

2023 Qualifacts Credible Real World Testing Results Report

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RWT Results Report Summary

This document provides the Real-World Testing Results Report for Qualifacts Credible for the calendar year 2023. This document includes elements that allow reflection, direct results, and analysis of the process of conducting Real World Testing of our certified health IT (45 CFR § 170.405)

ONC has provided the guidance that Real World Testing intends to evaluate compliance with the certification criteria and interoperability of exchanging electronic health information (EHI) within the care and practice setting targeted for use. Our RWT plans are built toward final testing measurements and metrics to evaluate our product interoperability within production settings.

Attestation

This Real World Testing Results Report has all the required elements documented on the ONC Real World Testing Results Report Template. The information in this document is current and comprehensively addresses the health IT developer's Real World Testing Results Report requirements.

| | |
|--------------------------------------|--|
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General Information

| | |
|--|---|
| Results Report based on 2023 RWT Report ID Number | Credible-RWT-2023 |
| Developer Name: | Qualifacts Systems, LLC |
| Product Name: | Credible Behavioral Health Software |
| Version Number: | Version 11 |
| Certified Health IT Product List (CHPL) ID: | ONC CHPL ID: 15.04.04.3124.Cred.11.01.1.221230, CHPL link |
| Developer Real World Testing Page URL: | https://www.qualifacts.com/onc-certification-and-costs/ |

Changes to the Original Plan

| Summary of Change [Summarize each element that changed between the plan and the 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] |
|--|--|---|
|--|--|---|

In 2023, Qualifacts Credible encountered no interest or engagement for measures where the testing methods were designed to interact with the customer. As such, we pivoted and utilized our quality metrics for reporting against real-world data to accommodate this shift in our intended design.

Withdrawn Products

ONC Guidance: 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.

| | |
|---|---|
| Version Number(s): | <p>In CY2023, Qualifacts Credible software did not withdraw any products during the reporting year.</p> |
| Date(s) Withdrawn: | |
| Inclusion of Data in Results Report: | |

Summary of Testing Methods and Key Findings

Qualifacts Credible focused on two distinct testing methods for our 2023 Real World Testing Plan:

- **Reporting/Logging:** This methodology uses the EHR's logging and reporting capabilities to evaluate system actions as part of users' production workflows. A typical example is the numerator recording and measure's calculation required by §170.315(g)(1) and §170.315(g)(2). It can also include reviews of the audit log and customized reports from the EHR. This methodology often provides historical measurement reports that can be accessed at different times of the year and evaluate the interoperability of EHR functionality. It can be a benchmark for assessing real-world testing over multiple time intervals.
- **Compliance and Tool:** This methodology uses inspection to evaluate if EHR complies with the ONC criteria. Assessment can be accomplished through 1-on-1 manual testing and various validation tools to assess compliance and interoperability. If an EHR module's technology is not widely used in production by current users, compliance inspection can ensure the functionality continues to meet the certification requirements.

"You can't connect the dots looking forward; you can only connect them looking backward. So you have to trust that the dots will somehow connect in your future."

-Steve Jobs

In this sophomore year of ONCs RWT, Credible (and presumably all health IT developers) continues to gain immeasurable and valuable insight into the vision, execution, and goal – including the "spirit" – behind Real World Testing. Objectively reviewing metrics throughout the year provided an opportunity for quality checkpoints, data analysis, and – as in 2022 – the privilege to grow, learn, explore, engage, and move the needle forward on the reachable goal of national interoperability.

Where appropriate in this RWT Results Report, a review of "year-over-year" data was noted and discussed. The beauty of these annual ONC results reports is the review of calendar year data not only for real-world application and use but also to see the trends of that use from one year to the next. The healthcare IT industry is nearing eight years since the passage of The 21st Century Cures Act – we continue to discover and explore the aims, ideals, and purpose of firmly creating a nationally interoperable, interchangeable foundation.

Standards Updates (SVAP)

Including Standards-Version Advancement Process (SVAP) and the United States Core Data for Interoperability (USCDI)

| | |
|---|---|
| Standard (and version): | In 2023, Qualifacts Credible software and products did not include these voluntary standards. |
| Updated certification criteria and associated project: | |
| Health IT Module CHPL ID: | |
| Conformance Measure: | |

Care Setting(s) Targeted

Qualifacts Credible software is targeted at behavioral healthcare and the human services industries. The testing methods utilized are at an enterprise level, and each care setting is included in the analysis, review, and reporting.

