ONC Criteria Real World Testing

PncSuite 12 – Updated 9/16/2024

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General Information

Plan Report ID Number: [For ONC-Authorized Certification Body use only]
Developer Name: Point and Click Solutions
Product Name(s): PNC Suite
Version Number(s): 12
Certified Health IT Product List (CHPL) Product Number(s): 15.04.04.3146.Pncs.12.00.0.230313
Developer Real World Testing Plan Page URL: https://www.pointandclicksolutions.com/onc-disclosures

Concept of ONC Real World Testing

The Office of the National Coordinator for Health IT(ONC) has mandated yearly reporting on Real World Testing(RWT) for specified ONC criteria for maintenance of the ONC certification as outlined in the ONC 21st Century Cures Act Final Rule . The objective of the RWT mandate is to require Certified Health IT Developers to demonstrate interoperability and functionality of their certified health IT in real world settings and scenarios.

PNC Real World Testing Timeline

Submit RWT Plan to ONC	Dec 2024
Collect RWT Data	2025
Submit RWT 2025 Report	January 2026

PNC Certified Criteria Requiring Real World Testing

Currently PNC ONC certified criteria requiring RWT:
§ 170.315 (b)(10) Electronic Health Information export

Justification For Real World Testing Approach

PNC's approach to real world testing is to collect automated data using metrics that represent the use of the ONC criteria functionality in a live clinical setting. The data will be collected across all PNC sites using the criteria functionality without collecting PHI. PNC feels that this is the most transparent reporting on the live use of specific features.

Collecting and reporting on actual use data maximizes data accuracy and completeness. This should render high quality data that reflects, as close as possible, the current usage status. It avoids the lag time associated with intermittent polling of usage.

Automatically collecting data avoids the need for end user input and is much more efficient that any testing plan that involves end user participation. This avoids multiple potential bias errors that might otherwise be associated with end user selection and participation. End user quantitative system usage is measured without any awareness which will also increase the participation rate and the data volume.

Real World Testing Participants

Point and Click Solutions PNCSuite12 is a fully functional outpatient EHR for medical and mental health services with clients across the US and in several other countries. The majority of clients provide college and university medical and mental health services. PNC has over 300 client sites in the US. Data will be pooled from this group with more details of the participant pool to be supplied with the yearly ONC summary report.

Relied Upon Software

All criteria utilize Point&Click's Tempura & PncApiServer and a web server (for example, Microsoft IIS). If there are additional relied upon software elements for individual criteria they will be specified with the criteria testing plan.

Testing Plan by Criteria

§ 170.315 (b)(10) Electronic Health Information Export

This criterion requires organizations to be able to export computable electronic health information (EHI) for a single patient and for a patient population.

I.   Single patient electronic health information export.
    A.   Enable a user to timely create an export file(s) with all of a single patient's electronic health information that can be stored at the time of certification by the product, of which the Health IT Module is a part.
    B.   A user must be able to execute this capability at any time the user chooses and without subsequent developer assistance to operate.
    C.   Limit the ability of users who can create such export file(s) in at least one of these two ways:
        1.   To a specific set of identified users
        2.   As system administrator function.
    D.   The export file(s) created must be electronic and in a computable format.
    E.   The publicly accessible hyperlink of the export's format must be included with the exported file(s).
II.   Patient population electronic health information export. Create an export of all the electronic health information that can be stored at the time of certification by the product, of which the Health IT Module is a part.
    A.   The export created must be electronic and in a computable format.
    B.   The publicly accessible hyperlink of the export's format must be included with the exported file(s).
III. Documentation. The export format(s) used to support paragraphs (b)(10)(i) and (ii) of this section must be kept up-to-date.

This standard is available on HealthIT.gov and includes standards referenced (https://www.healthit.gov/test-method/electronic-health-information-export).

Workflow Summary

PNC system users with the appropriate permissions can perform the following patient data export actions related to the (b)(10) criteria certification:

- Single patient EHI export: A PNC user with the appropriate permissions can export data for a single patient using the Fast Healthcare Interoperability Resources(FHIR) standard in a computable format.
- Patient population EHI export: A PNC user with the appropriate permissions can export data for a specified population of patients using the Fast Healthcare Interoperability Resources(FHIR) standard in a computable format.

PNC is not currently certified to the patient facing (g)(10) ONC criteria which utilizes requests from patient and/or organization for data export. Criteria (b)(10) is a user facing data export feature. This will likely limit the use of this export in PNC and will limit the amount of data that is expected to be collected during RWT until criteria (g)(10) is certified in the future.

Export File Format

Files are exported via FHIR Json format.
Details about PNC's ONC 170.315.b.10 Electronic Health Information Export can be found at
https://www.pointandclicksolutions.com/fhir-record-export

Data Collection Method

The following metrics are used to collect the data to document the real world use of this criteria in the PNC system:

1. Count of Single Patient Data Exports
   This report shows the number of EHI exports for a single patient performed by PNC clients.
   The data in this report demonstrates the use of the (b)(10) criteria standards in a real world setting.
2. Count of Patient Population EHI Exports
   This report shows the number of EHI exports for a patient population performed by PNC clients.
   The data in this report demonstrates the use of the (b)(10) criteria standards in a real world setting.
3. Average Patients per Patient Population EHI Export
   This report shows the average number of patients in patient population EHI exports.

Discussion of Expected Outcomes

As stated above, PNC is not currently certified to the patient facing (g)(10) ONC criteria which utilizes requests from patient and/or organization for data export. Criteria (b)(10) is a user facing data export feature. This will likely limit the use of this export in PNC and will limit the amount of data that is expected to be collected during RWT until criteria (g)(10) is certified in the future.

However, we are anticipating some use of the exports based on patient and organization requests for data that are not from client facing interface requests. The (b)(10) criteria will be used for export in these cases. We feel that this will demonstrate use, even if small amounts initially, that the (b)(10) criteria are in place and ready for use in the PNC system. PNC allows patients/clients to download the majority of their EHI securely via the patient portal which also limits the number of requests for other types of EHI export. PNC expects this to change somewhat when the (g)(10) criteria is certified in the near future increasing the data export requests from systems outside of the patient/client portal.