2025 Flatiron Health Real World Testing Results

BACKGROUND & INSTRUCTIONS

Under the ONC Health IT Certification Program (Certification Program), health IT developers are required to conduct Real World Testing of their certified health IT (45 CFR 170.405). The Office of the National Coordinator for Health Information Technology (ONC) issues Real World Testing resources to clarify health IT developers' responsibilities for conducting Real World Testing, to identify topics and specific elements of Real World Testing that ONC considers a priority, and to assist health IT developers in developing their Real World Testing plans and results reports.

A Real World Testing plan template was created to assist health IT developers in organizing the required information that must be submitted for each element in their Real World Testing plan. To accompany the plan template, ONC has also provided this results report template. While the use of this template is voluntary, health IT developers may find it useful in preparing their Real World Testing results report(s). Health IT developers must submit one year of results to address the Real World Testing of eligible products as outlined in their previous year's Real World Testing plan(s). If adjustments to approaches are made throughout Real World Testing, the health IT developer should reflect these adjustments in their Real World Testing results report. ONC expects that the results report will include a list of these changes, the reasons for them, and how intended outcomes were more efficiently met as a result.

While every effort has been made to ensure the accuracy of restatements of 45 CFR Part 170, this template is not a legal document. The official program requirements are contained in the relevant laws and regulations. This resource should be read and understood in conjunction with the following companion resources, which describe in detail many of the Certification Program requirements referenced in this resource.

- Real World Testing–What It Means for Health IT Developers – Fact Sheet
- Real World Testing Resource Guide
- Real World Testing Certification Companion Guide

Health IT developers should also review the following regulatory materials, which establish the core requirements and responsibilities for Real World Testing under the Certification Program.

- 21st Century Cures Act: Interoperability, Information Blocking, and the ONC Health IT Certification Program final rule, 85 FR 25642 (May 1, 2020) (**ONC Cures Act Final Rule**)
  - Section VII.B.5 — *"Real World Testing"*
- Health Data, Technology, and Interoperability: Certification Program Updates, Algorithm Transparency, and Information Sharing Final Rule, 89 FR 1192 (March 11, 2024) (**HTI-1 Final Rule**)
  - Section III.E — "Real World Testing"

GENERAL INFORMATION

Plan Report ID Number: [For ONC-Authorized Certification Body use only]

Developer Name: Flatiron Health

Product Name(s): OncoEMR®

Version Number(s): 2.8

Certified Health IT Product List (CHPL) ID(s): 15.04.04.3010.Onco.28.02.1.221221

Developer Real World Testing Plan Page URL: https://flatiron.com/certification/

Developer Real World Testing Results Report Page URL [if different from above]: N/A

CHANGES TO ORIGINAL PLAN

If a developer has made any changes to their approach for Real World Testing that differs from what was outlined in their plan, note these changes here.

Summary of Change	Reason	Impact
Removed from results: ● 170.315(b)(1) Transitions of care ● 170.315(b)(2) Clinical information reconciliation and incorporation ● 170.315(b)(3) Electronic prescribing ● 170.315(b)(10) Electronic Health Information Export ● 170.315(c)(1) Clinical quality measures (CQMs) ● 170.315(e)(1) View, download, and transmit to 3rd party	Real World Testing Condition and Maintenance of Certification Requirements Enforcement Discretion Notice released on June 30, 2025.	None

• 170.315(f)(1) Transmission to immunization registries • 170.315(f)(4) Transmission to cancer registries • 170.315(f)(5) Electronic case reporting		

SUMMARY OF TESTING METHODS AND KEY FINDINGS

TESTING METHODS

Consistent with the ONC's recommendation that "Real World Testing verify that deployed Certified Health IT continues to **perform as intended by conducting and measuring observations of interoperability and data exchange,**" Flatiron's testing methods focused on capturing and documenting the number of instances that certified capability is successfully utilized in the real world. In instances where no evidence existed due to zero adoption of a certified capability or the inability to capture evidence of successful use for other reasons, Flatiron demonstrated the required certified capability in a semi-controlled setting as close to a "real world" implementation as possible.

