



Net Health Wound Care

General Information

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Developer Name: Net Health
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Developer Real World Testing Page URL: www.nethealth.com/real-world-testing

Real World Testing Plan

Net Health® Wound Care’s approach to real world testing (RWT) reinforces our commitment to compliance with our certification criteria. Our cloud-based, SaaS (Software as a Service) application allows for real-time, de-identified and aggregated usage reports, permitting Net Health to verify the application works in production as intended and verifying Net Health Wound Care’s ability to be used by providers in the real world.

Our real-world testing plan is focused on our ability to monitor usage of our application as it relates to our certification criteria without interrupting our customers’ workflow. Additionally, Net Health can aggregate and review usage metrics of many of our software features on a regular basis, allowing us to identify possible issues as they arise. Net Health Wound Care was designed with an agile framework, ensuring responsiveness to regulatory updates and to defects and/or service disruptions. Net Health Wound Care’s software development cycles occur on a bi-weekly basis, with acute releases available if needed, allowing us to quickly respond to issues or concerns.

Net Health Wound Care will comply with the most recent 21st Century Cures Act criteria which are reflected in the following plan. Net Health commits to preventing information blocking in all its forms and was encouraged by CMS’ adoption of the FHIR standards to promote meaningful interoperability.

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Test Plan

Measure 1: Electronically Send and Receive Referrals

Description of the measure/metric

Measure: Numbers of received and sent referral summaries, and associated error rate, in the Net Health Wound Care production environment.

Description: A provider should be able to electronically send and receive a referral from another provider or clinical practice within the Net Health Wound Care software using the specified standards. This measure will demonstrate the ability of a provider to send a care/referral summary from Net Health Wound Care, receive a care/referral summary, and review, validate, and incorporate data within Net Health Wound Care using the most up to date USCDI v1 data.

Net Health internal audit log reports will be reviewed to validate the number of times a provider sent or received a transition of care/referral summary, along with success and error rates. This aggregate report will be reviewed quarterly by Net Health staff. Net Health Wound Care also provides clients with a Referral Summary Error Log that allows them to see for themselves within the application if an imported referral summary has failed, along with the associated error message.

Additionally, the measure will verify the correct patient record and incorporate the data into the appropriate patient's record by matching any pre-existing patient records on name, date of birth, and facility with the incoming transition of care. If demographic information does not match, the clinician can locate the patient manually using a search function or create a new patient record.

For inbound patient referrals, Net Health Wound Care users can utilize a reconciliation tool built into the software for the imported Consolidated-Clinical Document Architecture (C-CDA) data. Users can then compare items already documented on the patient record and any new medical record elements included in the referral summary. The clinician can then elect to reconcile the two data sets to create a comprehensive medical record for the patient.



Associated certification criteria

Certification Criteria	Requirement
§170.315 (b)(1) Transitions of Care – Cures Update	(i)(A) Send transition of care/referral summaries
	(i)(B) Receive transition of care/referral summaries
§170.315(b)(2) Clinical Information Reconciliation and Incorporation – Cures Update	(ii) Transition of care/ referral summary is matched to the correct patient
	(iii) Reconcile information

Justification for selected measure/metric

By utilizing a cloud-based, SaaS application, Net Health can run aggregated reports of functionality usage within the application across customer installations in our production environment. Net Health Wound Care is able to demonstrate conformance with the certification criteria in wound care practices without disrupting providers and clients with data requests by analyzing the number of successful and error-generating exchanges of C-CDAs.

Care setting(s) that are addressed

Our certified EMR is marketed in the care settings listed below:

- **Outpatient Wound Care:** Hospital-based or privately-owned outpatient wound care clinics
- **Independent Providers:** Independent providers or groups of providers who offer wound care services in post-acute facilities

The above measure applies to both care settings.

Expected outcomes

- Real world testing (RWT) will indicate the provider's ability to send and/or receive electronic referrals, with <1% error rate.
- RWT will demonstrate that the Health IT Module is conformant to "§170.315 (b)(1) Transitions of Care" and "§170.315(b)(2) Clinical Information reconciliation and incorporation" certification criteria.
- RWT will demonstrate that the Health IT Module is interoperable as specified in §170.315 (b)(1) by demonstrating the ability to send and receive referrals.
- RWT will demonstrate that the Health IT Module is able to reconcile and incorporate C-CDA as specified in §170.315(b)(2) to demonstrate the Health IT Module is interoperable with <1% error rate.



