



FEI Systems

Connecting Every Dimension of  
Health and Human Services

# WITS Requirements Document

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## 2024 Real World Test Results

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Created by: WITS Business Analysis Team

Dated: 1/29/2025

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# Real World Test Results

## For Criteria

### §170.315 (b)(1), §170.315 (c)(1), and §170.315 (g)(9)

## General Information

Plan Report ID Number: 2024RWTRResults\_Ver1.0

Developer Name: FEI Systems

Product Name(s): Web Infrastructure for Treatment Services (WITS)

Version Number(s): 23

Certified Health IT: 15.04.04.1479.WITS.23.03.1.221223

Product List (CHPL) ID(s): 15.04.04.1479.WITS.23.03.1.221223

Developer Real World Testing Page URL: <https://www.feisystems.com/certifications/>

## Real World Testing Approach

The Certified Health IT product WITS is sold by FEI Systems as an ambulatory care Electronic Health Record (EHR) software application. WITS customers specialize in providing substance abuse and mental health services. The applicable 2015 Edition criteria that we included in our 2024 Real World Testing are:

**TABLE 1**

§170.315 (b)(1)
§170.315 (c)(1)
§170.315 (g)(9)

In the real world, the modules tested provide one seamless approach to fulfil clinical and administrative documentation requirements and incorporate the features and functions of the criteria mentioned in Table 1. The results in this document demonstrate how these combined certified criteria perform in the production environment.

## METHODOLOGY

### Testing environments:

- Public-facing production-like instance of ONC certified WITS version 24.10.1. Clients in this environment have realistic client data based on elements of current clients.
- Public API testing tool Postman.com.

### Testers:

- La'Tray Jeffers, Tennessee Department of Mental Health and Substance Abuse Services
- Ken Horvath, Tennessee Department of Mental Health and Substance Abuse Services
- Allison Robertson, FEI Systems (External API testing for (g)(9))
- Kevin Sutter, FEI Systems (External API testing for (g)(9))

Testing Dates: 1/24/2025 - 1/28/2025

### Proctoring:

- Microsoft Teams meeting with screen share to observe provider testing activities of certified criteria through WITS unassisted.

## JUSTIFICATION FOR METHODOLOGY

WITS obtained 2015 Edition ONC certification in 2019 at the request of one of our WITS customers, the Tennessee Department of Mental Health and Substance Abuse Services (TN). Since deploying ONC-mandated functionality to our customer, TN continues to assert that they do not use the ONC data collection screens and interoperability capabilities (CCDA-related) to conduct business. Therefore, as was the case in the 2023 test period, there is no production data that can be used as a representation of ONC client data collection or interoperability for 2024 Real World Testing. For this reason, we have simulated near-production client data in our public-facing Real World Testing environment. This means we created client records for Real World Testing that have elements of real client data. They cannot be tied back to any existing private health information (PHI) or personally identifiable information (PII).

FEI Systems deployed WITS Version 24 to production during the 2024 calendar year. We submitted a request to our ONC-ACB Drummond Group to update our CHPL listing to Version 24 and were advised that we would need to complete ICS testing before this update could be made. However, due to a connection issue with third-party software NewCrop, on which we rely for e-prescribing functionality, we were not able to complete ICS testing and update our CHPL listing to Version 24 before the 2024 Real World Testing report deadline. As a result, although WITS Version 23 is still the current version listed on CHPL, we completed our 2024 Real World Testing in a Version 24 Real World Testing environment. There was no change to ONC-certified functionality between WITS Versions 23 and 24. The NewCrop connection issue has since been resolved.

To test the publicly available APIs that satisfy the (g)(9) criteria, a WITS team member used a 3<sup>rd</sup> party API tool called Postman.com, which a client can run on their home computer or other internet-enabled device. After some discussion, it was agreed that there was no suitable candidate external to FEI with the necessary technical skills that was available at no cost to test the criteria using the tool. Therefore, one of our staff tested the APIs to satisfy the testing criteria. The testing process is described in the section for Measure 4.

None of our customers have a MIPS reporting requirement. Because of this, we have not updated the Documentation of Current Medications in the Medical Record QRDA report (CMS68) XML from version 8 to the current version because our customers have no need for it.

Versions 23 and 24 of WITS continued to support the 2015 Edition criteria on the WITS CHPL listing for the 2024 calendar year even though TN was not using the functionality. The ONC modules in WITS are currently not enabled for any other customers. We anticipate that more customers will request ONC functions in the future because of the 2015 Cures Act updates to our product.

## Measures Used In Testing

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## DESCRIPTION OF MEASUREMENT/METRIC

The Measure/Metrics and the Descriptions listed below apply to the simultaneous and seamless use of the functionality of the applicable certified measures mentioned in Table 1. FEI identified the following metrics and descriptions in the 2024 Real World Test plan.

Measurement/Metric	Description
<p><b>Measure 1:</b> Clinician logs into WITS and receives a C-CDA from a referring provider via Direct Protocol with no Tech Support and no errors. C-CDA has demographic information adjusted so PHI is not visible. Successful receipt of C-CDA is achieved and observed.</p>	<p>Clinician begins a new patient encounter in the WITS certified software with a patient referred by another clinician. With a Direct Address and unique Updox credentials the clinician is able to have a seamless login and secure receipt of C-CDA from the referring clinician using the Direct Protocol. The USCDI version 1 standard will be demonstrated in these transactions through screenshots collected. Log files are also captured. These will all show the successful receipt of the C-CDA with all fields completed and arranged per provider preference. This will meet § 170.315(b)(1) (Receive).</p>
<p><b>Measure 2:</b> Documentation of Medications (CQM68) is done without assistance. No errors are expected.</p>	<p>The clinician documents medications (CQM68) within appropriate location in the WITS software to meet 170.315(c)(1) by completing the appropriate fields as they document the patient’s medications on the date of the encounter in WITS software. It will be later reflected in the numerator and denominator of this MIPS CQM measure and the generation of a QRDA file format.</p>
<p><b>Measure 3:</b> Updated C-CDA is sent back to referring partner. Successful sending of CCDA is achieved and observed.</p>	<p>Clinician sends updated C-CDA with minimal delay back to referring clinician via Direct Protocol (Updox). Updated C-CDA is also sent to the patient portal. Confirmation of sent C-CDA is captured along with log files. This will meet § 170.315(b)(1) (Send).</p>
<p><b>Measure 4:</b> The patient will have the ability to access (by authentication) either partial or full encounter summaries by way of an API call from a 3<sup>rd</sup>-party application running on a patient-owned device to the API of the EHR.</p>	<p>This same patient will be enabled to present their authenticated credentials to use a 3rd-party application running on a patient-owned device to access either partial encounter summary data or a full encounter summary. They will have the ability to view and or transmit their information as they see fit. This will meet § 170.315 (g)(9).</p>

## ASSOCIATED CERTIFICATION CRITERIA

Measurement/Metric	Associated Certification Criteria
Measure 1	§ 170.315(b)(1) Transitions of care - Receive
Measure 2	§ 170.315(c)(1) CQM – Record and Export
Measure 3	§ 170.315(b)(1) Transitions of care - Send

Measure 4	§ 170.315 (g)(9) API
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## Test Results

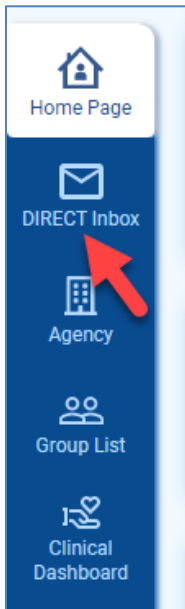
### SUMMARY OF FINDINGS

The below summary of findings is supported by the detailed screenshots of tasks as shown in the sections on measures.

