Drummond Group LLC

EHR Testing Guide

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Scope of Document

This Drummond Group Testing Guide consists of three sections. Section One provides an overview of the Drummond EHR Testing Program. Section Two addresses Drummond Group's testing procedures. Section Three covers how to schedule testing, steps in applying for testing and test pricing, as well as how Drummond Group handles appeals and complaints.

Section One. Overview of the Drummond Group Health IT Testing Program

ONC Authorized Testing Body: Drummond Group LLC
Drummond Group LLC (DG), now ONC-approved to test both the 2014 Edition and the 2015 Edition, has been accredited by the American National Standards Institute (ANSI) as a certification body for the Certification Program for Health Information Technology. Also, Drummond Group has been accredited by the National Voluntary Laboratory Accreditation Program (NVLAP, NVLAP Lab Code: 200979-0) of the National Institute of Standards and Technology (NIST) to test health IT under the auspices of the Office of the National Coordinator for Health IT (ONC-HIT). Drummond Group's accredited EHR Testing Lab has tested hundreds of EHR products under the Health IT program. Products tested and/or certified by Drummond Group can be used by eligible providers and hospitals as part of their criteria for qualifying for Center for Medicare and Medicaid Services (CMS) incentive payments.

This guide covers information related to Drummond Group's health IT testing services.
For more information on Drummond Group's certification services, please see the Health IT Certification Guide.

Companies have a choice in the ONC Health IT Certification Program. You can register for Drummond Group Testing and Certification, Certification only or Testing only. For those choosing Testing and Certification, Drummond Group offers:

> * "continuity of care" between the Drummond Test Lab and the Drummond Certification Body;
> *familiarity with the same knowledgeable, customer-friendly people you have worked with over the years;
> *and the assurance of The Drummond Difference

Drummond's Decision Guide to 2015 Testing and Certification. Please note that the complexity of certification choices have significantly increased with 2015 Edition. Drummond Group's "Decision Guide to 2015 Edition" offers detailed explanations on the ONC 2015 Edition criteria which can reduce the complexity of the decision-making process to meet Stage 3 Meaningful Use. To receive a copy of this Guide that includes pricing, please contact Client Services by sending an email to EHR@drummondgroup.com. A similar document for 2014 Edition certification is also available by request.

2015 Edition Exploratory Call. Drummond Group offers a complimentary 2015 Edition 1-hour exploratory call for developers with our highly-trained and skilled test proctors. Developers may use this call to discuss technical details of the ONC criteria before committing to test with Drummond Group. To schedule this call, please contact Client Services by sending an email to EHR@drummondgroup.com.

2014 Edition and 2015 Edition Pretest Support Package.

• Separate from ONC Test Event and provides critical information to prepare for testing prior to registration

• Access to Drummond Group Test Proctor for Technical Support (conference calls/help desk support tickets)

• Overview Sheets which provide a high-level overview of each of the new 2015 edition criteria

• Drummond Group Online Knowledgebase (FAQs, Support Videos)

• Program is 30 calendar days and self-paced

• Cost is $5000 and is credited to EHR testing fees

• A signed MCA (Mutual Confidentiality Agreement) is collected with payment

To request this package, please contact Client Services by sending an email to
EHR@drummondgroup.com.

Section Two. Testing Procedure

Roles and Responsibilities
1. Drummond Group is responsible for the overall coordination of the test as well as documenting the test results.
2. Internal allocation of resources for each test participant must be sufficient to complete the testing in a timely manner as determined by DG. Test duration is dependent upon the number of modules tested, but generally takes between one and two business days. Participants must supply the dedicated effort of at least one full-time software tester for each product. Additional resources within software development and network support will be required throughout the test.
3. For remote testing, the coordination of the testing will come primarily from a conference call supplied by Drummond Group and remote video conferencing testing tools supplied by the participant. Attendance on the conference call is mandatory.
4. For remote testing, participants will be responsible for operating their respective products over the Internet, although there may be some special arrangements at a specified location to facilitate testing.
5. Confidentiality, security and loss prevention of all test data collected during testing is maintained through a variety of security precautions, including secure limited password access and secure backup of data.
6. Drummond Group will maintain good communication with the client prior to or during testing to make them aware of delays or changes to testing.

Pre-Test Activities
After an EHR participant registers with DG (see Section Three for details), returns a signed Master Services Agreement and Statement of Work (SOW) and the required, non-refundable administrative fee, they will receive access to pre-test material and be assigned to a Test Proctor. The fee will be credited back to vendor after testing activities are complete. This material includes the DG Proctoring sheets. These proctoring sheets are based upon the ONC test procedures.

You will also receive instructions for pre-test setup of assigned test data. Some patient information must be entered on the day of testing with the DG Test Proctor viewing these actions, but other data will need to be pre-loaded prior to the day of testing. These instructions will provide guidance on the pre-loading of patient data.

