Drummond LLC

Health IT Testing Guide

October 8, 2021

Scope of Document

This Drummond Testing Guide consists of three sections:

1. Section One provides an overview of the Drummond ONC Health IT Testing Program.
2. Section Two addresses Drummond's testing procedures.
3. Section Three covers steps to enroll, schedule testing, access support, as well as how Drummond handles appeals and feedback.

Section One:
Drummond Health IT Testing Program Overview

ONC Authorized Testing Body: Drummond Group LLC
Drummond Group LLC (Drummond), ONC-approved to test the 2015 Edition and the 2015 Edition Cures Update, has been accredited by the American National Standards Institute (ANSI; Product Certification Body #1045) as a certification body for the Certification Program for Health Information Technology. Also, Drummond 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. Drummond's accredited EHR Testing Lab has tested more than 1,500 EHR products under the Health IT program. Products tested and/or certified by Drummond 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 and other programs.

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

Companies have a choice in the ONC Health IT Certification Program. You can register for Drummond Testing and Certification, Certification only, or Testing only. For those choosing Testing and Certification, Drummond offers continuity of services between the Drummond Test Lab and the Drummond Certification Body, as well as familiarity with the same knowledgeable, customer-friendly people you have worked with over the years.

Drummond Decision Guide to 2015 Testing and Certification. Please note that the complexity of certification choices has significantly increased with 2015 Edition and with the 2015 Edition Cures Update. Drummond's *Decision Guide to 2015 Edition* offers you detailed explanations of the ONC 2015 Edition and 2015 Edition Cures Update criteria; information which can reduce the complexity of the decision-making process for this program.

Section Two: Testing Procedure

Roles and Responsibilities

1. Drummond is responsible for the overall coordination of the test as well as documenting the test results.
2. The customer must allocate enough internal resources for each test so that the test can be completed in a timely manner as determined by Drummond. Test duration is dependent upon the number of criteria tested, but generally takes between one and three 6-hour test days for live-test criteria, and often more depending upon customer readiness. The customer must supply the dedicated effort of at least one full-time software tester for each product. Drummond will require additional resources in software development and network support throughout the test.
3. For remote testing, Drummond will provide coordination via a conference call and remote video conferencing service. Customer attendance on the conference call is mandatory.
4. For remote testing, the customer will be responsible for operating respective products over the Internet, although there may be some special arrangements at a specified location to facilitate testing.
5. Drummond maintains confidentiality, security, and loss prevention of all test data collected during testing through a variety of security precautions, including secure access and backup of data.
6. Drummond maintains good communication with customers prior to and during testing to announce delays or changes to testing.

Pre-Test Activities

After an EHR customer registers with Drummond (see Section Three for details) and returns a signed Master Services Agreement and Statement of Work (SOW) along with the required, non-refundable administrative fee, they will receive access to pre-test material and be assigned to a Test Proctor. The prepaid fee will be credited back to the vendor after testing is complete, unless the fee is forfeited in accordance with terms set forth in the SOW. The pre-test materials include the Drummond Proctor Sheets, which are the test scripts used for certification testing and are based upon the ONC test procedures.

Vendors also will receive instructions for pre-test setup of assigned test data. Some test patient information must be entered on the day of testing observable by the Drummond Test Proctor, but other data will need to be loaded prior to testing. These instructions will provide guidance on the pre-loading of patient data.

Prepare for Testing

After assignment, the Test Proctor will schedule a 1-hour call to discuss the upcoming testing activities with you. After the call, you are strongly encouraged to use the free ticketing system provided by Drummond to submit questions about the requirements of the ONC criteria. Drummond provides other training materials, including videos and FAQs, to help you prepare.

You also should prepare by reviewing the ONC-supplied test procedures. Test procedures for

2015 Edition can be found at https://www.healthit.gov/topic/certification-ehrs/2015-edition-test-method

2015 Edition Cures Update can be found at https://www.healthit.gov/topic/certification-ehrs/2015-edition-cures-update-test-method

These are the same testing procedures used by Drummond as sources for our official Proctor Sheets used for ONC testing and certification. If you can execute the test methods for the certification criteria you are seeking, you 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 Proctor Sheets.

