



REAL WORLD TESTING PLAN – September 25, 2023

ONC - Health IT Certification Program

Table of Contents

- General Information.....1
- Justification for Real World Testing Approach2
- Standards Updates (SVAP)2
- Measures Used in Overall Approach3
 - 1. Description of the Measurement/Metric.....3
 - 2. Associated Certification Criteria4
 - 3. Justification for Selected Measurement/Metric4
 - 4. Care Setting(s)4
 - 5. Expected Outcomes5
- Schedule of Key Milestones5

General Information

Developer Name:	D.A.W. SYSTEMS, INC.
Product Name:	SCRIPTSURE CLOUD ERX
Version Name:	V.2.1
Certified Health IT Product List (CHPL) ID:	15.04.04.2919.Scri.02.00.0.190611 15.04.04.2919.Scri.02.01.0.220413
Developer Real World Testing Page URL:	https://www.dawsystems.com/pdf/realworldtestingplan092023.pdf
Certified Health IT Criteria:	170.315: (a)(1), a(4), a(5), b(3), d(1-8), d(12-13), g(2-5)
Associated Real World Testing Measure(s) for RWT (Scope of Real-World Testing):	170.315(b)(3)
RWT Plan report ID Number:	DAWRWT092023



Justification for Real World Testing Approach

D.A.W. SYSTEMS, INC. (hereinafter “DAW”) provides ScriptSure Cloud ERX (hereinafter “ScriptSure”) ONC Certified Health IT Solution (modular) to medical professionals in ambulatory care settings. The ScriptSure application is an Electronic Prescribing solution. The ScriptSure application is either sold directly to end users to be used as a stand-alone application or it is licensed to and integrated/interfaced with an EHR partner application. The audience and user base of the ScriptSure application covers a range of specialties. These specialties include family practice, internal medicine, pain management, hospice, palliative care, dentistry, behavioral health and more. All end users of ScriptSure electronically prescribe using the application. End user facilities using ScriptSure range from solo-practitioners to large group and multi-provider facilities.

The applicable and required criteria that will be tested is 170.315(b)(3).

DAW will focus Real World Testing on the electronic prescribing of both controlled and non-controlled medications in ambulatory settings across multiple specialties and multiple facility sizes. DAW will measure usability, successful transmission of Electronic Prescriptions across the Surescripts ERX network, receiving messages back from pharmacies and analyze and track error rates of electronic prescribed medications. Qualitative data will be collected through analysis of prescription transactions and quantitative data from end user feedback (where applicable) and analysis of support cases. This approach is justified based on the criteria, scope of the application and DAW userbase audience (ambulatory settings in which all of use ScriptSure to electronically prescribe). Completion will demonstrate compliance and maintenance to the associated (170.315(b)(3)).

Standards Updates (SVAP)

Standard (and version):	Not Applicable
Updated certification criteria & associated product:	Not Applicable
Health IT Module CHPL ID:	Not Applicable
Method used for standard update:	Not Applicable
Date of ONC ACB notification:	Not Applicable
Date of customer notifications:	Not Applicable
Conformance measure:	Not Applicable
USCDI updated certification criteria:	Not Applicable

Measures Used in Overall Approach

1. Description of the Measurement/Metric

The following detail the testing Measurements that will be used to determine compliance and to produce the Real World Testing Final Report. Each of the measurements below will apply to data derived from users subject to the Real World Testing defined in the Care Settings section below.

Measurement		Description of Measurement/Metric
1.	Successful Prescriptions sent by End Users	This is calculated by the total number of prescriptions that were successful divided by the total number of prescriptions that were sent electronically to pharmacies by the users subject to the Real World Testing. Results will be represented in fractions and converted to percentages based of the Care Settings examined. Descriptions of acceptable rates based on industry practices will be evaluated and determined, and the results will be measured against the industry rates and overall compliance with the requirement of associated criteria. Prescriptions may be broken down into controlled vs noncontrolled and structured SIG vs free form SIG counts.
2.	Error Prescriptions	This is determined by mining the end users prescription routing and examining error responses from the electronic network and pharmacy receivers. The errors will be calculated and separated into categories for analysis to determine if the error was caused by a ScriptSure issue, network issue, or pharmacy issue and within those categories if the issue is the result of a programmatic issue or a user/pharmacist training issue. The results will begin by calculating the total number of errors for the Care Settings and divide that by the total number of prescriptions the Care Settings executed. From there, the error messages will be separated into categories to determine the causes of errors and analyze.
3.	CancelRx	This is determined by tracking the number of prescriptions transmitted for the Care Settings with a message type of CancelRx.
4.	Diagnosis	This is calculated by total number of prescriptions and how many had diagnosis added.
5.	Codified Prescription Note vs. Free form usage	Total number of prescriptions and how many had codified notes and how many were free form notes. Correlation between free form notes vs prescription errors will be examined. Calculated by measuring total number of prescriptions and percentage that are Codified Note vs Free Form and how many were error prescriptions.