Schedule of milestones

Key Milestone	Date/Timeframe
Beginning of collection period for RWT - 2023	January 1, 2024
Run reports to verify aggregate data is being collected	Quarterly - 2024
RWT period ends/verify collection of all data	January 1, 2025
Analyze data and create report	February 1, 2025

Measure 2: E-Prescribing

Description of the measure/metric

Measure: Number of quarterly successful transactions for each supported e-prescribing message type in the Net Health Wound Care production environment and number of errors for each message type.

Description: A provider should be able to perform electronic prescribing following the standards in §170.315(b)(3).

Because Net Health Wound Care is a SaaS-based application, Net Health will create internal reports that demonstrate real world use of electronic prescribing. Net Health Wound Care can meet all requirements of §170.315(b)(3) by querying our database for utilization numbers (and associated errors) for each supported e-prescribing message type as defined by the requirements. This will be done quarterly to verify all transaction types are being utilized and reviewed by Net Health staff.

If Net Health Wound Care providers have not completed transactions for each message type stipulated in §170.315(b)(3), those transactions will not be able to be demonstrated in our production environment using this method. However, Net Health users do currently e-prescribe in the Net Health Wound Care application today. Net Health will respond to any findings that indicate zero usage for particular message types and investigate.

Associated certification criteria

Certification Criteria	Requirement
§170.315(b)(3) – Cures Update	Prescribe, respond to change requests



Justification for selected measure/metric

By pulling aggregate usage reports from the Net Health database, we can demonstrate conformance with certification criteria without disrupting our providers and clients with data requests. These aggregated reports will demonstrate that new prescriptions were successfully routed to Surescripts, and that previous e-prescriptions can be effectively updated within the Net Health Wound Care application from inbound e-prescription requests utilizing the latest NCPDP standard message formats.

Care setting(s) that are addressed

Our certified EMR is marketed in the below care settings:

- **Outpatient Wound Care:** Hospital-based or privately-owned outpatient wound care clinics
- **Independent Providers:** Independent providers or groups of providers who offer wound care services in post-acute facilities

The above measure applies to both care settings.

Expected outcomes

- Real world testing (RWT) will indicate the provider's ability to send or change electronic prescriptions with <1% error rate
- RWT will demonstrate that the Health IT Module is conformant to § 170.315(b)(3) Electronic prescribing certification criteria.
- RWT will demonstrate that the Health IT Module is interoperable as specified in §170.315(b)(3) by demonstrating that aggregate reports of live clients/ facilities achieving each of the standards in § 170.315(b)(3).

Schedule of milestones

Key Milestone	Date/Timeframe
Beginning of collection period for RWT	January 1, 2024
Verify monthly transactions are taking place	Quarterly - 2024
RWT period ends/ verify collection of all data	January 1, 2025
Analyze data and create report	February 1, 2025

Measure 3: Data Requests – Application Access

Description of the measure/metric

Measure: Number of successful exchanges of structured patient information in Net Health's production environment as measured by API calls within the publicly available Net Health API.



Description: A patient should be able to share their health information upon request with third-party vendors that have elected to integrate with Net Health's publicly available FHIR API. Additionally, third-party vendors should be able to perform an EMR-based launch of a FHIR application as part of this new program. Documentation and costs associated with this API will be made available to all vendors.

Given the patient population our application serves, and our status as a specialty EMR, utilization of this API function is low; however, we hope to drive adoption by generating meaningful use cases alongside our customers. If that is the case, upon our completion of this test, Net Health can prove conformance with this certification criteria in our production environment with test data.

If, by the end of Quarter 3, Net Health Wound Care is not able to verify all the requirements using aggregated and de-identified reporting data, Net Health will utilize a test application built in our production environment with which we can exchange test patient information to collect results in quarter 4. All tests can be completed in our production environment.

Due to Net Health Wound Care being a SaaS-based application, all requirements of §170.315(g)(10), and §170.315(g)(9) can be met by querying the database to verify the number of responses for data requests by data category, date range, or all data categories in accordance with the criteria. A quarterly review of certification criteria will be done to verify each requirement is met throughout the year.

