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# **SLI Compliance**

## **ONC-ATL Testing**

### **Program Guide**

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### Purpose of this Guide

The purpose of this document is to provide our customers information and guidance on how SLI Compliance's ONC-ATL Testing process is conducted throughout our partnership. SLI Compliance strives to make the testing process as clear, understandable and efficient as possible. Our goal is to make your experience a success.



### Who is SLI Compliance

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SLI Compliance, a division of Gaming Laboratories International, LLC (SLI Compliance) is an Office of the National Coordinator (ONC) Authorized Test Laboratory (ATL) and Authorized Certification Body (ACB) under the 45 CFR Part 170 Establishment of the Permanent Certification Program for Health Information Technology; Final Rule Effective September 4th, 2012. SLI Compliance is an ideal ONC-ATL candidate to test your product set. Since its founding in 1996 as SysTest Labs, our focus has been to help customers manage technology risk. We maintain an ISO 9001:2015 certified Quality Management System. SLI Compliance is a certified lab under the National Voluntary Laboratory Accreditation Program (NVLAP) of the National Institute of Standards and Technology (NIST) (NVLAP Lab Code 200733-0). Our test laboratory has been audited by NVLAP and our Quality System is accredited to ISO 17025.

SLI Compliance is fully accredited to test all approved criteria within the ONC-Health IT Certification Program. The services we provide as an ONC-ATL ensure a product meets the baseline requirements of the ONC-Health IT Certification Program, and those results are submitted to SLI Compliance's ONC-ACB for certification. Once a product has achieved certification, all eligible providers (EPs), eligible hospitals (EHs) and critical access hospitals (CAHs) who choose to use certified technology in a meaningful way may be eligible to apply for incentive payments under the Meaningful Use Program governed by The Centers for Medicare and Medicaid Services (CMS), an organization within the US Health and Human Services (HHS) Department.



### About the ONC-Health IT Certification Program

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Per the [HITECH Act](#), the Office of the National Coordinator was charged with creating the EHR Certification Program. Centers for Medicare and Medicaid Services (CMS) oversees Meaningful Use and provides incentive payments to EPs and EHs who meaningfully use Certified EHR Technology (CEHRT).

The ONC Health Information Technology (Health IT) Certification Program is the second part of ONC's two-part approach to establish a transparent and objective certification process, following the Temporary Certification Program (TCP).

The TCP was established to ensure that Certified EHR Technology (CEHRT) would be available for adoption by health care providers who sought to qualify for the [Centers for Medicare and Medicaid Services \(CMS\) EHR incentive payments](#) beginning in 2011.

The ONC-Health IT Certification Program became fully operational on October 4, 2012 and ONC continues to manage the overall program.

In the ONC-Health IT Certification Program, certification and testing activities are performed by separate entities. Certification is conducted by ONC-Authorized Certification Bodies (ONC-ACBs) and testing is performed by Authorized Testing Laboratories (ATLs). Developers and Vendors first test their product with an ATL, and if their product meets the requirements, they work with SLI Compliance's ONC-ACB or another ONC-ACB to certify the product. Once the product is certified, it is submitted to ONC, who posts approved products to the [Certified Health IT Product List \(CHPL\)](#).

For additional information about the certification program and rule, please visit:

[ONC Certification Programs and Policy](#)



### SLI Compliance as Your Testing Partner

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SLI Compliance conducts testing as an ONC Authorized Testing Laboratory (ATL) against the approved 2014 & 2015 Edition ONC criteria. The following outlines the registration and testing process. Registration & Scheduling

To register with SLI Compliance you can go to the SLI website [www.SLICompliance.com](http://www.SLICompliance.com) and navigate to the “Testing for Certification of Health IT” selection. You will see a Register button “and once selected, it will step you through a series of questions regarding what scope of testing and/or certification you are looking for. Once your registration is received by SLI Compliance, your request will be processed and you will receive a follow up phone call or email from our Account Executive who will be the primary resource to help guide you and complete the process, and provide you a proposal quote on your selected services.

Or you can contact us at [HealthIT@slicompliance.com](mailto:HealthIT@slicompliance.com)

*Note: During the registration process, the Vendor will be asked what date you would like to begin your test. This is a tentative testing date and to secure a test date, the Vendor must submit a completed Services Agreement.*

### Agreements and Contracts

After a Vendor completes the SLI Compliance online registration process and has received the initial quote from our account executive team member, the SLI ONC Services Agreement will be sent to the Vendor by the SLI Account Executive for the Vendor to review.