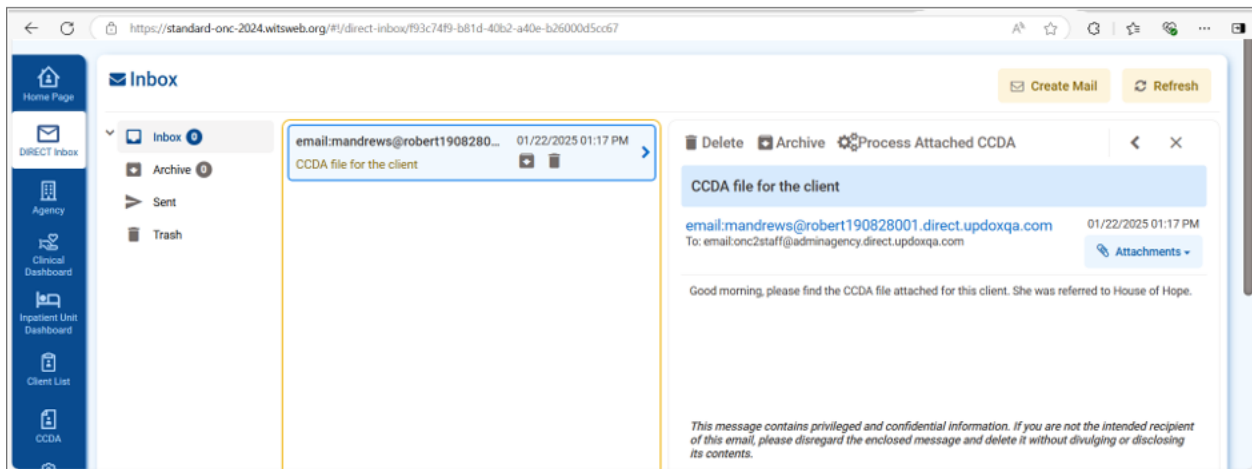
Measure 1: § 170.315(b)(1) (Receive)	<p>The testers successfully:</p> <ul style="list-style-type: none"> <li>Opened a secure DIRECT message from a provider in another WITS agency that included a copy of the referral and CCDA of a client.</li> <li>Processed the CCDA received in the DIRECT message and linked it to the client record to view the CCDA in human readable format.</li> </ul>
Measure 2: 170.315(c)(1)	<p>The testers successfully:</p> <ul style="list-style-type: none"> <li>Opened client records and reviewed client's medications history of Client Profile\Medication History.</li> <li>Navigated to Activity List\Encounters screen.</li> <li>Opened client encounter for Individual Counseling and checked the indicator for Medication(s) Documented.</li> <li>Navigated to menu Agency\CQM Reporting in the main WITS menu.</li> <li>Entered parameters and generated the XML QRDA Report.</li> </ul>
Measure 3: § 170.315(b)(1) (Send)	<p>The testers successfully:</p> <ul style="list-style-type: none"> <li>Navigated to Activity List\Encounters screen.</li> <li>Opened client encounter for Individual Counseling.</li> <li>Entered a signed note.</li> <li>Created a DIRECT message from the encounter to send the Encounter Summary CCDA and consent form to a provider in another agency.</li> <li>Navigated to DIRECT Message inbox on the WITS main menu and verified in the Sent box that the message was sent to the provider in another agency.</li> </ul>
Measure 4: § 170.315 (g)(9)	<p>Using 3<sup>rd</sup> party software Postman.com and the public API documentation, the tester successfully retrieved:</p> <ul style="list-style-type: none"> <li>A user token to run (g)(9) APIs.</li> <li>A full Summarization of Episode Note for the specified client (g)(9).</li> </ul>

### MEASURE 1 (B)(1)

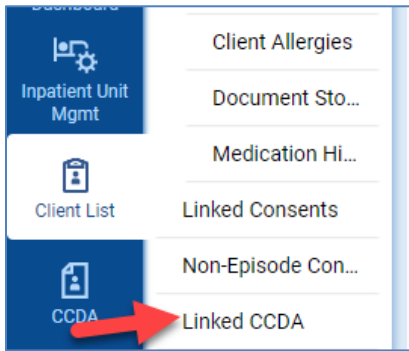
- From the Home page, testers chose menu DIRECT Inbox from the left-hand menu. Each tester had a dedicated DIRECT Message email address and inbox prepared.



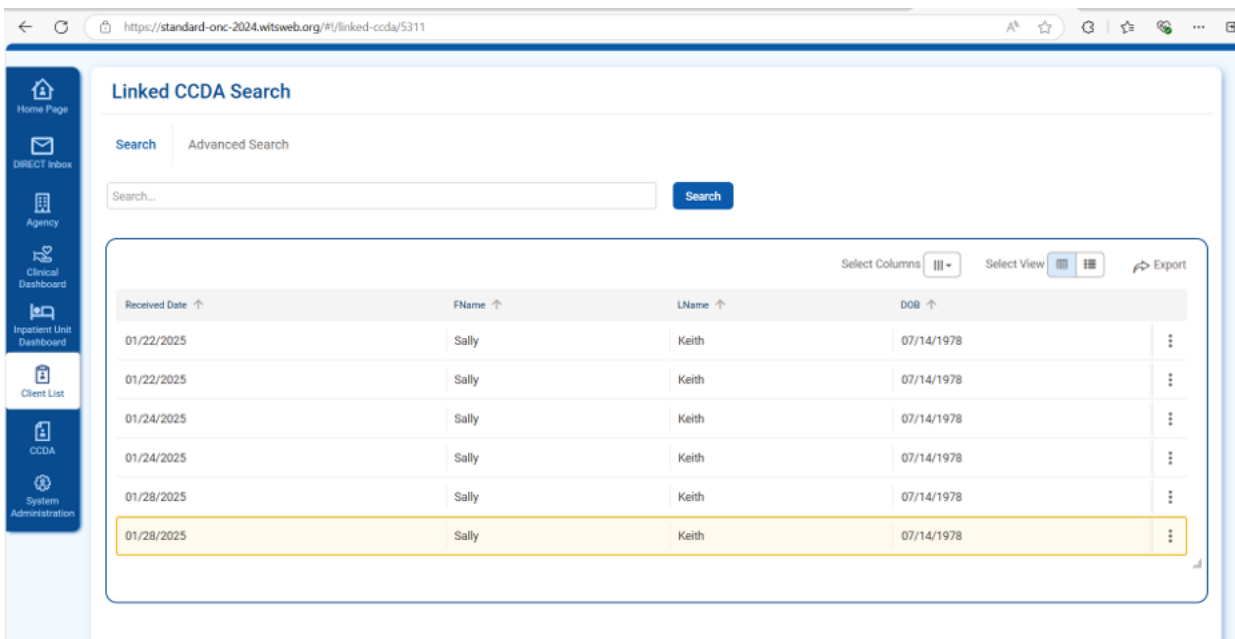
- In the Inbox view, the tester opened the email from Agency Robert Direct Agency by double-clicking it. The email showed in the right-hand email pane. It contained the CCDA (EHR) file for a client referred to Agency House of Hope, LLC via a consent document.
  - Tester 1: client Martha Jones, client ID - J613824SN392554
  - Tester 2: client Sally Keith, client ID - J183213IO291554
- The tester clicked the gears icon to process the CCDA file in WITS and link it to the client's record.



