FEI Systems

Connecting Every Dimension of Health and Human Services

WITS Requirements Document

2025 Real World Test Results

Created by: WITS Business Analysis Team

Dated: 2/25/2026

FEI Systems | 10980 Grantchester Way | Suite 370| Columbia, Maryland 21044
tel: (443) 270-5100 fax: (410) 715-6538 | www.FEIsystems.com

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Real World Test Results

For Criteria §170.315 (g)(7) and §170.315 (g)(9)

General Information

Plan Report ID Number: 2025RWTResults_Ver1.1

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 2025 Real World Testing are:

TABLE 1

§170.315 (g)(7)
§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 23.8.1. Clients in this environment have realistic client data based on elements of current clients.
- Public API testing tool Postman.com.

Testers:

- Allison Robertson, FEI Systems (External API testing for (g)(7,9))

Timeline of Key Testing Milestones

Key Milestone	Date/Timeframe
Created a public-facing production-like instance of ONC certified WITS version 23.8.1 for Real World Testing	Mid December 2025-Mid January 2026
Created synthetic client records containing CCDA data in Real World Testing instance	January 13-14, 2026
Performed (g)(7) and (g)(9) API testing in Postman using test client records	January 15-20, 2026
Analysis of API testing results	January 20-23, 2026

Composed Real World Test results report	January 23-29, 2026
Submitted Real World Test results report to ACB	February 6, 2026

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. ONC-mandated functionality was enabled in 2025 for another WITS customer, the State of Alaska Department of Health (AK); however, as of January 2026, they have asserted that they are not using the functionality either. Therefore, as was the case in the 2024 test period, there is no production data that can be used as a representation of ONC client data collection or interoperability for 2025 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).

Our 2025 Real World Test plan originally included additional measures to test criteria § 170.315(b)(1) (Send), § 170.315(b)(1) (Receive), and 170.315(c)(1). We were notified in July 2025 that, pursuant to EO 14192, ASTP/ONC would be exercising enforcement discretion related to certain Real World Testing requirements and that we would only be required to submit test results for criteria§170.315 (g)(7) and §170.315 (g)(9). As a result, we are not submitting test results for Measures 1-3 and 5 of our 2025 Real World Test plan.

To test the publicly available APIs that satisfy the (g)(7) and (g)(9) criteria, a WITS team member used a 3rd party API tool called Postman.com, which a client can run on their home computer or other internet-enabled device. We reached out to our customers with ONC-certified WITS instances via email to inquire about their willingness and availably to assist

with testing. Our customers advised us that, although they were willing to assist with testing certified functionality in the WITS interface as needed, they did not have any staff resources available with the technical knowledge to perform API testing. Therefore, one of our staff tested the APIs to satisfy the testing criteria. All API responses were validated against the corresponding client records in the WITS interface to objectively verify that accurate results were returned for each test client. 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.

On guidance from Drummond Group, we performed 2025 Real World Testing in a WITS version 23 environment, as this is the version currently certified on CHPL.

Version 23 of WITS continued to support the 2015 Edition criteria on the WITS CHPL listing for the 2025 calendar year even though neither TN nor AK was 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

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 2025 Real World Test plan.

Measurement/Metric	Description

Measure 4: Using public API documentation, users will retrieve a user token to run (g)(7) and (g)(9) APIs. They will then retrieve a list of encounters and Unique Client Number for a specific simulated patient ((g)(7)) and a full Summarization of Episode Note for the same simulated patient ((g)(9)). This test will be repeated for four different simulated patients. The measure will report on the count of successful retrievals.	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)(7,9).

Associated Certification Criteria

Measurement/Metric	Associated Certification Criteria
Measure 4	§ 170.315 (g)(7,9) API

Test Results

Summary Of Findings

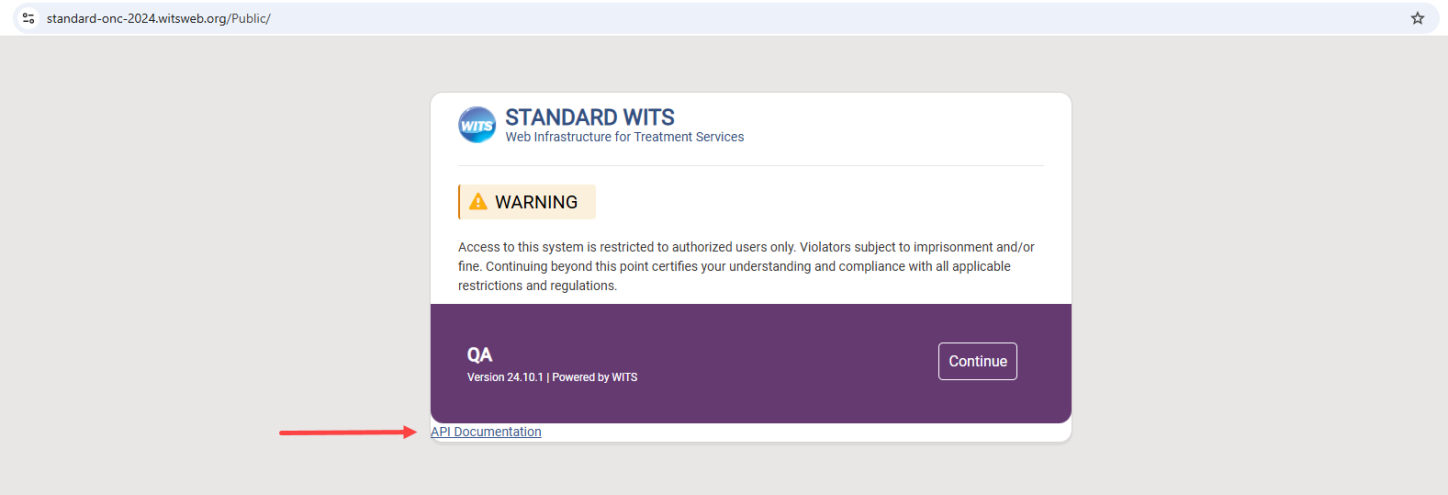
The below summary of findings is supported by the detailed screenshots of tasks as shown in the sections on measures.