Relied Upon Software

Additional software relied upon to demonstrate compliance: Surescripts Clinical Direct Messaging for § 170.315(e)(1) and § 170.315(h)(1), Dynamic Health IT CQM solution for § 170.315(c)(1) to (c)(3), Microsoft NTP for § 170.315(e)(1), and Firely (Version 4.11.0-alpha-build-20221018.2) and Duende (Version 6.0.2) for § 170.315(g)(10).

Key Milestones

| Key Milestone | Timeframe |
|--|---|
| <p>Within the year's first two quarters, Credible maintained a continual emphasis on a collaborative team focused on product functionality, especially against functionality that is part of certification criteria.</p> <p>During this same time, reporting and data gathering for RWT methods were monitored toward the data output of Reporting/Logging. Throughout these quarters and the entire calendar year, the reports produced against certification criteria have been regularly monitored for completeness and analysis of trends.</p> | <p>Q1-Q2</p> <p>Care Settings: behavioral healthcare and human services</p> |
| <p>Much like the first half of the calendar year, the collaborative team emphasis continues, maintaining cohesion against certified functionality. In the latter quarters of the calendar year, Credible supported continuous quality checks on the data reporting for criteria marked with Reporting/Logging.</p> | <p>Q3-Q4</p> <p>Care Settings: behavioral healthcare and human services</p> |

Metrics and Outcomes

| Measurement and Associated Criteria (noting Relied Upon Software, if applicable) | Outcomes and Challenges |
|--|--------------------------------------|
| Measure: Number of Transition of Care C-CDAs Successfully Sent § 170.315(b)(1) Transitions of care § 170.315(h)(1) Direct Project | Testing Method: Reporting/Logging |

Credible used reporting across all live customer databases, where we gleaned the following metrics for these reporting results against the criteria:

| Year-Month | Live Partner Count | Direct messages received | Partners receiving Direct | Direct messages sent |
|------------|--------------------|--------------------------|---------------------------|----------------------|
| 2023-01 | 546 | 393 | 5 | 337 |
| 2023-02 | 554 | 425 | 6 | 386 |
| 2023-03 | 557 | 367 | 4 | 329 |
| 2023-04 | 564 | 204 | 6 | 188 |
| 2023-05 | 565 | 420 | 5 | 381 |
| 2023-06 | 568 | 396 | 6 | 338 |
| 2023-07 | 569 | 208 | 6 | 168 |
| 2023-08 | 582 | 412 | 7 | 374 |
| 2023-09 | 580 | 308 | 5 | 272 |
| 2023-10 | 584 | 475 | 8 | 418 |
| 2023-11 | 589 | 467 | 8 | 404 |
| 2023-12 | 589 | 392 | 6 | 313 |

While overall customer utilization is on the lower end, the percent successful is significantly positive, with an average success rate of 99.16%, an increase from the 2022 RWT Result of this same metric of 98.947%.

Conversely, when viewing the utilization of outgoing – or sent – Clinical Summary documents using Direct messages, the utilization dramatically reduces. The following metrics are reflective of the 2023 calendar year:

| Year-Month | Partners sending Direct | Clinical Summary documents sent via Direct | Clinical Summary documents sent via Direct successfully | Clinical Summary documents sent via Direct Percent Successful | Unique Partners sending Clinical Summary documents via Direct |
|------------|-------------------------|--|---|---|---|
| 2023-01 | 2 | 0 | 0 | N/A | 0 |
| 2023-02 | 2 | 4 | 0 | 0.00 | 1 |
| 2023-03 | 4 | 7 | 6 | 85.71 | 2 |
| 2023-04 | 2 | 3 | 0 | 0.00 | 1 |
| 2023-05 | 3 | 2 | 1 | 50.00 | 2 |
| 2023-06 | 1 | 0 | 0 | N/A | 0 |
| 2023-07 | 1 | 0 | 0 | N/A | 0 |
| 2023-08 | 1 | 0 | 0 | N/A | 0 |
| 2023-09 | 1 | 0 | 0 | N/A | 0 |
| 2023-10 | 1 | 0 | 0 | N/A | 0 |
| 2023-11 | 4 | 4 | 1 | 75.00 | 2 |
| 2023-12 | 2 | 0 | 0 | N/A | 0 |

Customer utilization is relatively low, with an overall success rate of 52.68% (8 successful documents out of 20 documents sent across a calendar year). Successful delivery of Direct messages could be due to incorrect "send-to" information, among other user-involved reasons.

