Disclosure Statement

The electronic health records (EHR) technology offered through IntegraCloud (the "IntegraCloud EHR") seeks to provide a broad array of clinical and record keeping functions to a variety of users operating in a dynamic and changing health care industry. The nature of the specific data and information that must be collected to achieve those clinical and record keeping functions may change over time and vary by clinical practice or specialty (e.g. Oncology). Therefore, functionality of the certified health IT, including among other things the manner in which data is collected, software coding and processes, interoperability of platforms, and user interfaces, may require updating to address the changing nature of data and information necessarily collected from users. Given the challenges of timely incorporating dynamic market changes into the production environment of the certified health IT, it is possible that updates or changes necessary for some certified functionality may not be effectively implemented in the time or manner necessary for certain users to enjoy the benefit of otherwise expected capabilities. In order to evaluate the functionality of the current production environment of the IntegraCloud EHR, IntegraConnect, LLC (IC) engaged qualified professionals to perform an independent assessment. Although this assessment was not intended to be a complete audit of all certified functionality, IC sought to evaluate key functions that were tested by the ONC-ACB or have been self-declared by IC. Following the completion of the first phase of this evaluation, IC has identified several deficiencies in functionality that would reasonably be expected of certified health IT. While several deficiencies are highlighted in this Disclosure Statement, a more complete listing of the results of the review and mitigation efforts has been incorporated into the Costs and Limitations table.

- ONC regulations governing certified health IT require certain functionality identifying Drug-Drug and Drug-Allergy interactions. This functionality requires that, at the time of computerized provider order entry (CPOE), including prescribing a medication, interventions must automatically indicate to the user whether any Drug-Drug or Drug-Allergy contraindications are evident within the patient's history. Although the IntegraCloud EHR generally employs a third-party vendor for ePrescribe tools, there are certain workflows in which a user may send complete medication orders without engaging these third-party vendors (e.g., when medications are ordered and administered locally at a clinic). Therefore, it is possible that a user may enter a medication order that would not achieve a compliant automated Drug-Drug or Drug-Allergy interaction check.

- Regulations governing certified health IT require the IntegraCloud EHR to offer certain functionality related to Clinical Quality Measures (CQMs). Among others, this functionality includes the ability to record all of the data required to calculate each CQM and the ability to export, import, calculate, and report the CQM data. As described more fully in the Costs and Limitations table below, IC has identified functional deficiencies that fail to meet the requirements of §170.315(c)(1)-(3). As a result of these technological deficiencies, the IntegraCloud EHR may not be able to record all of the data that would be necessary to calculate each CQM, as required by §170.315(c)(1). Additionally, the IntegraCloud EHR may not be able to export a data file at any time the user chooses and without subsequent developer assistance, as required by §170.315(c)(1). IC is remediating these deficiencies by adding new functionality and improving its existing technology to bring the IntegraCloud EHR into compliance with §170.315(c)(1)-(3). During the remediation of these deficiencies, IC will continue to contract with FigMD, an independently certified vendor, to perform the import, calculate and report functions for our users.

- Since its certification in October 2018, the actual needs of the IntegraCloud EHR's specific customer base narrowed the number of CQMs relevant to our business from the twenty-three (23) CQMs initially presented for testing and certification to a more limited set of eight (8) CQMs used in the clinical environment of our users. The reduction of the number of CQMs presented for certification may affect the remediation efforts currently being implemented related to IC's compliance with §170.315(c)(1)-(3).

- ONC regulations governing certified health IT require certain functionality related to sending and receiving Transition of Care documents in the CCDA format. This functionality requires that the system be able to validate and display data in the CCDA format, and be able to create a file formatted according to the standard specified in §170.205(a)(4) using the Continuity of Care Document and Referral Note document templates. While IC generally supports this functionality, there is a risk that the IntegraCloud EHR could fail to generate a fully conformant CCDA document. IC is currently employing the current version of the locally installable reference CCDA validator tool to evaluate and, if necessary, to mitigate that risk.

