

## 2023 Real World Test Plan

### Aura – Sigmund and MedicFusion , Versaform

**For Criteria: §170.315 (b)(1), §170.315 (b)(2), §170.315 (b)(3),  
170.315(b)(6), §170.315 (e)(1)**

#### GENERAL INFORMATION

Plan Report ID Number: VSS Medical RWT December 7, 2022

Developer Name: VSS Medical Technologies, LLC

Product Name(s): Aura Sigmund, Aura Medicfusion, Aura Versaform

Version Number(s): 5.0

Certified Health IT: 15.04.04.2848.Aura.05.01.0.211118

Product List (CHPL) ID(s): 15.04.04.2848.Aura.05.01.0.211118

Developer Real World Testing Page URL:

<https://www.sigmundsoftware.com/privacy-certifications/>

#### JUSTIFICATION FOR REAL WORLD TESTING APPROACH

Currently the Certified Health IT module Aura Sigmund & MedicFusion Erx are sold by VSS Medical Technologies, LLC as an Ambulatory Care Electronic Health Record (EHR) Software application. It is used in the specialties of Behavioral Health and Healthcare Practices (i.e., Internal Medicine and Chiropractic Medicine)

The applicable 2015 Edition criteria that we will include in our Real World Test plan are:

**Table 1**

§170.315 (b)(1) Cure Update	§170.315 (b)(2) Cures Update
§170.315 (b)(3) Cures Update	§170.315 (b)(6)
§170.315 (e)(1) Cures Update	

These criteria were tested individually during the ONC certification process. However, in the real world these certified modules provide one seamless approach to accomplish the clinical and administrative documentation requirements and incorporate the features and functions of all of the criteria mentioned in Table 1. To that end, the Real World Test plan will be designed to demonstrate how these combined certified criteria perform in the production environment. Since this certified product is deployed in multiple settings and specialties within the marketplace, we will design our Real World Test plan to reinforce the capabilities that we encounter in these production environments. The Aura application does allow providers to fully satisfy their reporting requirements for the MIPS program.

**STANDARDS UPDATES (INCLUDING STANDARDS VERSION ADVANCEMENT PROCESS (SVAP) AND UNITED STATES CORE DATA FOR INTEROPERABILITY (USCDI))**

Standard (and version)	N/A
Updated certification criteria and associated product	N/A
Health IT Module CHPL ID	N/A
Method used for standard update	N/A
Date of ONC-ACB notification	N/A
Date of customer notification (SVAP only)	N/A
Conformance measure	N/A
USCDI-updated certification criteria (and USCDI version)	N/A

MEASURES USED IN OVERALL APPROACH

DESCRIPTION OF MEASUREMENT/METRIC

*Describe the measure(s) that will be used to support the overall approach to Real World Testing.*

The Measure/Metrics and the Descriptions listed below will apply to the simultaneous and seamless use of the functionality of the applicable certified measures mentioned in Table 1.

The RWT will be witnessed via Microsoft Teams session with the participants (current customers) using a mirrored production environment and real patient data. Upon completion we will observe and report the successful conformance of our customers using the certified technology as it was designed, to be able to complete the applicable 2015 Edition Certified criteria listed in Table 1 above.

The Measure/Metrics and Descriptions for Measures 1 - 5 listed below will apply to multiple criteria simultaneously to demonstrate the functionality of these certified measures: § 170.315(b)(1) Transitions of care (Cures Update) (Receive), § 170.315(b)(2) Clinical Information Reconciliation and Incorporation (Cures Update), § 170.315(b)(3) Electronic Prescribing (Cures Update), § 170.315(b)(1) Transitions of care (Cures Update) - (Send), § 170.315 (e) (1) View, Download and Transmit to 3rd party (Cures Update).

The Measure/Metrics and Descriptions for Measures 6 - 8 will apply to § 170.315(b)(6) Data export.