Measure: Number of Different Destinations C-CDAs Successfully Sent

§ 170.315(b)(1) Transitions of care
 § 170.315(h)(1) Direct Project

Testing Method:
 Reporting/Logging

Credible used reporting across all live customer databases, where we gleaned the following metrics for these reporting results against the criteria:

| Year-Month | Live Partner Count | Unique destinations for all Direct messages sent | Unique destinations for Direct messages containing a Clinical Summary |
|------------|--------------------|--|---|
| 2023-01 | 546 | 2 | 0 |
| 2023-02 | 554 | 2 | 1 |
| 2023-03 | 557 | 3 | 1 |
| 2023-04 | 564 | 2 | 1 |
| 2023-05 | 565 | 3 | 2 |
| 2023-06 | 568 | 1 | 0 |
| 2023-07 | 569 | 1 | 0 |
| 2023-08 | 582 | 1 | 0 |
| 2023-09 | 580 | 1 | 0 |
| 2023-10 | 584 | 1 | 0 |
| 2023-11 | 589 | 4 | 2 |
| 2023-12 | 589 | 2 | 0 |

Overall utilization remains low, yet there is a high success rate among the destinations. Compared to the same data of the last reporting period, the average customer count increased from one 12-month period to the next (501 in 2022 and 570 in 2023). However, the unique destinations for all messages sent decreased to 23 in 2023 (35 in 2022).

One customer is a high utilizer with their connection to [Mass Hlway](#), the Massachusetts Health Information Exchange (HIE). When reviewing the reports, we see high success in this granular view:

| Unique vs All Customers | Messages Sent | Messages Successful |
|-------------------------|---------------|---------------------|
| Unique Customer | 3,880 | 3,864 |
| All Partners | 3,908 | 3,877 |
| % Unique Customer | 99.28% | 99.66% |

The percentage of successful messages remains high, with a slight increase year over year (99.2% 2022 / 99.66% 2023). The volume of messages decreased year over year, led by the unique customer (4,268 2022 / 3,880 2023).

Measure: Number of C-CDAs Received and (or) Incorporated

§ 170.315(b)(1) Transitions of care
 § 170.315(b)(2) Clinical information reconciliation and incorporation

Testing Methods:
 Reporting/Logging

Measure: Compliance of Problem List/Medication/Medication Allergy Reconciliation and Incorporation from C-CDA

§ 170.315(b)(2) Clinical information reconciliation and incorporation

Credible used reporting across all live customer databases, where we collected the following metrics for these reporting results against the criteria:

| Year-Month | Live Partner Count | # of Clinical Summary documents imported in the month | Patients seen in the month | Patients seen in the month w/ Summary Document | Percent seen in the month w/ Summary Document | Patient seen with Medication Incorporated | Patient seen with Medication Allergy Incorporated | Patient seen with Problem Incorporated |
|------------|--------------------|---|----------------------------|--|---|---|---|--|
| 2023-01 | 546 | 58 | 751,234 | 2,894 | 0.39% | 12 | 1 | 5 |
| 2023-02 | 554 | 27 | 737,686 | 2,638 | 0.36% | 11 | 1 | 5 |
| 2023-03 | 557 | 106 | 786,742 | 2,588 | 0.33% | 25 | 8 | 4 |
| 2023-04 | 564 | 234 | 750,412 | 2,307 | 0.31% | 48 | 16 | 5 |
| 2023-05 | 565 | 649 | 786,398 | 2,746 | 0.35% | 174 | 41 | 3 |
| 2023-06 | 568 | 606 | 768,149 | 3,134 | 0.41% | 308 | 72 | 2 |
| 2023-07 | 569 | 48 | 728,767 | 2,722 | 0.37% | 369 | 79 | 4 |
| 2023-08 | 582 | 6 | 774,134 | 2,840 | 0.37% | 379 | 73 | 2 |
| 2023-09 | 580 | 9 | 736,396 | 2,252 | 0.31% | 344 | 67 | 1 |
| 2023-10 | 584 | 9 | 775,053 | 1,440 | 0.19% | 390 | 81 | 1 |
| 2023-11 | 589 | 8 | 756,293 | 1,191 | 0.16% | 355 | 68 | 0 |
| 2023-12 | 589 | 10 | 725,744 | 1,341 | 0.18% | 429 | 91 | 0 |

This powerful interoperability option is clearly less utilized for client continuity of care across providers and specialties. Where functionality is available and positive, the two areas of Clients Seen with Summary Document and where there is the incorporation of data, higher utilization may be lacking due to lagging behavioral healthcare industry change.

