# Test Criteria: 170.315.b.8 Data Segmentation for Privacy - Receive

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| **Testing Result** |  |
| Participant and Product-with-version |  |
| Setting (Ambulatory or Inpatient) |  |
| Test Proctor |  |
| Test Date |  |
| Test Result | Pass:  Fail:  No Attempt: |
| Error Description (if applicable) |  |
| Modifications to Product Under Test |  |
| Additional Software Used |  |
| Additional Proctor Notes |  |

### Overview

In this document you will find:

* [Test Data and Test Tools](#_Test_Data_and)
* [Standards Support](#_Demonstrate_Standards_Support)
* [Drummond Test Report (Instructions, Expected Results, Points to Remember)](#_DTR_170.315(b)(8)_Data)
* [Test Procedures](#_Test_Procedures)
* [Appendix A: Testing Guide](#_Appendix_A:_Testing)
* [Appendix B: ONC Criteria](#_Appendix_B:_ONC)

### Version of ONC Test Method

1.1

### Scope of Proctoring Sheet

The ONC test method associated with this criterion is the only approved test method for EHR Meaningful Use certification. This Proctoring Sheet is not a replacement test method but a test procedure document for performing the ONC test method and recording the results. Proctoring Sheet describe test data, test criteria and expected results. It is assumed the Health IT developer or Participant UnderTest is familiar with the associated ONC test method.

# Robustness and Reliability Requirement

To satisfy the module criteria, it is expected that the Product-Under-Test is able to complete the testing requirements reliably, including repeat testing with the same result without error, and with a satisfactory level of robustness. This includes unexpected error messages produced through normal operation, multiple unintended restarts of the application or any other “buggy” facets of the product displayed while testing. These errors are record in the Additional Proctor Notes of the proctor sheet. Lack of reliability and robustness of design will result in failure of the module.

# Test Data and Tools

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| **Test Data Source:** | ONC-Supplied  DG-Supplied:  Developer-Supplied: |
| **Pre-Test Data Setup:**  Not applicable. | |
| **Test Data:**   * ‘Restricted’ test file provided by ONC can be downloaded for the applicable setting from the ETT [C-CDA R2.1 Validator](https://ttpedge.sitenv.org/ttp/#/validators) using the “Receiver SUT Test Data” selection. File(s) will be loaded/received during test event:   Ambulatory:   * + 170.315\_b8\_DS4P\_Amb   Inpatient:   * + 170.315\_b8\_DS4P\_Inp * ‘Unrestricted’ test file provided by DG will be loaded/received during test event and is available for download in Zendesk. Please note that receipt of an ‘unrestricted’ C-CDA may be satisfied if also testing 170.315(b)(1). Discuss this option with your Test Proctor. | |
| **Test Tools:**  Not applicable. | |

# Demonstrate Standards Support

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| **Test Result:** | PASS:  FAIL:  No Attempt: |
| **Instructions:** Implement standards to demonstrate support for both the C-CDA Release 2.1 and Data Segmentation for Privacy (DS4P) Release 1 standards. | |

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| **§170.205 Content Exchange Standards – Patient Summary Record** | | |
|  | §170.205(a)(4) | HL7 Implementation Guide for CDA® Release 2: Consolidated CDA Templates for Clinical Notes (US Realm), Draft Standard for Trial Use, Volume 1—Introductory Material, Release 2.1 and HL7 Implementation Guide for CDA® Release 2: Consolidated CDA Templates for Clinical Notes (US Realm), Draft Standard for Trial Use, Volume 2—Templates and Supporting Material, Release 2.1 (incorporated by reference in § 170.299). |
|  | §170.205(o)(1) | HL7 Implementation Guide: Data Segmentation for Privacy (DS4P), Release 1. |

# DTR 170.315(b)(8) Data Segmentation for Privacy – Receive

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| **Test Result:** | PASS:  FAIL:  No Attempt: |
| **Instructions:** Health IT module receives **two** C-CDA R2.1 summary records:   1. C-CDA formatted in accordance with §170.205(a)(4) that is document-level tagged as restricted and subject to restrictions on re-disclosure in accordance with §170.205(o)(1). This document must be sequestered and viewed by authorized users only. 2. C-CDA formatted in accordance with §170.205(a)(4) that is NOT document-level tagged as restricted. | |
| **Expected Test Result:**   * Receive a summary record that is formatted in accordance with the standard adopted in § 170.205(a)(4) that is document-level tagged as restricted and subject to restrictions on re-disclosure according to the standard adopted in § 170.205(o)(1). * Sequester the document-level tagged document from other documents received. * Only authorized users are able to view the restricted document and without incorporating any of the data from the document. * In addition to the restricted document-level tagged document, health IT module must also receive a summary record that is formatted in accordance with the standard adopted in § 170.205(a)(4) that is NOT document-level tagged as restricted and subject to restrictions on re-disclosure according to the standard adopted in § 170.205(o)(1). | |
| **Points to Remember:**   * “Sequester” means that only authorized users will have the ability to view the document. Once document-level tagged documents are received and stored in the Health IT Module they must only be accessible and viewable by authorized users and separated from other documents. The developer has full design and development discretion to implement a solution which handles this capability properly. Specific functionality other than authorized user access is not required, but if a developer opts to implement a more complex solution than described that is permissible and acceptable. * Receipt of an ‘unrestricted’ C-CDA may be satisfied if also testing 170.315(b)(1). Discuss this option with your Test Proctor. | |