Measure 4: § 170.315 (g)(7,9)	Using 3rd party software Postman.com and the public API documentation, the tester successfully retrieved: • A user token to run (g)(7,9) APIs. • The list of encounters and Unique Client Number for 4/4 simulated clients (g)(7). • A full Summarization of Episode Note for 4/4 simulated clients (g)(9).

Measure 4 (g)(7) and (g)(9)

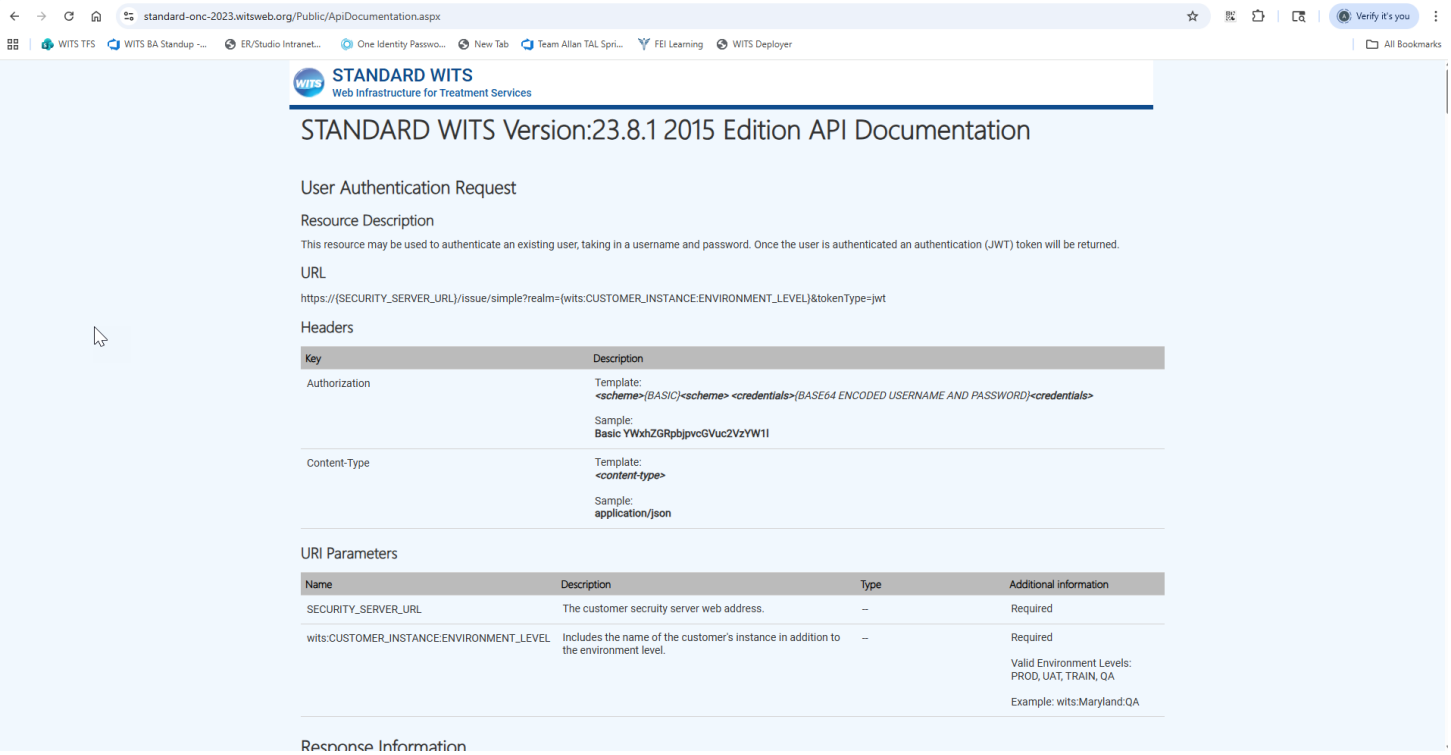
Public API Documentation

At the landing page for the public WITS site https://standard-onc-2023.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 (g)(7)
- All Data Request (g)(9)