Measure: Electronic Prescribing {NewRx, RxChangeRequest, RxChangeResponse, RxFill}
 § 170.315(b)(3) Electronic prescribing

Testing Method:
Reporting/Logging

Credible used reporting across all live customer databases, where we gleaned the following metrics for these reporting results against the criteria:

NewRx

| Year-Month | Live Partner Count | Partners sending NewRx | NewRx sent | NewRx sent successfully | Percent NewRx sent successfully |
|------------|--------------------|------------------------|------------|-------------------------|---------------------------------|
| 2023-01 | 546 | 344 | 566,783 | 566,020 | 99.87% |
| 2023-02 | 554 | 343 | 514,547 | 514,043 | 99.90% |
| 2023-03 | 557 | 347 | 593,892 | 592,983 | 99.85% |
| 2023-04 | 564 | 348 | 527,651 | 526,346 | 99.75% |
| 2023-05 | 565 | 353 | 591,989 | 590,925 | 99.82% |
| 2023-06 | 568 | 357 | 563,683 | 562,831 | 99.85% |
| 2023-07 | 569 | 372 | 528,183 | 524,583 | 99.32% |
| 2023-08 | 582 | 372 | 612,465 | 611,814 | 99.89% |
| 2023-09 | 580 | 374 | 533,278 | 532,793 | 99.91% |
| 2023-10 | 584 | 379 | 588,896 | 588,277 | 99.89% |
| 2023-11 | 589 | 381 | 567,333 | 566,599 | 99.87% |
| 2023-12 | 589 | 377 | 516,735 | 515,590 | 99.78% |

RxChangeRequest / RxChangeResponse

| Year-Month | Live Partner Count | Partners sending RxChangeResponse | Partners receiving RxChangeRequest | RxChangeResponse sent | RxChangeResponse sent successfully | Percent RxChangeResponse sent successfully |
|------------|--------------------|-----------------------------------|------------------------------------|-----------------------|------------------------------------|--|
| 2023-01 | 546 | 63 | 202 | 380 | 156 | 41.05% |
| 2023-02 | 554 | 62 | 206 | 343 | 154 | 44.90% |
| 2023-03 | 557 | 63 | 212 | 400 | 194 | 48.50% |
| 2023-04 | 564 | 67 | 215 | 406 | 169 | 41.63% |
| 2023-05 | 565 | 69 | 224 | 488 | 210 | 43.03% |
| 2023-06 | 568 | 70 | 224 | 526 | 235 | 44.68% |
| 2023-07 | 569 | 73 | 237 | 454 | 227 | 50.00% |
| 2023-08 | 582 | 88 | 228 | 580 | 290 | 50.00% |
| 2023-09 | 580 | 80 | 227 | 441 | 215 | 48.75% |
| 2023-10 | 584 | 90 | 241 | 696 | 435 | 62.50% |
| 2023-11 | 589 | 96 | 243 | 707 | 413 | 58.42% |
| 2023-12 | 589 | 91 | 241 | 854 | 414 | 48.48% |

* 73.6% of all failures on RxChangeResponse are recorded by Surescripts as "Error Code 601: Message could not be delivered to recipient" – the failures are not from EHR to Surescripts but, rather, the inability to send to the pharmacy.

RxFill

| Year-Month | Live Partner Count | RxFill received | Partners receiving RxFill |
|------------|--------------------|-----------------|---------------------------|
| 2023-01 | 546 | 0 | 0 |
| 2023-02 | 554 | 0 | 0 |
| 2023-03 | 557 | 0 | 0 |
| 2023-04 | 564 | 0 | 0 |
| 2023-05 | 565 | 0 | 0 |
| 2023-06 | 568 | 0 | 0 |
| 2023-07 | 569 | 0 | 0 |
| 2023-08 | 582 | 0 | 0 |
| 2023-09 | 580 | 0 | 0 |
| 2023-10 | 584 | 0 | 0 |
| 2023-11 | 589 | 0 | 0 |
| 2023-12 | 589 | 0 | 0 |

Overall, there is a high utilization of e-prescribing across all customer domains, highlighting the great need and strength of this data interoperability. NewRx, year over year, saw a slight increase to 99.81% (2023) versus 99.62% (2022). Low utilization and success with change requests and responses continue to trend and can be attributed to various factors, with provider choice being the strongest. Our customers have yet to receive an RxFill message from a participating pharmacy.