Prepare for Testing
After vendor assignment, Test Proctor will schedule a 1-hour call to discuss the upcoming testing activities. After the call, vendors are strongly encouraged to utilize the free technical support provided by Drummond Group through their ticket system to submit questions the requirements of the ONC criteria. Other training material including videos and FAQs are provided to assist vendors in their preparation.

Vendors should also prepare by reviewing the ONC-supplied test procedures. Test procedures for **2014 Edition** can be found:
http://www.healthit.gov/policy-researchers-implementers/2014-edition-final-test-method

Test procedures for **2015 Edition** can be found:
https://www.healthit.gov/policy-researchers-implementers/2015-edition-test-method

These are the same testing procedures we use for the official ONC testing and certification of EHR systems and applications. If a vendor or implementer can successfully execute the test methods for the certification criteria they are seeking, they should have a high degree of confidence entering the day of testing. Before entering an EHR test event, participants must confirm they have successfully pre-tested their product or implementation on their own using the ONC test procedures and Drummond Group Proctor Sheets.

Test Day Time Allotment
Your test on your test day is scheduled with a hard time deadline. Based on our experience in testing a variety of types of products from modules to complete EHR, this timeframe will allow you to complete the testing, IF YOU ARE PREPARED, but preparation is the key to your success on test day. **Strict time allotment for testing 2014 Edition and 2015 Edition:**
- o Supplemental Retest: 2 hours
- o 1-9 Modules: 3 hours
- o 10-20 Modules: 6 hours
- o 21-30 Modules: 12 hours
- o 31-40 Modules: 18 hours
- o 41-50 Modules: 24 hours
- o 50+ Modules: 28 hours

Remote Testing
Remote testing is defined as performing testing via the internet wherein the applicant performs testing actions from their office location and the DG Test Proctor performs the testing from his or her office. All ATLs must support remote testing, which is the preferred method for Drummond Group. The Health IT testing process is well-suited for remote testing, and we have a long history of successfully conducting test events remotely.

To perform remote testing, the vendor or participant must provide remote video access to their Health IT system under test (SUT). There are several remote video tools available, and many are inexpensive or free. Some options include GoToMeeting and WebEx. DG has no preference and will work with each participant's preference. DG will supply a teleconference number for the verbal communication.

The purpose of the remote web conference software is to allow the DG Test Proctor to view your Health IT application during the ONC testing. A member of your team needs to be present to execute the test steps directed by the DG Test Proctor via the teleconference for the duration of testing. As your test lead performs the test steps, the DG Test Proctor will view the actions of your Health IT system under test. Some files will need to be emailed to the DG Test Proctor for confirmation of successful execution of test steps.

Onsite Testing
Onsite testing is performed at the participant's location, such as a hospital. Drummond Group can accommodate specific requests for onsite testing. Testing onsite is identical to conducting it remotely except for the location of the DG Test Proctor(s). The same ONC-supplied test procedures and ONC guidelines are applied in either case. However, instead of the DG Test Proctor viewing the results remotely, he or she will view them in person at the participant's location of choice.

Additional fees, including travel for the DG Test Proctor(s), must be supplied by the participant. Some Health IT testing can be done only onsite. If you are interested in onsite testing, please contact DG for fees and scheduling at ehr@drummondgroup.com.

Day of Testing
On the day of testing, your test lead and the DG Test Proctor will connect and communicate through your web conferencing software or service and the DG supplied teleconference phone number. The testing is based upon the standards and certification criteria put forth by ONC and the normative test methods provided by ONC. Based on these criteria and methods, the Drummond Group EHR Test Procedures will instruct the vendor or participant on the steps to demonstrate and verify compliance with the ONC testing requirements. Throughout the testing, the DG Test Proctor will perform screen shots and request files to verify your performance. Once the testing is complete, the DG Test Proctor will inform you of any errors or testing criteria failures and, if failures occurred, discuss rescheduling opportunities (please review the retesting section below).

Critical Things to Remember for Testing
- Be Prepared. A product or system that has been fully debugged by pre-testing over the ONC test methods and staffed by a knowledgeable member of your testing team should not have difficulty in completing testing in the time allotment. However, a product or system that has not gone through a complete company-internal QA testing process or is handled by personnel unfamiliar with the testing criteria likely will not complete in the allotted time. If this occurs, the product under test will not be certified over the intended criteria and you will be required to reschedule a new testing slot to complete testing and then move to certification. Additional retesting fees may apply.
- ONC test methods and test tools are the final guide. They are the basis for verifying an EHR product or system can satisfy the certification criteria. An ATL MUST follow these methods and use these tools in their testing efforts. If a product under test fails a method criteria or test tool evaluation, the ATL must consider the criteria as failed. A participant cannot excuse a test method or debate the result of the test tool.
- The Drummond Group test proctor does not certify a product.

