

Real World Testing Plan for 170.315(b)(10) – Electronic Health Information Export

Developer Name: Automedical, LLC

Health IT Product Name: Med-A-Morphosis

CHPL ID: 15.05.05.3016.RMSC.01.00.1.180517

Certification Criterion: 170.315(b)(10) – Electronic Health Information (EHI) Export

Plan Year: 2025

Plan Report ID #: 20241108aut

Version: V3

Date Submitted: 11/07/2024

1. Overview of Certification Requirement

The 170.315(b)(10) criterion requires certified Health IT Modules to allow the export of electronic health information (EHI) in a timely manner and in a computable format. This capability must be available for both a single patient's data and a population-level export of all stored EHI.

Developer RWT Plan Page URL:

<https://mamemr.com/etcetera/rwt/index.html>

Objective:

The primary objective of this testing plan is to demonstrate that our Health IT Module is capable of exporting all the EHI stored at the time of certification in a timely and computable format. The testing will verify that users can initiate this export without developer assistance and that only authorized users have access to this functionality.

2. Standards Updates

This product does not include any voluntary SVAP standards updates.

3. Measures and Outcomes for Testing

Each measure is associated with the 170.315(b)(10) certification criterion and tests specific functionality as described below.

Measure 1: Single Patient Export (170.315(b)(10)(i))

- **Name/Indicator:** Single Patient EHI Export
- **Associated Criteria:** 170.315(b)(10)(i)
- **Description:**

The system must allow a healthcare provider to export all EHI for a single patient in a computable format (e.g., JSON). The exported file must include a publicly accessible hyperlink documenting the format.
- **Justification:**

This measure ensures that healthcare providers can export patient-specific EHI on request to comply with HIPAA and other legal requirements.
- **Care Settings:**

This functionality will be tested in an in-patient settings where patients request access to their health records.
- **Expected Outcomes:**

The export file will be verified for proper formatting using a JSON linter to ensure data integrity. The export should complete in under 24 hours. Error rates will be tracked, and the system should achieve a success rate of 95% or higher.

Measure 2: Population-Level Export (170.315(b)(10)(ii))

- **Name/Indicator:** Population-Level EHI Export
- **Associated Criteria:** 170.315(b)(10)(ii)
- **Description:**

The system must allow the export of all EHI across a patient population in a computable format (e.g., JSON). The exported file must include a publicly accessible hyperlink documenting the format.
- **Justification:**

This measure ensures that healthcare organizations can perform large-scale exports of EHI for reporting, analysis, or compliance with legal and regulatory requirements.
- **Care Settings:**

This functionality will be tested in in-patient setting where population-level exports are necessary for operational and regulatory purposes.
- **Expected Outcomes:**

The export will be verified using a JSON linter to ensure format integrity. The process should complete within a few days, depending on the dataset size. Success is defined by a 90% completion rate within the expected timeframe and a maximum error rate of 5%.

Measure 3: Access Control and Audit Trail

- **Name/Indicator:** Access Control and Audit Logging
 - **Associated Criteria:** 170.315(b)(10)
 - **Description:**
The system must restrict the ability to execute EHI exports to specific authorized users (e.g., system administrators) and log each export event.
 - **Justification:**
This measure ensures that only authorized personnel can export EHI, preventing unauthorized access to sensitive patient information and ensuring compliance with HIPAA.
 - **Care Settings:**
Tested in an in-patient setting to ensure that access control policies are enforced consistently.
 - **Expected Outcomes:**
Unauthorized users will be denied access, and all export attempts will be logged. The success criterion is that 100% of unauthorized access attempts are blocked, and the audit logs capture all activity related to exports.
-

4. Testing Methodology

Test Environment:

Testing will be conducted in a controlled environment using the production version of our certified Health IT Module. Test data will include de-identified patient records that simulate real-world use cases.

Test Scenarios:

- **Scenario 1: Single Patient EHI Export**
 - A healthcare provider initiates an export of all EHI for a single patient.
 - The system processes and generates export files in a computable format (e.g., JSON).
 - Time taken to generate the file will be recorded, and JSON formatting will be verified using a JSON linter.
- **Scenario 2: Population-Level EHI Export**
 - The system administrator initiates an export of all EHI stored in the system across multiple patients.
 - The export files will be verified for completeness, proper format, and document integrity using a JSON linter.
- **Scenario 3: Access Control Testing**
 - Non-administrator users attempt to access the EHI export functionality.
 - The system must deny access to unauthorized users.
 - The audit log will be checked to ensure all export attempts (successful or failed) are recorded for compliance.

5. Success Criteria

- **Single Patient Export:** The export is completed in under 24 hours, and the files are in a computable format with proper documentation.
- **Population Export:** The export is completed within a reasonable timeframe (e.g., a few days for a large patient population). The files must pass JSON linter validation.
- **Access Control:** Unauthorized users are denied access to the export function, and all attempts are logged.

6. Data Collection and Reporting

All testing results, including time-to-export, export format validation, and access control verification, will be documented in a detailed report. The report will include:

- Number of test runs and percentage of successful exports.
- Time measurements for each export scenario.
- List of any issues encountered and resolutions.
- Confirmation of the accuracy of access control and audit logs.

The collected data will be used to create the final Real World Testing Results Report.

7. Schedule of Key Milestones

- **Q2 2025:** Testing of Single Patient Export
- **Q3 2025:** Testing of Access Control
- **Q4 2025:** Testing of Population-Level Export

8. 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.

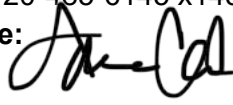
Authorized Representative Name: Adrianna Canul

Authorized Representative Email: adriannac@myrMSC.com

Authorized Representative Phone: 720-485-6145 x145

Authorized Representative Signature:

Date: 11/19/2024

A handwritten signature in black ink, appearing to read 'Adrianna Canul', written over the signature label.