



# Real World Testing Plan 2022 eDerm Systems - version 2.8.0

## Testing of certified health IT (45 CFR 170.405) ONC Health IT Certification Program

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Plan for eDerm Systems:

Date of Plan: 11/15/2021

Date of Test: 2022

eDerm Systems  
Andrew Queen  
Manager  
(561)499-6900  
support@edermSystems.com  
4700 Exchange Court,  
Suite 110  
Boca Raton, FL 33431

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## I. Background

Real World Testing of eDerm Systems (version 2.8.0), an ambulatory EHR and Practice Management System, is required in 2022 under the ONC Health IT Certification Program for Certified Health IT (45 CFR 170.556 and 170.523(i)). The purpose of this test plan is to document the approach and criteria used to meet the requirements.

## II. General Information

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

Developer Name: Andrew Queen

Product Name(s): eDerm Systems

Version Number(s): 2.8.0

Certified Health IT Product List (CHPL) ID: 15.04.04.2592.eDer.28.00.1.191025

Developer Real World Testing Page URL: <https://www.edermehr.com/ederm-onc-certified>

### III. Justification for Real World Testing Approach

In order to comply with the Real World Testing Condition and Maintenance of Certification requirements, the Real World Testing plan should be made available by December 15, 2021 and the results will be made available by March 15, 2023.

eDerm will demonstrate interoperability and functionality of its certified module in a real world ambulatory dermatology setting and scenario. Each element in the plan is relevant to the strategy for meeting the requirements. eDerm will be using real clients to ensure functional accuracy and transparencies. eDerm users will include clinical staff members such as providers and staff.

Justification for Real World Testing Approach		
Certification Criteria Reporting Metrics Ongoing Testing	Description of Test Plan	Certification criteria metric data from clients will be aggregated for monthly reporting.
	Testing Method/Methodology	Monthly Reporting: A secure site will have automated reports for review with an automated aggregation of monthly data.
		Direct Messaging with Updox: The internal eDerm team will run and deliver aggregated reports on a monthly basis related to sending and receiving direct messages.
		Electronic Prescribing: The internal eDerm team will run and deliver aggregated reports on a monthly basis related to inbound and outbound electronic prescribing transactions and medication history requests.
		Patient Portal: The internal eDerm team will run and deliver aggregated reports on a monthly basis related to patient portal invites and patient actions such as portal access.
Description of Certification Criteria Expected Outcomes	Please see Measures Used in Overall Approach - Expected Outcomes.	
Measurement/Metric by Certification Criteria	Please see Measures Used in Overall Approach - Planned Functional Testing/Description of Reporting Metric.	
Justification for Real World Test Approach by Certification Criteria	Please see Measures Used in Overall Approach - Justification.	

Use Case/Scenario-Based Point in Time Testing	Description of Test Plan	To test the features and functionalities required by the certification criteria, simulated real world patient-focused scenarios and use cases will be used. In some cases, real world patient data will be utilized to confirm compliance such as successful transmission statuses for some interoperability certification criteria requirements. The use cases will include actions by different user types to capture the required data and workflows. The patient-focused scenarios' steps and use cases are cross mapped to the individual requirements within the interoperability certification criteria to ensure complete testing. Compliance with required standards will be tested via manual inspection by experts from eDerm and ONC-recommended test tools.
	Testing Method/Methodology	Any and all of the following test methodologies will be used to accomplish complete testing of conformance with the certification criteria requirements. While there will be a starting plan, the use of testing methodologies may differ based upon the individual client's access to different functionalities and skill sets of available staff. <ul style="list-style-type: none"> <li>- Manual entry of synthetic data</li> <li>- Screenshots of manually entered synthetic data and log files</li> <li>- Testing with ONC-approved testing tools, when appropriate</li> <li>-Analysis of database log files</li> <li>- Analysis of external and eDerm log files</li> <li>- Real world examples of successful transmissions by client report</li> <li>- Use of production environments when possible while limiting touchpoints with PHI as much as feasible</li> <li>-Use test and production environments as available</li> </ul>
	Description of Expected Outcome	Clients will all be able to successfully demonstrate the interoperability elements related to the certification criteria that will be tested.