Associated certification criteria

Certification Criteria	Requirement
§ 170.315(g)(10) Standardized API for patient and population services	(i) Data response for single patient data
	(ii) Data response for multiple patients' data
§ 170.315(g)(9) Application Access – All Data Request – Cures Update	(I) Respond to request for all data classes/dates in C-CDA

Justification for selected measure/metric

By utilizing Net Health Wound Care's cloud capabilities to pull aggregate reports of functionality from the application, we can demonstrate conformance with the certification criteria without disrupting our providers and their patients with data requests.

Furthermore, it would be difficult to verify FHIR API utilization if our clients' patients are not taking advantage of this function or if no third-party vendors have elected to utilize our publicly available FHIR API. By using a test facility in the same production environment



used by our clients and integrating a Net Health-developed healthcare app, Net Health will demonstrate conformance to the certification criteria.

Care setting(s) that are addressed

Our certified EMR is marketed in the below care settings:

- **Outpatient Wound Care:** Hospital-based or privately-owned outpatient wound care clinics
- **Independent Providers:** Independent providers or groups of providers who offer wound care services in post-acute facilities

The above measure applies to both care settings.

Expected outcomes

- Real world testing (RWT) will allow Net Health to verify utilization of our publicly available FHIR API by both third-party vendors and patients who have elected to share their health information with a third-party app.
- RWT will demonstrate the ability to respond to a request for patient data and return said patient data utilizing a shared patient ID via our secure FHIR-based API.
- RWT will demonstrate the ability to respond to a request for all USCDI data categories in a summary record format in accordance with § 170.315(g)(9).
- RWT will demonstrate the ability to respond to requests for a single patient's data or for multiple patients' data as a group according to the standard adopted consistent with the FHIR Resource search criteria include adopted in §170.315(g)(10).

Schedule of milestones

Key Milestone	Date/Timeframe
Beginning of collection period for RWT	January 1, 2024
Verify aggregate reports for data collection	Quarterly – 2024
RWT period ends/ verify collection of all data	January 1, 2025
Analyze data and create report	February 1, 2025

Measure 4: Patient Access to View, Download, Transmit

Description of the measure/metric

Measure: Number of successful downloads, views and transmissions of patient C-CDAs within Net Health's Patient Portal as triggered by a patient's (or their authorized representative) action within our cloud-based portal.



Description: A patient should be able to view, download and transmit their health information to a third-party. Net Health has built a Patient Portal to fulfill this function, allowing patients on- demand access to their medical record information.

Because Net Health Wound Care is a SaaS-based application, all requirements of §170.315(e)(1) can be met by querying the database for each individual requirement. A quarterly review of each certification criterion will be done to verify each requirement is met.

All criteria are tested against the new 21st Century Cures Act updates test procedures in addition to testing the real-world usage and results of the core software functions

Associated certification criteria

Certification Criteria	Requirement
§ 170.315(e)(1) View, Download, and Transmit to 3rd Party – Cures Update	(i)(A) View data in a readable format
	(i)(B) Download ambulatory summary using CCD Template
	(i)(C) Transmit ambulatory summary to 3rd party

Justification for selected measure/metric

By utilizing Net Health Wound Care’s cloud capabilities to pull aggregate reports of functionality from the application, we can demonstrate conformance with the certification criteria without disrupting our providers and clients with data requests.

Patient medical record information in the format of the USCDI v1 elements is fully viewable in a human-readable format within Net Health’s patient portal. Successful downloads, views and transmissions imply effective utilization of this key functionality within our patient portal.

Care setting(s) that are addressed

Our certified EMR is marketed in the below care settings:

- **Outpatient Wound Care:** Hospital-based or privately-owned outpatient wound care clinics
- **Independent Providers:** Independent providers or groups of providers who offer wound care services in post-acute facilities

The above measure applies to both care settings.



Expected outcomes

- Real-world testing (RWT) will allow the user to be able to view, download, and transmit their health information to a third-party in accordance with § 170.315(e)(1).
 - The user will be able to view their health information in a web-based portal
 - The user will be able to download the C-CDA in both a human-readable format and a usable CCD template
 - Transmit email transmission to any email address, including an encrypted method

Schedule of milestones

Key Milestone	Date/Timeframe
Beginning of collection period for RWT	January 1, 2024
Verify aggregate reports for data collection	Quarterly – 2024
RWT period ends/ verify collection of all data	January 1, 2025
Analyze data and create report	February 1, 2025

Measure 5: Patient Selection – Application Access

Description of the measure/metric

Measure: Number of successful exchanges of structured patient information with a third-party vendor in Net Health’s production environment utilizing a shared patient ID.

