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## SLI Global Solutions Inc. EHR Testing and Certification Guide

SLI Global Solutions (SLI) is an Office of the National Coordinator Accredited Test and Certification Body (ONC-ATCB) under the Temporary Certification Program Pursuant to 45 CFR Part 170, § 170.415. SLI has partnered with Orion Registrar, Inc. (Orion) to form a consortium to deliver all ONC-ATCB services. This best-in-class partnership combines SLI's more than 14 years of experience testing software applications with Orion's more than 10 years of experience with certifying organizations to various standards. This collaboration provides the requisite independence of testing and certification functions in accordance with ONC expectations.

SLI is an ideal ONC-ATCB candidate to test your EHR product set. Since its founding in 1996 as SysTest Labs, SLI's focus has been to help customers manage technology risk. SLI is an ISO 9001:2008 certified company. Our Corporate Quality System (CQS) has been audited to ISO 9001:2008 standards of quality performance. SLI is a certified lab under the National Voluntary Laboratory Accreditation Program (NVLAP) of the National Institute of Standards and Technology (NIST). SLI has been audited by NVLAP and our Quality System is ISO 17025 compliant.

SLI also maintains a strong corporate presence in the field of healthcare. Within the last five years, we have served the needs of State Medicaid Agencies with implementation of federally certified Medicaid Management Information Systems (MMIS) administered by these states. We have also supported the technology assessment and independent testing needs of large hospital EHR's.

SLI is ONC-approved for testing and certifying all criteria and all modules within the ONC Certification Program. The services we provide as an ONC-ATCB allow end users to apply for meaningful use designation for EHR systems and applications. The Centers for Medicare and Medicaid Services (CMS), an organization within the US Health and Human Services (HHS) Department, provides incentive payments for users that take advantage of ATCB-certified products and systems and meet internal objective criteria for their use.

## Conducting Certification Testing with SLI

This guide provides an overview of the EHR testing process conducted by SLI Global Solutions. Successful execution of testing is highly dependant on both the tester/client and SLI having the necessary information prior to testing in order to be fully prepared. The below sections provide an overview of the EHR certification test process.

### ***Pre-Test Activities***

After an EHR participant registers with SLI, the SLI ATCB Services Agreement is executed. When SLI receives the signed agreement and the required 50 percent deposit of the testing fees, you will receive a Vendor Start-up Package containing pretest materials and a request for any technical documentation required in return. You will also receive instructions for pre-test setup of sample patient test data and a schedule for testing. Some patient information must be entered on the day of testing with SLI witnessing these actions, but other data must be pre-loaded prior to the day of testing.

### ***Required Forms***

There is a range of information that must be provided to SLI prior to testing. The [Attestations and Declarations document](#) must be completed and submitted to SLI for review at least 3 days prior to the testing date. The form will be provided to you as part of the vendor package.

### ***Remote Testing***

Remote testing allows for the conduct of testing over the internet using a remote video connection and is the most cost-effective approach. SLI supports remote testing as our method for the ATCB program. SLI will provide the means for remote video access to your EHR system using.

### ***Client Test Environment***

SLI requires testing to be conducted in an environment that meets a minimum specification to ensure the integrity of testing. SLI's minimum specifications are as follows:

- Office environment with normal operating temperature and humidity
- Standard configuration of equipment for testing (ie PC or laptop)
- Standard Internet connectivity (wireless or LAN)

***Day of Testing***

On the day of testing, your test lead and SLI will connect and communicate through the Goto Meeting remote session. The testing will be based upon the standards and certification criteria put forth by ONC and the test methods developed by NIST. The SLI proctor will instruct your test staff to follow a prescribed set of steps that demonstrate compliance with the ONC requirements. Throughout the testing, we take screen images and will request files to verify system functionality where required by the NIST procedures. Once the testing is complete, we will inform you if there are any failures and submit a Testing Audit Report to you shortly thereafter.

A product or system that has been pre-audited to the NIST test methods should not have difficulty in completing testing in approximately one business day. SLI assumes the person assigned to execute and demonstrate the functionality during the test is a knowledgeable member of your staff that is very familiar with the system. However, if your product has not been pre-audited to the NIST criteria or if your staff executing the test steps under our direction is not knowledgeable in its functionality, difficulties may be encountered during the test run. Please contact us about pre-certification audit services offered by SLI if you are not sure that you are ready for certification testing.

***Testing and Certification Results***

The NIST Test Methods and NIST Test Tools are the basis for verifying an EHR product can satisfy the certification criteria. If a product under test fails a criterion, we must consider the test as failed. After testing is completed, SLI will apprise you of the results and submit a test report to our certification partner, Orion Registrar, for evaluation and validation. As a separate entity specializing in certification audits and registrations, Orion executes all matters pertaining to certification criteria associated with ISO Guide 65 that are required for the ONC ATCB program.