	Measurement/Metric	The percentage of clients who successfully demonstrate the required interoperability functionality is the metric.
	Justification for Real World Test Approach	The Real World Test approach is intended to be focused on demonstrating full compliance with the interoperable certification criteria requirements in a way that provides the least burdensome work effort for clients to execute.

#### IV. Standards Updates (Including Standards Version Advancement Process (SVAP) and United States Core Data for Interoperability ((USCDI))

The criteria will be tested against the 2015 Edition version of the criteria.

#### V. Measures Used in Overall Approach

The Real World Testing consists of tests corresponding to the 2015 Edition criteria, that a user might perform with eDerm Systems. The table below shows the following.

Description of Measurement/Metric

Associated Certification Criteria

Justification

Care setting and Justification

Expected Outcomes

**EVENT COUNTING:** Count monthly events based upon identified metric from midnight on the first day of the month to midnight on the last day of the month.

#### eDerm Systems Real World Test Metrics to be Measured

Certification Criteria	Planned Functional Testing / Description of Reporting Metric	Justification	Care Setting and Justification	Expected Outcomes
<b>REPORT METRICS ONGOING</b>	<b>Planned Reporting Metric Description</b>			
170.315(b)(1) Transitions of care and 170.315(h)(1) Direct Project	Total number of successfully transmitted C-CDAs (CCD and Referral Note) via Direct messaging based on receipt	Show the volume of successfully transmitted C-CDAs via Direct messaging.	Providers practicing Dermatology - This type of care setting represents 100% of the	Identification of standard/baseline volume of aggregated successful transmissions of C-CDAs via Direct

	of MDN ACK message status		customer base of eDerm Systems and is supported by providers practicing across the United States.	Messaging by month.
	Total number failed C-CDA (CCD, and Referral Note) transmissions based on receipt of MDN NACK message status	Quantify volume of unsuccessful C-CDA transmissions via Direct Messaging. Many reasons exist outside of the control of EHR vendors that can result in unsuccessful transmission.		Identification of standard/baseline volume of aggregated failed transmissions of C-CDAs via Direct Messaging by month.
	Total number received C-CDAs via inbound Direct messaging	Show the volume of successful receipt of C-CDAs via Direct Messaging into the Clinical Information Reconciliation.		Identification of standard/baseline volume of aggregated received transmissions of C-CDAs by month.
170.315(b)(2) Clinical Information Reconciliation and Incorporation	Total number of problem list reconciliations	Show the volume of completed problem list reconciliations performed dependent on client action.	Providers practicing Dermatology - This type of care setting represents 100% of the customer base of eDerm Systems and is supported by providers practicing across the United States.	Identification of standard/baseline volume of aggregated problem list reconciliations by month.
	Total number of medication list reconciliations	Show the volume of completed medication list reconciliations performed dependent on client action.		Identification of standard/baseline volume of aggregated medication list reconciliations by month.
	Total number of medication allergy list reconciliations	Show the volume of completed medication allergy list reconciliations performed dependent on client action.		Identification of standard/baseline volume of aggregated medication allergy list reconciliations by month.
	Total number with all three domains reconciled	Show the volume of completed reconciliations performed for problem list, medication list and allergy list dependent on client action.		Identification of standard/baseline volume of aggregated reconciliation of all three domains (problems, medications, medication

				allergies) by month.
170.315(b)(3) Electronic Prescribing	Total number of new electronic prescriptions successfully transmitted	Show the volume of successfully transmitted electronic prescription messages.	Providers practicing Dermatology - This type of care setting represents 100% of the customer base of eDerm Systems and is supported by providers practicing across the United States.	Identification of standard/baseline volume of aggregated successfully transmitted new electronic prescriptions by month.
	Total number of changed electronic prescriptions successfully transmitted	Show the volume of successfully transmitted changed electronic prescription messages.		Identification of standard/baseline volume of aggregated successfully transmitted changed electronic prescriptions by month.
	Total number of canceled electronic prescriptions successfully transmitted	Show the volume of successfully transmitted canceled electronic prescription messages.		Identification of standard/baseline volume of aggregated successfully transmitted canceled electronic prescriptions by month.
	Total number of refill prescriptions successfully transmitted	Show the volume of the number of electronic prescription refills successfully transmitted.		Identification of standard/baseline volume of aggregated successfully transmitted electronic prescription refills by month.
	Total number of medication history requests sent electronically	Show the volume of medication history requests transmitted electronically.		Identification of standard/baseline volume of aggregated successfully transmitted medication history requests by month.

