

Clinical Quality Measures

Passed

- § 170.315(c)(1) — record and export
- § 170.315(c)(2) — import and calculate
- § 170.315(c)(3) — report

Care Coordination

Passed

- § 170.315(b)(10): Electronic Health Information Export

Justification of RWT Testing Approach – CQMsolution

CQMsolution is a software application that “bolts-on” to EHR products. It is used in both ambulatory and inpatient care settings. In general, we chose to concentrate on the aspects of each criterion that would closely follow the actual activities of CQMsolution end users and also provide the most benefit for caregivers and patients. At a high level, these use cases include:

- 1) Capabilities that support comparison with industry-standard benchmarks and with prior/expected performance for CQM calculation and reporting, and
- 2) Providing the best possible support for MIPS participants in automated, streamlined end-to-end reporting.
- 3) Functionality that gives EHR users flexibility in choosing EHR vendors and migrating from one EHR to another, even in the middle of a quality reporting period,

| Criteria | Care Setting | Measurement Period | Date | Key Milestones |
|---|------------------------|----------------------|--|---|
| Clinical Quality Measures | | | | |
| § 170.315(c)(1)—record and export § 170.315(c)(2)—import and calculate § 170.315(c)(3)—report | Ambulatory & Inpatient | 1/1/2025 - 5/31/2025 | Start test plan execution: January, 2025 | <input type="checkbox"/> Based on historical data, select the most popular eQMs. |
| | | | February, 2025 | <input type="checkbox"/> The file should upload and be accepted by the HQR website without error. |
| | | | March, 2025 | <input type="checkbox"/> The file should upload and be accepted by MIPS without error. |
| | | | April, 2025 | <input type="checkbox"/> All populations of all measures should match. |
| | | | Complete test execution: May, 2025 | <input type="checkbox"/> Prepare reporting for RWT |
| Care Coordination | | | | |
| § 170.315(b)(10) Electronic Health Information export | Ambulatory & Inpatient | 3/1/2025 - 6/1/2025 | Start test plan execution: May, 2025 | <input type="checkbox"/> • Available reporting programs are configurable per user according to license |
| | | | May, 2025 | <input type="checkbox"/> • Practice reporting types can be configurable via the UI |
| | | | June, 2025 | <input type="checkbox"/> QRDA I files are downloaded for only those patients contained within the report and are validated successfully |
| | | | July, 2025 | <input type="checkbox"/> Use Cypress to check validity of output file |
| | | | Complete test execution: August, 2025 | <input type="checkbox"/> Export was created and completed successfully |
| | | | | <input type="checkbox"/> Prepare RWT results report |