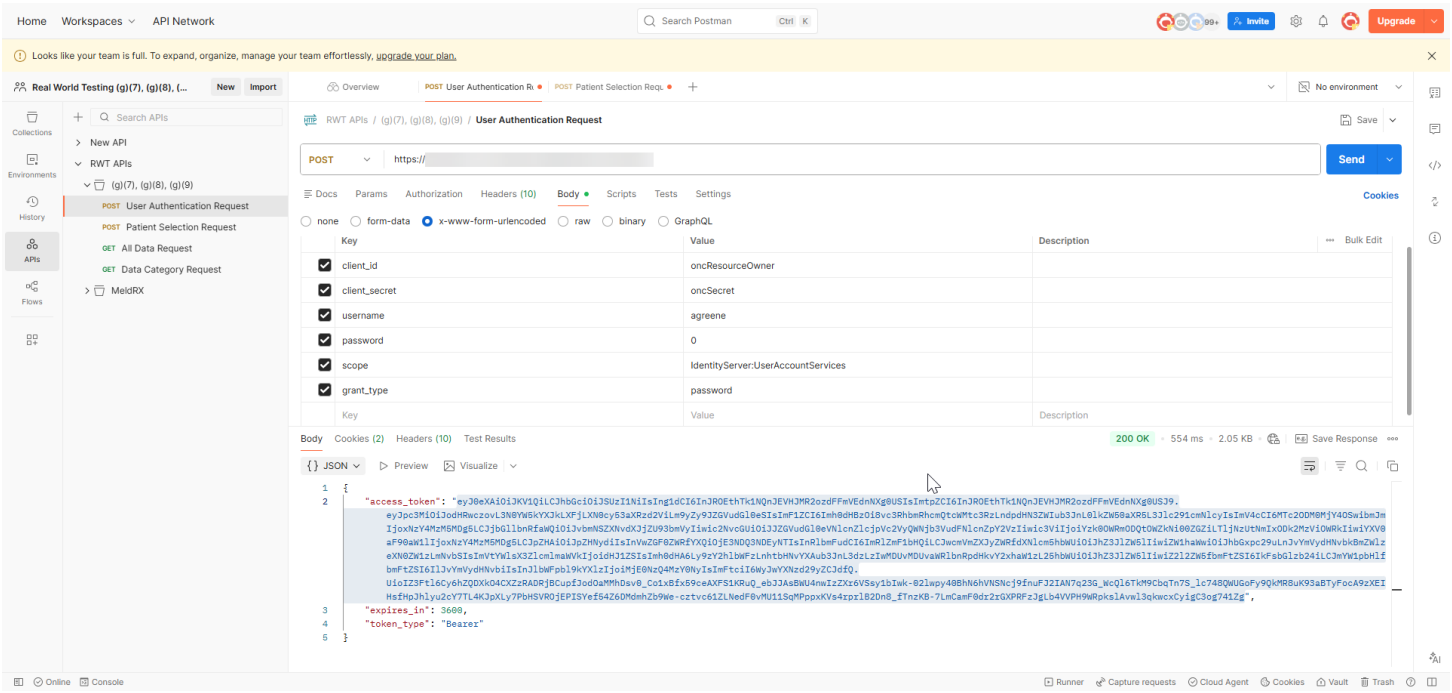


User Authentication Request

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.



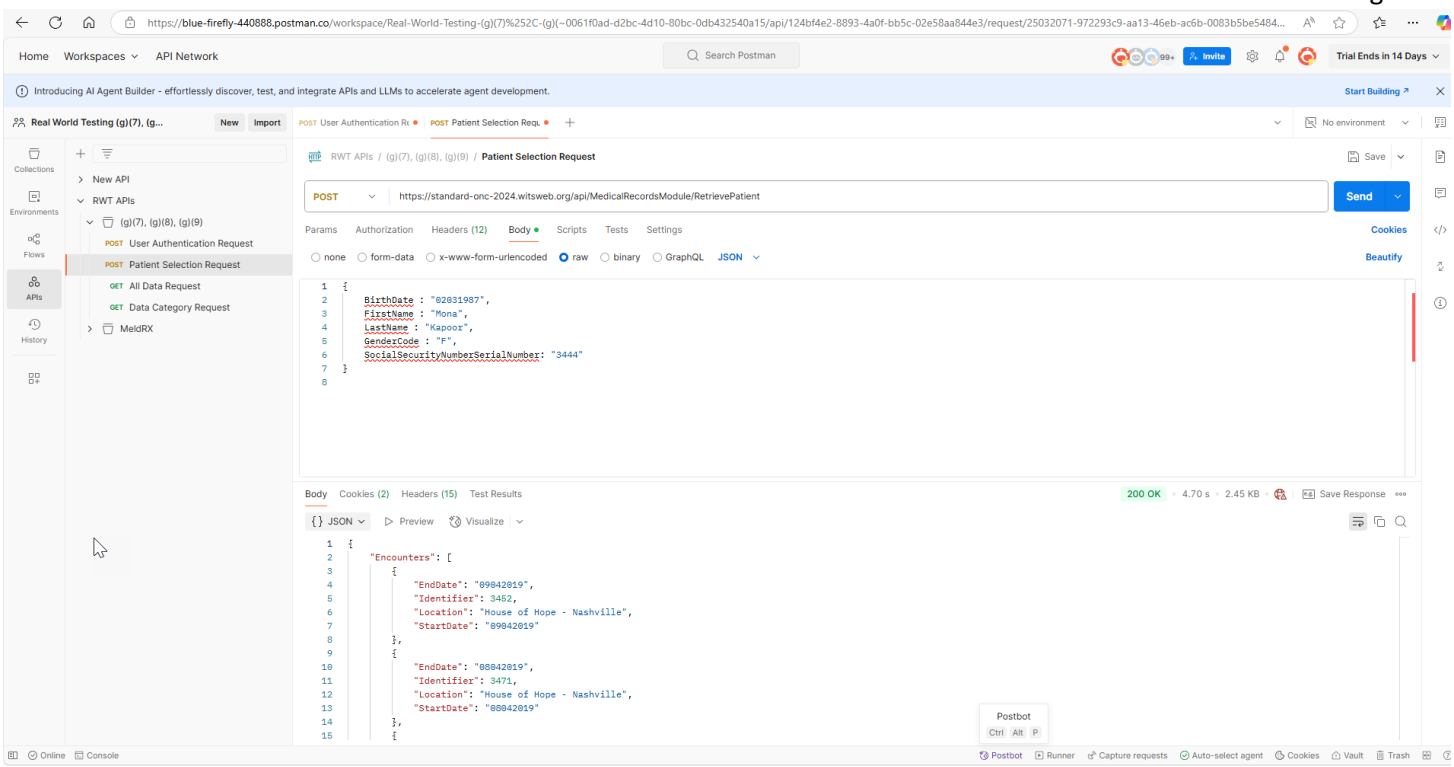
Patient Selection Request (g)(7)