At Qualifacts, we wholeheartedly continue to support [CMS' statement](#), "Adopting the standards to facilitate e-prescribing is one of the key action items in the Federal government's plan to expedite the adoption of electronic medical records and build a national electronic health information infrastructure in the United States."

We look forward to the continued enhancements of USCDI elements in the [Medication](#) class and, eventually, the inclusion of robust, applicable data standards (such as NPDDP standards) to enhance use and interoperability.

Measure: Clinical Quality Measure Successful Creation, Aggregate, and Report

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

Testing Method:
Reporting/Logging

Credible used reporting across all live customer databases, where we gleaned the following metrics for these reporting results against the criteria:

| Year-Month | Live Partner Count | Total number of CQM reports | Partners creating CQM reports | Unique Partners with at least one CQM created all time (cumulative) |
|------------|--------------------|-----------------------------|-------------------------------|---|
| 2023-01 | 546 | 23 | 6 | 117 |
| 2023-02 | 554 | 47 | 5 | 117 |
| 2023-03 | 557 | 81 | 12 | 121 |
| 2023-04 | 564 | 51 | 9 | 121 |
| 2023-05 | 565 | 46 | 11 | 122 |
| 2023-06 | 568 | 42 | 5 | 123 |
| 2023-07 | 569 | 63 | 7 | 124 |
| 2023-08 | 582 | 33 | 4 | 125 |
| 2023-09 | 580 | 22 | 2 | 125 |
| 2023-10 | 584 | 23 | 6 | 126 |
| 2023-11 | 589 | 57 | 10 | 127 |
| 2023-12 | 589 | 11 | 5 | 128 |

Credible relies on the CQM Solution from Dynamic Health IT as our long-standing trusted partner for Clinical Quality Measures and associated criteria for this measure. However, we have seen less and less participation in using CQM measures due to factors such as:

- The use of the MIPS Extreme and Uncontrollable Circumstances (EUC) exception for MIPS/APM under the Quality Payment Program due to COVID-19 continued into PY2022 (<https://qpp.cms.gov/mips/exception-applications?py=2022>).
- The 2022 report from [JAMA Health Forum](#) highlighted that psychiatrists (the main care setting for Credible) performed significantly lower and received more significant penalties in QPP's MIPS program. This report has been widely cited as the reason for low participation, with headlines reporting the "pinch of MIPS" to "low MIPS system scores" as the reason for this trend.

JAMA relayed in their study: "In this cross-sectional study comparing psychiatrists with other outpatient physicians in the 2020 Medicare MIPS, psychiatrists had significantly lower performance scores and, consequently, were more likely to be penalized and less likely to receive bonus payments than their peers. These performance disparities were driven primarily by lower scores in the quality and promoting interoperability domains. In particular, psychiatrists performed more poorly on technology-dependent measures, such as participation in health information exchanges; care coordination measures, such as documentation of patient medications in medical records; and preventive care measures unrelated to psychiatry, such as cancer screening."

Credible provides a robust, interoperable solution for value-based reporting across our customer base. However, utilization waxes and wanes dependent on incentive-based programming overall.

The concluding statement from the JAMA research provides excellent clarity into the overall landscape: "In this national cross-sectional study of Medicare psychiatrists and other outpatient physicians participating in the 2020 MIPS, psychiatrists received significantly lower performance scores, were penalized more frequently, and received fewer bonus payments than other outpatient physicians. CMS may want to reconsider the use of many current MIPS measures for assessing the performance of psychiatrists."

Measure: Compliance of C-CDA Creation and C-CDA Scorecard Average

§ 170.315(b)(1) Transitions of care

Testing Methods: Compliance and Tool

Measure: Compliance with C-CDA Error Detection

§ 170.315(b)(1) Transitions of care

Measure: Compliance of Data Export C-CDA and C-CDA Scorecard Average

§ 170.315(b)(6) Data export

Credible's RWT Plan indicated this measure to be coordinated with a customer, yet as shown in this results report, Credible did not achieve diverse and robust participation as initially expected.