- The tester navigated back to the client record to view the consumed CCDA file through menu Linked CCDA.



- The tester was able to verify that a linked CCDA record was created.



- The user clicked the View button to open the human-readable CCDA file in a new tab.

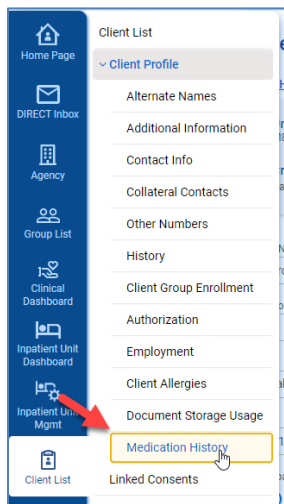
<b>Patient</b>	Name: Sally Keith		<b>Sex</b>	Female
<b>Date of birth</b>	July 14, 1978		<b>Race</b>	Race: Unknown
<b>Preferred Language</b>	English ( en )		<b>Ethnicity</b>	Ethnicity: Unknown
<b>Contact info</b>	Current Address: 8710 Chestnut St, Sykesville, MD 21784, US  Previous Address: 8710 Chestnut St, Sykesville, MD 21784, US (Primary Home):		<b>Patient IDs</b>	718321310291554 78981EFD-4E0C-455B-BFEB-6645A8BC0957
<b>Document Id</b>	80323e7e-bad4-4140-abel-0c9e71394a4f 78981EFD-4E0C-455B-BFEB-6645A8BC0957			
<b>Document Created:</b>	January 22, 2025, 19:17:51			
<b>Performer (primary care physician)</b>	Molly Andrews of Robert Direct Agency			
<b>Contact info</b>	19082801 Agency Admin Office Way Columbia, Maryland 21046, US (Work Place): tel:(190) 828-9001			
<b>Author</b>				
<b>Contact info</b>				
<b>Encounter Location</b>	Roberts Direct Facility			
<b>Document maintained by</b>	Robert Direct Agency			
<b>Contact info</b>	Work Place: 19082801 Agency Admin Office Way Columbia, Maryland 21046, US (Work Place): tel:(190) 828-9001			
<b>Information recipient:</b>				

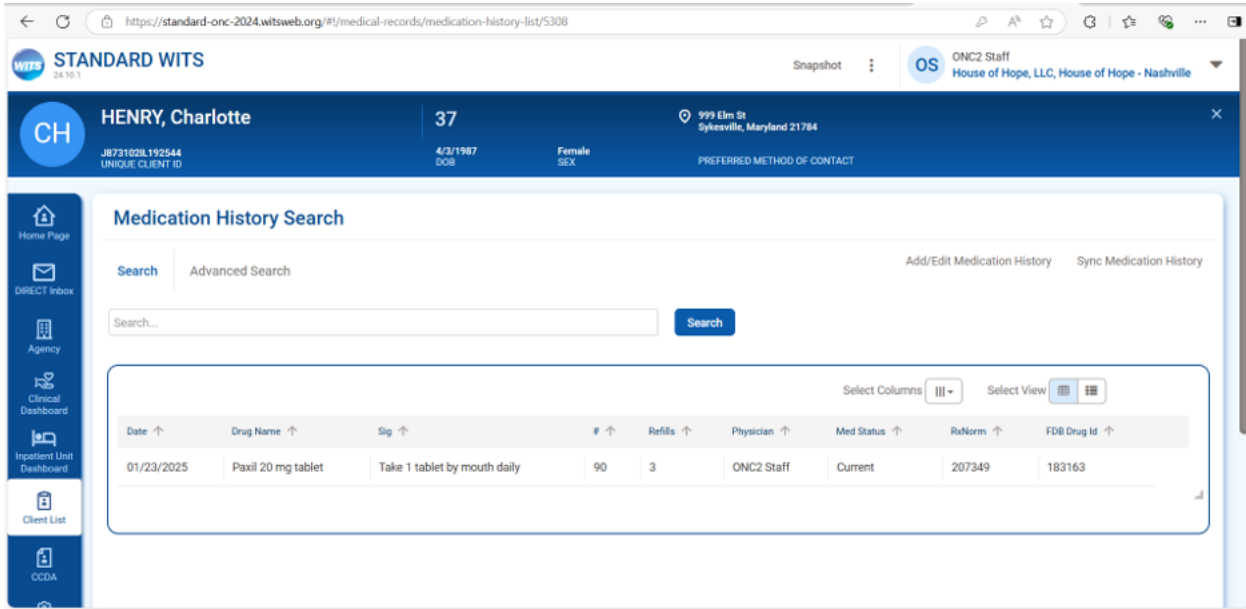
**Table of Contents**

- CHIEF COMPLAINT
- ALLERGIES, ADVERSE REACTIONS
- IMMUNIZATIONS
- MEDICATIONS
- MEDICATIONS ADMINISTERED PER TIME PERIOD

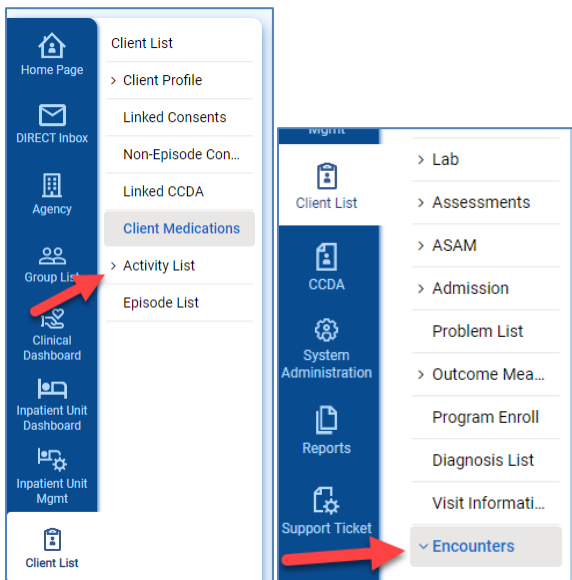
## MEASURE 2 (C)(1)

- From the Home page, testers navigated to the Medication History menu under Client Profile to open the Medication History screen and reviewed the listed medications for each client.
  - Tester 1: client Charles Jackson, client ID - Q293504EN193554
  - Tester 2: client Charlotte Henry, client ID - J913264EA571544





- Testers navigated to the Encounters screen for each client to document that they reviewed medication.



- Testers opened the Encounter for each client with the service “**Individual Counseling**”.

standard-onc-2024.witsweb.org/#/

WITS STANDARD WITS 24101

Generate Report Snapshot OS ONC2 Staff House of Hope, LLC, House of Hope - Nashville

**CH HENRY, Charlotte** 37 999 Elm St Sykesville, Maryland 21784

J873102IL192544 UNIQUE CLIENT ID 1 CASE # 4/3/1987 DOB Female SEX PREFERRED METHOD OF CONTACT

Client List

Home Page

DIRECT Inbox

Agency

Clinical Dashboard

Inpatient Unit Dashboard

Client List

CCDA

System Administration

Client Profile

Linked Consents

Non-Episode Con...

Linked CCDA

Client Medications

Activity List

Intake

Lab/Radiology

Tx Team

Screening

Lab

Assessments

ASAM

Admission

Problem List

Outcome Mea...

