

# Alpha II, LLC – MIPS Accelerator - REAL WORLD TESTING PLAN

## GENERAL INFORMATION

Plan Report ID Number: 20241025alp

Developer Name: Alpha II, LLC

Product Name(s): MIPS Accelerator

Version Number(s): 6

Certified Health IT Product List (CHPL) ID(s): 15.02.05.1598.HEAL.01.03.0.220117

Developer Real World Testing Plan Page URL: <https://www.alphaii.com/mips-certification>

## JUSTIFICATION FOR REAL WORLD TESTING APPROACH

The healthcare landscape is experiencing a significant shift. Complex government regulations, rising costs and higher consumer expectations are driving the accelerated transition from fee-for-service to a value-based care payment model. As a result, healthcare organizations face mounting pressure to improve quality of care and lower costs. Alpha II, a Certified EHR Technology and expert in clinical data analytics, delivers innovative solutions to ensure clinicians and healthcare organizations successfully and profitably navigate the complex, ever-changing healthcare landscape.

Alpha II's proprietary ONC-certified, cloud-based software enables organizations to more effectively leverage the data in their EHR to deliver high quality patient care at lower costs. With our enterprise solutions, healthcare organizations can effectively track and analyze data for population health management initiatives and easily comply with complex CMS programs. Since the software fully automates the process and does all the work with no IT resources, administrative support and workflow changes, healthcare organizations have more time to focus on patients.

Alpha II's MIPS Accelerator is certified to ingest patient data, calculate all relevant electronic Clinical Quality Measures, and to export the data required to comply with programs such as MIPS, CPC+, PCF, and APM reporting regardless of practice size, specialty, or Care Setting. The purpose of this Real World Test plan is to track and document the relevant interoperability criteria and adherence to the relevant criteria Alpha II is certified for

## STANDARDS VERSION ADVANCEMENT PROCESS (SVAP) STANDARDS UPDATES

<b>Standard (and version)</b>	CMS Implementation Guide for Quality Reporting Document Architecture Category I Hospital Quality Reporting; Implementation Guide for 2024 (Updated August 2023)
<b>Updated certification criteria and associated product</b>	CMS Implementation Guide for Quality Reporting Document Architecture Category III Eligible Clinicians Programs; Implementation Guide for 2024 (Updated November 2023)
<b>Health IT Module CHPL ID</b>	MIPS Accelerator: § 170.315(c)(3) Clinical quality measures (CQMs) — report
<b>Date of ONC ACB notification</b>	15.02.05.1598.HEAL.01.03.0.220117
<b>Date of customer notification</b>	October 4 <sup>th</sup> , 2024
<b>Conformance method and measurement/metric(s)</b>	October 4 <sup>th</sup> , 2024
	Successful Data File Creation and Time Available

<b>Standard (and version)</b>	170.205(h)(2); HL7® CDA® R2 Implementation Guide: Quality Reporting Document Architecture - Category I (QRDA I); Release 1, STU Release 5.3 with errata - US Realm, December 2022
<b>Updated certification criteria and associated product</b>	MIPS Accelerator 6 170.315(c)(1)
<b>Health IT Module CHPL ID</b>	15.02.05.1598.HEAL.01.03.0.220117
<b>Date of ONC ACB notification</b>	October 27 <sup>th</sup> , 2023
<b>Date of customer notification</b>	October 26 <sup>th</sup> , 2023
<b>Conformance method and measurement/metric(s)</b>	Export Error Rate and Import Error Rate Creation Real World Testing Measures

<b>Standard (and version)</b>	170.205(h)(2); HL7® CDA® R2 Implementation Guide: Quality Reporting Document Architecture - Category I (QRDA I); Release 1, STU Release 5.3 with errata - US Realm, December 2022
<b>Updated certification criteria and associated product</b>	MIPS Accelerator 6 170.315(c)(2)
<b>Health IT Module CHPL ID</b>	15.02.05.1598.HEAL.01.03.0.220117
<b>Date of ONC ACB notification</b>	October 27 <sup>th</sup> , 2023
<b>Date of customer notification</b>	October 26 <sup>th</sup> , 2023
<b>Conformance method and measurement/metric(s)</b>	Time Available and Dashboard Update Rate Creation Real World Testing Measures

## MEASUREMENT(S)/METRIC(S) USED IN OVERALL APPROACH

### Description of Measurement/Metric

Measurement/Metric	Description	Care Setting
Import Error Rate	The percentage of QRDA I files generated in accordance with the QRDA Implementation Guide successfully imported into Alpha II's software.	Ambulatory Anesthesiology Radiology Emergency Medicine
Export Error Rate	The percentage of QRDA I files generated by the user that successfully export.	Ambulatory Anesthesiology Radiology Emergency Medicine
Time Available	The percentage of the year the functionality is available to a user.	Ambulatory Anesthesiology Radiology Emergency Medicine
Dashboard Update Rate	The percentage of user-initiated updates to Alpha II's dashboard that successfully complete.	Ambulatory Anesthesiology Radiology Emergency Medicine
Successful Data File Creation	The percentage of QRDA III files generated for submission that are accepted by CMS under the MIPS, PCF, or APM programs.	Ambulatory Anesthesiology Radiology Emergency Medicine
Successful Export of Single Patient Data Export	The percentage of single patient data exports initiated by end users that are complete and in the structured data export format published	Ambulatory Anesthesiology Radiology Emergency Medicine
Successful Export of Bulk Data Export	The percentage of bulk data exports that are requested and contain all patient data in the structured data export format published	Ambulatory Anesthesiology Radiology Emergency Medicine

