

CY2025 REAL WORLD RESULTS REPORT



Qualifacts
CareLogic

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RWT Results Report Summary

This document provides the Real-World Testing Results Report for Qualifacts CareLogic for the calendar year 2025. 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)

ASTP/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 ASTP/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.

Authorized Representative Name:	Hope Winkowski, Vice President of Product Compliance
Authorized Representative Email:	hope.winkowski@qualifacts.com
Authorized Representative Phone:	301-652-9500 x0428
Date of Attestation:	January 30, 2026
Authorized Representative Signature:	<i>Hope Winkowski</i>

General Information

Results Report based on 2023 RWT Report ID Number	CareLogic-RWT-2025
Developer Name:	Qualifacts Systems, LLC
Product Name:	CareLogic
Version Number:	Enterprise S3
Certified Health IT Product List (CHPL) ID:	ONC CHPL ID: 15.04.04.2237.Care.S3.00.1.181220, 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]
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Qualifacts CareLogic did not make any changes to our approach for Real World Testing that differs from what was outlined in the CY2025 RWT plan.

Withdrawn Products

ASTP/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 CY2025, Qualifacts CareLogic software did not withdraw any products during the reporting year.</p>
Date(s) Withdrawn:	
Inclusion of Data in Results Report:	
Report:	

Summary of Testing Methods and Key Findings

Qualifacts CareLogic focused on two distinct testing methods for our 2025 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 to 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 the 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 third year of ASTP/ONCs RWT, CareLogic (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 opportunities for quality checkpoints, data analysis, and, as reporting years since 2022, the privilege of growing, learning, exploring, engaging, and moving the needle toward the achievable 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 has been operating for nearly eight years since the passage of the 21st Century Cures Act – we continue to explore the aims, ideals, and purpose of establishing a nationally interoperable, interoperable foundation.

Standards Updates (SVAP/USCDI)

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

Standard (and version):	USCDI v3.1
Updated certification criteria and associated project:	170.315 (b)(1), 170.315 (b)(2), 170.315 (e)(1), 170.315 (g)(9), 170.315(g)(10)
Health IT Module CHPL ID:	15.04.04.3124.Care.S3.00.1.181220
Method used for standard update:	Health Data, Technology, and Interoperability (HTI-1) Final Rule
Date of ONC ACB notification:	November 14, 2025
Date of customer notification (SVAP only):	n/a
Conformance Measure:	<ul style="list-style-type: none"> - Number of Transition of Care C-CDAs Successfully Sent, Number of Different Destinations C-CDAs Successfully Sent, Compliance of C-CDA Creation and C-CDA Scorecard Average, and Compliance of C-CDA Error Detection for (b)(1) - Number of C-CDAs Received and (or) Incorporated for (b)(1) and (b)(2) - Compliance of Portal Download and Email Transmit Capabilities and C-CDA Scorecard Average for (e)(1) - Compliance of API Resource Query Support for (g)(9) and (g)(10)
USCDI updated certification criteria (and USCDI version):	170.315 (b)(1), 170.315 (b)(2), 170.315 (e)(1), 170.315 (g)(9), 170.315(g)(10) USCDI v3.1

Care Setting(s) Targeted

Qualifacts CareLogic 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: Rcopia (DrFirst) for § 170.315(b)(3), Updox for § 170.315(e)(1), MaxMD DIRECT mdEmail for § 170.315(b)(1), § 170.315(e)(1), and § 170.315(h)(1), Dynamic Health IT CQMsolution for § 170.315(c)(1) to (c)(3), Ping Identity for § 170.315(g)(10).

Key Milestones

Key Milestone	Timeframe
<ul style="list-style-type: none"> Qualifacts successfully published the RWT Plan for CY2025 within the timeframe noted. The Plan can be viewed at https://www.qualifacts.com/onc-certification-and-costs/. 	On or before November 1, 2024
<ul style="list-style-type: none"> During the end of 2024 and into Q1 2025, Qualifacts performed an analysis of data and generated the Real World Testing Results Report creation for CY2024. The final report can be found at the URL listed above. 	Data review: December 2024 to January 2025 Submission and publication: On or before February 1, 2025
<ul style="list-style-type: none"> Lessons Learned: Qualifacts performed an internal “lessons-learned” process that reviewed successes from the previous year and areas for improvement for each annual RWT update. These quarterly sessions allowed Qualifacts to review data collection toward the annual Real World Test Plan criteria. 	Quarterly throughout 2025
<ul style="list-style-type: none"> Qualifacts did <i>not</i> submit a CY2026 Real World Testing Plan due to the June 30, 2025, Discretion Notice from ASTP/ONC removing this requirement. https://healthit.gov/certification-health-it/enforcement-discretion-notices/ 	Planned for October 15, 2025,

- During the end of 2025 and into Q1 2026, Qualifacts analyzed data and created the Real World Testing Results Report for CY2025. This is the final report, published at the URL above and submitted to the ACB.