It is important to note that Real World Testing is only one component of the Health IT Certification program used to demonstrate compliance with the program requirements. Real World Testing augments and supports testing that was conducted prior to certification being granted. It is not intended to duplicate the methods or results previously demonstrated. Instead, these results demonstrate that the certified capabilities have been successfully deployed for providers to use at their discretion in live settings.

Flatiron has used the following approach to demonstrate successful real-world implementations.

- Summative Testing
- Interactive Testing

Summative assessments were used to measure which certified actions were performed at the conclusion of a given time period. These were conducted by generating reports and examining audit logs from within the certified health IT module to help demonstrate the frequency of actions within the given time frame, and where possible, whether those actions were successful or unsuccessful. High success rates are generally an indicator of a successful implementation of a given certified capability in a real-world setting. Summative testing was conducted using data from a representative subset of Flatiron Health practices (approximately one third of the Flatiron Health network). These practices were specifically selected to ensure the representative sample population utilized for summative assessments included practices of varying characteristics (e.g., size, location).

Interactive testing was used to demonstrate conformance to requirements where the adoption rate of a given certified capability is zero and to demonstrate ongoing compliance with updated standards and code sets (SVAP). Interactive tests were completed via a live test as opposed to examining historical usage statistics. The goal of these tests was to allow a user to demonstrate the certified Health IT module being used in a way consistent with their own practice or care setting. Flatiron has conducted interactive testing on specified criteria in a non-production environment, consistent with

ONC's guidance that the developer may, "use synthetic patient data in lieu of or in addition to real patient data in real or simulated/test scenarios, executed in environments that mirror production environments."

KEY FINDINGS

Flatiron's 2025 Real World Testing was used to validate that certified functionality is behaving as expected in production. Our 2025 Real World Testing results show that certified functionality is being utilized at various levels by our customer network. In some cases, certified functionality is being used frequently by Flatiron practices (or third-party application developers). In other cases, certified functionality is being used infrequently or not at all by Flatiron practices (or third-party application developers). The certified functionality that is not being used at all by Flatiron practices (or third-party application developers) was identified in our 2025 Real World Testing Plan as likely criteria to have low or no adoption. This list includes criteria (g)(7)and (g)(9). For this reason, we proactively planned to include interactive testing for these criteria to demonstrate how this functionality operates in production. The results of our 2025 Real World Testing show that some certified functionality has no adoption not because it is not deployed appropriately nor functional in production, but as a result of consumer demand.

STANDARDS VERSION ADVANCEMENT PROCESS (SVAP) STANDARDS UPDATES

Voluntary standards updates must be addressed in the Real World Testing results report. Real World
Testing results reports must include all certified health IT updated to newer versions of standards prior to
August 31 of the year in which the updates were made for the submitted plan.
Indicate as to whether voluntary SVAP standards are leveraged as part of the certification of your health IT
product(s).

> [] Yes, I have products certified with voluntary SVAP standards. (If yes, please complete the table below)
> [X] No, none of my products include these voluntary standards.

Care Setting(s)

OncoEMR is marketed solely to ambulatory Oncology practices.

Metrics and Outcomes

The below information details outcomes from Flatiron's 2025 Real World Testing that successfully demonstrate that Flatiron:

- ✔ is compliant with the certification criteria, including the required technical standards and vocabulary code sets;
- ✔ is exchanging electronic health information (EHI) in the care and practice settings for which it is marketed for use; and/or,
- ✔ EHI is received by and used in the certified health IT.

This section is also used to describe how the specific data collected from Real World Testing measures demonstrate results. Where possible, context is provided to the measures and results to understand the number of sites/users/transactions tested for the specified measures (i.e., the denominator for comparison to the reported results). If applicable, any Relied Upon Software that is used to meet a criterion's requirements is included in this section.

