REAL WORLD TESTING PLAN – November 12, 2021
ONC - Health IT Certification Program

Contents

General Information

Developer Name:	DAW SYSTEMS, INC.
Product Name:	SCRIPTSURE CLOUD ERX
Version Name:	V.2.0
Certified Health IT Product List (CHPL) ID:	15.04.04.2919.Scri.02.00.0.190611
Developer Real World Testing Page URL:	https://www.dawsystems.com/pdf/realworldtestingplan112021.pdf
Certified Health IT Criteria:	170.315: (a)(1), a(4), a(5), a(10), a(13), b(3), d(1-8), 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:	DAWRWT112021

Justification for Real World Testing Approach

DAW 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 and 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, 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 and analysis of support cases. This approach is justified based on the criteria, scope of the application and DAW user base audience (ambulatory settings in which all of use ScriptSure to electronically prescribe). Completion will demonstrate compliance and maintenance to the associated criteria.

Standards Updates (SVAP)

The standard utilized by ScriptSure Cloud ERX is NCPDP SCRIPT Standard Version 2017071.

Standard (and version):	NCPDP SCRIPT Standard Version 2017071
Updated certification criteria & associated product:	ScriptSure Cloud ERX V.2.0
Health IT Module CHPL ID:	15.04.04.2919.Scri.02.00.0.190611
Method used for standard update:	SVAP
Date of ONC ACB notification:	Q3 2021
Date of customer notifications:	October 2019 through September 2021
Conformance measure:	170.315(b)(3) Surescripts Certification (approved ONC-ATL)
USCDI updated certification criteria:	N/A

Measures Used in Overall Approach

1. **Description of the Measurement/Metric:**

   Real World Testing will measure the following for the selected Care Settings over a period of time in 2022. Data will be compiled from communications and transactions related to electronic prescriptions received from Surescripts network and stored within the ScriptSure application database. Support cases from clients may be utilized to identify problem or error prescriptions and difficulties with prescription sending and creation.

   A. **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 evaluate 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 non-controlled and structured SIG vs free form SIG counts.

   B. **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.

2. **Associated Certification Criteria:**

   The associated certification criteria are controlled and non-controlled medications sent using structured SIG per NCPDP SCRIPT Standard Version 2017071 and compliance with 170.315(b)(3). and the 2015 Edition Cures Update

3. **Justification for Selected Measurement/Metric:**

   Successful and error prescriptions will be measured. All Providers that utilize the application prescribe medications. Analysis of usage, successful sending and errors will demonstrate real world use and offers the ability to test the efficacy and utilization of the application and its compliance with ONC criteria and NCPDPD 2017071 compliance and compliance with the 2015 Edition Cures Update

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 1 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 EHRs.

A. Solo-practice dentist (ambulatory setting).
B. Solo-Practice Psychiatrist (ambulatory setting).
C. Hospice facility with at least 3 providers (ambulatory setting).

5. **Expected Outcomes:**

   o   Successful prescriptions sent by end users: Expected outcome is that there will be less than 1% of all prescriptions sent by a provider are not 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. Analysis of successful prescriptions will demonstrate compliance.

   o   Error Prescriptions: Less than 1% of all prescription sent by providers in the Care Settings will result in errors. Any errors that occur are expected to be due to user or pharmacist training or a technical issue with the pharmacy system. We expect that there will be greater errors related to controlled prescriptions than non-controlled prescriptions across all Care Settings and user types. Confirming low error rates and error rates related to training instead of failure due to application programming will help demonstrate compliance.

   o   ScriptSure is successfully exchanging electronic health information (EHI) in the care and practice settings for which it is marketed for use.

   o   Evidence of EHI is received by and used in the ScriptSure.

   o   ScriptSure is compliant with the certification criteria, including the required technical standards and vocabulary codes sets;

      ▪   Full compliance with 170.315(b)(3) is expected.
      ▪   Full compliance with NCPDP SCRIPT Standard Version 2017071 is expected.

   o   DAW will address any errors accordingly post results.

Schedule of Key Milestones

Key Milestone	Care Setting	Date/Time Frame
Define specific end users that will be tracked throughout the course of the Real World Testing	All Care Settings defined	Q1 2022
Capture data at end of quarter for analysis	All Care Settings defined	Q2 2022
Capture data at end of quarter for analysis and comparison to previous quarter	All Care Settings defined	Q3 2022
Create final reports and submit	All Care Settings defined	Q4 2022

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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Date: November 12, 2021