The tester then created a POST API for the Patient selection request using the public documentation. This API uses the public WITS URL https://standard-onc-2023.witsweb.org to return data. This resource may be used to retrieve a patient, taking in the patient's first name; last name; date of birth; gender code; and last four digits of the social security number. If a patient whose credentials match the input data is found, the patient's unique client number (which will act as the patient's token), first name, last name, middle name, and encounter list will be returned.

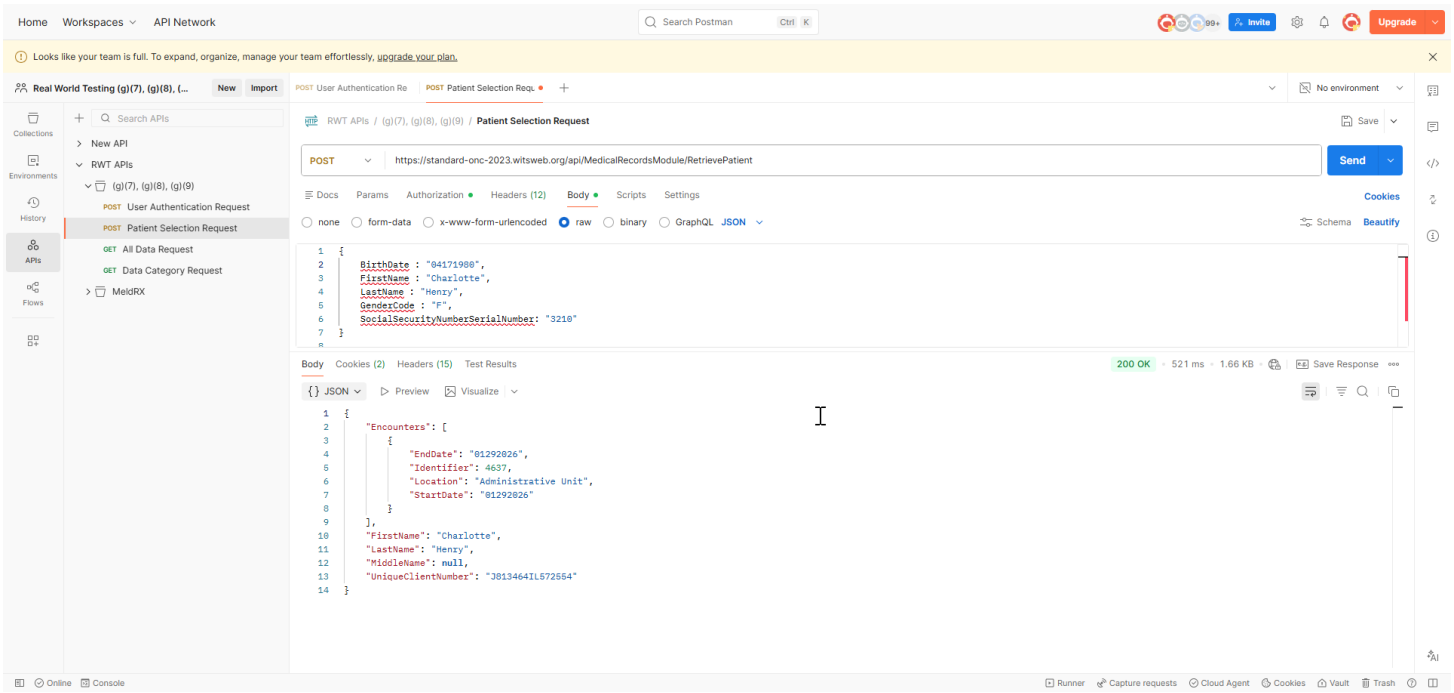
In the body of the API, accessed by a link next to the Headers, the tester entered each client's birthdate, first and last name, gender code, and the last 4 digits of their SSN. This information is required to return the list of encounters for that client.