The SLI Compliance ONC Services Agreement needs to be mutually executed and the Vendor may be required to provide a non-refundable 50 percent deposit for the services selected, dependent on credit rating. (If the 50% deposit is required for testing services, fee(s) must be received by SLI Compliance in order for the vendor to be considered “under contract”. At this point in the process, the Vendor is now a Client and will have access to the Vendor Packet as well as the SLI Compliance ATL Testing Team for interpretation guidance.

Any questions pertaining to the SLI Compliance Services Agreement and/or deposit should be directed toward your assigned SLI Account Executive.



### Pricing

Pricing for the 2014 and 2015 Edition criteria begins with a one-time base charge for any testing, and then each criterion is rated according to complexity, resulting in a per criteria fee built in addition to the base charge. Pricing includes all of the pre-testing preparation activities, issuance of a vendor packet, kick-off call, support services, testing services, one additional re-test (if needed) and the production of a Final Test Report to be sent to our Authorized Certification Body (ACB). If SLI Compliance is only providing the ATL Test Services, the final payment is required prior to issuance and submission of the report to an another ONC-ACB.

### *Identifying Your Scope of Testing*

Your product may be certified to 2014 Certification Criteria for Ambulatory, Inpatient or both settings of care.

For 2015 Edition Certification, ONC has dropped the 'complete' certification designation, so all products certified will be called certified modules. ONC has also dropped the 'ambulatory' and 'inpatient' domain designations. The overall scope will highly depend on what your customers need in order to attest. Per the ONC Final Rule, 170.315(g)(4) Quality Management System and 170.315(g)(5) Accessibility centered design are required with every certification.

There are many other "conditional requirements" this is outlined on the ONC website. Identifying the scope can be accomplished by reviewing [Testing and Test Methods](#) and determining for which criteria your product meets the requirements.



# SLI Compliance: ONC-ATL Testing Program Guide

The possible designations and configurations you may test to are as follows:

Complete - Testing to <u>ALL Criteria</u> for the designated setting below	
2014 Test Methods (Ambulatory)	Practice setting which is grouped by all applicable 170.314
2014 Test Methods (Inpatient)	Practice setting which is grouped by all applicable 170.314

Modular - Testing to <u>specific selected</u> criteria for the designated setting below and meeting the <u>minimum requirements</u>	
2014 Test Methods (Ambulatory)	*Includes the minimum required criteria. The minimum for 2014 is determined by what criteria is selected
2014 Test Methods (Inpatient)	*Includes the minimum required criteria. The minimum for 2014 is determined by what criteria is selected
2015 Test Methods (Ambulatory)	*Includes the minimum required criteria. The minimum for 2015 is determined by what criteria is selected
2015 Test Methods (Inpatient)	*Includes the minimum required criteria. The minimum for 2015 is determined by what criteria is selected

*\* SLI Compliance will assist in identifying what the required minimum for 2014 & 2015 criteria based on what criteria the vendor selects.*

*For specific details on the program requirements please visit the [HealthIT.gov](https://www.healthit.gov/policy-researchers-implementers/standards-and-certification-regulations) website and Policy and Researchers/Implementers' page:*

<https://www.healthit.gov/policy-researchers-implementers/standards-and-certification-regulations>





# Conducting Testing with SLI Compliance

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This section provides an overview of the ONC-Health IT testing process conducted by SLI Compliance. Successful execution of testing is highly dependent on both the Vendor/Client and SLI Compliance ATL Team having the necessary information prior to testing in order to be fully prepared. The below sections provide an overview of the testing process.

## Pre-Test Preparation Activities

Once the registration and contractual agreements have been executed, SLI Compliance ATL team member will schedule a Kick-off call to introduce you to the team you'll be working with and answer initial questions you may have. Our ATL Test Team will provide the Client a Vendor Start-up Package containing pre-test materials. These materials will provide information regarding what the Client must complete and return to SLI Compliance for review prior to testing.

### *Required Forms and Information*

There is specific information that must be provided to SLI Compliance. The following documents and information must be completed and submitted to SLI Compliance for review at a minimum 2 business days prior to the testing date. The forms will be provided to you as part of the ATL vendor package.

