REAL WORLD TESTING RESULTS REPORT 2025

BACKGROUND & INSTRUCTIONS

Under the ONC Health IT Certification Program (Certification Program), health IT developers are required to conduct Real World Testing of their certified health IT (45 CFR 170.405). The Office of the National Coordinator for Health Information Technology (ONC) issues Real World Testing resources to clarify health IT developers' responsibilities for conducting Real World Testing, to identify topics and specific elements of Real World Testing that ONC considers a priority, and to assist health IT developers in developing their Real World Testing plans and results reports.

A Real World Testing plan template was created to assist health IT developers in organizing the required information that must be submitted for each element in their Real World Testing plan. To accompany the plan template, ONC has also provided this results report template.

While the use of this template is voluntary, health IT developers may find it useful in preparing their Real World Testing results report(s). Health IT developers must submit one year of results to address the Real World Testing of eligible products as outlined in their previous year's Real World Testing plan(s). If adjustments to approaches are made throughout Real World Testing, the health IT developer should reflect these adjustments in their Real World Testing results report. ONC expects that the results report will include a list of these changes, the reasons for them, and how intended outcomes were more efficiently met as a result.

While every effort has been made to ensure the accuracy of restatements of 45 CFR Part 170, this template is not a legal document. The official program requirements are contained in the relevant laws and regulations. This resource should be read and understood in conjunction with the following companion resources, which describe in detail many of the Certification Program requirements referenced in this resource.

- Real World Testing–What It Means for Health IT Developers – Fact Sheet
- Real World Testing Resource Guide
- Real World Testing Certification Companion Guide

Health IT developers should also review the following regulatory materials, which establish the core requirements and responsibilities for Real World Testing under the Certification Program.

- 21st Century Cures Act: Interoperability, Information Blocking, and the ONC Health IT Certification Program final rule, 85 FR 25642 (May 1, 2020) (**ONC Cures Act Final Rule**) ○ Section VII.B.5 — *"Real World Testing"*

TEMPLATE INSTRUCTIONS

The following template is organized by elements required to be submitted in the Real World Testing results report. Each section provides a field for submitting responses and/or explanations for how the health IT developer addressed each required element in their Real World Testing approach. These fields

serve as a foundation of information required for developing a Real World Testing results report and can be expanded with additional rows or columns to address the specific needs of the Real World Testing results being submitted.

GENERAL INFORMATION

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

Developer Name: Binh Pham

Product Name(s): Universal EHR

Version Number(s): 2.0.0

Certified Health IT Product List (CHPL) Product Number(s): 15.04.04.2478.Univ.02.00.1.180312

Developer Real World Testing Plan Page URL: https://www.universalehr.com/rwt/default.aspx

Developer Real World Testing Results Report Page URL [if different from above]:

[OPTIONAL] CHANGES TO ORIGINAL PLAN

As a result of the Real World Testing Condition and Maintenance of Certification Requirements Enforcement Discretion Notice, we have excluded results of measures not related to API criterias g.7, g.9, and g.10. Otherwise, Universal EHR has not made changes from our original Real World Testing Plan for 2025.

[OPTIONAL] WITHDRAWN PRODUCTS

We, Universal EHR, do not intend on withdrawing any products at this time.

SUMMARY OF TESTING METHODS AND KEY FINDINGS

Universal EHR is marketed to outpatient clinic care settings, and as such utilized Real World Testing with an outpatient clinic (Dao Medical Group) working closely to conduct and measure observations of interoperability. The measures used in the approach of our Real World Testing Plan for 2025 and this document uses metrics and data gathered from internal reporting and assistance with result retrieval from EMRDirect, our vendor for PhiMail server.

Results within this document demonstrate successful interoperability through quantifiable values obtained through summative assessment and through surveying individuals involved in real world testing within the scope of the certification. Several measures have seen low to none adoption rate of the associated certified capability, which could be accounted by clinician/provider preference and protocol, alongside specific workflows which consider implementation of the given real-world measure to be an obstacle in day-to-day activities.

STANDARDS UPDATES (INCLUDING STANDARDS VERSION ADVANCEMENT PROCESS (SVAP) AND UNITED STATES CORE DATA FOR INTEROPERABILITY (USCDI))

Both required and voluntary standards updates must be addressed in the Real World Testing plan. Real World Testing plans must include all certified health IT updated to newer versions of standards prior to August 31 of the year in which the updates were made.

Indicate as to whether optional standards, via SVAP and/or USCDI, are leveraged as part of the certification of your health IT product(s).

[   ] Yes, I have products certified with voluntary SVAP or USCDI standards. (If yes, please complete the table below.

[X] No, none of my products include these voluntary standards.

Care Setting(s)

Outpatient Settings – Universal EHR is currently marketed to and provides services for ambulatory/outpatient settings.

Metrics and Outcomes

Values of outcomes reflect real results from within the reporting interval and not results of internal testing. Internal testing results are explained in the Analysis section.

Measurement /Metric	Associated Criterion(a)	Relied Upon Software	Outcomes
Measure 10: Compliance of API Resource Query Support	170.315(g)(7): Application access – patient selection 170.315(g)(9): all data request 170.315(g)(10): Standardized API for patient and population services	PhiMail server	This measure tracks the number of successful API accesses through the Universal EHR API. Since the adoption rate for this API was expected to be low or none, testing the functionality instead of using test patient data. The number of successful FHIR requests will be tracked compared to the number of total requests sent in the mirrored production environment using HTTP response codes where 200 and 202 are successes, 401 are failed authentication, 429 is failure due to "too many requests" warning, and 500 is a server error.

A total of 3,164 FHIR requests were processed, with the following HTTP response status codes returned:

Practice Setting: Outpatient Primary Care

Reporting Interval: January 1, 2025 – April 31, 2025

Successful requests (200, 202): 3,080
Failed requests with authentication failure (401): 0
Failed requests with "too many requests" warning (429): 78
Failed requests with server error (500): 6
Total requests: 3,164

Analysis: Data and result counts were retrieved with assistance from EMRDirect of PhiMail. After conducting internal tests on the API, our test results indicate that an authorized user can potentially successfully connect to and access the server. The 6 responses due to authentication failure were the results of an invalid or missing token for API access. The 78 "too many requests" warning resulting in failures were a result of testing, sending a number of requests exceeding limitations within timeframes set by the API.

KEY MILESTONES

Key Milestone	Care Setting	Date/Timeframe
Release of RWT Documentation provided to authorized providers and representatives testing the measurements and metrics.	Outpatient	12/15/2024
Initialize data collection of RWT measurements	Outpatient	1/1/2025
Meet with authorized providers and representatives to ensure RWT protocols are being followed.	Outpatient	2/1/2025
Follow up with authorized providers and representatives to check on data collection	Outpatient	3/1/2025
Meet with authorized providers and representatives to ensure RWT protocols and guidelines are being followed and are effective.	Outpatient	6/1/2025
End of Real World Testing data collection period, start of finalization of data for analysis.	Outpatient	1/1/2026

ATTESTATION

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Authorized Representative Signature: *Binh Pham*

Date: 1/23/2026