### Associated Certification Criteria.

Measurement/Metric	Associated Certification Criteria	Relied Upon Software (if applicable)
Import Error Rate	170.315(c)(1)	
Export Error Rate	170.315(c)(1)	
Time Available	170.315(c)(2) & 170.315(c)(3)	
Dashboard Update Rate	170.315(c)(2)	
Successful Data File Creation	170.315(c)(3)	
Successful Export of Single Patient Data Export	170.315(b)(10)	
Successful Export of Bulk Data Export	170.315(b)(10)	

**Justification for Selected Measurement/Metric**

Measurement/Metric	Justification
Import Error Rate	The ability to import data for the purpose of creating patients and populating all required measure components demonstrates the interoperability of the software.
Export Error Rate	The successful export of patient-level data demonstrates the software's interoperability and that it operates in accordance with the applicable QRDA Implementation Guide.
Time Available	The amount of time the functionality is available to a user directly impacts the interoperability of the product.
Dashboard Update Rate	Successful completion of a user-initiated update to the calculation of eCQMs based upon imported data demonstrates the software's ability to successfully ingest data and calculate measures.
Successful Data File Creation	The successful submission of data to CMS under various QPP programs demonstrate the software is operating in accordance with the applicable QRDA Implementation Guide.
Successful Export of Single Patient Data Export	The ability to export a single patient record by an end user, with appropriate user privileges, demonstrates the ability to transmit a single patient's EHI in the published standardized format.
Successful Export of Bulk Data Export	The successful generation of all patient data in a single request that meets the published standardized format demonstrates the interoperability of the software to complete a full data export of EHI

## Care Settings

Care Setting	Justification
Ambulatory	The outpatient quality reporting eCQMs that MIPS Accelerator has completed certification in, c(1), c(2), and c(3), were designed for the Ambulatory care settings. Patient EHI that is contained within the software may need to be exported utilizing b(10) certified criteria by an Ambulatory Care setting for purposes of interoperability.
Anesthesiology	The outpatient quality reporting eCQMs that MIPS Accelerator has completed certification in, c(1), c(2), and c(3), were designed for Anesthesiologists who see patients in an outpatient setting. Patient EHI that is contained within the software may need to be exported utilizing b(10) certified criteria in an Anesthesiology setting for purposes of interoperability.
Radiology	The outpatient quality reporting eCQMs MIPS Accelerator has completed certification for (c(1), c(2), and c(3)) were designed for Radiologists who see patients in an outpatient setting. Patient EHI that is contained within the software may need to be exported utilizing b(10) certified criteria in a Radiology setting for purposes of interoperability.
Emergency Medicine	The outpatient quality reporting eCQMs MIPS Accelerator has completed certification for (c(1), c(2), and c(3)) were designed for Emergency Medicine clinicians who see patients in an outpatient setting. Patient EHI that is contained within the software may need to be exported utilizing b(10) certified criteria in an Emergency Medicine setting for purposes of interoperability.

## Expected Outcomes

Measurement/Metric	Expected Outcomes
Import Error Rate	100% of all QRDA I files generated in accordance with the QRDA Implementation Guide should be imported into the software.
Export Error Rate	100% of all QRDA I files generated by the use should be successfully exported.
Time Available	The ability to utilize the functionality throughout the entire year for all certified measures demonstrates the interoperability of the product.
Dashboard Update Rate	100% of all user-initiated dashboard updates should successfully complete.
Successful Data File Creation	100% of all QRDA III files generated for submission should be successfully submitted to CMS.
Successful Export of Single Patient Data Export	100% successful generation of single patient data exports queued by a user with Admin level user capabilities
Successful Export of Bulk Data Export	100% generation of all patient data exports of EHI requested.

## SCHEDULE OF KEY MILESTONES

Key Milestone	Care Setting	Date/Timeframe
Real World Testing plan - develop for publication the Real World Testing plan, including working with ONCACB to finalize and publish approved plan	All	10/01/2024 – 12/15/2024
Verify functionality related to the previously developed. Tracking of approved Real World Testing plan metrics and implement any adjustments as necessary	All	10/15/2024 - 12/31/2024
Measure data collection	All	01/01/2025 - 12/31/2025
Quarterly review of data collected	All	Quarterly, 2025
Real World Testing final 2025 data analysis, documentation, and submission of report to ONC-ACB	All	01/01/2026 - 01/15/2026

## 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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Authorized Representative Signature: Amanda L Morgan

Date: 10/31/2024

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<sup>i</sup> Certified health IT continues to be compliant with the certification criteria, including the required technical standards and vocabulary codes sets; certified health IT is exchanging EHI in the care and practice settings for which it is marketed for use; and EHI is received by and used in the certified health IT. (85 FR 25766)

<sup>ii</sup> <https://www.federalregister.gov/d/2020-07419/p-3582>