Measurement/ Metric	Relied Upon Software (if applicable)	Outcomes	Description & Challenges Encountered (if applicable)
170.315 (g)(7) Application access — patient selection	N/A	Over a 90-day period (06/01/25 - 08/31/25): 1) Number of requests for a patient ID or token: **0** 2) Number of requests that provided sufficient information to provide a valid response: **0** 3) Number of follow-up requests made using the provided patient ID or token: **0**	**Description:** This criterion requires the certified Health IT module to provide an API and supporting documentation that enable external applications to request a unique patient identifier from the certified Health IT module that can be used to request additional patient data. We recorded the frequency that patient ID requests are received by providers via API to demonstrate the certified capability is available and effective, regardless of the frequency it is used. As expected and outlined within our 2025 RWT Plan, there was zero adoption of this certified capability by our users during the specified reporting window. As planned, we have supplemented summative testing with interactive testing to demonstrate the feature is available and functioning as expected should any users elect to begin using this feature. We note that as of January 2026, Flatiron leverages FHIR-based API functionality to meet our (g)(7) certification requirements and may see increased usage in the future.
170.315 (g)(9) Application access — all data request	1) Flatiron leverages FirstDataback to support the translation of FDB identifiers to the minimum RxNorm Code Set for medication list and allergy medication that need to be translated. 2) Flatiron leverages Symedical, a terminology tool, to support required minimum vocabulary code sets (SNOMED, LOINC).	Over a 90-day period (06/01/25 - 08/31/25): 1) Number of requests for a patient's Summary Record made by an application via an all data category request using a valid patient ID or token: **0** 2) Number of requests for a patient's Summary Record made by an application	**Description:** This criterion requires the certified Health IT module to provide an API and supporting documentation that enable external applications to request all categories of patient data defined in the CCDS from the certified Health IT module. We recorded the frequency that patient data requests for all categories are received by providers and fulfilled via API to demonstrate the certified capability is available and effective, regardless of the frequency it is used. As expected and outlined within our 2025 RWT Plan, there was zero adoption of this certified capability by our users during the specified reporting window. As planned, we have supplemented summative testing for this criteria with interactive testing to demonstrate the feature is available and functions as expected should any users elect to begin using this feature. We note that as of January 2026, Flatiron leverages FHIR-based API functionality to meet our (g)(9) certification requirements and may see increased usage in the future.

		via an all data category request using a valid patient ID or token for a specific date range: **0**	
170.315 (g)(10) Standardized API for patient and population services	1) Flatiron leverages FirstDataback to support the translation of FDB identifiers to the minimum RxNorm Code Set for medication list and allergy medication that need to be translated. 2) Flatiron leverages Symedical, a terminology tool, to support required minimum vocabulary code sets (SNOMED, LOINC).	Over a 90-day period (06/01/25 - 08/31/25): 1) Capture the total number of applications utilized by customers during a reporting period: **112 unique FHIR Applications** 2) Capture total number of times users or systems utilize applications to access information for multiple patients during a reporting period: **44**	**Description:** This criterion requires the certified Health IT module to offer two types of API-enabled services: one focused on a single patient's data and the other on multiple patients' data. This will be achieved through the utilization of Fast Healthcare Interoperability Resources (FHIR) standards. The approach for gauging the adoption and usage of these APIs involves tracking the total number of external and Flatiron-supported applications that invoke our customers' FHIR APIs within their live environments. Flatiron will monitor the frequency with which applications utilize the platform to connect to our customers' live environments for the purpose of reviewing FHIR data elements which can include USCDI information. Additionally, Flatiron will record the instances in which third-party applications connect to the FHIR APIs to access data pertaining to multiple patients.

The following test plans have been executed to demonstrate Real World certified capabilities for criteria where metrics are not available due to lack of adoption of the certified capability. Individual justifications for why each criterion has had low adoption are specified in the table below.