Testing Results
After testing is completed, Drummond Group will create your test report and communicate status to the client administrative contact or testing personnel. If your company has chosen Drummond Group as the Certification Body, the DG ATL will submit the test results to the DG ACB for

review and decision. For more information on that process, please read the Drummond Group
EHR Certification Guide.

Retesting
There are three scenarios for retesting:
Original Retest session –fees may apply
During the original testing session, if your product is unable to successfully complete the testing
process on your originally scheduled day, DG will set a new test date to retest the particular
problem module(s). The first two additional hours are free, but if additional time is needed, fees
may apply per the test event SOW. Upon successful completion of the test, your test report will
be completed and sent to the certification body for certification review. The free supplemental
retest **must be scheduled within 3 business days and completed within 10 business days of
your original test date**.

Guidelines for Retest:
* Only registered modules that you attempted to test on the original test date qualify for the retest
(no fees). Any modules not attempted do not qualify for the retest (no fees) and must be tested
within a paid retest event.

* Also be aware that we reserve the right to retest on previously tested and passed modules on
retest day as a form of audit surveillance. This will be done at no charge unless audit reveals
errors in the module that indicate the EHR is no longer compliant with the criteria.

Second Retest Session – fees apply.
If the product fails the original test session (including, if applicable, the original retest date) and
needs to retest, an additional test would have to be scheduled according to available test dates on
the DG testing calendar. Please follow the same steps to apply as your original application. On
the Drummond Group registration form, select "Retest" and complete the application. This starts
the registration process described below in "Section Three - How to Apply." Retest fees would
apply and are outlined in "Section Three - Pricing" in this document.

Modifying Certified Products Retest Session – fees apply.
A previously certified Complete EHR (2014 Edition only) or EHR Module may be updated for
routine maintenance or to include new capabilities that affect elements both related and unrelated
to the certification criteria adopted by the Secretary without its certification becoming invalid. If
major or minor changes are made to your product, you will submit to Drummond Group an
attestation review request (please submit at:
https://www.drummondgroup.com/index.php/joinregister-for-ehr-testing). An attestation
document will then be returned to you for completion with which you may indicate the changes
that were made, the reasons for those changes, whether your development team believes this
affects your previous certification and other such information including supporting
documentation that would be necessary to properly assess the potential effects the new version
would have on previously certified capabilities. Upon receipt of the attestation, Drummond
Group Certification Body will determine whether the updates and/or modifications are such that
the new version would adversely affect previously certified capabilities and therefore need to be

retested and recertified, or whether to grant certified status to the new version derived from the previously certified Complete EHR (2014 Edition only) or EHR Module. Please note that ONE attestation review is free; additional attestation reviews are $1,000 each. If retesting is needed, you will be notified by Drummond Group; retest fees would apply and are outlined in "Section Three - Pricing" in this document.

Open Source Products
Open source software products are considered the same as commercial software products in the Drummond Group EHR Testing program. Both types of products are treated the same with respect to pricing, the application process, a signed Master Services Agreement, the testing process and, if applicable, certification.

Section Three. Scheduling Testing, Steps to Apply, and Test Pricing

How to Apply and Schedule Testing
There are three steps to apply for EHR Testing. If there are questions along the way, please send an email to EHR@drummondgroup.com.

Step One. Fill out the EHR registration form for 2014 Edition or 2015 Edition located at: https://www.drummondgroup.com/enroll-for-ehr-services.
To the best of your ability, include the correct product name with version with release number on the application form, or TBD if unknown. This information will be used in the testing process. You will have an opportunity to make changes to this information prior to testing, if needed.

Step Two.
    Schedule. On the registration form, you are required to identify a date or dates, on which you would like to test. Drummond Group will make every effort to schedule your test on or around the days you select. However, keep in mind that test dates are given on a first-come, first-served basis. A few days after successfully submitting your registration form, you will receive a confirmation email from Drummond Group that will include tentative testing dates as well as the Master Services Agreement and GAP Inheritance Request Form. A separate email will be sent conveying the Statement of Work. Please note that to reserve the test date, you must submit a completed Master Services Agreement, Statement of Work and payment as outlined below.

    Master Services Agreement. Within the confirmation email, Drummond Group will provide the applicant the DG Master Services Agreement for EHR. The applicant must provide a signature on our Master Services Agreement and return the agreement within 3 weeks via email to Lisa Sullivan, Director of Finance. Failure to return the signed Master Services Agreement within the required timeframe may result in losing the tentative test date(s) scheduled.

    Statement of Work. After registration, Drummond Group will provide the applicant the DG Statement of Work which includes pricing information. The applicant must provide a signature on our Statement of Work and return the agreement and the required, non-refundable administrative fee within 3 weeks via email to Lisa Sullivan, Director of Finance. Failure to return the signed Statement of Work within the required timeframe may result in release of the tentative test date(s) scheduled.