- ONC regulations governing certified health IT require certain functionality related to viewing, downloading and transmitting health information to a third party in accordance with the standard adopted in §170.204(a)(1). This functionality may alternatively be demonstrated in accordance with the standard specified in §170.204(a)(2). A review of this functionality found the IntegraCloud EHR to be compliant, IC identified some risks set forth in greater detail in the Costs and Limitations table below. For instance, certain users not be able to: (a) view their Problems List; (b) download their health information in an XML (CCDA) file format; or (c) transmit their health information using standard, unencrypted email.

- ONC regulations governing certified health IT require certain functionality related to the calculation and reporting of the Promoting Interoperability (PI) measures supported by the IntegraCloud EHR. Testing has confirmed that the IntegraCloud EHR supports the correct calculation and reporting of these PI measures, these calculations may require the execution of back-end processes and may not allow users to unilaterally initiate the calculation and reporting of measures in all cases.
- ONC regulations governing certified health IT require certain functionality related to an application programming interface (API) that allows for patient selection and data category requests, including all data category requests.
    o Specifically, ONC regulations require that, for each of the individual data categories specified in the Common Clinical Data Set, the API return the full set of data for that data category (according to the specified standards, where applicable) in a computable format, and respond to requests for patient data associated with a specific date as well as requests for patient data within a specified date range. In certain instances, a review of this functionality determined that the IntegraCloud EHR may not perform data range filtering as required, may not enable the selection of data categories as specified, and the CCDA documents generated may contain some conformance errors.
    o Each of these three criteria require documentation that contains API syntax, function names, required and optional parameters and their data types, return variables and their types/structures, exceptions and exception handling methods and their returns, as well as the software components and configurations that would be necessary for an application to implement in order to be able to successfully interact with the API and process its response(s). It also required Terms of Use, including any associated developer policies and required developer agreements. The API documentation must be available via a publicly accessible hyperlink. Our review found the documentation to be lacking certain of the components above, as well as sufficient detail for a developer to easily and correctly implement the API, and other limitations as outlined in the table below.
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Additional costs and limitations of the IntegraCloud EHR are detailed in the following Costs and Limitations table.

Capability	Description of Capability	Costs or Fees *Types of costs or fees that a user may be required to pay to purchase, license, implement, maintain, upgrade, use, or otherwise enable and support the use of the implementation or use of the capability -OR- in connection with the data generated in the course using the capability*	Contractual Limitations *Limitations of a contractual nature (including developer policies and other business practices) that a user may encounter in the implementation or use of the capability -OR- in the connection with the data generated in the course of using the capability*	Technical or Practical Limitations *Limitations of a technical or practical nature that a user may encounter that could prevent or impair the successful implementation, configuration, maintenance, support or use of the capability -OR- prevent or limit the use, exchange or portability of any data generated in the course of using the capability*
EMR DIRECT - Direct Messaging *§170.315(e)(1)* *§170.315(e)(2)* *§170.315(b)(1)* *§170.315(b)(2)* *§170.315(h)(1)* *§170.315(h)(2)*	This functionality allows users to send and receive Direct-based messages to/from other users of certified health IT systems. Direct messages may include clinical data, notes, and other information. Our Direct offerings support related Meaningful Use and ONC requirements for sending and receiving transitions of care summary documents. We also support a range of other messaging options. Our Direct capabilities include bundled Health Internet Service Provider (HISP) services for facilitating message exchange. However, see limitations and additional types of costs that may apply for these and other third-party HISPs.	Monthly fee per provider + one-time setup fee	No contractual limitations	No technical or practical limitations
CHANGE HEALTHCARE SERVICES - Electronic Claim Submission, Patient Payer Eligibility, Receive Clearinghouse Reports, Receive Claim Submission Reports, ERA Services, Claim Status Updates	This functionality provides users to the ability to submit primary and secondary claims electronically to most payers who accept electronic claim submission. This functionality also provides users the ability to receive electronic clearinghouse and payer responses which includes 277 - Clearing House reports - denials, 837 - electronic claim submission batch reports, 835 - Electronic Remittance Advices, Real-time payer verifications, Electronic Claim status reports to update the status of each claim until payment has been received.	Monthly fee	No contractual limitations	No technical or practical limitations