Description: Net Health’s publicly available FHIR API allows for a standard exchange of patient health information utilizing a shared patient ID to ensure accurate record exchange.

Because Net Health Wound Care is a SaaS-based application, all requirements of §170.315(g)(7) can be met by querying the database for each individual requirement. A quarterly review of certification criteria will be done to verify each requirement is met throughout the year.

Furthermore, it would be difficult to verify API utilization if our clients’ patients are not taking advantage of this function or if no third-party vendors have elected to utilize our publicly available API. By using a test facility in the same production environment used by our clients and integrating a Net Health-developed healthcare app, Net Health will demonstrate conformance to the certification criteria.



Associated certification criteria

Certification Criteria	Requirement
§ 170.315(g)(7) Application Access – Patient Selection	(i) Receive a request and return an ID or token to obtain data

Justification for selected measure/metric

By utilizing Net Health Wound Care’s cloud capabilities to pull aggregate reports of functionality from the application, we can demonstrate conformance with the certification criteria without disrupting our providers and clients with data requests.

Furthermore, it would be difficult to verify API utilization if our clients’ patients are not taking advantage of this function or if no third-party vendors have elected to utilize our publicly available API. By using a test facility in the same production environment that is utilized by our clients and integrating a Net Health-developed healthcare app, Net Health will demonstrate conformance to the certification criteria.

Care setting(s) that are addressed

Our certified EMR is marketed in the below care settings:

- **Outpatient Wound Care:** Hospital-based or privately-owned outpatient wound care clinics
- **Independent Providers:** Independent providers or groups of providers who offer wound care services in post-acute facilities

The above measure applies to both care settings.

Expected outcomes

- Real world testing (RWT) will allow Net Health Wound Care to identify and match a singular patient record with a third-party app.
- RWT will demonstrate the ability to receive a patient ID from Net Health Wound Care for medical record integrity.
- RWT will demonstrate the ability to receive a request with sufficient information to uniquely identify a patient and return an ID or other token, in accordance with § 170.315(g)(7), that can be used by an application to subsequently execute requests for that patient's data.



Schedule of milestones

Key Milestone	Date/Timeframe
Beginning of collection period for RWT	January 1, 2024
Verify aggregate reports for data collection	Quarterly – 2024
RWT period ends/ verify collection of all data	January 1, 2025
Analyze data and create report	February 1, 2025

Measure 6: Export and Import CQM Data

Description of the measure/metric

Measure 1: Number of QRDA Category I files created by Net Health Wound Care users.

Description: Net Health Wound Care is designed with interoperability in mind, allowing providers to record and export MIPS CQM information, as well as import data files and calculate measure scores.

Net Health Wound Care will utilize internal reports to demonstrate clients can successfully import/ export data files. Net Health will monitor utilization of our QRDA Category I export capabilities throughout the reporting year.

Measure 2: Number of successful data submissions directly to CMS using Net Health Wound Care's Automatic Transmission.

Description: Net Health Wound Care has also developed functionality to allow individual providers to directly report promoting interoperability and eCQM data to CMS via the Net Health Wound Care application and CMS' OAuth API. Utilizing internal reports and audit logs, Net Health Wound Care can verify whether clients are utilizing the API successfully.

Associated certification criteria

Certification Criteria	Requirement
§ 170.315(c)(1)—Record and Export	(i) Record CQM data
	(ii) Export data file
§ 170.315(c)(2)—Import and Calculate	(i) Import data file and use it
	(ii) Calculate CQM
§ 170.315(c)(3)—Report - Cures Update	(i) Create data file for transmission of CQM data



Justification for selected measure/metric

Net Health's focus is on using our cloud-based application's ability to provide unbiased utilization data. We will monitor utilization of these functions to demonstrate our clients' ability to utilize the system to record, export, import, calculate and report for CQM data.

Care setting(s) that are addressed

Our certified EMR is marketed in the below care settings:

- **Outpatient Wound Care:** Hospital-based or privately-owned outpatient wound care clinics
- **Independent Providers:** Independent providers or groups of providers who offer wound care services in post-acute facilities

The above measure applies to both care settings.

