POINTCLICKCARE 2022 REAL WORLD TESTING PLAN: SINGLE CRITERION - § 170.315(b)(3) Electronic prescribing

GENERAL INFORMATION

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

Developer Name: PointClickCare Technologies Inc.

Product Name(s): PointClickCare

Version Number(s): 4

Certified Health IT Product List (CHPL) ID(s): 15.04.04.2181.Poin.04.00.1.191231

Developer Real World Testing Page URL: https://pointclickcare.com/company/certifications/real-world-testing-plan

JUSTIFICATION FOR REAL WORLD TESTING APPROACH

The PointClickCare application supports transmission of medication related events in accordance with § 170.315(b)(3) Electronic Prescribing using NCPD Script 201707 standard. Events may be initiated by a prescriber, agent of the prescriber or a caregiver. Electronic prescribing is a patient centric activity therefore all metrics will be event based and focus on ePrescribing workflows for Long Term Post Acute Care (LTPAC) setting.

To test the real-world interoperability and conformance of our certified ePrescribing technology, a Certified Health IT Developer, who markets to providers in LTPAC settings, works with long term care pharmacies to connect and transmit medication order information for accurate and timely fulfillment and delivery of the medication services to its residents. The goal of the PointClickCare application is to provide prescribers, care providers and agents with the ability of entering and transmitting medication prescriptions information to the pharmacy partner. Actions may include requesting additional supply of the medication from the pharmacy, cancelling medication order, receiving dispense notification from the pharmacy and reconciling that with what was originally prescribed for the residents. The Certified Health IT Developer will test the ability of its certified ePrescribing technology to successfully transmit clinically accurate and complete medication prescription using at § 170.315(b)(3) Electronic prescribing requirements.

LTPAC ePrescribing transactions that will be analyzed and reported on include: NewRx, CancelRx Request/Response, and RxFill.

While the PointClickCare application also supports the retail focused ePrescribing transactions of RxChange, RxRenewal, RxHistory, there are no real-world applicable workflows that exist for the LTPAC and therefore messaging volumes will not be analyzed or reported on as part of this test plan. Individual justifications include:

(1) <u>RxChange Request and Response</u> – in LTPAC timely administration of the medication services is of utmost importance. To avoid delays in medication management services, if changes are required, a facility and a pharmacy typically sign a "Therapeutic Interchange Agreement" or "Collaborative practice agreement" that clearly outline acceptable changes that does not require utilization of RxChange Request and Response electronic transactions. For example, the use of CPAs can decrease the number of requests to authorize refills, modify prescriptions, initiate therapeutic interchanges (in which the pharmacist can substitute another drug for the medication prescribed), and order and interpret laboratory tests, while keeping the

prescriber apprised of the pharmacist's actions through established communication mechanisms.

(2) <u>RxRenewal Request and Response</u> – renewal of medication orders occurs through pharmacy submitting renewal manifest in the delivery tote with all the medications. The process is largely paper based and is driven by the pharmacy for multiple residents. In other cases, medications are renewed through a "Collaborative practice agreement".

(3) RxHistoryRequest and Response – in LTPAC the integration is between one facility and one pharmacy, so there are no supported workflows where it would be of use to request medication history for a patient from one pharmacy only. The LTPAC industry did not adopt this transaction.

The goal of this real-world testing approach is to demonstrate that both the interoperability and conformance capabilities of the certified ePrescribing technology are consistent with the requirements of the § 170.315(b)(3) Electronic prescribing certification criterion as it applies to the LTPAC care setting. This will be done through the test scenarios included in the plan.

STANDARDS UPDATES (INCLUDING SVAP AND USCDI)

Standard (and version)	NCPDP Script 2017071	
Updated certification criteria and	§ 170.315(b)(3) Electronic prescribing	
associated product		
Health IT Module CHPL ID	15.04.04.2181.Poin.04.00.1.191231	
Method used for standard update	Not applicable	
Date of ONC ACB notification	March 31, 2021	
Date of customer notification (SVAP	Not applicable	
only)		
Conformance measure	Not applicable	
USCDI updated certification criteria	Not applicable	
(and USCDI version)		