2. Associated Certification Criteria

The associated certification criteria are controlled and non-controlled medications sent using per **170.315(b)(3)**.

3. Justification for Selected Measurement/Metric

All Providers (Care Settings) utilize the application to electronically prescribe medications in line with 170.315(b)(3). Analysis of Measurements below will demonstrate Real World use and offers the ability to test the efficacy and utilization of the application and its compliance with ONC criteria 170.315(b)(3). Each of the following are Measurements are within the required tests for (b)(3) and therefore justified in the Real World Testing.

Measurement		Justification
1.	Successful Prescriptions sent by End Users	Measuring the rate of successful prescriptions will demonstrate that users are able to send prescriptions successfully to pharmacies.
2.	Error Prescriptions	Measuring the rate of prescriptions that result in an error will demonstrate that users are able to successfully send prescriptions to pharmacies without receiving errors.
3.	CancelRx	Tracking will demonstrate that users are able to successfully send/request cancellations of new prescriptions.
4.	Diagnosis	Measure number of prescriptions that providers are adding ICD-10 diagnoses to.
5.	Codified Prescription Note vs. Free form usage	Measures usage by end users of optional fields that can land on prescriptions. Total number of prescriptions and how many had codified notes and how many were free form notes. Correlation between free form notes vs prescription errors will be examined. Calculated by measuring total number of prescriptions and percentage that are Codified Note vs Free Form and how many were error prescriptions.

4. Care Setting(s)

The care setting selected for Real World Testing represent differing user types (DDS, MD, DO) and specialties (Dentist, Psychiatrist, Hospice). Recent new users (within 3 months of utilizing ScriptSure) and long-term users (in excess of 1 year) will be included in the testing results. The care settings that will be subject to Real World Testing are listed below and will represent a viable cross section of the Real World users of the ScriptSure ONC Certified application. A minimum of 5 active providers at a minimum of 3 practices will be tested. (DAW may decide to include more providers and facilities in the testing.) Our testing will measure ambulatory sites that we support and target and market to. This will cover a sufficient and viable sample of active users of the certified EHR:

- A. Solo-Practice dentist (ambulatory setting).
- B. Solo-Practice Psychiatrist (ambulatory setting).
- C. Hospice facility (ambulatory setting).

5. Expected Outcomes

Measurement		Expected Outcome
1.	Successful Prescriptions sent by End Users	> 99% of all prescriptions sent by a provider will be successful. We expect that there will be equal success of prescriptions across both controlled and non-controlled prescriptions and across all Care Settings and user types.
2.	Error Prescriptions	< 1% of all prescriptions sent will result in an error.
3.	CancelRx	< 1% of new prescriptions will be cancelled.
4.	RxChange	> 50% RxChange response rate.
5.	Diagnosis	> 10% of prescriptions will have diagnosis added.
6.	Codified Prescription Note vs. Free form usage	Hospice 90% utilization of free form note and 10% codified note solo practice < 10% total note utilization

Schedule of Key Milestones

Key Milestone	Care Setting	Date/Timeframe
Define specific end users that will be tracked throughout the course of the Real World Testing	All Care Settings defined	Q1 2024
Begin collection of data as laid out by the plan for analysis	All Care Settings defined	Q2 2024
Capture data at end of quarter for analysis and comparison to previous quarter	All Care Settings defined	Q3 2024
Create final reports and submit by 2/1/2025	All Care Settings defined	Q4 2024

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: Adam Forman, COO

Authorized Representative Email: aforman@dawsystems.com

Authorized Representative Phone: 866-755-1500

Authorized Representative Signature: 

Date: September 25, 2023