

REAL WORLD TEST PLAN 2025

LAST REVISION DATE

4 October 2025

VERSION 1.0

GENERAL INFORMATION

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

Developer Name	Verana Health
Product Name(s)	Verana Quality Measures
Version Number(s)	1
Certified Health IT Product List (CHPL) ID(s)	15.99.09.3092.VE05.01.01.1.230118
Developer Real World Testing Page	https://veranahealth.com/clinicians/verana-quality-measures/

JUSTIFICATION FOR REAL WORLD TESTING APPROACH

Consistent with the ONC’s recommendation that “Real World Testing verify that deployed Certified Health IT continues to perform as intended by conducting and measuring observations of interoperability and data exchange”, this test plan focuses on capturing and documenting the number of instances that certified capability is successfully utilized in the real world. In instances where no evidence exists due to low adoption of a certified capability or the inability to capture evidence of successful use for other reasons, we will demonstrate the required certified capability in a



semi-controlled setting as close to a “real world” implementation as possible.

It is important to note that Real World Testing is only one component of the Health IT Certification program used to demonstrate compliance with the program requirements. Real World Testing should augment and support testing that was conducted prior to certification being granted. It is not intended to duplicate the methods or results previously demonstrated. Instead, this test plan was developed to demonstrate that the certified capabilities have been successfully deployed for providers to use at their discretion in live settings.

We are using a 3-fold approach to demonstrate successful real-world implementations.

- Adoption Rate
- Summative Testing
- Interactive Testing

Adoption rate will be used to determine if/when certified capability is being used in the real world and to help identify differences in care settings. Evidence of high rates of implementation and usage indicate (but don't by themselves prove) a certified capability's usefulness and practical value. Evidence of low rates of implementation and usage might indicate a potential problem, of which there could be several different causes. Note, it is not the goal of this exercise to identify the individual causes of why a given certified capability may have a high or low adoption rate, but rather to identify the users and care settings for which a given test is relevant.

Summative assessments will be used to measure which certified actions were performed at the conclusion of a given time period. These will be conducted by generating reports and examining audit logs from within the certified health IT module to help demonstrate the frequency of actions within the given time frame, and where possible, whether those actions were successful or unsuccessful. High success rates should be an indicator of a successful implementation of a given certified capability in a real-world setting.

Interactive testing will be used to demonstrate conformance to





requirements where the adoption rate of a given certified capability is low and to demonstrate ongoing compliance with updated standards and code sets (SVAP).

Interactive tests will require a test as opposed to examining historical usage statistics. The goal is to allow a user to demonstrate the certified Health IT module being used in a way consistent with their own practice or care setting.

STANDARDS UPDATES (INCLUDING STANDARDS VERSION ADVANCEMENT PROCESS-SVAP AND USCDI)

Verana Health has not updated Verana Quality Measures to any new standards as of the past year nor plans to, prior to the execution of the 2025 Real World Test.

Standard (and version)	170.205(h)(2) HL7 CDA® R2 Implementation Guide: Quality Reporting Document Architecture - Category I (QRDA I); Release 1, DSTU Release 5.3 with errata (US Realm), Volume 1 - Introductory Material, December 2022 170.205(h)(3); 170.205(k)(3) CMS Implementation Guide for Quality Reporting Document Architecture: Category I and Category III; Hospital Quality Reporting, Eligible Clinicians and Eligible Professionals Programs; Implementation Guide for 2021
Updated Certification Criteria	170.315(c)(1) - Clinical quality measures (CQMs) — record and export § 170.315(c)(2) - Clinical quality measures (CQMs) —



	import and calculate § 170.315(c)(3) - Clinical quality measures (CQMs) — report
Product	Verana Quality Measures
CHPL Product Number	15.99.09.3092.VE05.01.01.1.230118
Method used for standard update	Certification Testing
Date of ONC ACB notification	N/A
Date of customer notification (SVAP only)	N/A
Conformance measure ISCDI updated and certification criteria (and USCDI version)	<p>170.315 (c)(1) Clinical quality measures - record and export</p> <ul style="list-style-type: none"> • Ability for users to access QRDA I and III files for download. <p>170.315 (c)(2) Clinical quality measures - import and calculate</p> <ul style="list-style-type: none"> • Ability for users to upload QRDA I files. <p>170.315 (c)(3) Clinical quality measures - report</p> <ul style="list-style-type: none"> • Ability for users to generate QRDA III files.

CARE SETTINGS

Verana Quality Measures is marketing to Ophthalmology, Urology and Neurology practices.

MEASURES USED IN THE OVERALL APPROACH

For each measurement/metric, describe the elements below:

- Description of the measurement/metric
- Associated certification criteria
- Care setting(s) that are addressed



- Justification for selected measurement/metrics
- Expected outcomes

Ophthalmology practices comprise the majority of users on the Verana Quality Measures product. Neurology and Urology practices are the other therapeutic areas in which Verana Quality Measures is currently marketed.

ADOPTION RATES

The following metrics are applicable to all criteria and all care settings. These metrics will not be used directly to demonstrate interoperability or conformance to certification criteria. Instead, they will primarily be used to help determine the participants that will be in scope for this evaluation. They can also aid with the justification for other metrics by providing additional context (i.e., extremely low adoption rates for certain certified capabilities will necessitate a different approach to testing). Verana Quality Measure is offered to all ophthalmology practices that have signed up and are part of the AAO registry. The Verana Quality measure practice license allows practices and providers to view their current measures dashboard, perform MIPs functionality/reporting and CQM file export.