170.315(b)(6) Data export	Total data exports performed	Show the volume of data exports performed.	Providers practicing Dermatology - This type of care setting represents 100% of the customer base of eDerm Systems and is supported by providers practicing across the United States.	Identification of standard/baseline volume of aggregated successful performance of Data Exports by month.
170.315(c)(1) Clinical quality measures – record and export-	Total number of quality measure defects: 1. Identified 2. Resolved Total number of successful submissions as reported by clients	Show limited number of quality measure-related defects with fast resolution to support client submission of eCQMs.	Providers practicing Dermatology - This type of care setting represents 100% of the customer base of eDerm Systems and is supported by providers practicing across the United States.	Identification of solution defects related to successful submission of QRDA files from 1/1/2022 to 3/2022.
170.315(c)(2) Clinical quality measures – import and calculate				Resolution of solution defects related to successful submission of QRDA files from 1/2022 to 3/2022.
170.315(c)(3) Clinical quality measures--report.		Show volume of successful submission of QRDA files for PI/MIPS reporting as reported by clients.		Identification of standard/baseline of aggregated self-reporting by clients of successful submission of QRDA files to CMS for 2021 reporting by month as follows: ECs - 1/2022 to 3/2022
170.315(e)(1) View, download, and transmit to 3rd party.	Total number of C-CDA documents made available to patients via a patient portal	Show the volume of C-CDAs made available to patients in an automated way via the patient portal.	Providers practicing Dermatology - This type of care setting represents 100% of the customer base of eDerm Systems and is supported by providers practicing	Identification of standard/baseline of aggregated volume of C-CDAs made available to patients via the patient portal by month.
	Total number of patient invites to create portal account	Show the volume of invitations to patients to create a patient portal account.		Identification of standard/baseline aggregated volume of patient invites sent to patients for



			across the United States.	creation of a portal account by month.
	Total number of new patient portal accounts/logins	Show the volume of new patient portal accounts/logins.		Identification of standard/baseline aggregated volume of new patient account/login creation by month.
	Total number of patient portal access events/logins	Show the total volume of successful patient access events/logins.		Identification of standard/baseline aggregated volume of patient portal login events by month.
170.315(f)(1) Transmission to immunization registries.	Total number of immunization registry HL7 message transmissions of administered immunizations	Show the volume of administered vaccines transmitted electronically to the appropriate public health agency.	Providers practicing Dermatology - This type of care setting represents 100% of the customer base of eDerm Systems and is supported by providers practicing across the United States.	Identification of standard/baseline aggregated volume of HL7 message transmissions of administered vaccines to state/regional Immunization Registries by month.
	Total number of immunization registry HL7 query/response message transmissions	Show the volume of queries transmitted to immunization registries to obtain an evaluated immunization history and forecast.		Identification of standard/baseline aggregated volume of HL7 query/response message transmissions by month.
170.315(f)(2) Transmission to public health agencies— syndromic surveillance.	Total number of Syndromic Surveillance HL7 message transmissions	Show the volume of syndromic surveillance electronic messages transmitted to the appropriate public health agency.	Providers practicing Dermatology - This type of care setting represents 100% of the customer base of eDerm Systems and is supported by providers practicing across the United States.	Identification of standard/baseline aggregated volume of HL7 syndromic surveillance message transmissions to a state/regional registry by month.