The API was able to successfully return a list of encounters and Unique Client Identifier (UCN) for 4/4 of the patients tested. The tester validated the API responses against the corresponding records in the WITS interface to objectively verify that accurate results were returned for each simulated client.

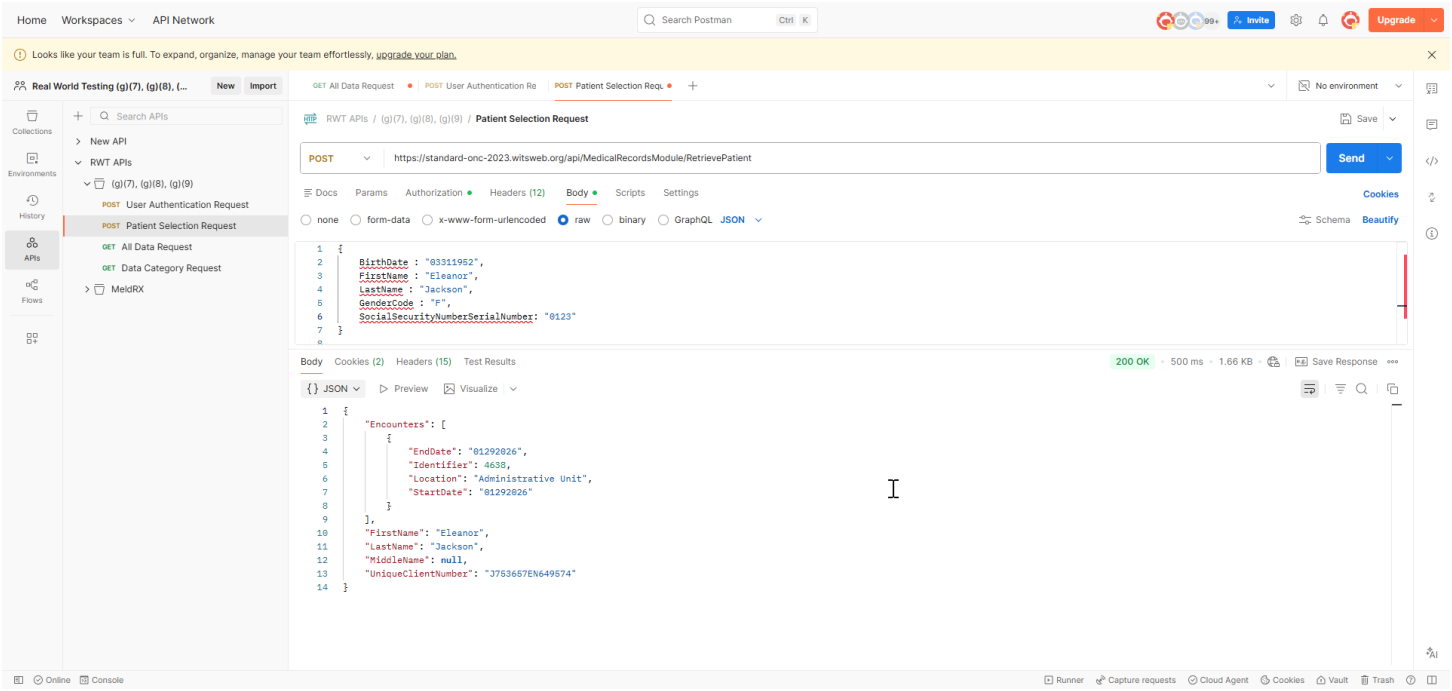
Each of the below patient records are synthetic and created solely for API functional testing in a production-like environment. No real patient data or PHI was used.