Measurement/Metric	Description
<b>Measure 1:</b> Clinician logs into Aura and receives a C-CDA from a referring provider via Direct Protocol with no Tech Support and no errors. C-CDA has demographic information adjusted so PHI is not visible. Successful receipt of C-CDA is achieved and observed.	Clinician begins a new patient encounter in the Aura certified software with a patient referred by another clinician. With a preconfigured NewCrop Direct Address the clinician can seamlessly and securely receive a C-CDA from the referring clinician using the Direct Protocol. The Common Clinical Data Set standard will be demonstrated in these transactions through screenshots collected. Log files are also captured. These will all show the successful receipt of the C-CDA with all fields completed and arranged per provider preference. This will meet § 170.315(b)(1) (Cures Update) (Receive).
<b>Measure 2:</b> The C-CDA is validated, and Clinical Information Reconciliation is performed. No errors are expected.	After successful receipt of the C-CDA, the clinician validates the C-CDA within Aura. Clinical information reconciliation for medication, medication allergy, and current problem list is performed using Aura software. Common Clinical Data Set standard will be demonstrated in these transactions through screenshots collected. Log files demonstrate the reconciliation. This will meet § 170.315(b)(2) Cures Update).

<p><b>Measure 3:</b> The ability to review and approve a prescription refill requests and to create and transmit a new e-Prescriptions. No errors are expected.</p>	<p>The clinician easily completes the review and renewal of a refill request and to create and transmit a new prescription electronically within appropriate location in the EHR software to meet 170.315(b)(3) (Cures Update) by completing the appropriate fields in the EHR.</p>
<p><b>Measure 4:</b> Updated C-CDA is sent back to referring partner. Successful sending of CCDAs is achieved and observed.</p>	<p>Clinician sends updated C-CDA with minimal delay back to referring clinician via Direct Protocol. Updated C-CDA is also sent to the patient portal. Confirmation of sent C-CDA is captured along with log files. This will meet § 170.315(b)(1) (Cures Update) (Send).</p>
<p><b>Measure 5:</b> Access via patient portal - Observation of the View, Download &amp; Transmit functions is performed. This will demonstrate the portal as a key tool for the clinician to share the patient's most current health information with the patient.</p>	<p>Real-time patient data will be adjusted to protect PHI before Measure 5 is completed. A patient will have access to patient portal to view encounter summaries of their choice as human readable C-CDAs and download the C-CDA without assistance. Transmission of patient data will be sent to a provider (Edge Protocol) and a standard email address. This will meet § 170.315 (e)(1) (Cures Update).</p>
<p><b>Measure 6:</b> A selected practice staff member is observed successfully exporting bulk patient data files on demand.</p>	<p>Authorized office practice staff member will perform an export of data from the production server in real-time (on demand) with a specific start &amp; end date immediately. This will be done without delay and sent to a specific file location decided by the staff member. This will be accomplished efficiently and with no error and the file will be inspected when received to ensure it is the file requested. Real world data will be used but demographic information will be changed to protect patient health information. This measure allows the capture of report data selected by and on demand without assistance from development staff. The ability to independently create reports is vital to office practices and integral to a certified EHR. VSS Medical staff will verify the reports have been created successfully with requested data and sent to specific location through screenshots.</p>
<p><b>Measure 7:</b> a selected practice staff member is successfully exporting a file at a single delayed time - with a specific start and end date in the future.</p>	<p>An authorized office staff member will perform a data export data in the future - 5 minutes from current time - from the production server with a scheduled specific start &amp; end date -such as November 1 - November 2, 2023. This will be accomplished efficiently and with no error and the file will be inspected when received to ensure it is the file requested. This measure allows the staff member to select a time in the future without assistance from development staff. The ability to independently create reports is vital to office practices and integral to a certified EHR. VSS Medical staff will verify the reports have been created successfully and sent to a specific file location with requested data through screenshots.</p>
<p><b>Measure 8:</b> A selected practice staff member sets an export for a delayed future time during hours after the practice is closed and is able to run successfully. This scheduled event will repeat as scheduled.</p>	<p>An authorized staff member sets up a specific data export to run after the practice is closed. This measure allows the capture of report data selected by and on demand without assistance from development staff. The ability to independently create reports is vital to office practices and integral to a certified EHR. VSS Medical staff will verify the reports have been created successfully with requested data and sent to specific location with screenshots that capture the activity. At the finish of Measure 8 § 170.315(b)(6) Data export will be satisfied.</p>

