The Empower™ Patient Portal and Engagement Suite successfully captured the user audit functions of user view, download, and transmit. This audit log and associated audit reporting clearly demonstrate at each quarterly audit that users successfully utilized the view, download, and transmit functions of the Empower™ Patient Portal and Engagement Suite applications.

## CHALLENGES ENCOUNTERED

No significant challenges were encountered as part of this auditing.



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## USE CASE 2 : REAL WORLD TEST PLAN - 170.315 (g)(7)

Measurement /Metric	Associated Criterion(a)	Relied Upon Software (if applicable)	Expected Outcomes	Challenges Encountered (if applicable)
Application Access - Patient Selection	170.315 (g)(7)		Empower responds with a Patient ID and Token to make extra calls using the token. Empower will create and audit log for each response in order to track success responses to the end-user	

## CERTIFICATION CRITERIA - 170.315(g)(7)

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

Certification Criteria	Requirement
170.315(g)(7) Application access — Patient Selection	This criterion requires the certified Health IT module to provide an API and supporting documentation that enables external applications to request a unique patient identifier from the certified Health IT module that can be used to request additional patient data.

## DESCRIPTION OF MEASUREMENT/METRICS

The following outlines the measures that were identified to best demonstrate conformance to certification criteria 170.315(g)(7) Application access — Patient Selection.

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



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## SOFTWARE RELIED UPON (if applicable)

None

## FUNCTIONAL REQUIREMENT

This criterion requires the certified Health IT module to provide an API and supporting documentation that enables external applications to request a unique patient identifier from the certified Health IT module that can be used to request additional patient data.

## FUNCTIONAL CRITERION / MEASUREMENT

We intend to record the frequency that providers receive patient ID requests via API to demonstrate the certified capability is available and effective, regardless of the frequency it is used.

### *Measure 1: Number of requests for a patient ID or token.*

This measure demonstrates that the User has made the initial request via API for access to the Patient Portal.

### *Measure 2: Number of requests that provided sufficient information to provide a valid response.*

This measure demonstrates that the User has provided sufficient information from the initial request via API for access for the Patient Portal to return a successful response by the Empower Patient Portal application and database.

### *Measure 3: Number of follow-up requests made using the provided patient ID or token.*

This measure demonstrates that the User has made additional requests and provided sufficient information from the initial request via API for access for the Patient Portal to return a successful response by the Empower Patient Portal application and database.

## OUTCOMES

There were no recorded attempts by external applications to request a unique patient identifier from the Empower™ Patient Portal and Engagement Suite during this reporting period.

Because of lack of actual live access, we manually tested the API functionality. We used fake but realistic patient data and tested against the Empower™ Patient Portal and Engagement Suite platform. Engineering and QA reported 100% success in testing outcomes.

## CHALLENGES ENCOUNTERED

The challenge of measuring this measure is the lack of users make the request to our API's.



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## USE CASE 3: REAL WORLD TEST PLAN - 170.315 (g)(9)

Measurement /Metric	Associated Criterion(a)	Relied Upon Software (if applicable)	Expected Outcomes	Challenges Encountered (if applicable)
Application Access - All Data Request	170.315 (g)(9)		It is expected that Empower will respond with the CCD A corresponding to the patient. Empower will create and audit log for each response in order to track success responses to the end-user.	

### CERTIFICATION CRITERIA - 170.315(g)(9) – all data request

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

Certification Criteria	Requirement
170.315(g)(9) Application access — all data request	<p>This criterion requires the certified Health IT module to:</p> <ul style="list-style-type: none"> <li>A. Respond to requests for patient data (based on an ID or other token) for all of the data categories specified in the Common Clinical Data Set at one time and return such data (according to the specified standards, where applicable) in a summary record formatted according to the standard specified in § 170.205(a)(4) following the CCD document template.</li> <li>B. Respond to requests for patient data associated with a specific date as well as requests for patient data within a specified date range.</li> </ul>

### DESCRIPTION OF MEASUREMENT/METRICS

The following outlines the measures that were identified to best demonstrate conformance to certification criteria 170.315(g)(9) Application access — all data request.

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





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## SOFTWARE RELIED UPON (if applicable)

None

## FUNCTIONAL REQUIREMENT

This criterion requires the certified Health IT module to provide an API and supporting documentation that enables external applications to request a unique patient identifier from the certified Health IT module that can be used to request additional patient data.

## FUNCTIONAL CRITERION / MEASUREMENT

We intend to record the frequency that providers receive patient ID requests via API to demonstrate the certified capability is available and effective, regardless of the frequency it is used.

*Measure 1: Number of requests for a patient's data made by an application via a data category request using a valid patient ID or token.*

This measure demonstrates that an Application has made a request for patient data via a valid patient ID for a specific date range.

*Measure 2: Number of requests for a patient's data made by an application via a data category request using a valid patient ID or token for a specific date range.*

This measure demonstrates that the User has made a request for patient data via a valid patient ID for a specific date range.

## OUTCOMES

There were no recorded attempts by external applications to request a unique patient identifier from the Empower™ Patient Portal and Engagement Suite during this reporting period.

Because of lack of actual live access, we manually tested the API functionality. We used fake but realistic patient data and tested against the Empower™ Patient Portal and Engagement Suite platform. Engineering and QA reported 100% success in testing outcomes.

## CHALLENGES ENCOUNTERED

The challenge of measuring this measure is the lack of applications to make the request to our API's.



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## KEY MILESTONES

*The list of key milestones that were met during the Real World Testing process. Includes details on how and when the developer implemented measures and collected data. Key milestones should be relevant and directly related to outcomes discussed.*

Key Milestone	Care Setting	Date/Timeframe
Begin collection of information as laid out by the plan	Inpatient Outpatient	January 1, 2023
Confirm application is properly logging patient activity including view, download, and transmit to 3rd party health information and external applications request of unique patient identifiers.	Inpatient Outpatient	Quarterly, 2023
Confirm application is properly reporting audit patient activity including view, download, and transmit to 3rd party health information and external applications request of unique patient identifiers.	Inpatient Outpatient	Quarterly, 2023
Process quarterly audit reporting of patient activity including view, download, and transmit to 3rd party health information and API request and external applications request of unique patient identifiers.	Inpatient Outpatient	Quarterly, 2023
Create RWT report	Inpatient Outpatient	December 2023
Submit RWT report	Inpatient Outpatient	January 2024



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## ATTESTATION

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

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Authorized Representative Signature:

Date: January 11, 2024