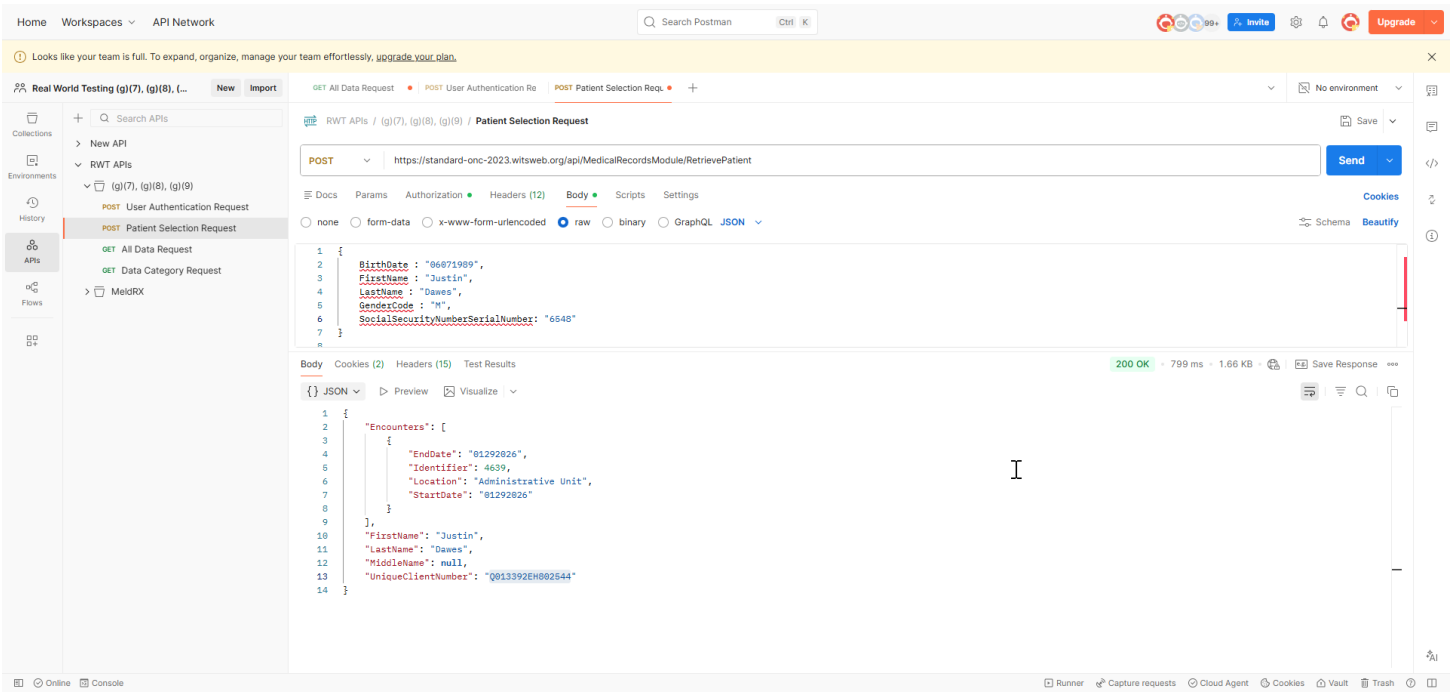
Client 1



Client 2



Client 3



Client 4

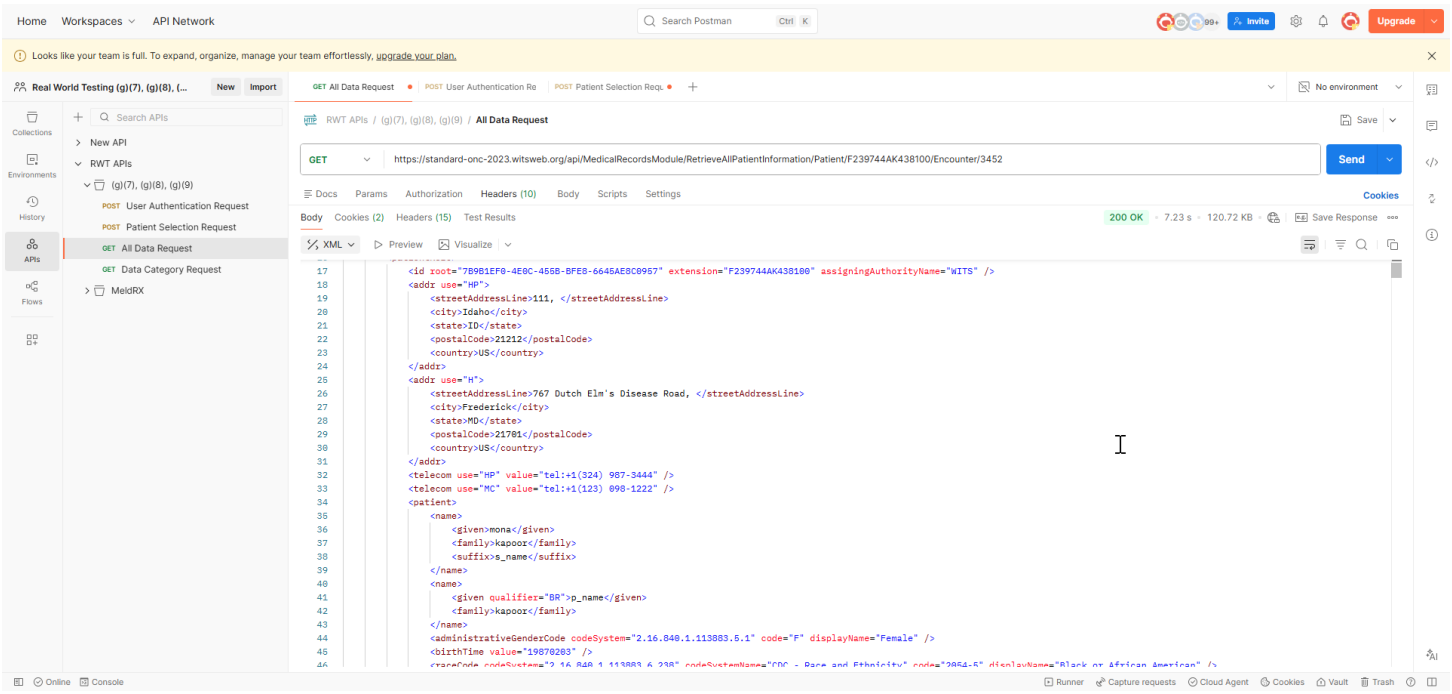
All Data Request (g)(9)