## ASSOCIATED CERTIFICATION CRITERIA

Measurement/Metric	Associated Certification Criteria	Relied Upon Software
Measures 1 -5 will be completed in one session.		
Measure 1	§ 170.315(b)(1) Transitions of care (Cures Update) - Receive	NewCrop – Edge Protocol
Measure 2	§ 170.315(b)(2) Clinical Information Reconciliation and Incorporation	NewCrop – Edge Protocol
Measure 3	§ 170.315(b)(3) Electronic Prescribing	N/A
Measure 4	§ 170.315(b)(1) Transitions of care (Cures Update) - Send	NewCrop – Edge Protocol
Measure 5	§ 170.315 (e)(1) View, Download and Transmit to 3rd party (Cures Update)	NewCrop – Edge Protocol
Measures 6 - 8	§ 170.315(b)(6) Data export	N/A

## JUSTIFICATION FOR SELECTED MEASUREMENT/METRIC

Measurement/Metric	Justification
<b>Measure 1:</b> Clinician logs into Aura and receives a C-CDA from a referring provider via Direct Protocol with no Tech Support and no errors. C-CDA has demographic information adjusted so PHI is not visible. Successful receipt of C-CDA is achieved and observed.	The ability to electronically receive a C-CDA, without developer assistance, from another provider and or point of service by using the Edge Protocol is integral to the exchange of data and interoperability and inherent in a certified EHR. The C-CDA will use the Common Clinical Data Set standard.
<b>Measure 2:</b> The C-CDA is validated, and Clinical Information Reconciliation is performed. No errors are expected.	A clinician must be able to perform clinical information reconciliation and incorporation for medication, medication allergy and the problems effectively, without developer assistance. As a result, a revised C-CDA using the Common Clinical Data Set standard will be created which can then be shared with additional clinicians and be sent to the patient portal for patient access. The ability to do this as part of the test plan will show how clinicians can complete this task efficiently and without error. The most current information will be available to both clinicians and the patient as required by a certified EHR.

<p><b>Measure 3:</b> The ability to review and approve a prescription refill requests and to create and transmit a new e-Prescriptions. No errors are expected.</p>	<p>An important part of certified EHR technology is the ability to review, create and electronically send patient prescriptions. Included in this functionality are the ability to refill prescriptions, review drug formularies, receive drug-drug and drug-allergy alerts as well and to easily send the prescriptions to the pharmacy of the patient's choice.</p>
<p><b>Measure 4:</b> Updated C-CDA is sent back to referring provider. Successful sending of the C-CDA is achieved and observed.</p>	<p>To complete the ability to bi-directionally participate in the interoperability of patient information the certified EHR technology must be able to allow providers to send a C-CDA using the Edge Protocol, and the Common Clinical Data Set standard.</p>
<p><b>Measure 5:</b> Access via patient portal - Observation of the View, Download &amp; Transmit functions is performed. This will demonstrate the portal as a key tool for the clinician to share the patient's most current health information with the patient. The amount of time should be no more than 3 minutes total for 3 tasks and there should be no errors. Additionally, the ability to access (authenticate) either partial or full encounter summaries by way of an API call from a 3<sup>rd</sup>-party application running on a patient-owned device to the API of the EHR.</p>	<p>The patient portal is vital to all patients. Patients will be able to login at any time and view their most current information as well as share it with any other clinicians they might choose to visit. This allows the exchange of information by the patients themselves which is key to giving control of their health information. This is an essential part of certified EHR technology.</p>
<p><b>Measure 6:</b> Practice staff member is observed successfully exporting data files on demand.</p>	<p>Exporting data on demand is an essential requirement for a clinical practice with a certified EHR. A selective member of the office staff needs the capability of doing this immediately and successfully without developer assistance.</p>
<p><b>Measure 7:</b> Practice staff member is successfully exporting a file at a delayed time - with a specific start and end date.</p>	<p>Exporting data at a relative time is a requirement for a clinical practice with a certified EHR. A selective member of the office staff needs the capability of doing this successfully without developer assistance.</p>
<p><b>Measure 8:</b> Practice staff member sets an export for a delayed time during hours after the practice is closed and is able to run successfully.</p>	<p>Exporting a specific report with large amount of data after hours is an essential requirement for a clinical practice with a certified EHR. A selective member of the office staff needs the capability of doing this successfully without developer assistance. The certified EHR requires this capability to avoid placing undue load on the technology during regular business hours and allows the staff member to place the files in a location of their choice.</p>