***Passing***

In order to receive a Certificate of EHR Compliance from SLI, the company must successfully complete all EHR testing and the test report must pass the Orion review. Also, final payment must be received for all services supplied by SLI. Upon certification you will receive a Letter of Compliance which provides information about the required maintenance of your product certification, and a separately issued Certificate of EHR Compliance, which can be utilized in marketing your certification. SLI will also notify ONC of the product's certification status.

### *Failure*

A module that does not comply with the NIST procedures is deemed to fail the testing. However, your system may have specific circumstances that require SLI to grant an exception to a specific requirement. The ATCB has the authority to deem certain requirements not applicable to a specific EHR depending on the specific circumstances.

### ***Retesting***

If your product is unsuccessful in any area during the testing process you may elect to re-schedule a future test session to retest the particular problem module(s) or entire test if preferred. The future test effort can be scheduled immediately and SLI will work with you to expedite the scheduling process.

### ***Modifying Certified Products***

A previously certified Complete EHR or EHR Module may be updated for routine maintenance or to include new capabilities without its certification becoming invalid. When changes are made to your certified product, you are required to provide SLI the following information to ensure proper maintenance of your certification:

- The specific changes that were made to the certified product
- An assessment of whether the change could affect your previous certification
- Supporting documentation that would be necessary to independently assess the effects the changes would have on the previously certified product

SLI will determine whether the updates and/or modifications are such that the new version could 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 or EHR Module. Please note that the first attestation review for products certified by SLI is free, while additional attestation reviews will require additional fees. If a system is determined to require re-testing due to product modifications, then it is treated as a new certification test engagement.

## Scheduling

To set up your product for certification testing you may contact our ATCB Account Executives:

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or fill out the EHR registration form located on our web site. On the registration form, you will be asked to identify a date on which you would like to test. You will receive a confirmation email from SLI which will include a tentative testing date as well as the SLI ATCB Services Agreement, and pre-test materials. Please note that to reserve the test date, you must submit a completed Services Agreement and provide a non-refundable 50 percent payment for the services selected. Final payment is required prior to issuance of a certification.

If you have not completed a pre-audit of your system to the NIST test methods, you will be asked if you want to undergo SLI pre-certification audit prior to registering for testing. Please contact us if you would like further information about this option.

## Usage Guidelines for SLI Certificate of Compliance

A successful test and certification review results in the issuance of a certificate of compliance. The following usage guidelines must be adhered to in regard to this designation in order to maintain conformance with the ONC temporary program requirements:

- a. A complete EHR or EHR Module that receives certification shall conspicuously include the following text on its Web site and in all marketing materials,

communications statements, and other assertions related to the Complete EHR or EHR Module's certification:

“This [Complete EHR or EHR Module] is 201[X]/201[X] compliant and has been certified by an ONC–ATCB in accordance with the applicable certification criteria adopted by the Secretary of Health and Human Services. This certification does not represent an endorsement by the U.S. Department of Health and Human Services or guarantee the receipt of incentive payments.”

- b. Treat a certification issued to an integrated bundle of EHR Modules the same as a certification issued to a Complete EHR for the purposes of paragraph (k)(1) of 45 CFR 170.423 except that it must also indicate each EHR Module that comprises the bundle.
- c. Ensure that representation of a certification issued to a Complete EHR or EHR Module based on applicable certification criteria adopted by the Secretary at subpart C of 45 CFR 170 is separate and distinct from any other certification(s) based on other criteria or requirements.
- d. Inform SLI (in writing) of major changes to the EHR.
- e. Use the Certification Mark/Logos in accordance with SLI's partner certifying body, Orion Registrar's requirements and Copyright requirements of the Mark/Logo. Original Certificates of Certification are the property of Orion. Also the applicant shall not use its certification in such a manner as to bring SLI or Orion into disrepute and shall not make any statement regarding its certification which SLI or Orion may consider misleading or unauthorized. Client will endeavor to ensure that no certificate or report or any part thereof is used in a misleading manner.
- f. Upon termination of the certification, discontinue reference to the certification in all advertising material or other documents and return any certification documents. The Client shall notify its contracting companies that the certification has been terminated.
- g. Maintain a record of all complaints and remedial actions concerning the Certified EHR.
- h. Allow Program Representatives and Regulatory Agencies access for Witness Audits and oversight of the EHR Certification Program.

A company may have its certification withdrawn if it violates any of the guidelines above or if a complaint has been received and, after review, has been found to be true and compromises the integrity of the certification. SLI requires that your company keep a

record of all complaints made known that relate to your product's compliance with the criteria set forth by the HHS Secretary and the resulting certification by SLI. We require that you provide these complaints to us as you receive them. All complaints will be forwarded on to ONC to support the goals of the ONC-ATCB Program.

**Contact Us for More Information:**

For further information on the SLI ONC- ATCB program, please contact:

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