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

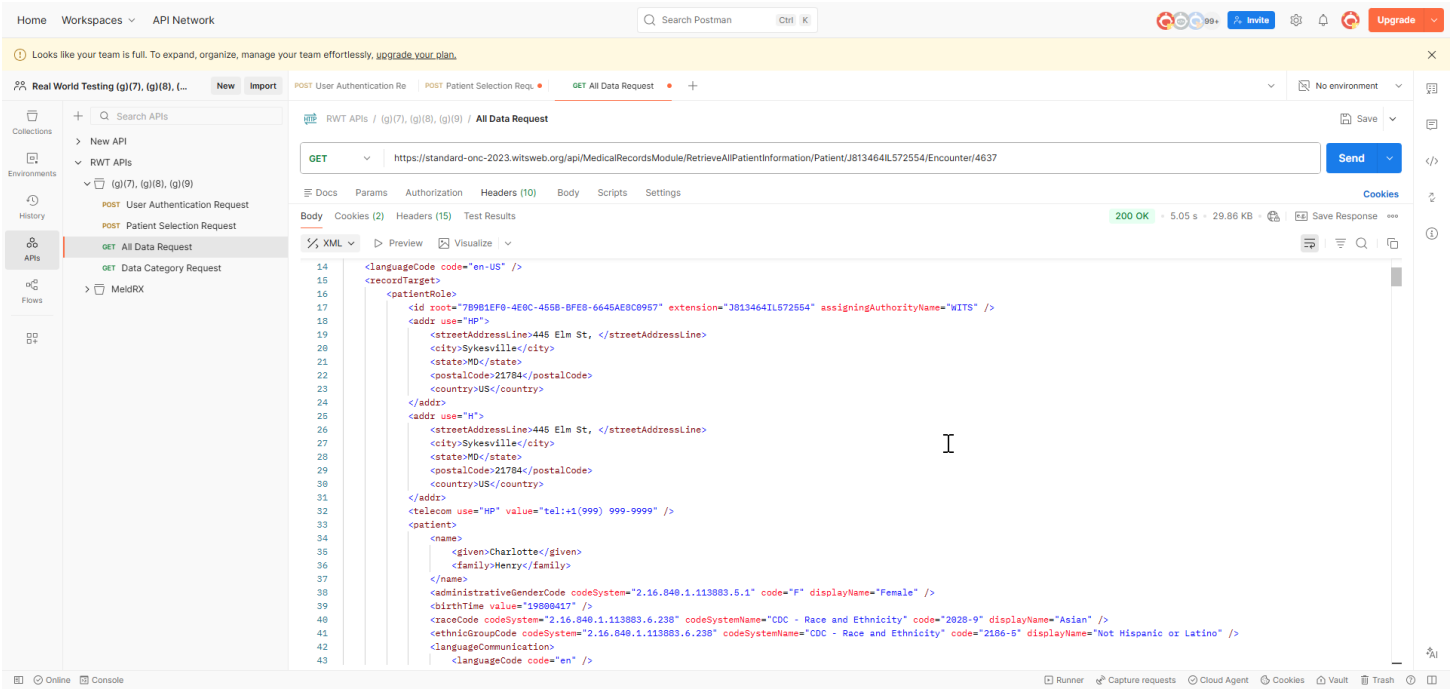
corresponding to the input information is found, then the XML payload representing the contents of the patient's CCDA data will be returned.

Using the same four synthetic clients from the Patient Selection Request test, 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 each client's UCN and one of the Encounter IDs gotten from the results of the Patient Selection Request API into the URL of the GET request.

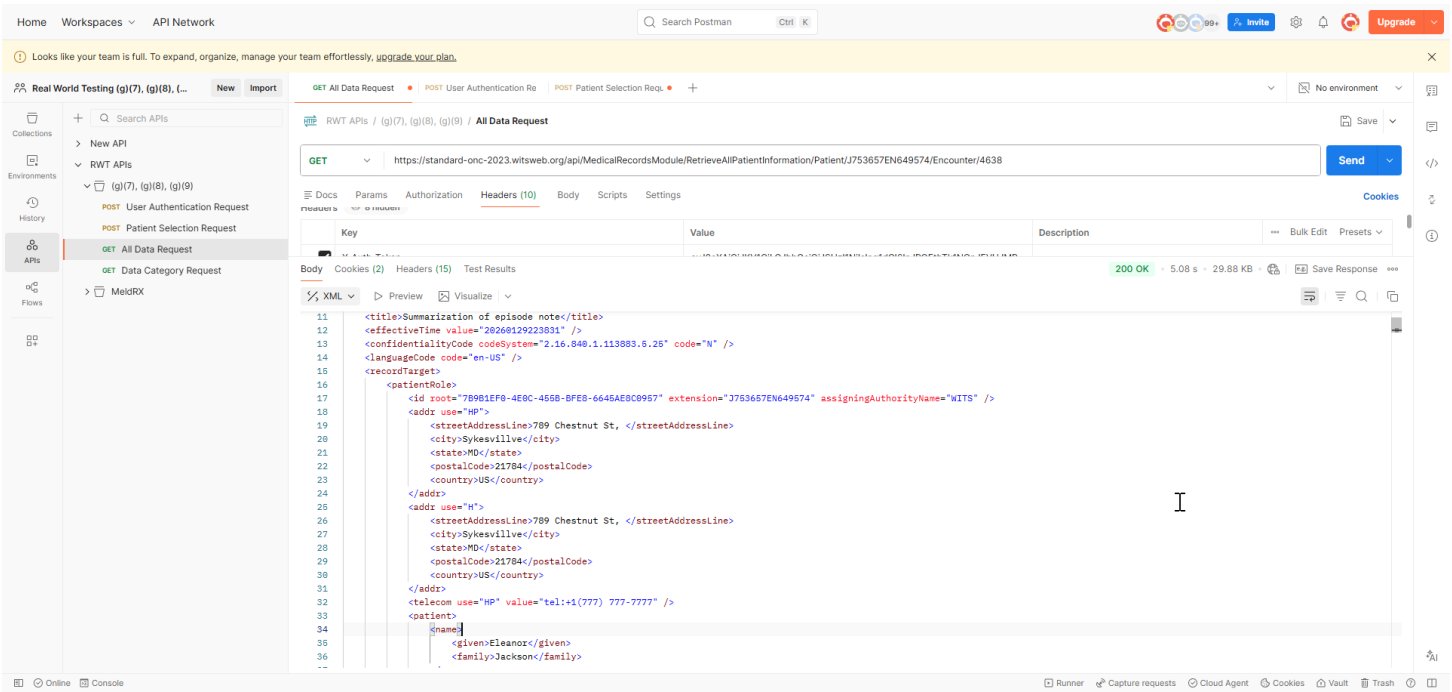
The All Data Request API call successfully generated a full "Summarization of episode note" CCDA for 4/4 of the patients tested as shown below. The tester validated the API responses against the corresponding records in the WITS interface and expected CCDA content to objectively verify that accurate results were returned for each simulated client.