CARE SETTING(S)

Care Setting	Justification
Facilities: <ul style="list-style-type: none"> <li>Ambulatory</li> </ul> Specialties: <ul style="list-style-type: none"> <li>Behavioral Health</li> <li>Internal Medicine</li> <li>Chiropractic Medicine</li> </ul>	<p>The Aura EHR is currently used by providers with multiple specialties. This test plan will demonstrate that the overall functionality is the same regardless of the specialty. We will get feedback from Behavioral Health, Internal Medicine, and Chiropractic Medicine. Additionally, we will document that the EHR performs the same in single and multiple provide offices. The overall process will be the same in all specialties. However, we will confirm that the EHR accommodates the specific workflow of each specialty.</p> <p>We will be conducted the Real World Testing with clinicians from the listed specialties with between 1-5 clinicians. These are the VSS Medical target audience.</p> <p>Real patient data will be deidentified and the testing will be using a mirrored production environment.</p> <p>The ability to complete all measures successfully with these practices will be documented through observation of the completed tasks. Deviations from the designed process, if any, will be noted and addressed.</p>

EXPECTED OUTCOMES

Measurement/Metric	Expected Outcomes
§ 170.315(b)(1) Transitions of care (Cures Update) (Receive)	<p>The Real World Testing will demonstrate that the clinician can receive C-CDA R2.1 C-CDA Document payload type in the designated setting. Using the Edge Protocol SMTP protocol. Both Referral Notes and Discharge Summaries will be evaluated.</p> <p>The received document will be evaluated for the ability to:</p> <ul style="list-style-type: none"> <li>Receive and validate and display any recorded errors if not a valid C-CDA documents.</li> <li>Parse and present a pre-configured human readable display of all Common Clinical Data Set data from the relevant C-CDA formatted to the CCDS standard.</li> </ul> <p>Aura compliant with standards for these criteria and vocabulary code sets in all of these measures. A 0% error rate is expected. Expected outcomes will include the following data points: total number of events tested, number of passed (i.e. successful) events, number of failed events, and a success rate expressed in percentage (successes / total number of events). As detailed in this plan under the "Schedule of Key Milestones" section, each measure/metric will be tested at least once (1) a quarter with our clinician RWT groups to ensure the expected outcomes are reliably attained.</p>

