

REAL WORLD TESTING PLAN

GENERAL INFORMATION

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

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/>

JUSTIFICATION FOR REAL WORLD TESTING APPROACH

Empower™ Patient Portal and Engagement Suite is a cloud-based solution accessible via web browser.

To comply with the Real-World Testing Condition and Maintenance of Certification requirements, Real World Testing plans will be made publicly available on the Certified Health IT Product List (CHPL) annually on December 15th. Additionally, Real World Testing results will be publicly available on the CHPL on March 15th of the subsequent year.

170.315 (e)(1) – View, Download and Transmit is marketed to inpatient and ambulatory care facilities. The Real-World Test Plan will be applicable and all criteria for 170.315 (e)(1) will be tested. All criteria for 170.315 (e)(1) are same across all care settings.

170.315 (g)(7): Application Access - Patient Selection is marketed to inpatient and ambulatory care facilities. The Real-World Test Plan will be applicable and all criteria for 170.315 (g)(7) will be tested. All criteria for 170.315 (g)(7) are same across all care settings.

170.315 (g)(9): Application Access - All Data Request is marketed to inpatient and ambulatory care facilities. The Real-World Test Plan will be applicable and all criteria for 170.315 (g)(9) will be tested. All criteria for 170.315 (g)(9) are same across all care settings.

170.315 (b)(10): EHI Export - Patient Portal can be used to share CCDAs documents for view, download and transmit (encrypted and unencrypted). This metric provides information on types of transmission deployed and the frequency of usage. Additionally, Includes a publicly accessible hyperlink of the export's format. The User will demonstrate the sharing of Medical information for a patient in either an ambulatory or inpatient setting.

STANDARDS UPDATES (INCLUDING STANDARDS VERSION ADVANCEMENT PROCESS-SVAP AND USCDI)

WellStack has not updated Empower™ Patient Portal & Engagement Suite to any new standards as part of SVAP as of this date.

Standard (and version)	Not Applicable
Updated certification criteria and associated product	Not Applicable
CHPL Product Number	Not Applicable
Method used for standard update	Not Applicable
Date of ONC ACB notification	Not Applicable
Date of customer notification (SVAP only)	Not Applicable
Conformance measure	Not Applicable
USCDI updated certification criteria (and USCDI version)	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 170.315 (b)(10) Cures: EHI Export USCDI version 1

MEASURES USED IN OVERALL APPROACH

Care Setting: Outpatient and Inpatient care

The test will demonstrate that Empower™ Patient Portal and Engagement Suite is conformant to:

- 170.315 (e)(1): View, Download, and Transmit to 3rd Party
- 170.315 (g)(7): Application Access - Patient Selection
- 170.315 (g)(9): Application Access - All Data Request

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

DESCRIPTION OF MEASUREMENT/METRIC

Measurement/Metric	Description
Patient Engagement	Measure adoption of CCDA View, Download, and Transmit (encrypted and unencrypted).

ASSOCIATED CERTIFICATION CRITERIA

Measurement/Metric	Associated Certification Criteria	Relied Upon Software (if applicable)
170.315 (e)(1)	View, download and transmit to 3 rd party	EMR Direct, Version 2023 and Medline Plus, version updated on May 7, 2018

JUSTIFICATION FOR SELECTED MEASUREMENT/METRIC

Measurement/Metric	Justification
170.315 (e)(1)	Patient Portal can be used to share CCDA document for view, download and transmit (encrypted and unencrypted). This metric provides information on types of transmission deployed and the frequency of usage.

TESTING METHODOLOGY

Measurement/Metric	Testing Methodology
170.315 (e)(1)	Activity logs will be reviewed to determine the frequency and types of transmission (encrypted and unencrypted) methods used.

CARE SETTINGS

Care Setting	Justification
Primary Care	There is no difference in functionality across different specialties. CCDA data will be shared via patient portal for view, download, and transmit. Data will track frequency of usage.
Inpatient Care	There is no difference in functionality across different specialties. CCDA data will be shared via patient portal for view, download, and transmit. Data will track frequency of usage.

EXPECTED OUTCOMES

Measurement/Metric	Expected Outcomes
170.315 (e)(1)	Patient (or Patient Representative) can view, download, and transmit (via encrypted or

	unencrypted method) CCDAs information. Data will track frequency of usage over time.
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USE CASE 2: REAL WORLD TEST PLAN - 170.315 (g)(7)

DESCRIPTION OF MEASUREMENT/METRIC

Measurement/Metric	Description
Application Access - Patient Selection	Measure will show how the patient will get access to a token and ID from Empower. The user demonstrates that when Empower API receives a request from another software component/service with enough information about a patient to identify that patient, Empower API returns an ID or other patient token.

ASSOCIATED CERTIFICATION CRITERIA

Measurement/Metric	Associated Certification Criteria
170.315 (g)(7)	Application Access - Patient Selection

REAL WORLD TESTING PLAN TEMPLATE

JUSTIFICATION FOR SELECTED MEASUREMENT/METRIC

Measurement/Metric	Justification
170.315 (g)(7)	The system receives credentials from the external APP to return the ID and token for the patient.