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FAXAGE	This functionality allows users to send and receive secured faxes to/from others via Faxage local and toll free fax.	Volume Based Fee	No contractual limitations	No technical or practical limitations
RELATIENT	This functionality allows users to send automated patient appointment reminders via phone, email, text. This functionality also allows patients to confirm, cancel, and/or submit request to reschedule appointments.	Monthly Fee	No contractual limitations	No technical or practical limitations
ELECTRONIC PATIENT STATEMENTS	This functionality allows users to batch and send patient statements via PLD Group	Volume Based Fee	No contractual limitations	No technical or practical limitations
HEALTH VAULT APP	This functionality allows patients to send and receive secured Direct-based messages to/from providers of certified health IT systems.	No Fee	No contractual limitations	No technical or practical limitations
MS SQL SERVER	The primary functionality of this software is storing and retrieving data as requested by other software applications-which may run either on the same computer or on another computer across a network (including the Internet).	No Fee	No contractual limitations	No technical or practical limitations

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Newcrop *§170.315(a)(1)* *§170.315(a)(4)* *§170.315(a)(7)* *§170.315(a)(10)* *§170.315(a)(8)* *§170.315(b)(3)*	This functionality provides clinicians the ability to send e-prescriptions, the electronic transmission of prescriptions between healthcare organizations and pharmacies.	No Fee	No contractual limitations	NewCrop did not receive CHPL certification and was unable to demonstrate certain functionalities in the course of the review. The IntegraCloud EHR is transitioning to another vendor Dr. First to remediate deficiencies and limitations in certified functionality.
FIRST DATA BANK	This functionality provides clinicians access to pharmaceutical information (medications) that is used within healthcare environment.	No Fee	No contractual limitations	No technical or practical limitations
MEDLINE PLUS *Clinical Decision Support* *§170.315(a)(9)*	This functionality provides encyclopedic information on health and drug issues and provides a directory of medical services. MedlinePlus Connect links patients or providers in electronic health record (EHR) systems to related MedlinePlus information on conditions or medications.	No Fee	No contractual limitations	The IntegraCloud EHR uses Medline Plus for its Clinical Decision Support (CDS), which is a website of consumer health information. Presentation of the CDS is not differentiated based on user's role. The data elements for which the EHR searches for linked CDS interventions are limited to problem list, medication list and laboratory results. The data for which the IntegraCloud EHR searches for linked CDS interventions based on an individual data element rather than combinations.

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				Some of the bibliographic information links used by the IntegraCloud EHR are not accessible.
RXNAV	This functionality is a browser for several drug information sources, including RxNorm, RxTerms and NDF-RT. RxNav finds drugs in RxNorm from the names and codes in its constituent vocabularies. RxNav displays links from clinical drugs, both branded and generic, to their active ingredients, drug components and related brand names. RxNav also provides lists of NDC codes and links to package inserts in DailyMed. The RxTerms record for a given drug can be accessed through RxNav, as well as clinical information from NDF-RT, including pharmacologic classes, mechanisms of action and physiologic effects.	No Fee	No contractual limitations	No technical or practical limitations
MEINBERG NTP	This functionality, Network Time Protocol (NTP), provides time synchronization in a network.	No Fee	No contractual limitations	No technical or practical limitations