Program Enroll

Encounter

Hide Context Information

ENC ID	Created By	Created Date	Updated By	Updated Date
3553	Staff, ONC2	1/23/2025 3:30 PM	Staff, ONC2	1/28/2025 2:13 PM

Rendering Staff: Staff, ONC2

Note Type: Case Management Note

Billable:  Yes  No

Program Name: House of Hope - Nashville/Alcohol Addiction Services - 1/16/2025 -

Service: Individual Counseling

Start Date: 1/23/2025 End Date: Start Time: 2:00 PM End Time: 3:00 PM

- Testers clicked the ‘Yes’ indicator for the field Medication(s) Documented. This indicator represents that the provider reviewed the list of current medications for the client.

HENRY, Charlotte UCN J873102IL192544 CASE# 1 37 Female

Encounter ...

Services

Immunization

Procedures

Functional Sta...

Notes

Treatment

Continuing Care

Discharge

Consent

Service Location: Ambulance - Air or Water

Emergency:  Yes  No

Pregnant:  Yes  No

Which Medication-Assisted Treatments were used?

Medication-Assisted Treatments

- Alcohol Use Disorder - Acamprosate
- Alcohol Use Disorder - Disulfiram
- Alcohol Use Disorder - Naltrexone - Injectable (e.g., Vivitrol®)
- Alcohol Use Disorder - Naltrexone - Oral
- Alcohol Use Disorder - Bupropion - Injectable (e.g., Subloxyde)

Used Medication-Assisted Treatments

Medication(s) Documented:  Yes  No

Medication(s) Not Documented Reason

- The testers navigated to the Agency\CQM Reporting menu in WITS.
- The testers entered parameters to run the eCQM report “Documentation of Current Medications in the Medical Record CMS68v8”.

## Clinical Quality Measure Reporting

[Edit](#)    

## Clinical Quality Measure Reporting

## Clinical Quality Measure Reporting

Agency  
House of Hope, LLCStaff  
Staff, ONC2Reporting Period from  
01/01/2025Reporting Period to  
12/31/2025eCQM(s)  
-- Export All Clients

Agency

House of Hope, LLC

Staff

Staff, ONC2

Reporting Period from

1/1/2025

Reporting Period to

12/31/2025

eCQM(s)

Q

No matches found

Q

Documentation of Current Medications in the Medical Record CMS68v8

 Export All Clients

- The users downloaded and opened the report to view the QRDA XML.

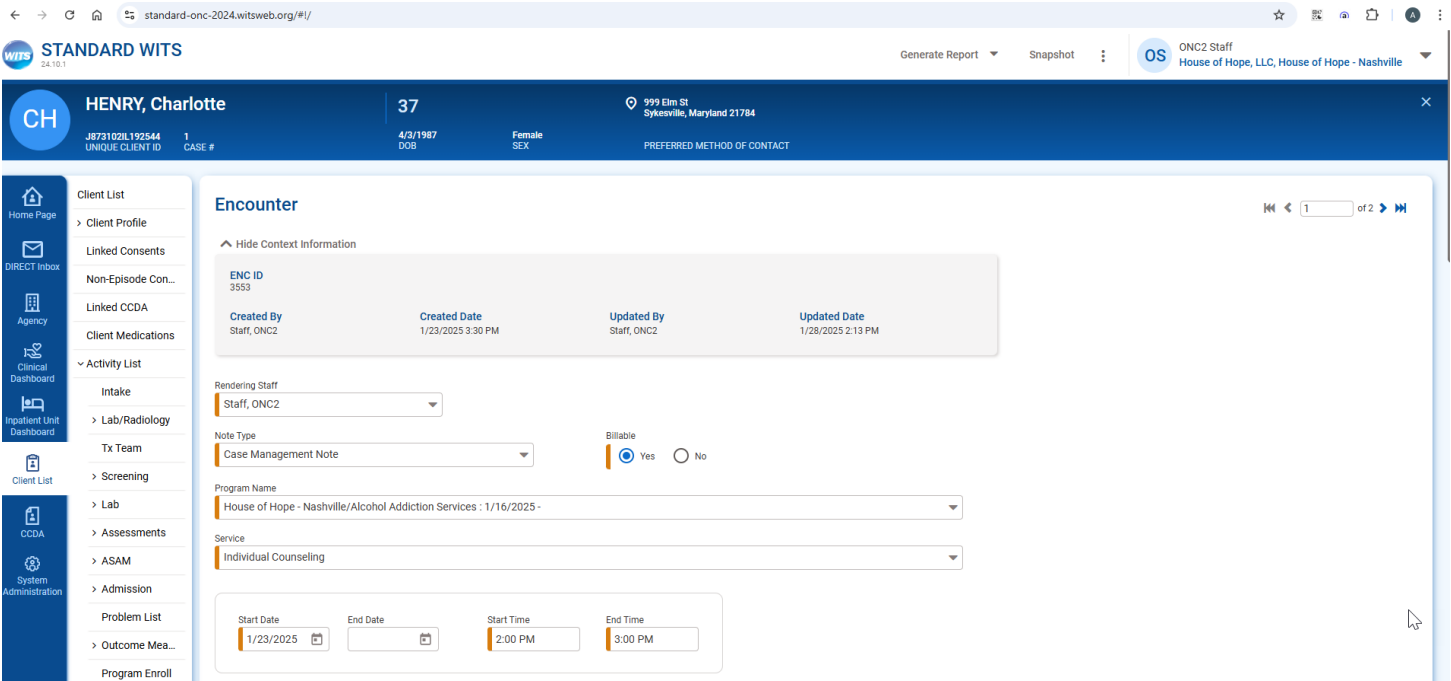
```

This XML file does not appear to have any style information associated with it. The document tree is shown below.
<<ClinicalDocument xmlns="urn:h17-org:v3" xmlns:sdtc="urn:h17-org:sdtc" xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xmlns:voc="urn:h17-org:v3/voc">
  <realmCode code="US"/>
  <typeId root="2.16.840.1.113883.1.3" extension="PCOD_HD000040"/>
  <templateId root="2.16.840.1.113883.10.20.22.1.1" extension="2015-08-01"/>
  <templateId root="2.16.840.1.113883.10.20.24.1.1" extension="2017-08-01"/>
  <templateId root="2.16.840.1.113883.10.20.24.1.2" extension="2017-08-01"/>
  <templateId root="2.16.840.1.113883.10.20.24.1.3" extension="2018-02-01"/>
  <id root="bf27a91d-1b1f-4596-b65f-8cc0095e6827"/>
  <code code="55182-0" codeSystem="2.16.840.1.113883.6.1" codeSystemName="LOINC" displayName="Quality Measure Report"/>
  <title>QRDA Incidence Report</title>
  <effectiveTime value="20250128193559"/>
  <confidentialityCode code="N" codeSystem="2.16.840.1.113883.5.25"/>
  <languageCode code="eng"/>
  <recordTarget>
    <patientRole>
      <id root="Standard" extension="J8731021L192544"/>
      <addr>
        <streetAddressLine>999 Elm St</streetAddressLine>
        <city>Sykesville</city>
        <stateMD</state>
        <postalCode>21784</postalCode>
        <country>US</country>
      </addr>
      <telecom value="(777) 777-7777"/>
    </patientRole>
    <patient>
      <name>
        <given>Charlotte</given>
        <family>Henry</family>
      </name>
      <administrativeGenderCode codeSystem="2.16.840.1.113883.5.1" codeSystemName="HL7 AdministrativeGender" code="F"/>
      <birthTime value="19870403"/>
      <raceCode codeSystemName="CDC Race and Ethnicity" codeSystem="2.16.840.1.113883.6.238" nullFlavor="ASKU"/>
      <ethnicGroupCode codeSystemName="CDC Race and Ethnicity" codeSystem="2.16.840.1.113883.6.238" nullFlavor="ASKU"/>
      <languageCommunication>
        <templateId root="2.16.840.1.113883.3.88.11.83.2" assigningAuthorityName="HITS/C83"/>
        <templateId root="1.3.6.1.4.1.19376.1.5.3.1.2.1" assigningAuthorityName="IHE/PCC"/>
        <languageCode code="en"/>
      </languageCommunication>
    </patient>
  </recordTarget>
  <author>
    <time value="20250128193559"/>
    <assignedAuthor>
      <id root="2.16.840.1.113883.4.6" assigningAuthorityName="NPI" extension="9876543213"/>
    </assignedAuthor>
  </author>
</ClinicalDocument>

