# REAL WORLD TESTING PLAN for 2025

## Perk Medical Systems LLC (PCB Apps LLC)

## GENERAL INFORMATION

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

Developer Name: Perk Medical Systems LLC (PCB Apps LLC)

Product Name(s): ezPractice

Version Number(s): V15.1

Certified Health IT Product List (CHPL) Product Number(s): 15.07.04.2154.Ezpr.15.01.1.230208

Developer Real World Testing Plan Page URL: https://penn-clinical.com/rwtestingplan-2025

## JUSTIFICATION FOR REAL WORLD TESTING APPROACH

ezPractice is an open source electronic health records and medical practice management software package that is used in the ambulatory primary/specialty care and behavioral health care settings.

ezPractice will utilize Real World Testing to demonstrate interoperability and functionality in real world settings and scenarios. Perk Medical Systems LLC will develop a reporting algorithm that will calculate Real World Testing metrics from real world data by analyzing the activity logs. This reporting algorithm will calculate the Real World Testing metrics for the pertinent 2015 Cures Edition criteria that are required for ezPractice's Real World Testing. These metric results will then determine and ensure successful Real World Testing while also providing insights that can be used to improve compliance and improve ezPractice. The ezPractice users will run this report algorithm and submit the results to the Perk Medical Systems LLC.

# 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 |
| **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)** | Not Applicable |

## MEASURES USED IN OVERALL APPROACH

**Description of Measurement/Metric**

| Measurement/Metric | Description |
|---|---|
| 170.315(b)(1) | Over a 90-day period:<br>1) Number of CCDAs created and sent<br>2) Number of CCDAs received via edge protocols |
| 170.315(b)(10). | Number of requests or token with sufficient information. |
| 170. 315(c)(1) | Over a 90-day period:<br>1) Number and list of quality measures configured in instance<br>2) Number of quality measures with positive numerator values<br>3) Number of quality measures with positive denominator values<br>Successful generation of a QRDA file for export |
| 170.315(g)(7) | Number of requests for a patient ID or token with sufficient information. |
| 170.315(g)(9) | Number of requests for a patient's data made by an application via a data category request using a valid patient ID or token fora specific 90-day date range |
| 170.315(g)(10) | Number of requests for a patient's Summary Record made by an application via an all-data category request using a valid patient ID or token for a specific 90-day date range |
| 170.315(h)(1) | 1) Number of Direct Messages sent and<br>2) Number of Delivery Notifications received<br>3) Number of Direct Messages received<br>4) Number of Delivery Notifications sent |

## Associated Certification Criteria

| Measurement/Metric | Associated Certification Criteria | Relied Upon Software (if applicable) |
|---|---|---|
| 170.315(b)(1) | *Criteria Link* | EMR Direct Interoperability Engine |
| 170.315(b)(10) | *Criteria Link* | N/A |
| 170. 315(c)(1) | *Criteria Link* | N/A |
| 170.315(g)(7) | *Criteria Link* | N/A |
| 170.315(g)(9) | *Criteria Link* | N/A |
| 170.315(g)(10) | *Criteria Link* | N/A |
| 170.315(h)(1) | *Criteria Link* | EMR Direct Interoperability Engine |

## Justification for Selected Measurement/Metric

| Measurement/Metric | Justification |
|---|---|
| 170.315(b)(1) | Perk Medical Systems will demonstrate the required certified capabilities by demonstrating how often CCDAs are created and exchanged with other systems to demonstrate the certified functionality is available and effective, regardless of the frequency it is used. |
| 170.315(b)(10) | Perk Medical Systems will evaluate the capability to successfully generate at least 1 full EHI export for a single patient in near real-time without support from the developer with real world end users. Further we intend to quantify the client/practice requests for bulk export as a means of utilization tracking. |
| 170. 315(c)(1) | Perk Medical Systems intends to record the measures, frequency, through numerator and denominator values, and QRDA output that CQM files are imported and/or exported by providers to demonstrate the certified capability is available and effective, regardless of the frequency it is used. |
| 170.315(g)(7) | Perk Medical Systems intends to record the frequency that patient ID requests are received by providers via API to demonstrate the certified capability is available and effective, regardless of the frequency it is used. |
| 170.315(g)(9) | Perk Medical Systems intends to record the frequency that patient data requests by category are received by providers and fulfilled via API to demonstrate the certified capability is available and effective, regardless of the frequency it is used. |
| 170.315(g)(10) | Perk Medical Systems intends to record the frequency that patient data requests for all categories are received by providers and fulfilled via API to demonstrate the certified capability is available and effective, regardless of the frequency it is used. |
| 170.315(h)(1) | Since not all systems respond with MDNs, we cannot reliably use that metric to define success. Furthermore, it is not feasible to obtain copies of Direct Messages from "outside" developers or providers. Therefore, we intend to demonstrate the required certified capabilities by demonstrating how often Direct Messages are exchanged with other systems to demonstrate the certified capability is available and effective, regardless of the frequency it is used. |

## Care Setting(s)

| Care Setting | Justification |
|---|---|
| Primary Care - Outpatient | This care setting is used by the majority of the practices that use ezPractice. |

## Expected Outcomes

| Measurement/Metric | Expected Outcomes |
|---|---|
| 170.315(b)(1) | The expectation is there will be moderate utilization by end users with a high success rate. |
| 170.315(b)(10) | The expectation is that EHI export for single patient will function successfully for all users. The expectation for bulk quantification is that this new requirement will have limited to no use at the time of testing. |
| 170. 315(c)(1) | The expectation is that, at the time of testing, there will be CQMs listed in production, positive values in numerator and denominator fields and that a QRDA can be created and exported. |
| 170.315(g)(7) | The expectation is there will be low utilization by providers. |
| 170.315(g)(9) | The expectation is there will be low or lack of utilization by providers. |
| 170.315(g)(10) | The expectation is there will be a low or lack of utilization by providers. |
| 170.315(h)(1) | The expectation is there will be moderate utilization by providers with a high success rate. |

# SCHEDULE OF KEY MILESTONES

| Key Milestone | Care Setting | Date/Timeframe |
|---|---|---|
| Begin communication with clients to ask for their support and participation in real-world testing. The goal is to have enough clients committed for real world testing by the end of 2Q-2025. | Office/ambulatory care | Q2 2025 |
| Real world testing with clients will be scheduled and performed. It is expected that a preparatory call will be done with clients to prepare them for testing activities. | Office/ambulatory care | Q3 and Q4 2025 |
| During the last quarter of the year, the CY 2025 real-world test plan will be completed according to ONC and ONC-ACB requirements and expectations. Test plan will be prepared for submission before the end of the year. | Office/ambulatory care | Q4 2025 |
| We will document our CY 2025 test results into our RWT Test Report and submit to our ONC-ACB. | Office/ambulatory care | February 2026 |

**ATTESTATION**

*The Real World Testing plan must include the following attestation signed by the health IT developer authorized representative.*

*Note: The plan must be approved by a health IT developer authorized representative capable of binding the health IT developer for execution of the plan and include the representative's contact information.[ii]*

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: Ashok Chinthala

Authorized Representative Email: achinthala@pcbapps.com

Authorized Representative Phone: (732) 302-0100 x 345

Authorized Representative Signature:

Date: 12/1/2024

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[i] Certified health IT continues to be compliant with the certification criteria, including the required technical standards and vocabulary codes sets; certified health IT is exchanging EHI in the care and practice settings for which it is marketed for use; and EHI is received by and used in the certified health IT. (85 FR 25766)

[ii] https://www.federalregister.gov/d/2020-07419/p-3582