



2026 NextGen Direct Messaging REAL WORLD TESTING PLAN

GENERAL INFORMATION

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

Developer Name: NextGen Healthcare

Product Name(s), Version Number(s), Certified Health IT Product List (CHPL) ID(s):

NextGen® Direct Messaging 2.14 15.04.04.2054.Next.02.04.0.210812

Developer Real World Testing Page URL:

<https://www.nextgen.com/certifications-and-cost-disclosures>

JUSTIFICATION FOR REAL WORLD TESTING APPROACH

This plan will cover § 170.315(h)(2) Direct Project, Edge Protocol, and XDR/XDM and § 170.315(b)(10) EHI Export for the NextGen Direct Messaging product.

Topic	Detail
Approach Summary	<ul style="list-style-type: none"> This plan covers NextGen® Direct Messaging's approach to Real World Testing across all care settings Each criterion will have measurements listed in the Description of Measurement/Metric selection below Data will be gathered by engaging clients using our product and by queries over a fixed timeframe from audit logs. The timeframe will be a 1 to 3-month period in which the client has indicated they have exported patient data. Should no clients indicate they have exported patient data, then data will be gathered via a test environment that mimics a client's care setting
Types of Settings	<ul style="list-style-type: none"> HIE's, Hospitals, Ambulatory Settings and Payers
Usage Quantification	<ul style="list-style-type: none"> 170.315(h)(2): Verify HISP partners can successfully send/receive Direct Messages, the results will be quantified and summarized 170.315(b)(10): EHI Export History is the NextGen Direct Messaging front-end audit log for EHR export, the results will be quantified and summarized
Demonstrate Conformance	<ul style="list-style-type: none"> Successfully send at least 95% of XDR/XDM messages to HISP w/associated MDNs (Processed and Dispatched) Successfully receive at least 95% of XDR/XDM messages from HISP w/associated MDNs (Processed and Dispatched) Successfully complete 100% of Patient Specific EHI Exports during the testing period

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	<ul style="list-style-type: none"> • Successfully complete 100% of Patient Population EHI Exports during the testing period • Zero export entries completed by non-administrator users
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STANDARDS UPDATES (INCLUDING STANDARDS VERSION ADVANCEMENT PROCESS (SVAP) AND UNITED STATES CORE DATA FOR INTEROPERABILITY (USCDI))

Standard (and version)	N/A
USCDI - updated certification criteria (and USCDI version)	N/A

MEASURES USED IN OVERALL APPROACH

Description of Measurement/Metric

§ 170.315(b)(10) EHI Export

Measurement/Metric	Description
Count of exports attempted vs. completed using patient specific criteria during 1/1/26-3/31/26.	A requirement of 170.315(b)(10) is the ability to export electronic health data for a single patient. This is done from the EHI Export option using queries specific to the desired patient.
Count of patient population exports attempted vs. completed during the period of 1/1/26-3/31/26.	A requirement of 170.315(b)(10) is the ability to export electronic health data for the entire patient population. This is done by running a script against the database.
Count of patient export entries in the log associated with users that do not have admin rights during 1/1/26-3/31/26.	A requirement of 170.315(b)(10) is the ability to restrict the specific patient EHI exports to either a set of specified users or admin users. NextGen Direct Messaging restricts this functionality to admin users.

§ 170.315(h)(2) Direct Project, Edge Protocol, and XDR/XDM17

Measurement/Metric	Description
Successfully sending XDR/XDM message to HISP w/associated MDNs (Processed and Dispatched)	A requirement of 170.315(h)(2) Direct Project, Edge Protocol, and XDR/XDM is the ability to verify that Direct Messaging has successfully sent encrypted and signed XDR/XDM messages from Direct Messaging using Direct v1.2 in accordance with the standard specified at § 170.202(b) ONC XDR and XDM for Direct Messaging Specification
Successfully receiving XDR/XDM message from HISP w/	A requirement of 170.315(h)(2) Direct Project, Edge Protocol, and XDR/XDM is the ability to verify that Direct Messaging has



associated MDNs (Processed and Dispatched)	successfully received encrypted and signed XDR/XDM messages using Direct v1.2 in accordance with the standard specified at § 170.202(b) ONC XDR and XDM for Direct Messaging Specification
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Associated Certification Criteria

§ 170.315(b)(10) EHI Export

§ 170.315(h)(2) Direct Project, Edge Protocol, and XDR/XDM17

Measurement/Metric	Associated Criteria
§ 170.315(b)(10) EHI Export	N/A
§ 170.315(h)(2) Direct Project, Edge Protocol, and XDR/XDM17	N/A