Test Day Time Allotment
Test dates are scheduled with a hard time deadline. Based on our experience in testing a variety of types of products, this timeframe will allow you to complete the testing *if you are prepared*. Drummond has a **strict time allotment for testing** of 6 hours per test day, and our *Decision Guide to the 2015 Edition* has tools that help you estimate the number of test days required based on the criteria required for live testing. Some of the criteria are documentation-only criteria, and some of the criteria require a Self-Declaration of Compliance. These instances require the Health IT Developer to self-test and declare themselves compliant to the certification criteria.

Remote Testing
Drummond will supply a video conferencing link, and the vendor or participant must share remote video access to their Health IT system under test (SUT).

A member of your team must be present to execute the test steps directed by the Test Proctor through the teleconference for the duration of testing. As your test lead performs the test steps, the Test Proctor will view the actions of your Health IT system under test. Your test lead will need to email files to your Test Proctor to confirm their successful execution of some of the test steps.

Onsite Testing
Onsite testing may be performed at your location, and Drummond can accommodate specific requests for such testing.

Additional fees, including travel for Drummond's Test Proctors, will be charged to you. If you are interested in onsite testing, please contact Drummond for fees and scheduling at EHR@drummondgroup.com.

Day of Testing

On the day of testing, your test lead and the Drummond Test Proctor will communicate through Drummond's web conferencing service. The testing is based upon standards, certification criteria, and normative test methods provided by the ONC. The Drummond EHR Test Procedures will instruct you on steps needed to demonstrate and verify compliance with ONC testing requirements. The Test Proctor will video record the entire test event as archival proof of test results and any compliance decisions. Throughout testing, the Drummond Test Proctor also may capture screen shots and/or request files to verify and record compliance. Once testing is complete, the Drummond Test Proctor will inform you of any errors or testing criteria failures and discuss rescheduling opportunities as needed.

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 run by a knowledgeable member of your testing team should not have difficulty completing testing in the time allotted. 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 schedule a new testing slot to complete testing and move to certification. Additional retesting fees may apply.
- ONC test methods and test tools are the final guide. They are the basis for verifying that an EHR product or system can satisfy the certification criteria. Test Labs *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 Test Lab must consider the criteria as failed. You cannot excuse a test method or debate the result of the test tool.
- The Drummond Test Proctor does *not* certify a product.

Testing Results

After testing is completed, Drummond will create your test report and communicate status to your administrative contact or testing personnel. If your company has chosen Drummond as the Certification Body, the Drummond ATL will submit the test results to the Drummond Certification Body for review and decision. For more information on that process, please read the Drummond EHR Certification Guide.

Retesting

If your product is unable to successfully complete testing during the original session, Drummond will set a new test date to retest the failed criteria. The first additional hour is free, and then fees may apply. The free one hour of retesting of failed criteria does not apply to attestation or surveillance testing. Upon successful completion of the test, your test report will be completed and sent to your chosen certification body for certification review. *The free one-hour supplemental retest must be scheduled within 3 business days and completed within 10 business days of your original test date.*

- Only registered criteria attempted on the original test date qualify for a free one-hour retest. Any criteria not attempted in original test must be tested in another paid event.

- We reserve the right to retest on previously tested and passed criteria on retest day as a form of surveillance. This will be done at no charge unless this audit reveals errors in the criteria indicating the EHR is no longer compliant with the criteria.

Attestation Retesting

A previously certified Health IT product may be updated for routine maintenance or to include new capabilities both related and unrelated to the certification criteria without its certification becoming invalid. If major or minor changes are made to your product, you need to submit an attestation review request to us at Drummond Health IT Testing Registration. Attestation documentation will be sent to you to determine changes that were made, the reasons for those changes, and whether your development team believes the changes affect your previous certification.

Upon receipt of the attestation documents, the Drummond Certification Body will determine whether the modifications require the product to be retested and recertified, or to grant certified status to the new version derived from the previously certified version. If retesting is needed, you will be notified by Drummond; retest fees apply.

