

CY 2022 Real World Testing Plan for Press Ganey Associates LLC HeM (Hospital Electronic Measures) Module

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Executive Summary

This is the Real World Test (RWT) Plan for CY 2022 for Press Ganey Associates LLC HeM (Hospital Electronic Measures) Module. We will be testing on the most current version 1.5, which is deployed to our user community.

As ONC has stated in its rule, “The objective of real-world testing is to verify the extent to which certified health IT deployed in operational production settings is demonstrating continued compliance to certification criteria and functioning with the intended use cases as part of the overall maintenance of a health IT’s certification.” We developed this plan, its measurements and expected outcomes to meet this objective.

This document includes the components of the Real World Testing Plan: Justification for the Real World Testing Approach, Methodology, Measures Used in the Overall Approach, Associated Certification Criteria, Justification for the Measurement Metric, Care Settings, Expected Outcomes, and the Schedule of Key Milestones used to evaluate our products ability to calculate eCQM (Electronic Clinical Quality Measures) performance data and use data exchange to report this data to certifying or government bodies.

We have included information about compliance with the Standards Version Advancement Process updates.

A table of contents with hyperlinks is provided later in the plan quick access to any document section, including the testing measurements and metrics found at the end of this document. Our signed attestation of compliance with the real-world testing requirements is on the following page.

Developer 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: Bill Caughron

Authorized Representative Email: Bill.Caughron@PressGaney.com

Authorized Representative Phone: (443) 459-5180

Authorized Representative Signature:

A handwritten signature in black ink, appearing to read 'Bill Caughron', with a long horizontal stroke extending to the right.

DATE: November 8, 2021

General Information

Plan Report ID Number: [For ONC-Authorized Certification Body use only]

Developer Name: Press Ganey Associates LLC

Product Name(s): Quality Performer HeM (Hospital Electronic Measures) Module

Version Number(s): 1.5

Certified Health IT: 2834

Product List (CHPL) ID(s): 15.04.04.2834.Qual.15.00.0.181231

Developer Real World Testing Page URL:

<https://www.pressganey.com/products/clinical-excellence/quality-performer/certification>

Press Ganey HeM Module is Certified for the following eCQMs.

The bolded ones are active and available for the 2022 Real World Test Plan:

- **CMS9 Exclusive Breast Milk Feeding**
- CMS26 Home Management Plan of Care (HMPC) Document Given to Patient/Caregiver
- CMS31 Hearing Screening Prior to Hospital Discharge
- CMS32 Median Time from ED Arrival to ED Departure for Discharged ED Patients
- CMS53 Primary PCI Received Within 90 Minutes of Hospital Arrival
- CMS55 Median Time from ED Arrival to ED Departure for Admitted ED Patients
- **CMS71 Anticoagulation Therapy for Atrial Fibrillation/Flutter**
- **CMS72 Antithrombotic Therapy By End of Hospital Day 2**
- CMS102 Assessed for Rehabilitation
- **CMS104 Discharged on Antithrombotic Therapy**
- **CMS105 Discharged on Statin Medication**
- CMS107 Stroke Education
- **CMS108 Venous Thromboembolism Prophylaxis**
- **CMS111 Median Admit Decision Time to ED Departure Time for Admitted Patients**
- CMS113 Elective Delivery
- **CMS190 Intensive Care Unit Venous Thromboembolism Prophylaxis**
- **CMS506 Safe Use of Opioids - Concurrent Prescribing**
- **CMS529 Core Clinical Data Elements for the Hybrid Hospital-Wide Readmissions (HWR) Measure with Claims and Electronic Health Record Data**

Timeline and Milestones for Real World Testing CY 2022

- **1 Q-2022:** Begin communication with a client and a backup client to ask for their support and participation in real-world testing. The goal is to have clients committed for real world testing by the end of 1Q-2022.
- **2Q-3Q 2022:** During the 2nd , 3rd and 4th quarter of CY 2022, clients can upload their data files to the HeM Module. During this time clients work with Press Ganey Clinical Advisors to evaluate their performance data, the quality of their electronic file, and work with their EHR (Electronic Health Record) vendor to identify any corrections needed if the EHR vendor's QRDA (Quality Reporting Document Architecture) output file is the one being sent to Press Ganey for evaluation. It is expected that a preparatory call will be done with clients to prepare them for testing activities. Results will be documented in the test results section of the test methods and ultimately used to build the test report. If any non-compliances are observed, we will notify the ONC-ACB (Office of the National Coordinator – Authorized Certification Bodies) of the findings and make the necessary changes required.
- **4 Q-2022:** During the last quarter of the year, the CMS (Centers for Medicare & Medicaid Services) test environment opens to allow submission of HeM data. Results, such as file rejection, and issues with the file are published in a report. Press Ganey downloads this report. The Clinical Advisor reviews the results with the client. File corrections are made and another upload, or cycles of file corrections and uploads to the CMS test environment occur until the client is satisfied and there are no rejections or file missing data elements. The RWT Report will be prepared for submission after the Transmission testing has occurred.
- **February of 2023:** Document our CY 2022 test results into our RWT Report and submit to our ONC-ACB.

Standards Version Advancement Process (SVAP) Updates

For CY 2022, we are not planning to make any version updates on approved standards through the SVAP process.