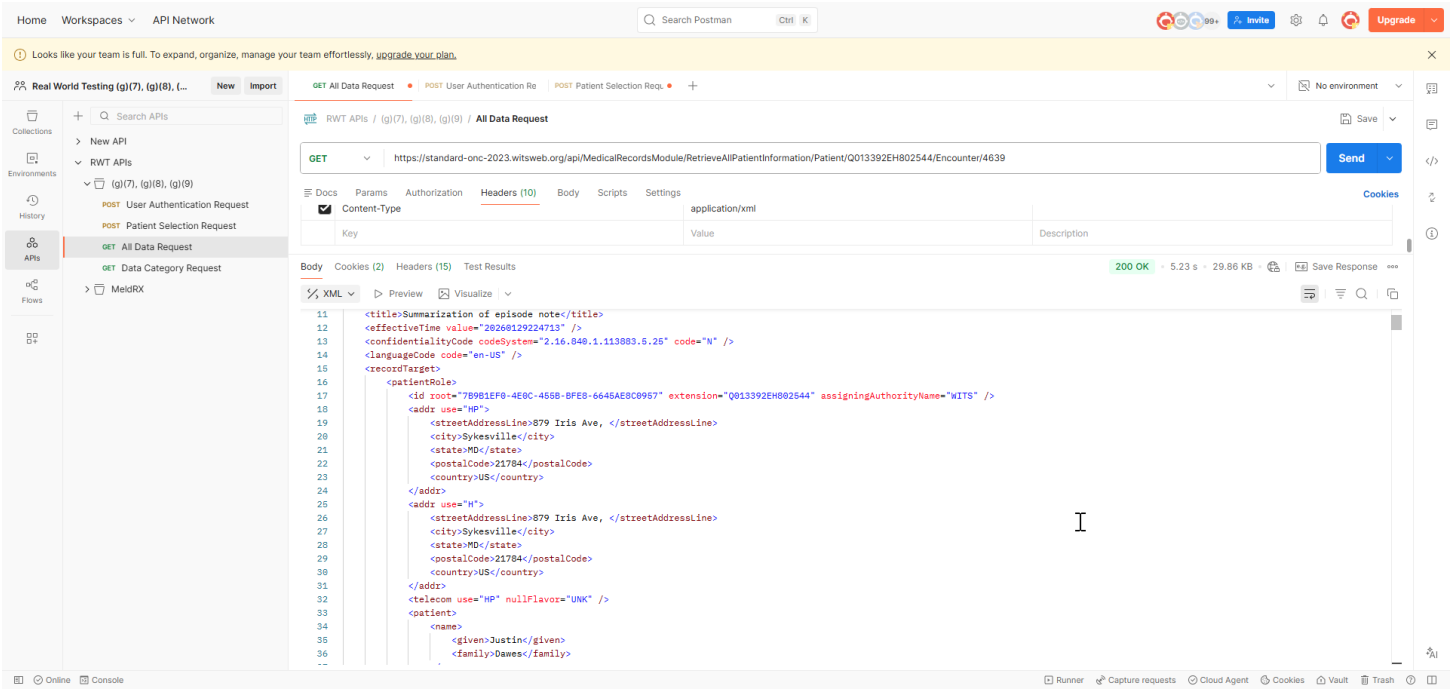
Client 1



Client 2



Client 3



Client 4

Attestation

The Real World Testing activities and results are complete and documented herein for the 2025 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 2025 Real World Test plan. Any deviations from the 2025 Real World Test plan have been addressed in the Justifications section.

Authorized Representative Name: Nik Garifalos

Authorized Representative Email: nik.garifalos@feisystems.com

Authorized Representative Phone: (443) 270-5143

Authorized Representative Signature:

Date: 2/25/2026