```

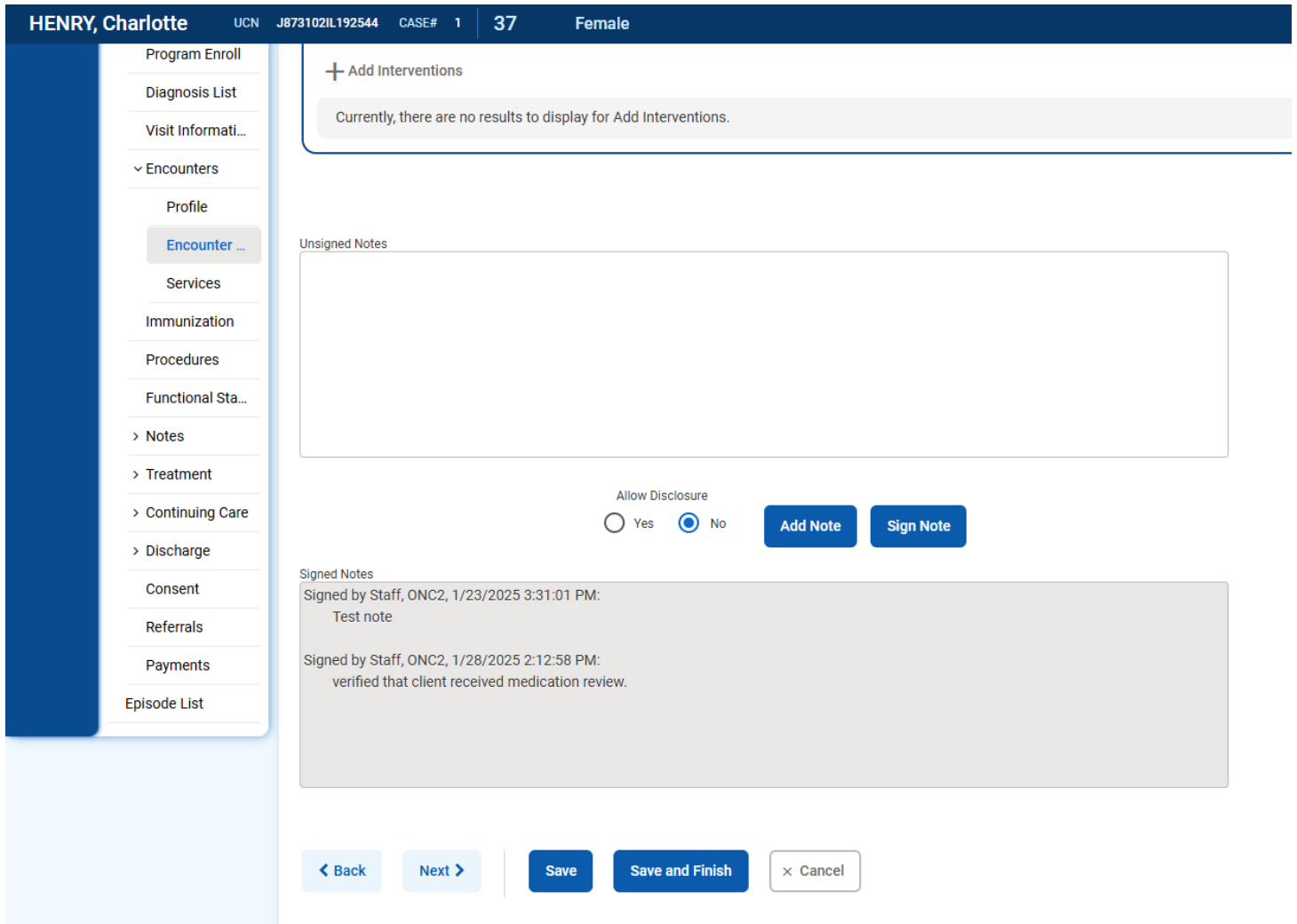
### MEASURE 3 (B)(1)

- Testers navigated back to the Encounter screen for each client and chose the encounter that represented Individual Counseling.

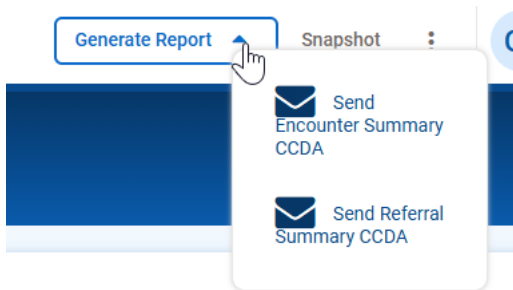


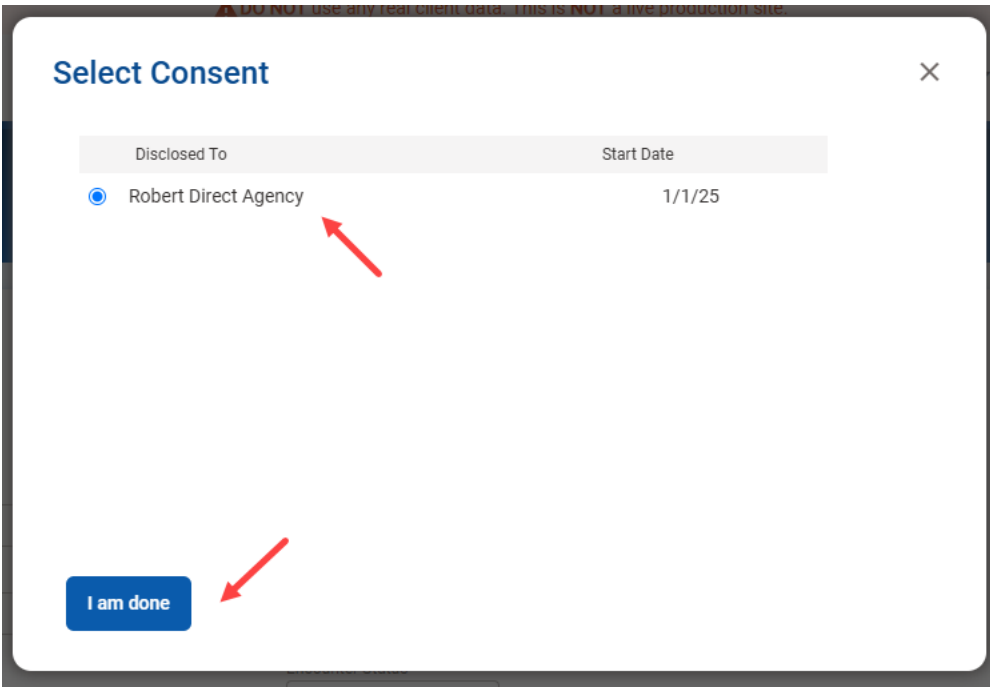
The screenshot shows the STANDARD WITS web application interface. At the top, the user is logged in as 'OS ONC2 Staff' at 'House of Hope, LLC, House of Hope - Nashville'. The main header displays the client's name 'HENRY, Charlotte', age '37', and address '999 Elm St, Sykesville, Maryland 21784'. Below this, the 'Encounter' screen is active, showing details for an encounter with ENC ID 3553, created on 1/23/2025 at 3:30 PM. The rendering staff is 'Staff, ONC2'. The note type is 'Case Management Note', and the program name is 'House of Hope - Nashville/Alcohol Addiction Services - 1/16/2025'. The service is 'Individual Counseling', which occurred on 1/23/2025 from 2:00 PM to 3:00 PM. A sidebar on the left contains navigation options like 'Client List', 'Client Profile', 'Linked Consents', and 'Activity List'.