| Associated Certification Criteria: | | | | | | |
|---|--|--|--|--|----------|------------|
| Table of Contents | | | | | | |
| § 170.315(c)(1) - Clinical quality measures (CQMs) — record and export § 170.315(c)(2) - Clinical quality measures (CQMs) — import and calculate § 170.315(c)(3) - Clinical quality measures (CQMs) — report | | | | | | |
| Measure Description: <ul style="list-style-type: none"> • Capture and record electronic clinical quality measure (eCQM) data in EHR (or trading partner's EHR) for calculating eCQMs. • Electronically create a data file for transmission of CQM data in accordance with the CMS QRDA Category I IG for inpatient measures as adopted in § 170.205(h)(3) and CMS QRDA Category III IG for ambulatory measures as adopted in § 170.205(k)(3). | | Justification: We chose to concentrate on the aspects of this criterion that would closely follow the actual activities of Dynamic Health IT users with respect to eCQM calculation and output: <ol style="list-style-type: none"> 1) Run quality measure reports and display results on Dashboard to compare with industry-standard benchmarks and with prior/expected performance. 2a) Generate eCQM output for PI/IQR (universal eCQM reporting program for hospitals) and ensure that it can be successfully uploaded to the PI/IQR website. 2b) Generate eCQM output for MIPS (the most widely-used eCQM reporting program for ambulatory) and ensure that it can be successfully uploaded to the Quality Payment Program (QPP) website. 3a) Verify that CQMsolution is a product that can support hospital quality reporting needs. 3b) Verify that CQMsolution is a product that can support MIPS participants in achieving an end-to-end reporting bonus. | | | | |
| Metric Description: <ol style="list-style-type: none"> 1) 100 percent matching data elements in CQMsolution vs EHR. This will be confirmed by visual validation of the following data: <ul style="list-style-type: none"> • Demographics • Problems • Medications • Allergies 2) 100 percent matching calculation results in CQMsolution vs submission environment 3) 0 percent of files uploaded to submission environment result in errors | | Standards Implemented: (SVAP) Standard (and version) <ul style="list-style-type: none"> • 170.205(h)(2) "HL7 CDA® R2 Implementation Guide: Quality Reporting Document Architecture - Category I (QRDA I); Release 1, DSTU Release 5.3 with errata (US Realm), Volume 1 - Introductory Material, December 2022" • 170.205(h)(3) 2023 "CMS Implementation Guide for Quality Reporting Document Architecture: Category I; Hospital Quality Reporting; Implementation Guide for 2023" • 170.205(k)(3) 2023 "CMS Implementation Guide for Quality Reporting Document Architecture: Category III; Eligible Clinicians and Eligible Professionals Programs; Implementation Guide for 2023" Updated certification criteria and associated product <ul style="list-style-type: none"> • § 170.315(c)(1) - Clinical quality measures (CQMs) — record and export: CQMsolution 24 • § 170.315(c)(2) - Clinical quality measures (CQMs) — import and calculate: CQMsolution 24 • § 170.315(c)(3) - Clinical quality measures (CQMs) — report: CQMsolution 24 Health IT Module CHPL ID <ul style="list-style-type: none"> • 15.05.05.2713.DH24.04.07.0.231024 Date of ONC ACB notification <ul style="list-style-type: none"> • 10/24/2023 Date of customer notification <ul style="list-style-type: none"> • NA Conformance method and measurement/metric(s) <ul style="list-style-type: none"> • § 170.315(c)(1) - 100 percent matching data elements in CQMsolution vs EHR • § 170.315(c)(2) - 100 percent matching calculation results in CQMsolution vs submission environment • § 170.315(c)(3) - 0 percent of files uploaded to submission environment result in errors | | | | |
| Developer Info: DYNAMIC HEALTH IT, INC 320 Monticello Ave. New Orleans, LA 70121 504.309.9103 Care Setting: CQMsolution is used for eCQM submission in both ambulatory and inpatient environments, thus this test plan accounts for both care settings. | | Product Info: Product Name: CQMsolution Product Version: 23, 24, 25 CHPL ID: (23) 15.05.05.2713.DH23.03.06.0.221229 (24) 15.05.05.2713.DH24.04.07.0.231024 (25) Pending | | Methods Use to Demonstrate Interoperability: <ul style="list-style-type: none"> • Visual inspection and matching of QRDA I data to EHR data • Matching of calculation results from CQMsolution to CMS • API Sandbox testing with CMS for file acceptance | | |
| Test Step: | Testing Procedure: | Expected Outcomes: | Key Milestone Date: | Key Milestone: | Outcome: | Comment(s) |
| | * Inpatient Setting | | | | | |
| 1i | Identify Trading Partner (TP) and coordinate with TP for calculating and reporting electronic clinical quality measures (eCQMs) using production data as described in this RWT plan. | <ul style="list-style-type: none"> • Confirm Trading Partner • Confirm ability to calculate and report eCQMs • Confirm with TP that production data will be used, whether in an actual live environment or a copy of a live environment | Start test plan execution: January, 2025 | <input type="checkbox"/> | | |