Credible tested 168 sample C-CDA XML files through the HealthIT "C-CDA Scorecard 2.0" Edge Test Tool.

| Area | Zero Errors | A+ | A- | B+ | B- | C | D |
|------------------|-------------|-----|----|----|-----|-----|-----|
| IG Errors | 155 | | | | | | |
| Cures Act Errors | 160 | | | | | | |
| Letter Grade | | 0 | 0 | 0 | 5 | 123 | 38 |
| Avg Score | 70.05 | | | | | | |
| Miscellaneous | | 166 | 0 | 0 | 0 | 0 | 0 |
| Medications | | 0 | 0 | 0 | 0 | 159 | 6 |
| Encounters | | 0 | 0 | 0 | 1 | 12 | 153 |
| Patient | | 152 | 0 | 0 | 0 | 0 | 11 |
| Immunizations | | 0 | 0 | 0 | 11 | 0 | 149 |
| Lab Results | | 0 | 0 | 0 | 4 | 3 | 1 |
| Social History | | 0 | 12 | 0 | 143 | 0 | 11 |
| Vital Signs | | 0 | 0 | 0 | 0 | 7 | 165 |
| Procedures | | 0 | 0 | 0 | 0 | 0 | 0 |
| Problems | | 0 | 0 | 0 | 18 | 111 | 37 |
| Allergies | | 0 | 13 | 2 | 2 | 0 | 146 |

Comparatively, during the 2022 testing, one sample file was uploaded (Grade = C). The robust overview afforded by this volume of a systematic review allows excellent insight and understanding toward use and areas of improvement. While the overall grade remained the same year over year, Credible's data analysis has grown, providing a wealth of knowledge for continual quality improvement.

Measure: Compliance of Data Segmentation of Privacy

§ 170.315(b)(7) Security tags – summary of care – send
 § 170.315(b)(8) Security tags – summary of care – receive

Testing Method: Compliance and Tool

Credible's RWT Plan indicated this measure to be coordinated with a customer, yet as shown in this results report, Credible did not achieve diverse and robust participation as initially expected.

Credible performed manual testing of sample files imported from ETT with the following results using ONC Test Procedure Version 1.2 and Test Tool (and version) ETT C-CDA R2.1 Validator for 2015 Edition Cures Update Version: 2.3.49:

| Imported file from ETT | Has Security Markings | Correctly Identified |
|---|-----------------------|----------------------|
| 170.315_b8_ds4p_amb_sample1_v8.xml | YES | YES |
| 170.315_b8_ds4p_amb_sample2_v4.xml | NO | YES |
| 170.315_b8_ds4p_inp_sample1_v7.xml | YES | YES |
| 170.315_b8_ds4p_inp_sample2_v4.xml | NO | YES |
| Security-tags-Summary-of-Care-receive-sample1.xml | YES | YES |

Through this testing, 100% of the files were correctly identified.

Measure: Compliance of QRDA Cat III with Cypress Validation Utility

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

Testing Method: Compliance and Tool

Credible's RWT Plan indicated this measure to be coordinated with a customer, yet as shown in this results report, Credible did not achieve diverse and robust participation as initially expected.

| Credible Domain Instance | # QRDA III Created | # Measures | # Zero Conformance | Percent Conforming | # Correctly Calculated | Percent Calculated |
|--------------------------|--------------------|------------|--------------------|--------------------|------------------------|--------------------|
| COMPLIANCE | 1 | 16 | 0 | 100 | 16 | 100 |

In the 2023 RWT Plans, Credible chose the outcomes listed to ensure compliance with the criteria, specifically the ability to calculate electronic clinical quality measures (eCQMs) and create a valid QRDA Category III XML file containing the calculation results. Credible used the Cat III XML file to validate against compliance using the Cypress Validation Utility (CVU). Credible achieved 100% conformance, zero errors, and completely accurate calculations in the results shown.

Credible attested to using ONC Test Procedure Version 1.4 and using Test Tool and Version Cypress 7.0.2. Credible uses Dynamic Health IT as our additional 3rd party partner for CQM reporting, using their CQM Solution.