170.315(g)(7) Application access – patient selection.	Total number patient API authentication events	Show the volume of successful patient authentication events for requests for CCDS data requests via a third-party application connected to the patient-facing API.	Providers practicing Dermatology - This type of care setting represents 100% of the customer base of eDerm Systems and is supported by providers practicing across the United States.	Identification of standard/baseline aggregated volume of successful patient authentications for accessing EHI via a patient-facing API by month.
170.315(g)(8) API - Data Category	Total number of data category requests received	Show the volume of patient requests for one or more data category requests via a third-party application.	Providers practicing Dermatology - This type of care setting represents 100% of the customer base of eDerm Systems and is supported by providers practicing across the United States.	Identification of standard/baseline aggregated volume of patient requests for one or more data categories via a patient-facing API by month.
170.315(g)(9) Application access – all data request.	Total number of all data requests (C-CDAs) received	Show the volume of patient data category requests via a third-party application.		Identification of standard/baseline aggregated volume of patient requests for a full C-CDA via a patient-facing API by month.
<b>FUNCTIONAL CONFORMANCE POINT IN TIME</b>				
Overall Point in Time Testing of Certification Criteria	Testing of applicable certification criteria included in the certified product listing.	Show the successful deployment of the certified functionality in real world environments.	Providers practicing Dermatology - This type of care setting represents 100% of the customer base of eDerm Systems and is supported by providers practicing across the United States.	All clients represent the applicable Care Setting Type and will be able to demonstrate the interoperability elements related to the certification criteria that will be tested to show that they work in the real world.

<p>170.315(b)(1) Transitions of care and 170.315(h)(1) Direct Project</p>	<ul style="list-style-type: none"> <li>- Demonstration of creation of a C-CDA at the end of an ambulatory encounter with transmission to the next provider of care via Direct Messaging with a confirmation of receipt in a client production environment.</li> <li>- Check evidence of successful C-CDA transmissions in the client's production environment under Transitions of Care.</li> <li>- Demonstration of the ability to receive a C-CDA via Direct messaging and save it into the EHR under Clinical Information Reconciliation Summary Received and Summary Incorporated.</li> </ul>	<ul style="list-style-type: none"> <li>- Show the ability to send C-CDAs to the next provider of care via Direct Messaging upon ambulatory visit departure.</li> <li>- Show the ability to receive C-CDAs from external sources via Direct Messaging upon patient arrival.</li> </ul>	<p>Providers practicing Dermatology - This type of care setting represents 100% of the customer base of eDerm Systems and is supported by providers practicing across the United States.</p>	<ul style="list-style-type: none"> <li>- Documentation evidencing receipt of C-CDAs into recipient EHR when sent by the client via Direct Messaging.</li> <li>- Documentation evidencing receipt of external C-CDAs into the client's EHR via Direct messaging into Clinical Information Reconciliation.</li> </ul>
<p>170.315(b)(2) Clinical Information Reconciliation and Incorporation</p>	<ul style="list-style-type: none"> <li>- Demonstration of problem list, medication list and allergy medication list reconciliation from discrete problems, medications and medication allergies parsed from a C-CDA in client production environment.</li> <li>- Check of evidence of successful reconciliations of parsed discrete data in client</li> </ul>	<p>Show the ability to reconcile discrete problems, medications and medication allergies parsed from a C-CDA into the EHR in a real-world environment.</p>	<p>Providers practicing Dermatology - This type of care setting represents 100% of the customer base of eDerm Systems and is supported by providers practicing across the United States.</p>	<p>Documentation evidencing the parsing of discrete problems, medications, and medication allergies from an inbound C-CDA with reconciliation of that data into the EHR problem list, medication list and allergy list.</p>