| | | | | | |
|-----------------------------|--|---|----------------|--------------------------|--|
| 2i | Identify four EH (Eligible Hospital) eCQMs for RWT. | Based on historical data, select the most popular eCQMs. | | | |
| 3i | Identify a one calendar quarter reporting period with adequate patient data for reporting. | Admins with sufficient familiarity with the hospital's clinical activities should be able to choose a period with an appropriate amount of quality data. | | | |
| 4i | Capture and record clinical quality measure (CQM) data in Trading Partner's (TP) EHR. Since manual data entry for an adequate quantity of data would be onerous, we will use actual patient data. a. If TP is integrated with CQMsolution, CQMsolution will capture data through a SQL query, so that when a user runs a CQM report, CQMsolution pulls data directly from the TP's database. b. Alternative approach: Pull in data through QRDA I files in a .zip folder | Data ready for report generation | | | |
| 5i | Correctly calculate numerator, denominator, exclusion and exception values for selected eCQMs. | The CQMsolution report should complete with no errors. | | | |
| 6i | Spot-check 10 patients for each measure, ensuring that some are in the denominator only, some are in the numerator and denominator and, if possible, some are exclusions or exceptions. | Use Patient List to check which categories Initial Patient Population (IPP), Denominator (Den), Exclusions (Excl), Numerator (Num) or Exceptions (Excp) each patient falls into. For each spot-check patient, use the drill-down to confirm that the patient data in CQMsolution (encounters, codes, demographics) matches the patient data in the EHR and that the patient is correctly categorized in CQMsolution. | | | |
| 7i | Upload the generated zip files containing the HQR_PI_IQR QRDA I files to the HQR website test environment. | The file should upload and be accepted by the HQR website without error. | February, 2025 | <input type="checkbox"/> | |
| * Ambulatory Setting | | | | | |
| 1a | Identify Trading Partner (TP) and coordinate with TP for calculating and reporting electronic clinical quality measures (eCQMs) using production data as described in this RWT plan. | <ul style="list-style-type: none"> • Confirm Trading Partner • Confirm ability to calculate and report eCQMs • Confirm with TP that production data will be used, whether in an actual live environment or a copy of a live environment | | | |
| 2a | Identify six EP (Eligible Professional) eCQMs for RWT. | Based on historical data, select the most popular eCQMs. | | | |
| 3a | Identify a one calendar year reporting period with adequate patient data for reporting. | Admins with sufficient familiarity with the physician practice's clinical activities should be able to choose a period with an appropriate amount of quality data. | | | |
| 4a | Capture and record clinical quality measure (CQM) data in Trading Partner's (TP) EHR. Since manual data entry for an adequate quantity of data would be onerous, we will use actual patient data. a. If TP is integrated with CQMsolution, CQMsolution will capture data through a SQL query, so that when a user runs a CQM report, CQMsolution pulls data directly from the TP's database. b. Alternative approach: Pull in data through QRDA I files in a .zip folder | Data ready for report generation. | | | |
| 5a | Correctly calculate numerator, denominator, exclusion and exception values for selected eCQMs. | The CQMsolution report should complete with no errors. | | | |
| 6a | Spot-check 10 patients for each measure, ensuring that some are in the denominator only, some are in the numerator and denominator and, if possible, some are exclusions or exceptions. | Use Patient List to check which categories Initial Patient Population (IPP), Denominator (Den), Exclusions (Excl), Numerator (Num) or Exceptions (Excp) each patient falls into. For each spot-check patient, use the drill-down to confirm that the patient data in CQMsolution (encounters, codes, demographics) matches the patient data in the EHR and that the patient is correctly categorized in CQMsolution. | | | |
| 7a | Upload the generated MIPS QRDA III file to QPP. | The file should upload and be accepted by MIPS without error. | March, 2025 | <input type="checkbox"/> | |

| | | | | | | |
|--|--|---|------------------------------------|--------------------------|--|--|
| 8 | <p>Check the submission environment's measure calculation results and compare them to CQMsolution's calculation results.</p> <p><i>Both settings</i></p> | All populations of all measures should match. | April, 2025 | <input type="checkbox"/> | | |
| 9 | <p>Calculate and compile metrics</p> | Prepare reporting for RWT | Complete test execution: May, 2025 | <input type="checkbox"/> | | |
| <p>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.</p> | | | | | | |
| Authorized Representative Name: Jeffery P. Robbins | | | | | | |
| Authorized Representative Email: jrobbins@dynamichealthit.com | | | | | | |
| Authorized Representative Phone: (504) 309-9103 | | | | | | |
| Authorized Representative Signature: <i>Jeffery P. Robbins</i> | | | | | | |
| Date: 10/31/2024 | | | | | | |