Questions? Email: LisaS@drummondgroup.com

    Product Name Form. Participants will also receive this document in the confirmation email. You must complete this form with your company name and product name as you would like it listed on our website as well as on the CHPL listing. It is imperative that this information be correct, so we require a signature from a senior member of your team. This form is due 2 weeks prior to your test date.

Step Three.

Upon receipt of the registration form, a signed DG Master Services Agreement and Statement of Work and administrative fee, your enrollment will be finalized and the test dates will be confirmed. DG will email an invoice for payment of test fees upon completion of **each test event**. The certification fee will be invoiced with the final test event. Payment terms will be as set forth on the invoice, and payment of all test and certification fees must be received prior to issuance of certification.

Please note: Final Payment must be received by Drummond Group prior to issuing the certification (for testing & certification only) or publishing the test report.

Cancellation Policy: Cancellation or rescheduling of testing less than the 30-day period prior to your scheduled and confirmed test date is subject to penalties as set forth in the Drummond Group SOW. Test dates may be rescheduled subject to the following policy:

- 30-day advance notice via email is required to postpone or cancel a scheduled test date and avoid a fee
- Reschedule request # 1 will be assigned a new test date right away
- Subsequent reschedule requests will initiate a 30-day waiting period, after which new test dates may be requested

Pricing.

Contact Client Services for pricing list at **EHR@drummondgroup.com** or 512-826-2938.

EPCS Certification. The U.S. Drug Enforcement Administration (DEA) has approved Drummond Group's e-Prescribing of Controlled Substances (EPCS) Certification Process. DG is now also providing EPCS certification to healthcare software companies with the capability of e-Prescribing controlled substances. For more information, including pricing, email us at EPCS@drummondgroup.com.

Maintaining Your Product Certification

Please note that the specific rules from HHS/ONC on maintaining your certification and the rules for surveillance are located in Drummond Group's Certification Guide. It is important to understand these rules to ensure your product maintains its certification.

Appeals and Complaints

All appeals and complaints about the Certification Body, EHR Test Lab or a Drummond Certified product should be submitted to EHRcomplaints@drummondgroup.com or discussed with your DG contact. If discussed with DG contact, we ask that you also outline the nature and severity of the problem in an email and send to EHRcomplaints@drummondgroup.com.

Appeals

1. DG shall, independent of the test proctor and through executive management, conduct a complete and thorough investigation of the issue by interviewing all personnel and examining all data relevant to the appeal.
2. The company will receive a formal response summarizing the findings and setting forth the determination with respect to the appeal.
3. If the issue is not resolved, they may respond in writing with an additional request for review. This request must stipulate specific objections to the findings and an explanation as to why those findings are deemed to be incorrect.
4. The additional request will be reviewed by executive management and a thorough investigation will be conducted per the new objections. A letter of resolution will be issued.
5. If this letter of resolution does not resolve the issue, the companies, DG being represented by executive management, shall engage in good faith negotiations for a period of time not to exceed thirty days in order to resolve the issue. If, after that period of time, the issue cannot be resolved to the mutual satisfaction of the parties (unless negotiation period is extended by mutual consent) the issue shall be settled exclusively by mediation as set forth in the Master Services Agreement

Complaints

1. All formal complaints must be received, fully documented, tracked, and decisions must be made on those complaints.
2. DG shall, independent of the subject of the complaint and through executive management, conduct a complete and thorough investigation of the issue by interviewing all personnel and examining all data relevant to the complaint.
3. Manager will ensure that DG has not provided consultancy for the client involved in the complaint or appeal or been employed by the client and that members of the certification body will not review or approve resolution of a complaint or appeal for any client within two years following the end of employment or consultancy for the client.
4. If there is any fault of DG, then an action plan (created by management) for internal resolution of problem process must be created and trained upon, and resolution of improvement process must be tracked.
5. The company issuing the complaint will receive a formal response summarizing the findings and setting forth the determination, or corrective action, with respect to the complaint. Likewise if this involves a certified product, the company certifying the product against which the complaint was issued will receive a notice of the complaint.
6. If the issue is not resolved, they may respond in writing with an additional request for review. This request must stipulate specific objections to the findings and an explanation as to why those findings are deemed to be unsatisfactory.
7. The additional request will be reviewed by executive management and a thorough investigation will be conducted per the new objections. A letter of resolution will be issued.
8. If this letter of resolution does not resolve the issue, the companies, DG being represented by executive management, shall engage in good faith negotiations for a period of time not to exceed thirty days in order to resolve the issue. If, after that period of time, the issue cannot be resolved to the mutual satisfaction of the parties (unless negotiation period is

extended by mutual consent) the issue shall be settled exclusively by mediation as set forth in the Master Services Agreement.

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