	production environment into the problem list, medication list and allergy list in the EHR.			
170.315(b)(3) Electronic Prescribing	<ul style="list-style-type: none"> <li>- Demonstration of creation and transmission of an electronic prescription in a client production environment.</li> <li>- Check of evidence of successfully transmitted electronic prescriptions in the client production environment.</li> </ul>	Show the ability to create and transmit electronic prescriptions successfully in a real-world environment.	Providers practicing Dermatology - This type of care setting represents 100% of the customer base of eDerm Systems and is supported by providers practicing across the United States.	Documentation evidencing the ability to create and transmit electronic prescriptions as well as validate successful transmission of real-world prescriptions.
170.315(b)(6) Data export	Demonstration of the use of a patient-list to create an export of C-CDAs with the ability to save them to a file system location at the client site.	To demonstrate the ability to successfully generate a set of C-CDAs on demand based upon a list of patients in a real-world environment.	Providers practicing Dermatology - This type of care setting represents 100% of the customer base of eDerm Systems and is supported by providers practicing across the United States.	Documentation evidencing the ability to create a patient list used to generate a set of C-CDAs upon demand with their health information.
170.315(c)(1) Clinical quality measures – record and export	- Demonstration of the ability to export patient data recorded in the EHR for a specified patient population and import that into the Cypress Test Tool for calculation of specified quality	Show that the calculation of quality measures out of the EHR technology produces the same results when calculated by the Cypress Test Tool.	Providers practicing Dermatology - This type of care setting represents 100% of the customer base of eDerm Systems and is supported by	Documentation evidencing the ability of the EHR to export quality measure data used in achieving matching results in the demonstration for 170.315(c)(2) when quality measures are

	measures that will match the results obtained in the testing for 170.315(c)(2).		providers practicing across the United States.	calculated by the Cypress Test Tool.
170.315(c)(2) Clinical quality measures – import and calculate	- Demonstration of the ability to calculate quality measures for the patient population and measures specified in the demonstration for 170.315(c)(1) and match to the quality measure results obtained from the Cypress Test Tool.	Show that the calculation of quality measures by the EHR produces the same results when they are calculated by the Cypress Test Tool.	Providers practicing Dermatology - This type of care setting represents 100% of the customer base of eDerm Systems and is supported by providers practicing across the United States.	Documentation evidencing the ability of the EHR to export quality measure data used in achieving matching results in the demonstration for 170.315(c)(1) when quality measures are calculated by the Cypress Test Tool.
170.315(c)(3) Clinical quality measures-- report.	- Demonstration of the ability to generate QRDA 1 and QRDA 3 files which comply with the CMS QRDA Implementation Guide.	Show that the EHR can produce QRDA files acceptable for submission to CMS sponsored quality reporting programs.	Providers practicing Dermatology - This type of care setting represents 100% of the customer base of eDerm Systems and is supported by providers practicing across the United States.	Documentation evidencing successful submission of QRDA files to CMS sponsored quality reporting programs via client attestations of successful upload.
170.315(e)(1) View, download, and transmit to 3rd party.	Demonstration of the following capabilities: - Create and make a valid C-CDA available to the patient in the patient portal - Patient's ability to create a portal count and review their health information, including a C-CDA	Show the process for providing patients with access to their health information via the patient portal as well as demonstrating the portal capabilities available to the patients.	Providers practicing Dermatology - This type of care setting represents 100% of the customer base of eDerm Systems and is supported by providers practicing	Documentation evidencing patient registration to patient portal.

	from their ambulatory visit.		across the United States.	
170.315(f)(1) Transmission to public health agencies— immunization registry.	<ul style="list-style-type: none"> <li>- Demonstration of the ability to generate a VXU message for an administered immunization and transmit it via HL7 2.5.1 to a public health agency successfully.</li> <li>- Check of evidence in production environment of successful VXU message transmissions to a PHA.</li> </ul>	Show the ability to submit information on administered immunizations to a public health agency.	Providers practicing Dermatology - This type of care setting represents 100% of the customer base of eDerm Systems and is supported by providers practicing across the United States.	Documentation evidencing the ability to generate the VXU message for an administered immunization as well as the successful transmission to a public health agency via HL7 2.5.1.
170.315(f)(2) Transmission to public health agencies— syndromic surveillance.	<ul style="list-style-type: none"> <li>- Demonstration of the ability to generate a Syndromic Surveillance message for a dermatology patient transmit it via HL7 2.5.1 to a public health agency successfully.</li> <li>- Check evidence in production environment of successful Syndromic Surveillance HL7 message transmissions to a PHA.</li> </ul>	Show the ability to submit information on subjective/objective status of dermatology patient on arrival to a public health agency.	Providers practicing Dermatology - This type of care setting represents 100% of the customer base of eDerm Systems and is supported by providers practicing across the United States.	Documentation evidencing the ability to generate the dermatology subjective/objective information on arrival as well as the successful transmission to a public health agency via HL7 2.5.1.