| Table of Contents | | | | | | |
|--|--|---|---|--------------------------|----------|------------|
| Associated Certification Criteria: § 170.315(b)(10) Electronic Health Information export | | | | | | |
| | Measure Description: Export USCDiv1 clinical data for a population of patients for use in a different health information technology product or a third party system. This export can be used for many purposes, including data portability when a physician practice switches to a new EHR platform. | Justification: We chose to concentrate on the aspects of this criterion that would: 1) demonstrate CQMsolution's ability to export batches of patient data in a straightforward fashion 2) facilitate interoperability by providing the exported data in the form of valid QRDA files that conform to the HL7 standards as described in the HL7 Implementation Guide for CDA Release 2: Quality Report Document Architecture, Category I. | | | | |
| | Metric Description: 1) QRDA count matches actual patient count in database 2) 100% of spot-checked QRDAs pass Cypress | | Standards Implemented: (SVAP) No updates have been made. | | | |
| | Developer Info: DYNAMIC HEALTH IT, INC 320 Monticello Ave. New Orleans, LA 70121 504.309.9103 Care Setting: Ambulatory/Inpatient The functionality for the criteria is the same whether the care setting is ambulatory or inpatient. | Product Info: Product Name: CQMsolution Product Version: 23, 24, 25 (23) 15.05.05.2713.DH23.03.06.0.221229 (24) 15.05.05.2713.DH24.04.07.0.231024 (25) Pending | Methods Use to Demonstrate Interoperability: 1) Visual validation/counting 2) Test output file with Cypress to ensure correct format/contents. | | | |
| Test Step: | Testing Procedure: | Expected Outcomes: | Key Milestone Date: | Key Milestone: | Outcome: | Comment(s) |
| 1 | Using production data in an actual live environment or copy of live environment, demonstrate the ability to configure data export configurations for user and practice | <ul style="list-style-type: none"> Available reporting programs are configurable per user according to license Practice reporting types can be configurable via the UI | Start test plan execution: May, 2025 | <input type="checkbox"/> | | |
| 2 | Demonstrate the ability to download a QRDA I zip file from a report run for a specific user | QRDA I files are downloaded for only those patients contained within the report and are validated successfully | May, 2025 | <input type="checkbox"/> | | |
| 3 | Demonstrate the ability to limit the set of users who can access the Generate QRDA I tool for batch export | Logging in as an Entity Admin will allow access to the Generate QRDA I functionality | | | | |
| 4 | Confirm users roles that have been denied Generate QRDA I tool access cannot create QRDA I batch exports | Logging in as a non-Entity Admin will not allow access to the Generate QRDA I functionality | | | | |
| 5 | Create and validate a QRDA I export for a single patient | Use Cypress to check validity of output file | June, 2025 | <input type="checkbox"/> | | |
| 6 | Create and validate a QRDA I batch export for an entire practice | Export was created and completed successfully | July, 2025 | <input type="checkbox"/> | | |
| 7 | Save the exported QRDA I batch to a preferred location at the time of export. | <ul style="list-style-type: none"> Saving to a preferred location is allowed Visually confirming the export after save is performed and successful | | | | |
| 8 | Calculate and compile metrics | Prepare RWT results report | Complete test execution: August, 2025 | <input type="checkbox"/> | | |
| 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: Jeffery P. Robbins | | | | | | |
| Authorized Representative Email: jrobbins@dynamichealthit.com | | | | | | |
| Authorized Representative Phone: (504) 309-9103 | | | | | | |
| Authorized Representative Signature: <i>Jeffery P. Robbins</i> | | | | | | |
| Date: 10/31/2024 | | | | | | |