Measure: Compliance of Portal Download and Email Transmit Capabilities and C-CDA Scorecard Average

§ 170.315(e)(1) View, download, and transmit to 3rd party

Testing Method: Compliance and Tool

Credible regularly reviews functionality as part of our continuous quality improvement and uses test clients in production/live environments to review the criteria and requirements. For this measure, we reviewed two specific outcomes:

- The number of clinical summaries sent from the portal to a direct address
- The number of clinical summaries sent from the portal to an email address

| Year-Month | Live Partner Count | Via Direct | Via Email |
|------------|--------------------|------------|-----------|
| 2023-01 | 546 | 0 | 38 |
| 2023-02 | 554 | 0 | 54 |
| 2023-03 | 557 | 0 | 36 |
| 2023-04 | 564 | 0 | 53 |
| 2023-05 | 565 | 0 | 34 |
| 2023-06 | 568 | 0 | 20 |
| 2023-07 | 569 | 1 | 25 |
| 2023-08 | 582 | 0 | 47 |
| 2023-09 | 580 | 0 | 48 |
| 2023-10 | 584 | 0 | 45 |
| 2023-11 | 589 | 2 | 26 |
| 2023-12 | 589 | 1 | 34 |

The data showcases a yin and yang moment: the functionality is being used, but the use is quite low.

Patient engagement has long been a topic for discussion and dissection for many years in the healthcare IT ecosystem. ONC created the [Patient Engagement Playbook](#) quite some time ago and it remains the industry leading robust resource with regular updates. How do the benefits of an engaged patient benefit their care *and* the practice? ONC relays, simply, "Patient engagement can have big benefits for your practice and your patients: better communication, better care, and better outcomes. Health information technology (health IT) is a powerful tool to help you get there — so learn how to make it work for you."

The [OpenNotes](#) movement echoes these benefits and effects and takes the conversation even one step further:

"Patients who read notes report that they:

- have improved understanding of their health and medical conditions
- recall their care plan more accurately
- are better prepared for visits
- feel more in control of their care
- take better care of themselves
- take their medications as prescribed more frequently
- have more successful conversations and stronger relationships with their doctors."

The benefits are overwhelmingly clear: engaging through portals provides positive care and outcomes, engagement and relationships, and overall understanding. The challenge, as these numbers show, is the leap for an engaged national patient population to use and participate with the information readily available.

| | |
|---|-------------------------------------|
| Measure: Compliance of Immunization Message § 170.315(f)(1) Transmission to immunization registries | Testing Method: Compliance and Tool |
| Measure: Compliance of Syndromic Surveillance § 170.315(f)(2) Transmission to public health agencies – syndromic surveillance | |

Credible's RWT Plan indicated this measure to be coordinated with a customer, yet as shown in this results report, Credible did not achieve diverse and robust participation as initially expected.

Credible created a sample of immunization VXU messages and utilized the NIST Immunization Test Suite tool for the following results:

```
NIST Immunization Test Suite Tool | Tool Release Date 10/12/2023
Application Version 2.0.15
7 files / 0 errors
```

The 2023 RWT Plans anticipated that +/- 75% of VXU messages created will have zero errors. As shown in the table above, a 100% error-free success rate was achieved.

```
HL7v2 Syndromic Surveillance Test Suite Date: 02/13/2023 00:00:00
Application Version: 1.7.2
8 files / 0 errors
```

The 2023 RWT Plans additionally relayed the following for Syndromic Surveillance: "As our customers do not regularly use this feature, so Credible will focus on its compliance evaluation to ensure it works if needed in future production situations." The data shown in the table above demonstrates the expected outcome of successfully generating and testing an HL7 v2.5.1 message.

Creation and transmission of VXU messages are vital components to overall interoperability and coordinated client care. It is unlikely that reporting on a large volume of immunization data will be achievable in care settings that Credible supports (behavioral healthcare and human services agencies) as they are not traditional settings for ongoing immunizations.

| | |
|---|-------------------------------------|
| Measure: Compliance of Electronic Case Reporting § 170.315(f)(5) Transmission to public health agencies – electronic case reporting | Testing Method: Compliance and Tool |
|---|-------------------------------------|

Credible's RWT Plan indicated this measure to be coordinated with a customer, yet as shown in this results report, Credible did not achieve diverse and robust participation as initially expected.

The 2023 RWT plans indicated "use the EHR functions to document immunization information typical to their workflow, including data classes expressed in the standards in §170.213 and other required criteria elements. Using documentation and compliance to create reportable elements

consisting of the data elements in the EHR based on criteria trigger codes and components will be explored and reviewed, as required by this measure criteria."

As shown in the results reporting for Measure: Compliance of Immunization Message (§ 170.315(F)(1) Transmission to immunization registries) and Measure: Compliance of Syndromic Surveillance (§ 170.315(F)(2) Transmission to public health agencies – syndromic surveillance) the validity of the messaging has been confirmed.