Flatiron has completed interactive testing for the following criteria:

- 170.315(g)(7) Application access—patient selection
- 170.315(g)(9) Application access—all data request

High Level Interactive Test Plan:

- **Care Settings**: All interactive testing was performed specifically targeting Oncology practice settings and real world data exchanges in the Oncology space.
- **Test Environment:** All interactive testing was performed in a live, staging environment. See table below for details.
  - o Flatiron has completed a video recording where a representative end user walks through the intended workflow for the criteria and captures evidence that the functionality works as expected in the Real-World deployment.
- **Test Data**: Interactive testing was performed using specially developed test patient data in the live staging environment. Test patients were created using the data elements that are typically used by Oncology providers. Flatiron ensured that the test data entered for each patient included the minimum necessary to meet the data requirements for each criterion being tested using the interactive testing method.

Criterion	Interactive Test Plan and Results	Justification for Interactive Testing
170.315 (g)(7): Application Access - Patient Selection	Flatiron used Swagger as a test app against the production deployment of the Flatiron API server. Flatiron set up new test patients so as not to expose PHI, but these test patients were set up in the manner of Real-World Oncology patients, using diagnoses, medications, and other codesets typically found in the Oncology setting. Flatiron used Swagger to mimic the workflow of a provider user querying the API for patients using a third-party app.	**Justification:** Flatiron developed the API functionality to support both patients and providers, but the main use case was to enable other providers and their vendors to query Flatiron API servers for patient data. Flatiron implemented the API criteria according to ONC standards, and currently has a publicly-accessible Patient API. As of the submission of the 2025 RWT Plan, there was no adoption by any developers, so Flatiron has used interactive testing to demonstrate that this certified capability is

Criterion	Interactive Test Plan and Results	Justification for Interactive Testing
170.315 (g)(9): Application Access - All Data Request	Flatiron entered patient specific IDs into swagger and evaluated the data returned to ensure it matched the patient and demographic data in the application. We also entered specific practice ID, patient ID and start date data to ensure the returned CCD data matched the output in the application. Results: 1) Successfully queried for a token using test patient demographics - demographics are returned 2) Token was used to query for CCD as well as discrete data, data was returned and visible to the user in Swagger	available in the production environment and that lack of adoption is not caused by lack of availability. **Justification:** Flatiron developed the API functionality to support both patients and providers, but the main use case was to enable other providers and their vendors to query Flatiron API servers for patient data. Flatiron implemented the API criteria according to ONC standards, and currently has a publicly-accessible Patient API. As of the submission of the 2024 RWT Plan, there was no adoption by any developers, so Flatiron has used interactive testing to demonstrate that this certified capability is available in the production environment and that lack of adoption is not caused by lack of availability.

Schedule of Key Milestones

OVERALL SCHEDULE

Key Milestone	Care Setting	Date/Time frame
Scheduling and logistics	Ambulatory Oncology	3/01/2025 - 6/01/2025
Data collection	Ambulatory Oncology	06/01/2025 - 08/31/2025
Review and collate data	Ambulatory Oncology	12/2/2025 - 1/15/2025
Writing report	Ambulatory Oncology	1/4/2025 -1/30/2025

CRITERIA BREAKDOWN

Criteria	Method	Care Setting	RWT Reporting Window (Timeframe within with data was collected)	Reviewed Data and Wrote Report
170.315 (g)(7): Application Access - Patient Selection	Interactive test plan	Ambulatory Oncology	Test plan executed & recorded on 11/24/2025	12/01/2025 - 1/30/2025

170.315(g)(9): Application Access - All Data Request	Interactive test plan	Ambulatory Oncology	Test plan executed & recorded on 11/24/2025	12/01/2025 - 1/30/2025
170.315 (g)(10) Standardized API for patient and population services	Summative metrics	Ambulatory Oncology	90 day window - 06/01/2025 - 08/31/2025	12/01/2025 - 1/30/2025

Attestation

This Real World Testing Results Report 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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