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|--|--|
| Standard (and version) | § 170.405 Real World Testing |
| Updated certification criteria and associated product | <p>§ 170.315(c)(1) Record and Export Quality Performer Hospital eMeasures (Hospital Electronic Measures)</p> <p>§ 170.315(c)(2) Import from a client's EHR Quality Performer Hospital eMeasures</p> <p>§ 170.315(c)(3) Report Quality Performer Hospital eMeasures</p> |
| Health IT Module CHPL ID | 15.04.04.2834.Qual.15.00.0.181231 |
| 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 |

Real World Testing Measurements

- The measurements for our Real World Testing Plan are described below. Each measurement contains: Associated ONC criteria
- Testing Methodology used
- Description of the measurement/metric
- Justification for the measurement/metric
- Expected outcomes in testing for the measurement/metric
- Number of client sites to use in testing (if applicable)
- Care settings which are targeted with the measurement/metric

In each measurement evaluated, we elaborate specifically on our justification for choosing this measure and the expected outcomes. All measurements were chosen to best evaluate compliance with the certification criteria and interoperability of exchanging electronic health information (EHI) within the certified EHR.

Testing Methodologies

For each measurement, a testing methodology is used. For our test plan, we use the following methodologies.

Data Upload: This methodology uses clients QRDA I file and allows the client to directly upload the file. A report on the status of the file upload, identifies cases with errors that fail to upload and what the issue is.

Data Calculation: This methodology evaluates the accuracy of the HeM Module to calculate the result for each eCQM that the client plans to submit to CMS (Centers for Medicare & Medicaid Services) /TJC (The Joint Commission) as an indirect method of evaluating data import. The HeM Module will determine whether the case is:

A PROPORTIONAL ECQM:

Meets the Initial Patient Population Criteria, Meets the Denominator Exclusion Criteria, Meets the Denominator Criteria, Meets the Numerator Criteria, or is Meets the Denominator Exception Criteria. We will be calculating whether the case meets the Initial Patient Population by comparing uploaded files to the counts on the HeM Dashboard.

A CONTINUOUS ECQM

(e.g. eCQM #111 – ED-2 Time from Decision to Admit to Departure from the Emergency Department), the HeM Module calculates the same results as the Proportional Measure if they are defined by the eCQM specification, as well as the time in minutes per case. The median for all cases is also calculated by the HeM Module, for client review of performance. We will be calculating whether the case meets the Initial Patient Population by comparing uploaded files to the counts on the HeM Dashboard.

Data Export: This methodology evaluates the completeness of the data file and of the data elements in the file used by Press Ganey Transmission services for reporting to CMS. The methodology also evaluates the ability for the client to create and download a QRDA I file for the client to upload to TJC.

Number of Clients Sites

For all measures, a single client can demonstrate the functionality of the HeM Module against the certified criteria.

Care and Practice Settings for Real World Testing

The HeM Module contains both inpatient and emergency department patient data. The use of the Module, however, is not within the physical inpatient and emergency department care settings. The HeM Module is used by the Quality Department and/or the Information

Technology Department in their physical space. Often the two departments work together to upload files, evaluate the HeM Module data and performance results.

RWT Measure #1. Record and Export Functionality

Associated Criteria

§ 170.315(c)(1) Record and Export

Care Settings and Number of Clients Site to Test

The use case will be performed in the Client's Quality Department or IT Department. Only one client is necessary to demonstrate the core capability.

Testing Methodology

Data Record/Upload and Data Export

Measurement Description

This use case tracks the ability to upload a client file a QRDA I file with accurate case counts when compared to the QRDA export file.

Measurement Justification

This use case has one measure capture. Number of individual case files in the upload to HeM Module is equal to the number of individual case files in the QRDA I Download file that the client creates.

This case count match verifies that the number of cases imported is equal to the number of cases in the export file (assuming there are no duplicates that need to be resolved on the load to the HeM Module).

Associated Certification Criteria

No additional updates to the software are needed for the Record functionality.

Measurement Expected Outcome

The number of individual case files in the upload to HeM Module is equal to the number of individual case files in the QRDA I file download that the client creates via the HeM Module *Create/Download QRDA File* feature.

RWT Measure #2. Import from a Client's EHR

Associated Criteria

§ 170.315(c)(2) Import from a client's EHR

Care Settings and Number of Clients Site to Test

The use case will be performed in the Client's Quality Department or IT Department. Only one client is necessary to demonstrate the core capability.

Testing Methodology

Data Upload/Record

Measurement Description

This is a measure that uses case counts per eCQM in the uploaded client QRDA I file (generated by the client EHR) that is created by running this file against the client's EHR database. We then compare these case counts to the eCQM measure counts on the HeM Dashboard for each eCQM uploaded.

Measurement Justification

This case count verifies that the number of cases imported is equal to the number of cases that will be evaluated for the eCQM Initial Patient Population, Denominator, Denominator Exclusion, Numerator and Denominator Exception case results.

Associated Certification Criteria

No additional updates to the software are needed for the Record functionality.

Measurement Expected Outcome

The number of individual case files for each client eCQM, in the client file that is uploaded to HeM Module, is equal to the number of individual case files for each eCQM/eMeasure that appear on the HeM Module Dashboard (minus those that fail to load for data issues).

RWT Measure #3. Report

Associated Criteria

§ 170.315(c)(3) Report

Care Settings and Number of Clients Site to Test

The use case will be performed in the Client's Quality Department or IT Department. Only one client is necessary to demonstrate the core capability.

Testing Methodology

Data Export

Measurement Description

The CMS Report verifies the success of transmission/reporting and any issues (QRDA I is not missing any required data elements).

Measurement Justification

The product is required to create a QRDA I file that will upload successfully (QRDA I is not missing any required data elements) to CMS as part of our Transmission Services.

Associated Certification Criteria

No additional updates to the software are needed for the Record functionality.

Measurement Expected Outcome

The CMS Report contains either success (QRDA I is not missing any required data elements) nor any formatting issues that cause the file to be rejected.