These criteria and data are flexible intentionally, with QPP providing the scope of a "[borderless registry](#)" as an acceptable means of defining this measure and its intent. As such, Credible does not have any customers who have engaged in this criteria.

We have maintained testing specific with USCDI v1 elements, creating a data export knowing that this baseline data set is the national set for interoperability. As this measure's success is truly limited to individual specifications for use, it is challenging to forecast victories overall without scope from a registry or otherwise to perform further acceptance testing.

Credible sees a time in the future when data classes and data elements are widely used, supported, and generated to create a robust ecosystem of true national interoperability. However, without mandated use towards interoperability, it is challenging to forecast the rich use of this measure now and in the immediate future.

Measure: Compliance of API Resource Query Support

§ 170.315(g)(7) Application access—patient selection
 § 170.315(g)(9) Application access—all data request
 § 170.315(g)(10) Standardized API for patient and population services

Testing Method: Compliance and Tool

Credible's RWT Plan indicated this measure to be coordinated with a customer, yet as shown in this results report; Credible did not achieve diverse and robust participation as initially expected.

This measure testing was to provide assurances toward the ability to connect to the EHR's API resources and query patient clinical data through the API. We anticipated that these metrics would show a shift toward the use of FHIR API -- and they mildly do just that -- but adoption has proven to be minimal in the behavioral healthcare and human services care settings, as shown in the following tables.

We look forward to a healthcare IT ecosystem where FHIR API provides the goals ONC envisions – innovation, solution, and low cost.

"A nationwide ecosystem of standard FHIR APIs will enable more innovation and solutions developed by industry and reduce one-off interfaces, resulting in lower interoperability costs in the future."

[On the Road to Cures Update: Certified API Technology](#) | Avinash Shanbhag and Rob Anthony, August 19, 2022, HealthITbuzz

Count of registered applications (sandbox)

| Year-Month | Live Partner Count | Requested | Completed |
|------------|--------------------|-----------|-----------|
| 2023-01 | 546 | 0 | 0 |
| 2023-02 | 554 | 0 | 0 |
| 2023-03 | 557 | 1 | 0 |
| 2023-04 | 564 | 0 | 0 |
| 2023-05 | 565 | 0 | 0 |
| 2023-06 | 568 | 2 | 1 |
| 2023-07 | 569 | 0 | 1 |
| 2023-08 | 582 | 1 | 0 |
| 2023-09 | 580 | 0 | 1 |
| 2023-10 | 584 | 0 | 0 |
| 2023-11 | 589 | 0 | 0 |
| 2023-12 | 589 | 0 | 0 |

Count of registered applications (production)

| Year-Month | Live Partner Count | Requested | Completed | API Calls | API Calls w/o Error |
|------------|--------------------|-----------|-----------|-----------|---------------------|
| 2023-01 | 546 | 0 | 0 | 0 | n/a |
| 2023-02 | 554 | 0 | 0 | 0 | n/a |
| 2023-03 | 557 | 0 | 0 | 0 | n/a |
| 2023-04 | 564 | 0 | 0 | 0 | n/a |
| 2023-05 | 565 | 0 | 0 | 0 | n/a |
| 2023-06 | 568 | 0 | 0 | 0 | n/a |
| 2023-07 | 569 | 0 | 0 | 0 | n/a |
| 2023-08 | 582 | 0 | 0 | 0 | n/a |
| 2023-09 | 580 | 0 | 0 | 0 | n/a |
| 2023-10 | 584 | 0 | 0 | 0 | n/a |
| 2023-11 | 589 | 0 | 0 | 0 | n/a |
| 2023-12 | 589 | 0 | 0 | 0 | n/a |

Count of Client Access Keys created

| Year-Month | Live Partner Count | Total Number of Keys Created | Partners Creating Access Keys |
|------------|--------------------|------------------------------|-------------------------------|
| 2023-01 | 546 | 16 | 5 |
| 2023-02 | 554 | 22 | 2 |
| 2023-03 | 557 | 33 | 6 |
| 2023-04 | 564 | 27 | 6 |
| 2023-05 | 565 | 19 | 4 |
| 2023-06 | 568 | 12 | 6 |
| 2023-07 | 569 | 8 | 5 |
| 2023-08 | 582 | 16 | 7 |
| 2023-09 | 580 | 13 | 4 |
| 2023-10 | 584 | 12 | 4 |
| 2023-11 | 589 | 15 | 4 |
| 2023-12 | 589 | 12 | 2 |