Data review: December 2025 to January 2026

Submission and publication: On or before February 1, 2026

ASTP/ONC 2025 Discretion Notice

As notified by ASTP/ONC on June 30, 2025, via the “Real World Testing Condition and Maintenance of Certification Requirements Enforcement Discretion Notice,” the scope of the Real World Testing Results Report is narrowed to the following:

For calendar year (CY) 2026:

ONC will not exercise its direct review authority under 45 CFR 170.580 for any non-conformity, potential or actual, that arises solely from a health IT developer not complying with 45 CFR 170.405(b)(2), except with respect to Health IT Modules certified to the certification criteria specified in 45 CFR 170.315(g)(7) through (10). This means that ONC only expects a developer with a Health IT Module(s) certified to the (g)(7) through (10) certification criteria, as of August 31, 2024, will submit a CY 2025 real world testing results report to its ONC-ACB by March 2026.

ONC will not conclude that an ONC-ACB has failed to adhere to 45 CFR 170.523(p)(2) and (3), find a violation of 45 CFR 170.560(a), or take any enforcement action under 45 CFR 170.565 against an ONC-ACB if an ONC-ACB does not review and confirm that applicable health IT developers submit real world testing results reports, except with respect to Health IT Modules certified to the criteria specified in 45 CFR 170.315(g)(7) through (10).

Source: <https://healthit.gov/certification-health-it/enforcement-discretion-notices/>

Metrics and Outcomes

Measurement and Associated Criteria (noting Relied Upon Software, if applicable)	Outcomes and Challenges																																																				
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																																																				
<p>This measure testing provided 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 using the FHIR API -- and they do, albeit mildly -- but adoption has been minimal in behavioral health and human services settings, as shown in the following tables.</p> <p>We look forward to a healthcare IT ecosystem where FHIR API provides ONC's goals – innovation, solution, and low cost.</p> <p>"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."</p> <p>On the Road to Cures Update: Certified API Technology Avinash Shanbhag and Rob Anthony, August 19, 2022, HealthITbuzz</p> <p>Count of registered applications (sandbox)</p> <table border="1" data-bbox="162 1188 1154 1675"> <thead> <tr> <th>Year-Month</th> <th>Live Customer Count</th> <th>Requested</th> <th>Completed</th> </tr> </thead> <tbody> <tr><td>2025-01</td><td>472</td><td>1</td><td>0</td></tr> <tr><td>2025-02</td><td>474</td><td>1</td><td>1</td></tr> <tr><td>2025-03</td><td>475</td><td>0</td><td>0</td></tr> <tr><td>2025-04</td><td>477</td><td>0</td><td>0</td></tr> <tr><td>2025-05</td><td>477</td><td>1</td><td>1</td></tr> <tr><td>2025-06</td><td>478</td><td>1</td><td>2</td></tr> <tr><td>2025-07</td><td>480</td><td>5</td><td>1</td></tr> <tr><td>2025-08</td><td>482</td><td>1</td><td>2</td></tr> <tr><td>2025-09</td><td>485</td><td>2</td><td>4</td></tr> <tr><td>2025-10</td><td>486</td><td>1</td><td>0</td></tr> <tr><td>2025-11</td><td>488</td><td>1</td><td>0</td></tr> <tr><td>2025-12</td><td>488</td><td>0</td><td>0</td></tr> </tbody> </table>		Year-Month	Live Customer Count	Requested	Completed	2025-01	472	1	0	2025-02	474	1	1	2025-03	475	0	0	2025-04	477	0	0	2025-05	477	1	1	2025-06	478	1	2	2025-07	480	5	1	2025-08	482	1	2	2025-09	485	2	4	2025-10	486	1	0	2025-11	488	1	0	2025-12	488	0	0
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Count of registered applications (production)

Year-Month	Live Customer Count	Requested	Completed
2025-01	472	1	0
2025-02	474	1	2
2025-03	475	0	0
2025-04	477	0	0
2025-05	477	0	0
2025-06	478	0	0
2025-07	480	1	1
2025-08	482	0	0
2025-09	485	0	0
2025-10	486	0	0
2025-11	488	0	0
2025-12	488	0	0

Count of Client Access Keys created

Year-Month	Live Customer Count	Total Number of Keys Created	Customers Creating Access Keys
2025-01	472	0	0
2025-02	474	0	0
2025-03	475	0	0
2025-04	477	0	0
2025-05	477	0	0
2025-06	478	0	0
2025-07	480	0	0
2025-08	482	0	0
2025-09	485	0	0
2025-10	486	0	0
2025-11	488	0	0
2025-12	488	0	0

As evidenced, the functionality was not used by customers in 2025. Qualifacts has utilized the flexibility offered, which aligns with ASTP's statement: "the use of synthetic patient data in lieu of or in addition to real patient data in real or simulated/test scenarios, executed in environments that mirror production environments." Where functionality testing in a production environment was conducted quarterly, no non-conformities were identified during internal testing. Should non-conformities be found during testing, they would be reported in the quarterly attestations to ONC-ACB.