- On the second screen of the Encounter, the tester entered a note for the encounter in the Unsigned Notes field then transferred it to the Signed Notes field. This allows the user to send a DIRECT Message to another provider for either a CCDA Summary file or CCDA Referral Notes file.

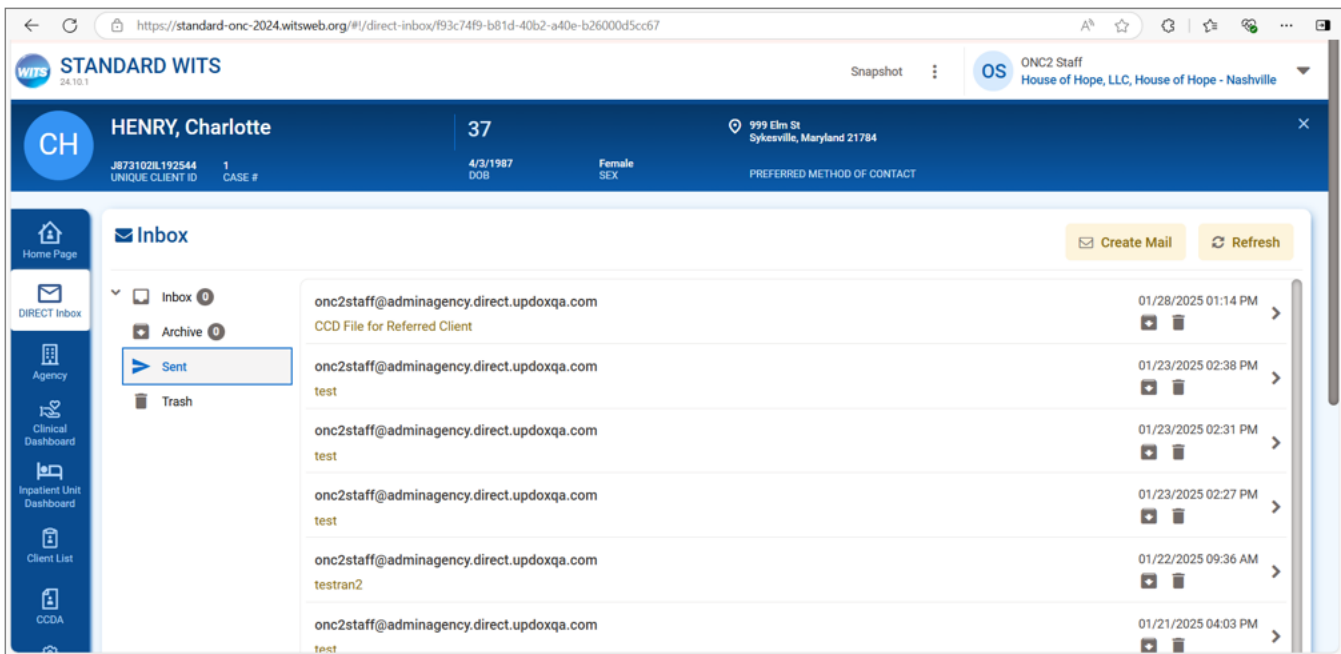


- The tester then created a DIRECT Message for an Encounter Summary CCDA. The testers chose a consent on file that allows the tester to send the file. This consent was attached to the message.





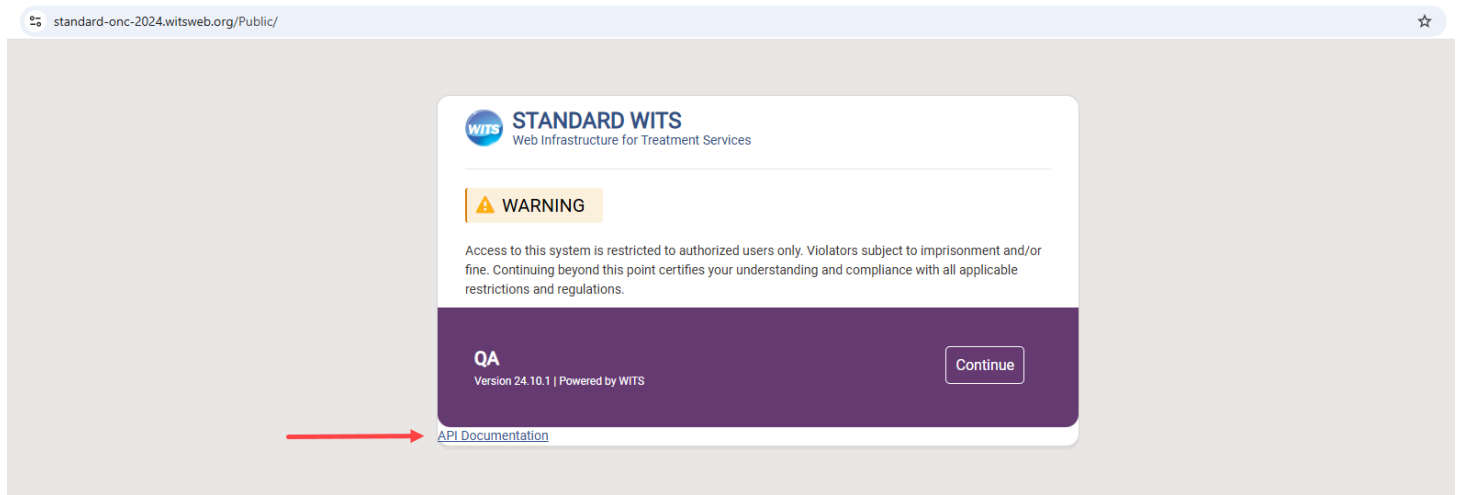
- The testers confirmed that the message was sent in their DIRECT Message Sent folder.