Open-Source Products

For the purposes of the Drummond EHR Testing program, open-source software products are considered the same as commercial software products. Both 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:
Steps to Enroll, Schedule Testing, and Access Support

Step One

Fill out the Health IT registration form for the 2015 Edition or 2015 Edition Cures Update. Select the related program, then follow the prompts based on the type of services needed.

Step Two

Registration & Scheduling. Shortly after submitting a registration form, you will receive a confirmation email from Drummond, outlining next steps to enroll and access technical support services.

Administration Fee Payment. In addition to the two contracts listed below, submitting an administration fee is required to complete enrollment for ONC Health IT services. Shortly after receipt of the confirmation email, an invoice for that fee will be issued to the accounts payable contact listed on your registration form. The invoice will be sent from Drummond's accounts receivable office via INTUIT and will include a link to submit payment by bank ACH. If it is your preference to submit payment via credit card, please submit a request to acctsrec@drummondgroup.com. Receipt and processing of a check takes up to 10 days. Payment by credit card incurs a 3% processing fee.

Master Services Agreement. The MSA will be issued to the client via the Congasign system for electronic signature. Return all pages of the MSA, signed by authorized, senior management, via Congasisn and direct questions to EHRcontracts@drummondgroup.com.

Statement of Work. SOW will be issued to the client via the Congasign system for electronic signature. Return all pages of the SOW, signed by authorized, senior management, via Congasisn. If the administration fee was not paid previously, it must be submitted at the same time as the SOW. You may modify the scope of services requested at registration as development continues, and prior to testing. Related fees will be modified and reflected on future invoices, as needed, without signing a revised SOW. Direct question to EHRcontracts@drummondgroup.com.

Step Three

Enrollment will be finalized upon receipt of the registration form, a signed MSA, signed SOW, and payment of the administration fee. Drummond will issue an invoice* for payment of test fees upon completion of *each test event*. The certification fee will be invoiced before certification occurs. *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 documentation.*

Technical Support. Upon completion of enrollment, the client will be introduced by email to an assigned Account Manager, who will contact the client by within 24 to 48 hours to schedule an introductory call. The Account Manager will also grant the client access to the Drummond portal. The client is able to submit questions to the Account Manager through this portal where Test Proctor Sheets and other resources are accessed.

Scheduling Test Dates. After enrollment, the client may request preferred test dates by emailing their assigned Test Proctor. All anticipated test dates can be requested at once or one at a time, based on the client's readiness.

Reschedule Policy. To postpone or cancel a scheduled test day, please email the Account Manager 30 days in advance to avoid forfeiting the administration fee. Other penalties may apply, as set forth in the Drummond SOW.

End of Year Testing. A premium fee of $500 is added to each test event scheduled during the final two weeks of the calendar year (December 15 –31).

Pricing. This information is provided with the Decision Guide material upon request at EHR@drummondgroup.com or (877) 437-8666.

EPCS Certification. The U.S. Drug Enforcement Administration (DEA) has approved Drummond's e-Prescribing of Controlled Substances (EPCS) Certification Process. Drummond also provides 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's Certification Guide. It is important to understand these rules to ensure your product maintains its certification**.**

Appeals and Complaints
All feedback about the Certification Body, EHR Test Lab, or a Drummond Certified product should be submitted to EHRcomplaints@drummondgroup.com or discussed with your Drummond contact.

Appeals
1. Drummond shall, independent of the test proctor and through 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, the company 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 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, Drummond, being represented by management, shall engage in good faith negotiations for a period not to exceed thirty days in order to resolve the issue. If, after that period, 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. Drummond shall, independent of the subject of the complaint and through management, conduct a complete and thorough investigation of the issue by interviewing all personnel and examining all data relevant to the complaint.
3. Management will ensure that Drummond 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 Drummond, then an action plan (created by Drummond management) for internal resolution of the problem process must be created, relevant Drummond staff must be trained upon this resolution and the resolution of the improvement in 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 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, Drummond being represented by management, shall engage in good faith negotiations for a period not to exceed thirty days to resolve the issue. If, after that period, 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 MSA.

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