- Vendor Certification Information form (provided in the Vendor Packet)
- Documentation of All 'Required Vendor Information' specified in Test Procedures section of each ONC Test Criteria that will be tested.
- Self-attestation forms for completion and signature(s).
- Any additional supporting vendor documentation that may be needed to satisfy the criteria (e.g., system manuals, security implementation, vendor policies).
- Any 3rd party software or tools you will require to demonstrate compliance to the criteria.



### 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 Compliance supports remote testing as our method for the ONC-Health IT testing. SLI Compliance will provide the means for remote video access to your system.

### Client Test Environment

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

1. Normal operating conditions and environment for your software.
2. Standard configuration of equipment for testing (i.e. PC or laptop, or equivalent).
3. Standard Internet connectivity (wireless or LAN).

### Testing

SLI Compliance schedules a test window with a client for interactive testing based on the scope of testing the vendor has selected. This can vary from system to system and is highly dependent of what criteria the vendor is testing to. SLI Compliance requires 2 days in addition to the interactive testing for SLI Compliance personnel to complete offline testing and reporting. If there are additional days needed to complete testing in addition to the initial test window the vendor is required to arrange and pay for these additional days per the executed SLI Compliance ONC Services Agreement.

Throughout the test effort, the client is expected to provide personnel competent in the functions and navigation of the system under test. At the beginning of testing each day, SLI Compliance will send the client a remote session invitation (SLI Compliance utilizes Go-To-Meeting) for connecting. SLI Compliance will act as a 'proctor' for any functions that must be manually executed on the system. The SLI Compliance Test Proctor will instruct your staff to follow a prescribed set of steps that demonstrate



compliance with the certification criteria requirements. Some patient information and test data is required to be entered on the day of testing with SLI Compliance selecting the data and/or witnessing the data input. Other test data may be pre-loaded prior to the day of testing (Please refer to the approved Test Methods for all data requirements).

### ***Visual Verification***

Throughout the testing process, the SLI Compliance Tester/Proctor will record the testing session and take screen images as needed. The SLI testers are required to visually inspect and verify specific functionality being demonstrated for compliance to the criteria requirements.

### ***Offline Verification***

All validation that does not require remote session interaction between the Client and SLI Compliance will be conducted by SLI Compliance ATL Test Team offline. This includes documentation review and any test artifact manual validation. Upon completion of offline testing, SLI Compliance will communicate the results to the client in a timely manner.

### ***Tool Verification***

Many of the requirements utilize conformance testing tools. The approved Test Methods provide the tool detail. The tools in many cases contain test scenarios, test cases, and test data that will be used in the testing process. In addition, the testing tools will provide automated validation and reports where called out in the Test Methods. It is highly encouraged that the client be familiar with not only the Test Methods & criteria required but also all the associated conformance tools.

## **Testing Results**

SLI Compliance will assign each certification criteria requirement a pass or fail status based on the visual, manual or automated verification performed in testing. If a product under test fails any criterion, the test is considered failed. Successful testing is achieved when all designated criteria have been completely tested and deemed accepted by SLI Compliance. Incomplete or partially completed criterion is considered failed until fully demonstrated and successful. SLI Compliance maintains all test artifacts and official test results for each engagement.



### *Exceptions and Interpretations*

A system may have specific circumstances that require SLI Compliance to grant an interpretation or exception to a specific requirement. The ATL has the authority to deem certain requirements not applicable to a specific system depending on the specific circumstances. This is determined on a case by case basis.

### 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. It is at the discretion of SLI Compliance to determine what level of retesting must be conducted to successfully verify the issues have been resolved and the required criteria are satisfied. The future test effort can be scheduled immediately, and SLI Compliance will work with you to expedite the scheduling process.

### Support

As part of the contract with SLI Compliance each client is given 8 hours of support time to communicate with our ATL Team. SLI Compliance staff can answer questions, provide feedback, clarifications, and interpretations of the certification criteria to a client. Per the rules of the certification program **in NO WAY can SLI Compliance perform consulting to assist a client in obtaining successful testing and certification.**



### Certification

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Upon successful testing, SLI Compliance ATL Team will complete and submit an official test report to the SLI Compliance Authorized -Certification Body (ONC-ACB), for evaluation and if accepted final certification. If the Client is using a separate ONC-ACB for certification services, the Client will need to provide this information prior to testing. As a separate entity, SLI Compliance's ONC-ACB executes all matters pertaining to certification criteria associated with ISO 17065 that are required for the ONC-Health IT Certification program.