<p>170.315(f)(3) Transmission to public health agencies – reportable lab test/results (Inpatient)</p>	<p>- Demonstration of the ability to generate a Reportable Lab Result message and transmit it via HL7 2.5.1 to a public health agency successfully. - Check evidence in production environment of successful Reportable Lab Result HL7 message transmissions to a PHA.</p>	<p>Show the ability to submit information on reportable lab results to a public health agency.</p>	<p>Providers practicing Dermatology - This type of care setting represents 100% of the customer base of eDerm Systems and is supported by providers practicing across the United States.</p>	<p>Documentation evidencing the ability to generate the Reportable Lab Result message as well as the successful transmission to a public health agency via HL7 2.5.1.</p>
<p>170.315(f)(5) Transmission to public health agencies – electronic case reporting.</p>	<p>- Demonstration of the ability to generate an Electronic Case Report CDA and transmit it via Direct messaging to the CDC AIMS platform. - Check evidence in production environment from the C-CDA Transmission Log.</p>	<p>Show the ability to automatically generate and transmit an Electronic Case Report CDA to a public health agency.</p>	<p>Providers practicing Dermatology - This type of care setting represents 100% of the customer base of eDerm Systems and is supported by providers practicing across the United States.</p>	<p>Documentation evidencing the ability to generate an Electronic Case Reporting CDA as well as the successful transmission to a public health agency via Direct messaging.</p>
<p>170.315(f)(6) Transmission to public health agencies – antimicrobial use and resistance reporting.</p>	<p>Demonstration of the ability to generate a set of Antimicrobial Use &amp; Resistance Reporting CDAs for upload to the CDC NHSN platform.</p>	<p>Show the ability to generate a set of Antimicrobial Use &amp; Resistance Reporting CDAs for reporting to the CDC NHSN platform.</p>	<p>Providers practicing Dermatology - This type of care setting represents 100% of the customer base of eDerm Systems and is supported by providers practicing across the United States.</p>	<p>Documentation evidencing the ability to generate a set of Antimicrobial Use &amp; Resistance Reporting CDAs as well as the successful upload to the CDC NHSN program, including client attestation of success.</p>

<p>170.315(f)(7) Transmission to public health agencies – health care surveys.</p>	<p>Demonstration of the ability to generate a Health Care Survey CDA for upload to the CDC.</p>	<p>Show the ability to generate a Health Care Survey CDA for reporting to the CDC.</p>	<p>Providers practicing Dermatology - This type of care setting represents 100% of the customer base of eDerm Systems and is supported by providers practicing across the United States.</p>	<p>Documentation evidencing the ability to generate a Health Care Survey CDA as well as the successful upload to the CDC, including client attestation of success.</p>
<p>170.315(g)(8) API - Data Category 170.315(g)(7) Application access – patient selection.</p>	<p>Demonstration of a patient's ability to make a data category request for one or more data elements from the Common Clinical Data Set via a 3rd party application that is connected to EHR's patient-facing API following authentication. - Check evidence in production environment auditable event entries for Data Category Request from Patient and Data Category Request Exported.</p>	<p>Show the end-to end-functionality from when a patient makes a request for a data category request for one or more of the data elements in the Common Clinical Data Set from a 3rd party application connected to the EHR, is authenticated and return of a C-CDA is received into the 3rd party application.</p>	<p>Providers practicing Dermatology - This type of care setting represents 100% of the customer base of eDerm Systems and is supported by providers practicing across the United States.</p>	<p>Documentation evidencing a patient's ability to request and retrieve a one or more data elements from the Common Clinical Data Set from the EHR's API into a 3rd party application.</p>
<p>170.315(g)(9) Application access – all data request. 170.315(g)(7) Application access – patient selection.</p>	<p>Demonstration of a patient's ability to make an all data request for a C-CDA via a 3rd party application that is connected to EHR's patient-facing API following authentication. - Check evidence in production environment auditable event</p>	<p>Show the end-to end-functionality from when a patient makes a request for a C-CDA from a 3rd party application connected to the EHR, is authenticated and return of a C-CDA is received into the 3rd party application.</p>	<p>Providers practicing Dermatology - This type of care setting represents 100% of the customer base of eDerm Systems and is supported by providers practicing across the United States.</p>	<p>Documentation evidencing a patient's ability to request and retrieve a C-CDA from the EHR's API into a 3rd party application.</p>



	entries for All Data Request from Patient and All Data Request Exported.			
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## VI. Schedule of Key Milestones