Justification for Selected Measurement/Metric

§ 170.315(b)(10) EHI Export

Measurement/Metric	Justification
Count of exports attempted vs. completed using patient specific criteria.	Comparing the number of attempted patient exports with the number successfully completed will demonstrate compliance with 170.315(b)(10)(i) by showing that our software is able to complete the exports requested.
Count of patient population exports attempted vs. completed.	Comparing the number of attempted population exports with the number successfully completed will show compliance with 170.315(b)(10)(ii) by showing that our software can complete the exports requested.
Count patient export entries in the log associated with users without admin rights.	Reviewing the users who triggered an EHI export and validating that the number who were not admins is zero will demonstrate compliance with 170.315(b)(10)(i) by showing that our software restricts this functionality to admins.

§ 170.315(h)(2) Direct Project, Edge Protocol, and XDR/XDM

Measurement/Metric	Justification
Successfully sending XDR/XDM message to HISP w/associated MDNs (Processed and Dispatched) over a 3-month timeframe.	A requirement of 170.315(h)(2) Direct Project, Edge Protocol, and XDR/XDM is the ability to verify that Direct Messaging has successfully sent encrypted and signed XDR/XDM messages from Direct Messaging using Direct v1.2 in accordance with the standard specified at § 170.202(b) ONC XDR and XDM for Direct Messaging Specification.
Successfully receiving XDR/XDM message from HISP	A requirement of 170.315(h)(2) Direct Project, Edge Protocol, and XDR/XDM is the ability to verify that Direct Messaging has



w/associated MDNs (Processed and Dispatched) over a 3-month timeframe.	successfully received encrypted and signed XDR/XDM messages from at least 3 HISP partners (e.g., other vendor Health IT Modules (HISPs) that have implemented (h)(1) or (h)(2) capabilities) using Direct v1.2 in accordance with the standard specified at § 170.202(b) ONC XDR and XDM for Direct Messaging Specification.
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Expected Outcomes

§ 170.315(b)(10) EHI Export

Measurement/Metric	Expected Outcomes
Count of exports attempted vs. completed using patient specific criteria.	Expected outcome: 95% of attempts successfully completed. Since NextGen Direct Messaging is not an EHR system, it is possible that no clients used this feature, and we may need to recreate the scenarios in a test environment.
Count of patient population exports attempted vs. completed.	Expected outcome: 95% of successful attempts completed. Bulk export is done via script and is not an audited event. As such, we will not be able to review historical performance, only export attempts that are made as part of the Real World Testing program. Since NextGen Direct Messaging is not an EHR system, it is possible that no clients used this feature, and we may need to recreate the scenarios in a test environment.
Count patient export entries in the log associated with users without admin rights.	Expected outcome: zero export entries will be associated with non admins.

§ 170.315 (h)(2) Direct Project, Edge Protocol, and XDR/XDM

Measurement/Metric	Expected Outcomes
Successfully sending XDR/XDM message to HISP w/associated MDNs (Processed and Dispatched) over a 3-month timeframe.	95% percent of messages sent with XDR/XDM data will be delivered with the appropriate MDNs (Dispatched and Processed notifications) to the various HISP partners.
Successfully receiving XDR/XDM message from HISP w/associated MDNs (Processed and Dispatched) over a 3-month timeframe.	95% percent of messages received with XDR/XDM data will be delivered with the appropriate MDNs (Dispatched and Processed notifications) to our system.



SCHEDULE OF KEY MILESTONES

Key Milestone	Care Setting	Date/Timeframe
Development of candidate list of HISP partners to assist with the Real-World Testing	HIEs, Hospitals, Ambulatory Clinics, Payers	10/04/2025
Finalization of the Real-World Testing plan, and submission to ONC-ACB per ONC-ACB instruction	IEs, Hospitals, Ambulatory Clinics, Payers	11/15/2025
RWT / Collection of data / create report	HIEs, Hospitals, Ambulatory Clinics, Payers	04/01/2026
Validation of expected results	HIEs, Hospitals, Ambulatory Clinics, Payers	06/01/2026
Submission of final test results Report	HIEs, Hospitals, Ambulatory Clinics, Payers	02/15/2027

ATTESTATION

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 the health IT developer's Real World Testing requirements.

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Date: 8/29/2025

ⁱ Certified health IT continues to be compliant with the certification criteria, including the required technical standards and vocabulary codes sets; certified health IT is exchanging EHI in the care and practice settings for which it is marketed for use; and EHI is received by and used in the certified health IT. (85 FR 25766) ⁱⁱ <https://www.federalregister.gov/d/2020-07419/p-3582>