



CY2025 REAL WORLD RESULTS REPORT



Qualifacts
Credible

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RWT Results Report Summary

This document provides the Real-World Testing Results Report for Qualifacts Credible 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 guidance indicating that Real World Testing intends to evaluate compliance with the certification criteria and the interoperability of exchanging electronic health information (EHI) within the care and practice setting targeted for use. Our RWT plans are built around final testing measurements and metrics to evaluate our product's interoperability in production settings.

Attestation

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

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Date of Attestation:	January 29, 2026
Authorized Representative Signature:	<i>Hope Winkowski</i>

General Information

Results Report based on 2024 RWT Report ID Number	Credible-RWT-2025
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]
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Qualifacts Credible 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Withdrawn Products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 that were previously included in their Real World Testing plan during the past year, please provide the following information.

Version Number(s):	<p>In CY2025, Qualifacts Credible 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 Credible 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 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 ASTP/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

Where appropriate in this RWT Results Report, a review of "year-over-year" data was noted and discussed. The beauty of these annual ASTP/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 nearing a decade since the passage of the 21st Century Cures Act. We continue to discover and explore the aims, ideals, and purpose of establishing a robust, nationally interoperable, interoperable foundation.

Standards Updates (SVAP and 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.Cred.11.01.1.221230
Method used for standard update:	Health Data, Technology, and Interoperability (HTI-1) Final Rule
Date of ONC ACB notification:	November 18, 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 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
<ul style="list-style-type: none"> Submission of Real World Testing Plan for CY2025 to the ACB. 	On or before November 1, 2024
<ul style="list-style-type: none"> Analysis and Real World Testing Results Report creation for CY2024. 	December 2024 to January 2025
<ul style="list-style-type: none"> Submission of Real World Testing Results Report for CY2023 to the ACB. 	On or before February 1, 2025
<ul style="list-style-type: none"> Lessons Learned: Qualifacts will perform a “lessons-learned” internal process to review successes from the previous year and areas for improvement for each annual RWT update. Quarterly review of data collection toward the annual Real World Test Plan criteria. 	Quarterly (2025)
<ul style="list-style-type: none"> Submission of Real World Testing Plan for CY2026 to the ACB. 	On or before October 15, 2025
<ul style="list-style-type: none"> Analysis and Real World Testing Results Report creation for CY2025. 	December 2025 to January 2026
<ul style="list-style-type: none"> Submission of Real World Testing Results Report for CY2025 to the ACB. 	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-notice/>

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	
This testing was conducted to provide assurance of 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 the FHIR API -- and they do, albeit modestly -- but adoption has been minimal in behavioral health and human services settings, as shown in the following tables.	

We look forward to a healthcare IT ecosystem in which FHIR API provides the goals ASTP/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 Customer Count	Requested	Completed
2025-01	0	0	0
2025-02	0	2	2
2025-03	0	1	0*
2025-04	0	1	1
2025-05	0	0	0
2025-06	0	1	1
2025-07	0	1	1
2025-08	0	1	1
2025-09	0	2	2
2025-10	0	0	0
2025-11	0	1	0*
2025-12	0	2	1*

*March 2025: Request was missing JWKS URL

*November 2025: Request was completed in December 2025

*December 2025: One request was completed in January 2026; one request was missing a callback and JWKS URL

Count of registered applications (production)

Year-Month	Live Customer Count	Requested	Completed
2025-01	550	2	2
2025-02	551	1	1
2025-03	553	0	0
2025-04	555	1	1
2025-05	555	1	0
2025-06	557	0	1*
2025-07	553	2	1*
2025-08	558	0	1*
2025-09	560	0	0
2025-10	564	0	0
2025-11	565	0	0
2025-12	568	0	0

*June 2025: Request was from May 2025.

*July 2025: Request from July waiting on completion.

*August 2025: Request was from July 2025

Count of Client Access Keys created

Year-Month	Live Customer Count	Total Number of Keys Created	Customers Creating Access Keys
2025-01	550	11	3
2025-02	551	4	2
2025-03	553	4	2
2025-04	555	4	2
2025-05	555	9	5
2025-06	557	10	4
2025-07	553	8	4
2025-08	558	12	4
2025-09	560	11	5
2025-10	564	4	3
2025-11	565	7	4
2025-12	568	3	2

The year-over-year comparison is analogous, with a small uptick in Access Keys utilization in 2025. The total number of keys created in 2025 equaled 87 for the full year, compared to 72 in 2024. The number of customers using this functionality remained constant: 40 in 2025 and 30 in 2024.