<p>§ 170.315(b)(2) Clinical Information Reconciliation and Incorporation (Cures Update)</p>	<p>The Real World Testing will demonstrate that the receiving clinician will be able to validate the C-CDA, compliant to the Common Clinical Data Set, perform reconciliation successfully for medication, medication allergy and problems at any time without delay and create an updated C-CDA, compliant to the Common Clinical Data Set, as required to demonstrate EHR exchange of information and interoperability. A 0% error rate is expected. Expected outcomes will include the following data points: total number of events tested, number of passed (i.e. successful) events, number of failed events, and a success rate expressed in percentage (successes / total number of events). As detailed in this plan under the "Schedule of Key Milestones" section, each measure/metric will be tested at least once (1) a quarter with our clinician RWT groups to ensure the expected outcomes are reliably attained.</p>
<p>§ 170.315(b)(1) Transitions of care (Cures Update (Send))</p>	<p>The Real World Testing will demonstrate that the clinician can send R2.1 C-CDA Referral Notes and Discharge Summaries compliant to the Common Clinical Data Set using the SMTP Edge Protocol. We will successfully validate the receipt of the sent documents. A 0% error rate is expected. Expected outcomes will include the following data points: total number of events tested, number of passed (i.e. successful) events, number of failed events, and a success rate expressed in percentage (successes / total number of events). As detailed in this plan under the "Schedule of Key Milestones" section, each measure/metric will be tested at least once (1) a quarter with our clinician RWT groups to ensure the expected outcomes are reliably attained.</p>
<p>§ 170.315(b)(3) Electronic Prescribing</p> <p>_____</p> <p>_____</p>	<p>The Real World Testing will demonstrate that the clinician can perform the following prescription-related transactions in accordance with established required standard as follows:</p> <ul style="list-style-type: none"> <li>• Create new prescription with full sig</li> <li>• Change prescriptions</li> </ul> <p>Transmit to pharmacy of choice and receive notification of success. A 0% error rate is expected. Expected outcomes will include the following data points: total number of events tested, number of passed (i.e. successful) events, number of failed events, and a success rate expressed in percentage (successes / total number of events). A 95% completion success rate is expected within the established normal time (usually under 30 seconds) to complete each function. As detailed in this plan under the "Schedule of Key Milestones" section, each measure/metric will be tested at least once a quarter with our clinician RWT groups to ensure the expected outcomes are reliably attained</p>



<p>§ 170.315 (e) (1) View, Download and Transmit to 3rd party (Cures Update)</p>	<p>The Real World Testing will demonstrate that the clinician can enable patients (and their authorized representatives) to view, at a minimum, the Common Clinical Data Set; laboratory test report(s); and diagnostic image reports. Enable patient (and their authorized representative) to view for health information filtered by a specific date and date range. Enable patient (and their authorized representatives) to download an ambulatory or inpatient summary (as applicable to setting) in the following formats:</p> <ul style="list-style-type: none"> <li>• Human readable format</li> <li>• Format C-CDA document summary will include, at a minimum, the Common Clinical Data Set; laboratory test report(s); diagnostic image reports.</li> </ul> <p>For all settings, patients (and their authorized representatives) will be able to transmit the C-CDA summary through both:</p> <ul style="list-style-type: none"> <li>○ Email transmission to any email address</li> <li>○ The Edge protocol of electronic transmission</li> </ul> <ul style="list-style-type: none"> <li>• When transmitted, the ambulatory or inpatient summary will be compliant to the Common Clinical Data Set; laboratory test report(s); diagnostic image reports; and:</li> <li>• Enable patient (and their authorized representative) to download for health information filtered by a specific date and date range.</li> </ul> <p>For all view, download, and transmit capabilities, the following information will be recorded and made accessible to the patient (and authorized representative):</p> <ul style="list-style-type: none"> <li>○ The action that occurred</li> <li>○ The date and time each action occurred</li> <li>○ The user who took the action; and the addressee to whom the summary was transmitted</li> </ul> <p>A 0% error rate is expected. Expected outcomes will include the following data points: total number of events tested, number of passed (i.e. successful) events, number of failed events, and a success rate expressed in percentage (successes / total number of events). As detailed in this plan under the "Schedule of Key Milestones" section, each measure/metric will be tested at least once (1) a quarter with our clinician RWT groups to ensure the expected outcomes are reliably attained.</p>
<p>§ 170.315(b)(6) Data export</p>	<p>The Real World Testing will demonstrate that a limited clinician group are enabled to set the configuration options when creating an export summary as well as a set of export summaries for patients whose information is stored in Aura. A clinician within the limited group is able to execute these capabilities at any time the user chooses and without subsequent developer assistance to operate.</p> <p>The limited set of clinicians are enabled to create export summaries formatted in accordance with the standard specified using the C-CDA that is compliant to the Common Clinical Data Set.</p> <p>The limited set of clinicians are enabled to set the date and time period (Start and End Dates) within which data would be used to create the export summaries. They can:</p> <ul style="list-style-type: none"> <li>○ Create export summaries in real-time</li> </ul>