## MEASURE 4 (G)(9)

### *Public API Documentation*

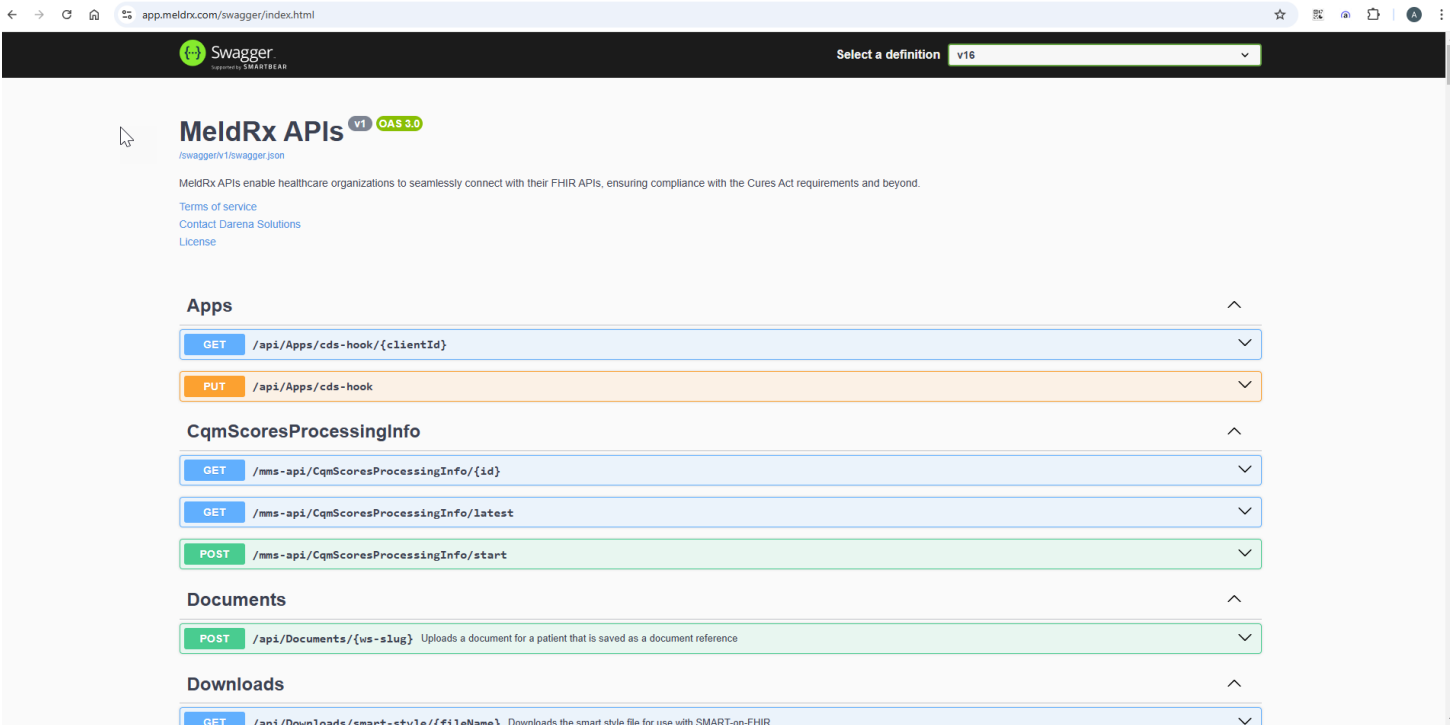
At the landing page for the public WITS site <https://standard-onc-2024.witsweb.org/Public/>, the tester clicked on the link for API Documentation.



The page that displayed is the API documentation for using the following APIs to obtain:

- An authorization token
- A patient selection request
- All Data Request (g)(9)

These APIs are provided by our vendor Darena Solutions, maker of the MeldRx product (formerly known as BlueButtonPRO).



Swagger  
Select a definition v16

## MeldRx APIs v1 OAS 3.0

/swagger/v1/swagger.json

MeldRx APIs enable healthcare organizations to seamlessly connect with their FHIR APIs, ensuring compliance with the Cures Act requirements and beyond.

[Terms of service](#)  
[Contact Darena Solutions](#)  
[License](#)

### Apps

- GET /api/Apps/cds-hook/{clientId}
- PUT /api/Apps/cds-hook

### CqmScoresProcessingInfo

- GET /mms-api/CqmScoresProcessingInfo/{id}
- GET /mms-api/CqmScoresProcessingInfo/latest
- POST /mms-api/CqmScoresProcessingInfo/start

### Documents

- POST /api/Documents/{ws-slug} Uploads a document for a patient that is saved as a document reference

### Downloads

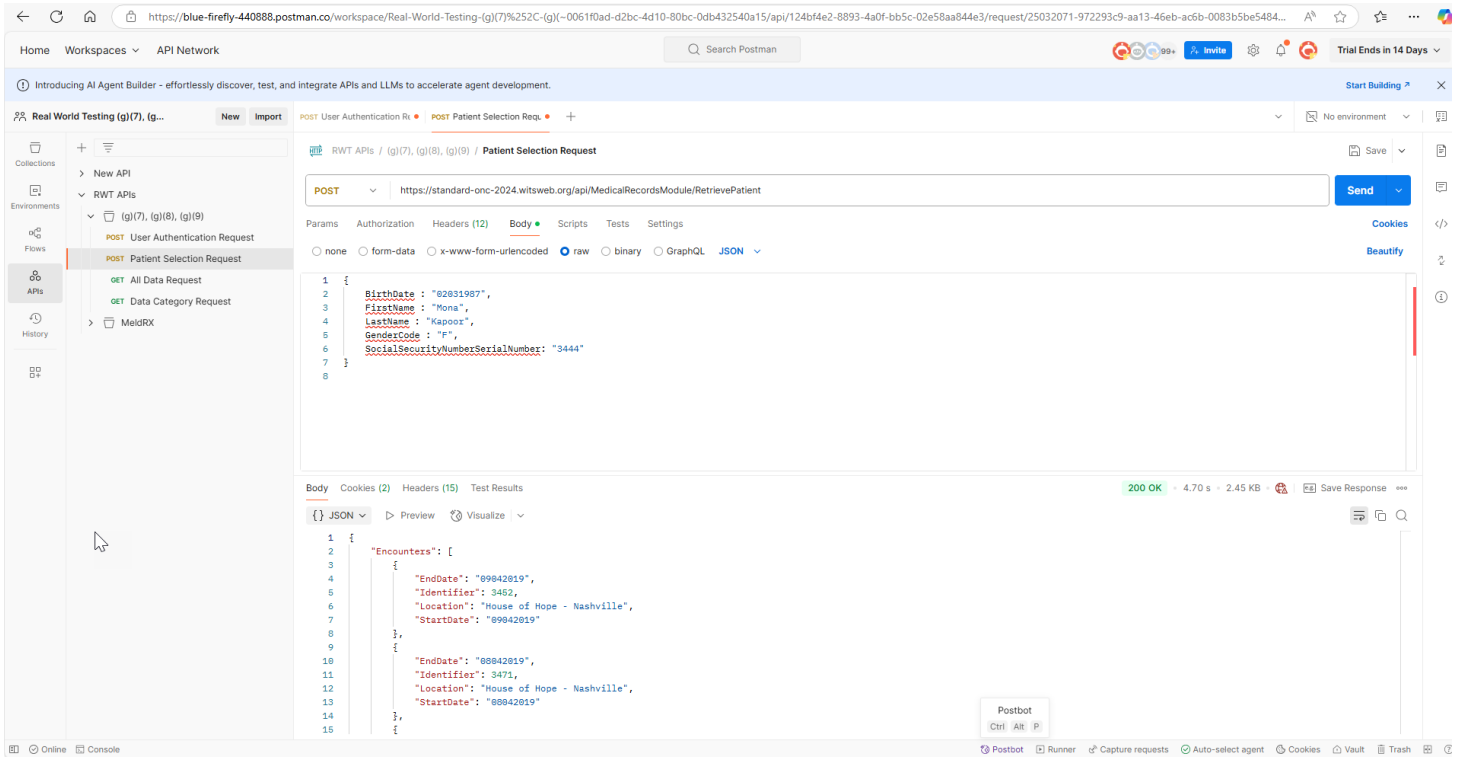
- GET /api/Downloads/smart-style/{fileName} Downloads the smart style file for use with SMART-on-FHIR

### *User Authentication Request*

The tester logged into Postman.com and logged into the website. Using the public API documentation mentioned above, the tester created a POST call to the User Authentication Request API to authorize an existing user (taking in a username and password) to the security server and obtain a security token. The parameters used were entered in the Body of the API per the requirements of the Postman application. Note: the security server URL is blurred for security purposes but can be obtained by contacting FEI as this is a public document.