Expected outcomes

- Real world testing (RWT) will give the customer the ability to document on each measure within Net Health Wound Care with <1 % error rate.
- RWT will demonstrate the customer's ability to export CQM files in standardized format on-demand from Net Health Wound Care using real-world data with <1 % error rate.
- RWT will demonstrate the submissions API to CMS is working with <1 % error rate

Schedule of milestones

Key Milestone	Date/Timeframe
Beginning of collection period for RWT	January 1, 2024
Run export/import reports to verify functionality is working as intended	Quarterly - 2024
RWT period ends/ verify collection of all data	January 1, 2025
Analyze data and create report	February 1, 2025

Measure 7: Direct Project

Description of the measure/metric

Measure: Number of messages successfully routed to Secure Exchange Solutions.

Description: Net Health partners with Secure Exchange Solutions to meet the §170.315(h)(1) Direct Project certification criteria. The measure will verify that our integration with Secure Exchange Solutions is in production and Net Health Wound Care users are able to successfully send and receive direct messages as detailed by the criteria.



Associated certification criteria

Certification Criteria	Requirement
§ 170.315(h)(1) Direct Project	(i) Send/receive data to standard and wrapped
	(iii) Delivery notification in direct

Justification for selected measure/metric

Net Health Wound Care uses a third-party, Secure Exchange Solutions, to meet this criterion via their SES Direct product. Secure Exchange Solutions will submit a real-world testing plan as part of their certification, so our measure is based on verification of our successful integration with Secure Exchange Solutions in our production environment.

Care setting(s) that are addressed

Our certified EMR is marketed in the below care settings:

- **Outpatient Wound Care:** Hospital-based or privately-owned outpatient wound care clinics
- **Independent Providers:** Independent providers or groups of providers who offer wound care services in post-acute facilities

The above measure applies to both care settings.

Expected outcomes

Ability to electronically send and receive health information to a third party formatted as a wrapped message using the Applicability Statement for Secure Health Transport, Version 1.2.

Schedule of milestones

Key Milestone	Date/Timeframe
Beginning of collection period for real world testing (RWT)	January 1, 2024
Follow up with clients who are participating to verify data is collected	Quarterly - 2024
RWT period ends/ verify collection of all data	January 1, 2025
Analyze data and create report	February 1, 2025



Measure 8: Data Export

Description of the measure/metric

Measure: Number of successful exports using Net Health Wound Care’s data export tool.

Description: Net Health has built a data export tool to meet this certification criterion. Our users with a Facility Administrator user role can generate and download a CDA file containing relevant treatment information for one or more patients in a specific date and time range. Once the file is generated, it can be imported into another CEHRT or another EMR that supports the CDA file

format, allowing this information to be integrated into the patient’s medical record. Net Health can generate a report of the total number of successful exports completed by our facilities in our production environment.

Associated certification criteria

Certification Criteria	Requirement
§ 170.315(b)(6) Data Export	(i) Create export summaries in real-time
	(ii) Create export summaries based on a relative date and time
	(iii) Create export summaries based on a specific date and time

Justification for selected measure/metric

A successful export indicates the ability to successfully extract this information out of the Net Health Wound Care application for use by another system in service of the completeness of a patient’s medical record. Our data export tool has been reviewed and designed to meet the regulations for criterion § 170.315(b)(6) Data Export.

Care setting(s) that are addressed

Our certified EMR is marketed in the below care settings:

- **Outpatient Wound Care:** Hospital-based or privately-owned outpatient wound care clinics
- **Independent Providers:** Independent providers or groups of providers who offer wound care services in post-acute facilities

The above measure applies to both care settings.

Expected outcomes

Ability for a Facility Administrator to export:



- Summaries of care in real-time
- Summaries of care on a scheduled date
- Summaries of care on a recurring basis for a relative timeframe (e.g., the first day of every month)

Schedule of milestones

Key Milestone	Date/Timeframe
Beginning of collection period for real world testing (RWT)	January 1, 2024
Follow up with clients who are participating to verify data is collected	Quarterly – 2024
RWT period ends/ verify collection of all data	January 1, 2025
Analyze data and create report	February 1, 2025

Attestation

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.

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Date: 10/30/2023