MEASURES USED IN OVERALL APPROACH

Description of Measurement/Metric				
Measurement / Metric	Description			
Create new prescriptions (NewRx) event success percentage	Real World Test Metric will calculate the percentage of successful transmissions of NewRx ePrescribing events to their partner pharmacy			
Cancel prescriptions (CancelRx) event success percentage	Real World Testing Metric will calculate the percentage of successful transmission of CancelRx ePrescribing events to their partner pharmacy			
Receive fill status notification (RxFill) event success percentage	Real World Testing Metric will calculate the percentage of successful accept and process transactions of RxFill ePrescribing event to their partner pharmacy			
Transmit and consume diagnosis	Real World Testing Metric will calculate the			
information in events frequency	percentage frequency where the diagnosis			
	information is specified on the medication order			
Associated Certification Criteria				
Measurement / Metric		Associated Certification Criteria		
Create new prescriptions (NewRx) event		§ 170.315(b)(3)(i)(A)		
success percentage				
Cancel prescriptions (CancelRx) event success percentage		§ 170.315(b)(3)(i)(C)		

Receive fill status notification (RxFill) event success percentage	§ 170.315(b)(3)(i)(E)
Transmit and consume diagnosis information in events frequency	§ 170.315(b)(3)(ii)

Justification for Selected Measurement / Metric		
Measurement / Metric	Justification	
Create new prescriptions (NewRx) event success percentage	Transactions related to medications are initiated by a provider or more commonly their agent and then transmitted to the pharmacy for timely processing and delivery of medications. Acceptance status by the pharmacy will indicate if a mediation order was clear, complete, and compliant. PointClickCare validates all the transactions against a schema published by NCPDP which ensures all transactions follow all requirements and best practices. This will be further verified through the review of the log files created by querying messaging databases.	
Cancel prescriptions (CancelRx) event success percentage	Transactions related to medications are initiated by a provider or more commonly their agent and then transmitted to the pharmacy for timely processing and delivery of medications. Acceptance status by the pharmacy will indicate if a mediation order was clear, complete, and compliant. PointClickCare validates all the transactions against a schema published by NCPDP which ensures all transactions follow all requirements and best practices. This will be further verified through the review of the log files created by querying messaging databases.	
Receive fill status notification (RxFill) event success percentage	Transactions related to medications are initiated by a provider or more commonly their agent and then transmitted to the pharmacy for timely processing and delivery of medications. Acceptance status by the pharmacy will indicate if a mediation order was clear, complete, and compliant. PointClickCare validates all the transactions against a schema published by NCPDP which ensures all transactions follow all requirements and best practices. This will be further verified through the review of the log files created by querying messaging databases.	
Transmit and consume diagnosis information in events frequency Care Setting(s)	PointClickCare provides ability to Enter medication orders. If known, all new prescriptions may include either a medication diagnosis or an indication for use. This measure would look to provide statistics on % of prescriptions created with medical diagnosis. Previous measure will report on numbers of successfully transmitted prescriptions, this metric is a subset of those numbers broken down by data it includes.	

Care Setting(s)	
Care Setting	Justification
Long Term Post Acute Care (LTPAC)	The Certified Health IT Developer markets its Modules in LTPAC care settings such as Skilled Nursing Facilities and Senior Living Communities

Expected Outcomes		
Measurement / Metric	Expected Outcomes	
Create new prescriptions (NewRx) event success percentage	Real World Testing will show successful transmission of compliant NewRx events to the partner pharmacy with greater than 99 percent success	
Cancel prescriptions (CancelRx) event success percentage	Real World Testing will show successful transmission of compliant CancelRx events to the partner pharmacy with greater than 99 percent success	
Receive fill status notification (RxFill) event success percentage	Real World Testing will show the successful receipt of RxFill events from the partner pharmacy with greater than 99 percent success	
Transmit and consume diagnosis information in events frequency	Real World Testing will show the frequency that diagnosis information is included on the NewRx, CancelRx, Resupply and RxFill events. It is expected that a majority of new orders will include the diagnosis. Volumes of orders including either will be tracked as a baseline for year one and reported on as they relate to overall number of new orders.	

SCHEDULE OF KEY MILESTONES

Key Milestone	Care Setting	Date / Timeframe
Begin collection of information as laid out by the plan	LTPAC	January 1, 2022
Follow-up with organizations to understand any issues arising from reviewing statistics/data collection	LTPAC	Quarterly, 2022
Data collection and review	LTPAC	Quarterly, 2022
End of Real World Testing period/final collection of all data for analysis	LTPAC	January 2023
Analysis and report creation	LTPAC	January 15, 2023
Submit Real World Testing report to ACB (per their instructions)	LTPAC	February 1, 2023

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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