### Test Procedures

**1.1 Data Segmentation for Privacy: Receive**

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|  | Health IT developer identifies policies associated with the handling of the Data Segmentation for Privacy documents. |
|  | User accesses health IT module and receives summary record supplied by ONC that is tagged as restricted and subject to restrictions on re-disclosure. (Note: Receipt may include proctor emailing file to developer to upload.) |
|  | Proctor verifies health IT module can receive summary record document formatted in accordance with the standard specified at §170.205(a)(4) that is document-level tagged as restricted, and contains restrictions on re-disclosure for each health care setting being certified. |
|  | User demonstrates how health IT module sequesters document-level tagged document from other summary documents for a specific patient. |
|  | Authorized user views this sequestered document without incorporating it into a patient record. |
|  | Proctor performs visually inspects document view within health IT module to verify:   * Data Segmentation for Privacy specific data (complete and without omission); * General Header author; and * If a document contains information protected by specific privacy policies, text indicated the nature of the explicit notice to the provider receiving the disclosed information. * If the author of document sections are different then the document author, using the health IT function(s), Proctor verifies health IT module provides the correct data provenance. |
|  | Unauthorized user attempts to, but cannot, access or view the sequestered C-CDA Release 2.1 document restricted according to the DS4P Release 1 patient summary. |

<INSERT SCREEN SHOTS>

* 1. **Data Segmentation for Privacy: Receive without Restrictions**

**Note: Receipt of an ‘unrestricted’ C-CDA may be satisfied if testing 170.315(b)(1).**

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|  | User accesses health IT module and receives summary record supplied by developer that contains no restrictions. |
|  | Proctor verifies health IT module can receive summary record document formatted in accordance with the standard specified at §170.205(a)(4) that is NOT document-level tagged as restricted for each health care setting being certified. |

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# Appendix A: Testing Guide

*This appendix contains more details and background on the testing requirements, including explanation on underlying standards, notable issues and best practice suggestions.*

Rev 01-Mar-2016 Additions

* The DS4P standard does not have a service discovery mechanism to determine if a potential recipient is able to receive a tagged document. We expect that providers will have to determine the receiving capabilities of their exchange partners, similar to how they have to work with their exchange partners today when they are manually exchanging sensitive health information via fax.

# Appendix B: ONC Criteria and Standards

*This appendix contains copy of the relevant ONC criteria and standards for this proctor sheet as a reference. In the event of a discrepancy with the ONC Final Rule, the ONC Final Rule takes precedence.*

**§170.315(b)(8) *Data segmentation for privacy—receive.*** Enable a user to:

(i) Receive a summary record that is formatted in accordance with the standard adopted in § 170.205(a)(4) that is document-level tagged as restricted and subject to restrictions on re-disclosure according to the standard adopted in § 170.205(o)(1);

(ii) Sequester the document-level tagged document from other documents received; and

(iii) View the restricted document without incorporating any of the data from the document.

**§170.205 Content Exchange Standards – Patient Summary Record.**

**(a)(4) *Standard.*** HL7 Implementation Guide for CDA® Release 2: Consolidated CDA Templates for Clinical Notes (US Realm), Draft Standard for Trial Use, Volume 1—Introductory Material, Release 2.1 and HL7 Implementation Guide for CDA® Release 2: Consolidated CDA Templates for Clinical Notes (US Realm), Draft Standard for Trial Use, Volume 2—Templates and Supporting Material, Release 2.1 (incorporated by reference in § 170.299).

**(o)(1) Standard.** HL7 Implementation Guide: Data Segmentation for Privacy (DS4P), Release 1.

# Change Log

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| Revision | Change Description |
| 03-Jan-2017 | Removed reference to developer-supplied test data and added reference to ONC-supplied ‘restricted’ test data. Added option for satisfying receipt of ‘unrestricted’ file as part of 170.315(b)(1). |
| 01-Mar-2016 | Initial Release. |
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**About Drummond Group LLC**

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