Clicking Send resulted in the creation of a token, highlighted here. The tester copied this token to use for the other API calls.





The screenshot shows a Postman interface for a REST client. The active request is a POST to `https://standard-onc-2024.witsweb.org/api/MedicalRecordsModule/RetrievePatient`. The request body is a JSON object:

```

1 {
2   "BirthDate": "02031987",
3   "FirstName": "Mona",
4   "LastName": "Kapoor",
5   "GenderCode": "F",
6   "SocialSecurityNumberSerialNumber": "3444"
7 }
8

```

The response is a 200 OK status with a JSON payload:

```

1 {
2   "Encounters": [
3     {
4       "EndDate": "09042019",
5       "Identifier": "3452",
6       "Location": "House of Hope - Nashville",
7       "StartDate": "09042019"
8     },
9     {
10      "EndDate": "09042019",
11      "Identifier": "3471",
12      "Location": "House of Hope - Nashville",
13      "StartDate": "09042019"
14    }
15  ]
16 }

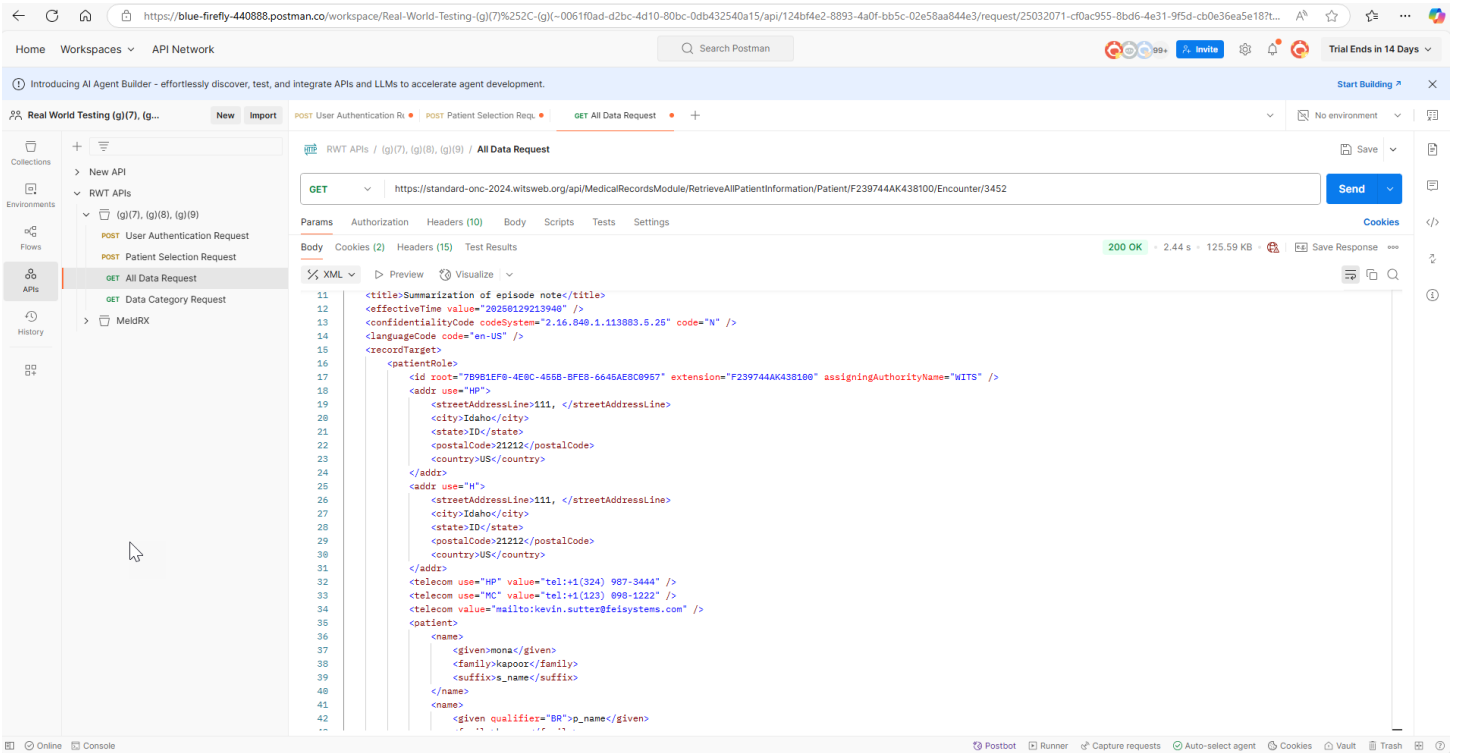
```

### All Data Request (g)(9)

This API may be used to retrieve all data elements from the clinical data set for a patient, taking in the patient token (unique client number) and an encounter identifier. The user’s token is also required. If the clinical data set corresponding to the input information is found, then the XML payload representing the contents of the patient's CCDA data will be returned.

The tester created a GET API request according to what Postman.com requires and the public API documentation. In the Header section, the tester pasted the user token from the User Authentication Request into the X-Auth-Token Header. The tester then pasted the clients UCN and one of the Encounter IDs gotten from the results of the Patient Selection Request API into the URL of the GET request.

The All Data Request API call generated a full “Summarization of episode note” CCDA for the client as shown below.



The screenshot shows the Postman interface with a GET request to the URL `https://standard-onc-2024.witsweb.org/api/MedicalRecordsModule/RetrieveAllPatientInformation/Patient/F239744AK438100/Encounter/3452`. The response is an XML document with the following structure:

```
11 <title>Summarization of episode note</title>
12 <effectiveTime value="20269129213940" />
13 <confidentialityCode codeSystem="2.16.840.1.113883.5.25" code="N" />
14 <languageCode code="en-US" />
15 <recordTarget>
16 <patientRole>
17 <id root="7B981EF8-4E9C-456B-BF68-6645AE8C0957" extension="F239744AK438100" assigningAuthorityName="WITS" />
18 <addr use="HP">
19 <streetAddressLine>111, </streetAddressLine>
20 <city>Idaho</city>
21 <state>ID</state>
22 <postalCode>21212</postalCode>
23 <country>US</country>
24 </addr>
25 <addr use="H">
26 <streetAddressLine>111, </streetAddressLine>
27 <city>Idaho</city>
28 <state>ID</state>
29 <postalCode>21212</postalCode>
30 <country>US</country>
31 </addr>
32 <telecom use="HP" value="tel:+1(324) 987-3444" />
33 <telecom use="MC" value="tel:+1(123) 098-1222" />
34 <telecom value="mailto:kevin.suttles@feisystems.com" />
35 <patient>
36 <name>
37 <given>mona</given>
38 <family>kapoor</family>
39 <suffix>s_name</suffix>
40 </name>
41 <name>
42 <given qualifier="BR" p_name</given>
```

## Attestation

The Real World Testing activities and results are complete and documented herein for the 2024 test year, which included the applicable measures that address all certification criteria listed. All information in this results document is up-to-date and fully addresses the health IT developer's Real World Testing requirements as determined by the 2024 Real World Test plan. Any deviations from the 2024 Real World Test plan have been addressed in the Justifications section.

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