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Demographics *§170.315(a)(5)(i)(A)*	This functionality allows users to record, change and access patient demographic data, including race and ethnicity, in accordance with certain standards.	No Fee	No contractual limitations	The race and ethnicity codes collected and coded by the IntegraCloud EHR are more detailed than those required by the Common Clinical Data Set race and ethnicity hierarchy. Consequently, if a detailed race or ethnicity code is selected, there may be limitations with respect to exporting such detailed coding in a CCDA.
Problem List *§170.315(a)(6)*	This functionality allows users to record, change, and access a patient's active problem list in accordance with certain standards.	No Fee	No contractual limitations	Though the IntegraCloud EHR generally supports this functionality, it currently only stores ICD-10-CM codes, which requires the user to map the coding to a SNOMED-CT code and store it using settings in advance of data capture. Certain codes within the current ICD-10-CM standard do not return in the search functionality for the purpose of patient data capture.
Family Health History *§170.315(a)(12)*	This functionality allows users to record, change and access a patient's family health history in accordance with certain standards.	No Fee	No contractual limitations	Users must specifically add SNOMED CT codes for certain familial diagnoses when adding such diagnoses to the patient's family health history. Familial relationships are currently captured in text form without SNOMED CT codes.
Patient-specific education resources *§170.315(a)(13)*	This functionality allows users to identify patient-specific education resources based on data included in the	No Fee	No contractual limitations	The IntegraCloud EHR identifies patient-specific education resources based upon the patient's diagnosis only.

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	patient's problem list and medication list in accordance with certain standards.			
Implantable Device List §170.315(a)(14)(vi)	This functionality enables a user to change the status of a Unique Device identifier.	No Fee	No contractual limitations	.Status change functionality is not available.
Clinical information reconciliation and incorporation §170.315(b)(2)	This functionality requires proper matching of a transmitted transition of care/referral summary to the correct patient.	No Fee	No contractual limitations	The IntegraCloud EHR requires user intervention to match and save a patient's CCDA to that patient's file.
Data Export §170.315(b)(6)	This functionality enables users to set specified configuration options when creating individual or sets of export summaries.	No Fee	No contractual limitations	The export summary configuration logic of the IntegraCloud EHR is limited by the end date of the patient's visit. Instances following such visit may not be captured such as creation date of certain data in a patient's record may be after the time of a patient's visit (e.g., a lab result arriving or an electronic prescription renewal being authorized).
Clinical quality measures (CQMs) §170.315(c)(1)(i)	This functionality enables users to record the data necessary to calculate the CQMs supported by the certified health IT.	No Fee	No contractual limitations	After an independent review of the 23 CQMs presented for certification, it is IC's understanding that the IntegraCloud EHR does not currently capture at least 10 of the data objects necessary to accurately calculate these CQMs in a manner capable of exporting them in a QRDA I document.

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Clinical quality measures (CQMs) *§170.315(c)(1)(ii)* *§170.315(c)(2)* *§170.315(c)(3)*	This functionality requires that the health IT have the ability to export and import the data necessary to calculate the CQMs supported by the certified health IT, and to calculate and report the CQMs included within the health IT's certification.	No Fee	No contractual limitations	The IntegraCloud EHR is currently not able to independently export a QRDA I file, import a QRDA I file, calculate the CQMs for which it is presented for certification, or export a QRDA III file for transmission of clinical quality measurement data. The IntegraCloud EHR has contracted with (and relies on) FIGmd, Inc., an independently certified health IT registry platform, to fully and correctly provide these required CQM export, import, calculate and report functionalities.
Auditable events and tamper-resistance *§170.315(d)(2)*	This functionality enables users to record actions related to electronic health information in accordance with certain standards.	No Fee	No contractual limitations	The actions recorded by the IntegraCloud EHR do not reflect specific field values, query or print activity.
Amendments *§170.315(d)(4)*	This functionality enables users to select records affected by a patient's request for amendment and append the amendment to the affected record.	No Fee	No contractual limitations	The IntegraCloud EHR reflects the status of an accepted amendment and contains controls for ensuring amendments are intended. The tracking capability of the audit log however is limited to reflecting updates and editing activity.
View, download, and transmit to third party *§170.315(e)(1)*	This functionality enables patients and authorized representatives to use health IT to view certain data, download certain data in specified formats, transmit data by certain methods and reflect certain historical patient activity.	No Fee	No contractual limitations	The patient portal linked to the IntegraCloud EHR does not display the patient's problem list. The download formats available in the patient portal linked to the IntegraCloud EHR are limited to PDFs. The patient portal linked to the IntegraCloud EHR does not permit patients to send

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				unencrypted emails. The current patient portal linked to the IntegraCloud EHR has limited audit capabilities.