Metric	Description
Number of licensed users of VQM	Identify the total number of licensed installs/users of the certified Health IT module, regardless of care setting, participation in incentive programs, or use of certified capabilities.
Number of active clinicians on VQM	Identify the total number of active clinicians on the VQM platform
Number of active practices on VQM	Identify the number of active practices on the VQM platform

SUMMATIVE ASSESSMENT METRICS

The following metrics will be measured by viewing audit logs and reporting systems available to track the behavior of the certified Health IT





module during a given time frame. All metrics are designed to reflect the core elements of the criteria, demonstrate interoperability, and demonstrate the success rate of the certified capability being used. In most cases Verana Health has elected to record these metrics over a 90-day period to reflect the reporting periods typically required for compliance with the federal incentive programs. In most cases, Verana Health elected to record these metrics from a representative sampling of customers. The continued measurable use of certified capabilities will provide implicit evidence of successful implementation of the required certified capability. This is especially meaningful in cases where interoperability with outside systems is demonstrated. In cases where it is not possible to determine “success” via an explicit confirmation by a receiving system, success will be defined as a transmission was made where no error was received from the destination system or its intermediaries. Additionally, Verana Health will review internal customer and vendor issue tracking systems for reports of failures or unsatisfactory performance in the field.

This testing would be performed on the production environment of Verana Quality Measures product which is used by actual users. The identified CMS measure testing would be aligned with the measure specifications of 2023. The testing would span over a period of time to ensure that similar results are obtained at each instance of testing.

Criterion	Metric	Care Setting	Justification and Expected Outcome
170.315 (b)(10) Electronic Health Information Export	Over a 90-day period: 1) Number of single patient exports done by users 2) Number of bulk patient exports requested	Outpatient care in Ophthalmology, Neurology and Urology specialties.	This criterion required a certified Health IT module to export patient level data for the data in the system. Our expectation is the following: a) Exports completed match the publicly



			<p>available data schema.</p> <p>b) Single patient exports are successful without developer intervention.</p> <p>c) Bulk patient data exports are completed without error.</p>
<p>170.315 (c)(1) Clinical quality measures - record and export</p>	<p>Over a 90-day period:</p> <ol style="list-style-type: none"> 1) Number of measures recorded during the period 2) Number of QRDA Category 1 and Category 3 files exported (attempted, successful) 3) Number of QRDA Category 1 and Category 3 files generated for CMS 122 quality measure. 	<p>Outpatient care in Ophthalmology, Neurology and Urology specialties.</p>	<p>This criterion requires a certified Health IT module to record required data, calculate CQMs from the recorded date and export the data in the QRDA Category 1 and QRDA Category 3 format. Verana Health intends to record the frequency that CQM files are exported by clinicians to demonstrate the certified capability is available and effective, regardless of the frequency it is used. Our expectation is there will be moderate utilization by clinicians with a high success rate.</p>



<p>170.315 (c)(2) Clinical quality measures - import and calculate</p>	<p>Over a 90 day period:</p> <ol style="list-style-type: none"> 1) Number of users who are able to upload QRDA 1 files and are able to successfully calculate the relevant measures. 2) Number of measures that have been successfully calculated across clinicians/practices 3) Number of performance errors identified. 4) Number of QRDA Category 1 files uploaded for CMS 122 quality measure. Number of patients calculated for files. 	<p>Outpatient care in Ophthalmology, Neurology and Urology specialties.</p>	<p>This criterion requires a certified Health IT module to allow upload of a data file with one or multiple patients and calculate one or more measures. Our expectation is the following:</p> <ol style="list-style-type: none"> a) Clinician/Practices are able to upload QRDA Category 1 format files. b) Clinician/Practices are able to calculate the measures based on the data file imported. c) The functionality is available widely to all practices/clinicians and can be used anytime.
<p>170.315 (c)(3) Clinical quality measures - report -</p>	<p>Over a 90 day period: How many data files with or without error have</p>	<p>Outpatient care in Ophthalmology, Neurology and Urology</p>	<p>This criterion requires a certified Health IT module to report MIPS</p>



	been created.	specialties.	measures to CMS. Our expectation is the following: a) Data files are successfully created without error.
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Verana Health will validate the Verana Quality Measure product by demonstrating compliance using real world production clinical data from Verana Health’s customers using the Verana Health Quality Measures platform.

SCHEDULE OF KEY MILESTONES

Key Milestone	Care Setting	Timeframe
Test Plan Preparation	Outpatient care in Ophthalmology, Neurology and Urology specialties	October 2024
RWT publicly available	Outpatient care in Ophthalmology, Neurology and Urology specialties	December 2024
Real World Test Planning/ Scheduling and Logistics	Outpatient care in Ophthalmology, Neurology and Urology specialties	June 2025, 90 days duration
Data Collection	Outpatient care in Ophthalmology, Neurology and Urology specialties	September 2025, 90 days duration
Review and collate data	Outpatient care in Ophthalmology,	November 2025, 90 days duration



	Neurology and Urology specialties	
Writing report	Outpatient care in Ophthalmology, Neurology and Urology specialties	December 2025, 30 days duration

INTERACTIVE TESTING

The following test plans will be executed to demonstrate Real World certified capabilities for criteria where metrics are not available due to lack of adoption of the certified capability.

High Level Interactive Test Plan:

- **Care Settings:** All interactive testing will be performed specifically targeting Outpatient care in the Ophthalmology and Neurology specialties.
- **Test Environment:** All interactive testing will be performed in a live staging environment.
 - Verana Health will use a recorded teleconference to walk through the intended workflow for the criteria and capture evidence that the functionality works as expected in the Real-World deployment.
 - **Test Data:** Interactive testing will be performed using specially developed test patient data in the live staging environment. Test patients will be created using the data elements that are typically used by Ophthalmology and Neurology providers. Verana Health will ensure that the test data entered for each patient includes the minimum necessary to meet the data requirements for each criterion being tested using the interactive testing method.

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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