TESTING METHODOLOGY

Measurement/Metric	Testing Methodology
170.315 (g)(7)	Using third party app the patient will connect to Empower and the audit logs will display success ID and token returned. <ul style="list-style-type: none"> • How many requests for a patient ID or token were received? • How many provided sufficient information to provide a valid response?

	<ul style="list-style-type: none"> How many follow-up requests were made using the provided patient ID or token?
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CARE SETTINGS

Care Setting	Justification
Primary Care	There is no difference in functionality across different specialties. CCDAs will be shared via patient portal for view, download, and transmit (encrypted or unencrypted). Data will track frequency of usage.
Inpatient Care	There is no difference in functionality across different specialties. CCDAs will be shared via patient portal for view, download, and transmit (encrypted or unencrypted). Data will track frequency of usage.

EXPECTED OUTCOMES

Measurement/Metric	Expected Outcomes
170.315 (g)(7)	It is expected that Empower will respond with a Patient ID and Token to make extra calls using the token. Empower will create and audit log for each response to track success responses to the end-user

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

DESCRIPTION OF MEASUREMENT/METRIC

Measurement/Metric	Description
Application Access - All Data Request	Measure will show how the patient will have access to the CCDAs using the API endpoint

ASSOCIATED CERTIFICATION CRITERIA

Measurement/Metric	Associated Certification Criteria
170.315 (g)(9)	Application Access - All Data Request

JUSTIFICATION FOR SELECTED MEASUREMENT/METRIC

Measurement/Metric	Justification
170.315 (g)(9)	The system will demonstrate that using an API a CCDA will be exported from the system containing associated data for the patient.

TESTING METHODOLOGY

Measurement/Metric	Testing Methodology
170.315 (g)(9)	Using any 3 rd party app with API access the patient will call the endpoint in Empower to get the full CCDA. The audit log in Empower will show the download success and the calls being made to obtain the Medical Records.

CARE SETTINGS

Care Setting	Justification
Primary Care	There is no difference in functionality across different specialties. CCDA data will be shared via patient portal for view, download, and transmit (encrypted or unencrypted). Data will track frequency of usage.
Inpatient Care	There is no difference in functionality across different specialties. CCDA data will be shared via patient portal for view, download, and transmit (encrypted or unencrypted). Data will track frequency of usage.

EXPECTED OUTCOMES

Measurement/Metric	Expected Outcomes
170.315 (g)(9)	It is expected that Empower will respond with the CCDA corresponding to the patient. Empower will create and audit log for each response in order to track success responses to the end-user.

USE CASE 4: REAL WORLD TEST PLAN - 170.315 (b)(10)

DESCRIPTION OF MEASUREMENT/METRIC

Measurement/Metric	Description
Electronic Health Information export	To ensure that health IT systems can efficiently export electronic health information for both individual patients and patient populations, enabling easier transitions between systems or data sharing across different platforms.

ASSOCIATED CERTIFICATION CRITERIA

Measurement/Metric	Associated Certification Criteria	Relied Upon Software (if applicable)
170.315 (b)(10)	EHI Export	MeldRx, v2.0

JUSTIFICATION FOR SELECTED MEASUREMENT/METRIC

Measurement/Metric	Justification
170.315 (b)(10)	Patient Portal can be used to share CCDA documents for view, download and transmit (encrypted and unencrypted). This metric provides information on types of transmission deployed and the frequency of usage. Additionally, Includes a publicly accessible hyperlink of the export's format.

TESTING METHODOLOGY

Measurement/Metric	Testing Methodology
170.315 (b)(10)	Activity logs will be reviewed to determine the frequency and types of transmission (encrypted and unencrypted) methods used.

CARE SETTINGS

Care Setting	Justification
Primary Care	There is no difference in functionality across different specialties. CCDA data will be shared via patient portal for view, download, and transmit. Data will track frequency of usage.
Inpatient Care	There is no difference in functionality across different specialties. CCDA data will be shared via patient portal for view, download, and transmit. Data will track frequency of usage.

EXPECTED OUTCOMES

Measurement/Metric	Expected Outcomes
170.315 (b)(10)	Patient (or Patient Representative) can view, download, and transmit (via encrypted or unencrypted method) CCDA information. Data will track frequency of usage over time. The export summary must contain data only from the specified date range and be completed successfully. A results report with a 95% success rate is also required to confirm the export has been saved and visually verified.

SCHEDULE OF KEY MILESTONES

Key Milestone	Date/Timeframe
WellStack submits first draft of CY25 RWT plan to Leidos for review	10/31/2024
WellStack identifies client list for Real World Testing	03/01/2025
WellStack schedules identified clients for Real World Testing	05/01/2025
WellStack executes Real World Testing with identified clients	06/01/2025 – 08/01/2025
WellStack completes analysis of WRT outcomes with identified clients	10/01/2025
WellStack completes RWT reporting	12/31/2025
Submit 2026 RWT plan	10/31/2025

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.

Date: October 30, 2024

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