

GENERAL INFORMATION

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

Developer Name: *Winnebago County*

Product Name(s): *Luna*

Version Number(s): 1.3

Certified Health IT Product List (CHPL) ID(s): 15.04.04.2940.Luna.01.00.1.241028

Real World Testing Plan Page URL: <https://ww2.winnebagocountywi.gov/it-department/real-world-testing>

STANDARDS VERSION ADVANCEMENT PROCESS (SVAP) STANDARDS UPDATES

Standard (and Version)	N/A
Updated certification criteria and associated product	N/A
Health IT Module CHPL ID	N/A
Date of ONC ACB Notification	N/A
Date of customer notification	N/A
Conformance method and measurement/metric(s)	N/A

JUSTIFICATION FOR REAL WORLD TESTING APPROACH:

As a self-developer, we have only a single care-setting, and our behavioral health clinic does not utilize the Electronic Health Information Export [(170.315(b)(10))]. Therefore, we have developed a process for testing this module that does include real production data but does not necessarily reflect actual customer usage of the module.

Our approach represents our best effort to simulate a real-world situation in which a care provider would want to extract information to be transitioned to another EHR.

MEASUREMENT(S)/METRIC(S) USED IN OVERALL APPROACH

Description of Measurement/Metric

Measurement/Metric	Description
Analysis of Electronic Health Information Export for a single patient	Winnebago County will extract one patient by querying the system tables. This query will create a document for each table found, find all the health records belonging to the patient, including images, and export the data as a single .zip file. This can be done upon a request by a patient. The export includes a hyperlink to the data format.
Analysis of Electronic Health Information Export for all patients	Winnebago County will extract multiple patients by querying the system tables. This query will create a document for each table found, find all the health records belonging to the patient, including images, and export the data as a single .zip file per patient. The export includes a hyperlink to the data format.
Analysis of Electronic Health Information Export limitations for certain staff members	Winnebago County will verify that only authorized users may export EHI data and that system administrators retain full access to EHI exports and related security.
Analysis of the Electronic Health Information Export format(s) used to support 170.315(b)(10)	Winnebago County will review all structural changes to the patient database and if necessary, make modifications to ensure that newly added patient data is included in the EHI export.

Associated Certification Criteria

Measurement/Metric	Associated Certification Criteria
Analysis of Electronic Health Information Export	170.315(b)(10)
Analysis of Electronic Health Information Export for all patients	170.315(b)(10)
Analysis of Electronic Health Information Export limitations for certain staff members	170.315(b)(10)
Analysis of the Electronic Health Information Export format(s) used to support 170.315(b)(10)	170.315(b)(10)

Justification for Selected Measurement/Metric

Measurement/Metric	Justification
Analysis of Electronic Health Information Export	Winnebago County chose to extract patient data for a single patient in order to test all of the capabilities of the export tool. We will collect statistical data related to the output of our files in order to confirm the success of our exports in a test environment that contains real production data.
Analysis of Electronic Health Information Export for all patients	Winnebago County chose to extract patient data for multiple patients in order to test all of the capabilities of the export tool. We will collect statistical data related to the output of our files in order to confirm the success of our exports in a test environment that contains real production data for each patient.
Analysis of Electronic Health Information Export limitations for certain staff members	Winnebago County chose to authorize only certain staff members to limit who can perform an EHI export. Our testing will verify that these limitations are behaving as expected.
Analysis of the Electronic Health Information Export format(s) used to support 170.315(b)(10)	Winnebago County developers will verify that no new patient information has been added to the database that has not been included in the set of information that has been included in the EHI export.

Care Setting(s)

Care Setting	Justification
Behavioral Health Clinic	The Winnebago Behavioral Health Clinic is the only setting in which our system is used and may be used by staff members with appropriate security access.

Expected Outcomes

Measurement/Metric	Expected Outcome
Analysis of Electronic Health Information Export for a single patient	The export tool should create a single .zip file with patient data included along with information describing the structure of the exported files.
Analysis of Electronic Health Information Export for all patients	The export tool should create a single .zip file with all patients' data included along with information describing the structure of the exported files.
Analysis of Electronic Health Information Export limitations for certain staff members	Only authorized staff should have access to the export tool.
Analysis of the Electronic Health Information Export format(s) used to support 170.315(b)(10)	All patient data within the database should be included in the export.

SCHEDULE OF KEY MILESTONES

Key Milestone	Care Setting	Date/Timeframe
Quarterly validation of Electronic Health Information Export and security	Behavioral Health Clinic	January 2026
Quarterly validation of Electronic Health Information Export and security	Behavioral Health Clinic	April 2026
Quarterly validation of Electronic Health Information Export and security	Behavioral Health Clinic	July 2026
Quarterly validation of Electronic Health Information Export and security	Behavioral Health Clinic	October 2026

ATTESTATION

The authorized representative below, on behalf of Winnebago County attests that this Real World Testing plan 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 Winnebago County's Real World Testing requirements.

AUTHORIZED REPRESENTATIVE DETAILS

Name:	Mike Breuer
Email:	mbreuer@winnebagocountywi.gov
Phone:	(920) 232-3476

Mike Breuer

Authorized Representative Signature

9/11/2025

Date