The Real World Testing plan should be made publicly available on the Certified Health IT Product List (CHPL) annually on December 15<sup>th</sup> and the results should be publicly available on March 15<sup>th</sup> of the subsequent year.

Test Type	Key Milestone	Care Setting	Date/Timeframe
Certification Criteria Reporting Metrics Ongoing Testing	Deploy metric reports for all clients that participate in Promoting Interoperability reporting for certification criteria with database data available. - Report automation configuration will be set up to run the reports monthly, transmit them to a secure site with an automated aggregation monthly calculation.	All client base that participates in Promoting Interoperability reporting	1/1/2022 to 2/28/2022
	Monthly reports provided by internal/third-party teams managing common/shared functionality as follows: - Direct Messaging (UpDox) - Patient Portal (for portal invites and patient actions in creating portal accounts and accessing portal data)	All client base that participates in Promoting Interoperability reporting	1/1/2022 to 12/31/2022
	Monthly aggregation of reports from all sources	All client base that participates in Promoting Interoperability reporting	2/1/2022 to 12/31/2022
	Monthly review and monitoring of aggregated report output from all sources	All client base that participates in Promoting Interoperability reporting	2/1/2022 to 12/31/2022

	Preparation of final aggregated report output from all sources for inclusion in Real World Test Report	All client base that participates in Promoting Interoperability reporting	1/1/2023 to 1/31/2023
Use Case/Scenario-Based Point in Time Testing	Client recruitment		11/1/2021 to 02/28/2022
	Scheduling of each recruited client Real World Test project activities based on dermatology care setting - Kick-off - Review Real World Test project plan - Establish Real World Test execution expectations and timeframes for touchpoint/status calls - Establish agreed upon testing completion timeframes - Determine need for client refresher training on certified functionality as required such as data export	Providers practicing Dermatology - This type of care setting represents 100% of the customer base of eDerm Systems and is supported by providers practicing across the United States.	1/1/2022 to 2/28/2022
	Conduct Real World Test activities over two-month timeframe for each client - Execution of Real World Test by client with eDerm Support for guidance/problem-solving - Documentation of outcomes of Real World Test activities throughout testing process	Providers practicing Dermatology - This type of care setting represents 100% of the customer base of eDerm Systems and is supported by providers practicing across the United States.	3/1/2022 to 6/30/2022
	Investigation of any client identified potential nonconformance during Real World Test activities	Providers practicing Dermatology - This type of care setting represents 100% of the customer base of eDerm Systems and is supported by providers practicing across the United States.	3/1/2022 to 6/30/2022

Review and analysis of output from individual client Real World Test outputs concurrently with client testing activities	Providers practicing Dermatology - This type of care setting represents 100% of the customer base of eDerm Systems and is supported by providers practicing across the United States.	3/1/2022 to 6/30/2022
Follow-up, clarification and retesting with client participants as required	Providers practicing Dermatology - This type of care setting represents 100% of the customer base of eDerm Systems and is supported by providers practicing across the United States.	7/1/2022 to 8/31/2022
Aggregation of all client Real World Test outputs into a final Real World Test Report section for Point in Time Testing	Providers practicing Dermatology - This type of care setting represents 100% of the customer base of eDerm Systems and is supported by providers practicing across the United States.	9/1/2022 to 11/30/2022

## VII. Attestation

The 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: Andrew Queen

Authorized Representative Email: [support@edersystems.com](mailto:support@edersystems.com)

Authorized Representative Phone: 561-499-6900

Authorized Representative Signature:

A handwritten signature in black ink, appearing to read "Andrew L.", is positioned below the signature label. The signature is written in a cursive style with a large initial 'A' and a long horizontal stroke at the end.

Date: 11/15/21