	<ul style="list-style-type: none"> <li>○ Create export summaries based on a relative date and time (e.g., the first of every month at 1:00am)</li> <li>○ Create export summaries based on a specific date and time (e.g., on 10/24/2015 at 1:00am)</li> </ul> <p>The limited set of clinicians are enabled to set the storage location to which the export summary or export summaries are intended to be saved. A 0% error rate is expected. Expected outcomes will include the following data points: total number of events tested, number of passed (i.e. successful) events, number of failed events, and a success rate expressed in percentage (successes / total number of events). As detailed in this plan under the "Schedule of Key Milestones" section, each measure/metric will be tested at least once (1) a quarter with our clinician RWT groups to ensure the expected outcomes are reliably attained.</p>
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**SCHEDULE OF KEY MILESTONES**

Key Milestone	Care Setting	Date/Timeframe
Prepare the Aura application for use in collecting data to support the RWT plan	Facilities: <ul style="list-style-type: none"> <li>• Ambulatory</li> </ul> Specialties: <ul style="list-style-type: none"> <li>• Behavioral Health</li> <li>• Internal Medicine</li> <li>• Chiropractic Medicine</li> </ul>	December 2022
Identify the user practices the will participate in the test plan	Facilities: <ul style="list-style-type: none"> <li>• Ambulatory</li> </ul> Specialties: <ul style="list-style-type: none"> <li>• Behavioral Health</li> <li>• Internal Medicine</li> <li>• Chiropractic Medicine</li> </ul>	January & February 2023
Confirm that the Real World Test Plan participants are able to log into their accounts and are ready to start the RWT plan documentation	Facilities: <ul style="list-style-type: none"> <li>• Ambulatory</li> </ul> Specialties: <ul style="list-style-type: none"> <li>• Behavioral Health</li> <li>• Internal Medicine</li> <li>• Chiropractic Medicine</li> </ul>	March 2023

<p>Conduct the series of Real World Testing with the participants on a regular basis (minimum, once a quarter) to obtain feedback on their progress and or if there are any issues to address.</p>	<p>Facilities:</p> <ul style="list-style-type: none"> <li>• Ambulatory</li> </ul> <p>Specialties:</p> <ul style="list-style-type: none"> <li>• Behavioral Health</li> <li>• Internal Medicine</li> <li>• Chiropractic Medicine</li> </ul>	<p>Quarterly 2023</p>
<p>End the Real World Test to coincide with the end of the year.</p>	<p>Facilities:</p> <ul style="list-style-type: none"> <li>• Ambulatory</li> </ul> <p>Specialties:</p> <ul style="list-style-type: none"> <li>• Behavioral Health</li> <li>• Internal Medicine</li> <li>• Chiropractic Medicine</li> </ul>	<p>December 2023</p>
<p>Real World Test analysis and generation of the report</p>	<p>Facilities:</p> <ul style="list-style-type: none"> <li>• Ambulatory</li> </ul> <p>Specialties:</p> <ul style="list-style-type: none"> <li>• Behavioral Health</li> <li>• Internal Medicine</li> <li>• Chiropractic Medicine</li> </ul>	<p>January 2024</p>
<p>Submit Real World Test Report to ACB before established deadline</p>	<p>Facilities:</p> <ul style="list-style-type: none"> <li>• Ambulatory</li> </ul> <p>Specialties:</p> <ul style="list-style-type: none"> <li>• Behavioral Health</li> <li>• Internal Medicine</li> <li>• Chiropractic Medicine</li> </ul>	<p>February 2024</p>



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## 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.<sup>i</sup>*

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: Javier Vega  
Authorized Representative Email: [Javier.Vega@SigmundSoftware.com](mailto:Javier.Vega@SigmundSoftware.com)  
Authorized Representative Phone: 1-800-448-6975 ext 5129

Authorized Representative Signature:

Date: 10/31/2022

*Javier Vega*

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