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January 25, 2018

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Qualifacts Systems, Inc.
Carelogic Enterprise S2.15
2015 E Attestation
Mandatory Disclosure

To Drummond Group:

The Mandatory Disclosure statement of costs and limitations for our certified product(s) is attached to this letter and will be posted along with the required product information on our website here: www.Qualifacts.com

A provider does have to **sign a contract** when purchasing Qualifacts Systems' Carelogic Enterprise S2.15. The terms for contractual obligation are negotiable and include third party add ons. Our certified product is comprised of the Carelogic Enterprise S2.15 core system and a few tightly integrated third party systems that we describe in this Mandatory Disclosure Attestation document.

Carelogic Enterprise S2.15 and its integrated **DrFirst Rcopia** application shall require a monthly fee per prescriber to support §170.314(a) (1) CPOE Medication, §170.314(a) (2) DDDA Interaction Checks, §170.314(a) (6) Medication List, §170.314. (a)(7) Medication Allergy List, §170.314(a) (2) Drug Formulary, and §170.314(b) (3) ePrescribing. There is also a onetime fee for identity proofing for Electronic Prescriptions for Controlled Substances prescribers as well as a onetime identity proofing fee for those prescribers who will not electronically send a controlled substance.

Carelogic Enterprise S2.15 and its integrated **Change Healthcare** (Emdeon) Clinician Exchange Labs application shall require a monthly fee per provider to support the §170.314.a.1 – Computerized Provider Order Entry-Labs. Integration with Change Healthcare is one option for meeting CPOE Labs but not the only option.

Carelogic Enterprise S.15 shall require a monthly fee per mailbox for MaxMD DIRECT messaging which is used for §170.314(b) (2) Transition of Care – SMTP and Secure Messaging and §170.314 (e) (3) when using Healthvault Patient Portal.

Carelogic Enterprise S2.15 may require a one-time cost to modify or build a custom secure HL7 file to upload to the public health entity for §170.314(f) (2) Transmission to immunization registries.

CareLogic Enterprise S2.15 may charge the user a fee based on utilization per customer agency per month for **data storage space** for documents in the **document library** used with §170.314(b) (1) Transitions of Care – SMTP and §170.314. (b)(4) Clinical Reconciliation

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Carelogic Enterprise S2.15 may charge a monthly fee per user for the use of CareLogic Enterprise S2.15 integrated **IMPACT** Assessment tool if the user elects to use this tool for §170.314(c)(1)-(3) Clinical Quality Measures – capture and export, Clinical Quality measures-import and calculate.

Carelogic Enterprise S2.15 may charge a monthly fee per **report writer** for the use of the ad hoc report writing tool using third party software **Pentaho** for use with §170.314(g)(2))Automate measure calculation.

Carelogic Enterprise S2.15 has a license and includes the "**Diagnostic and Statistical Manual of Mental Disorders, Fifth Edition.**™ Copyright ©2013 content from the American Psychiatric Association." The American Psychiatric Association requires users to gain permission and Qualifacts Systems, Inc. collects a fee for each user of this content. Therefore, Carelogic Enterprise S2.15 may charge a monthly fee for the use of this Diagnostic and Statistical Manual of Mental Disorders, Fifth Edition diagnosis content which is used for the following criteria §170.314(a) (8) Clinical Decision Support, §170.314(a)(15) Patient Specific Education Resources, §170.314(b)(2) Transitions of care , §170.314(a)(5) Problem List , §170.314(b)(4) Clinical Information Reconciliation, §170.314(f)(2) Transmission to public health agencies-immunizations , §170.314(c)(1,2,3) Clinical Quality Measures, §170.314(b)(6) Data Portability.

We agree to notify Drummond Group of any and all future changes to our transparency and disclosures language for this certified product-version.

We understand and agree that the ONC Health IT Certification Program Final Rule statement gives Drummond Group, as an ONC-ACB, the sole responsibility for ensuring compliance and determining appropriate consequences if EHR technology developers fail to divulge accurate transparency and disclosures information.

We understand and agree that we will provide to Drummond Group copies of or give access to any and all websites, marketing materials, communication statements, and other assertions made by your organization regarding the ONC certification status of this product in a reasonable time to ensure the transparency and disclosures information is being accurately disclosed.

Warm Regards,



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Qualifacts' Carelogic Enterprise S2.15 Costs and Limitations of Certified Health IT				
Capability	Description of Capability	Costs or Fees <i>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</i>	Contractual Limitations <i>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</i>	Technical or Practical Limitations <i>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</i>
A provider does have to sign a contract when purchasing Qualifacts Systems' Carelogic Enterprise S2.15.	The terms for contractual obligation are negotiable and include all third party add ons. Our certified product is comprised of the Carelogic Enterprise S2.15 core system and a few tightly integrated third party systems some of which we describe in this Costs and Limitations document.	In order to gain access to Carelogic Enterprise S2.15, there is a <ul style="list-style-type: none"> One time implementation fee per agency, a monthly recurring fee per agency based on the number of named or concurrent users 	<i>No contractual limitations</i>	<i>Currently a user has the option of using Internet Explorer version 10 or 11, Safari, or Chrome to run Carelogic Enterprise S2.15.</i>
Ability to transmit prescriptions electronically to the pharmacy; conduct a drug formulary check; conduct Drug-Drug, Drug – Allergy Checks Criteria: §170.314.b.3 – Electronic prescribing §170.314.a.10 - Drug Formulary Checks §170.314.a.2 - Drug-Drug, Drug-Allergy Checks	Carelogic Enterprise S2.1 includes a seamless interface with a third party ePrescribing tool named DrFirst Rcopia . DrFirst Rcopia allows the user to electronically prescribe and transmit both controlled and non-controlled substances. DrFirst Rcopia includes the additional capability of conducting drug formulary checks at the point of prescribing. DrFirst Rcopia also conducts a Drug-Drug, Drug-Allergy Check at the point of prescribing.	There are different levels of licenses and fees associated with being able to use DrFirst Rcopia for electronic prescribing. The EPCS level includes a onetime identity proofing (LOA3) fee per user fee as well as an ongoing monthly fee per prescriber. The Standard level also includes a onetime identity proofing fee (LOA2) as well as an ongoing monthly fee per prescriber.	<i>No contractual limitations</i>	<i>There are no technical or practical limitations.</i>

<p>Electronically transmit lab orders to the laboratory and electronically receive lab results back from the laboratory.</p> <p>Criteria: §170.314.a.1 – Computerized Provider Order Entry-Labs</p>	<p>Through a seamless integration between Carelogic Enterprise S2.15 and Change Healthcare (Emdeon) Clinician Exchange Labs, Carelogic Enterprise S2.15 offers user the option (not required) to electronically transmit lab orders to a laboratory and electronically receive lab results from a laboratory.</p>	<p>There is a monthly fee per user for this access to electronically write and transmit Lab orders and/or electronically receive lab results.</p>	<p><i>No contractual limitations</i></p>	<p><i>No technical or practical limitations</i></p>
<p>Carelogic Enterprise S2.15 includes the ability to send and receive secure messages and to send and receive DIRECT messages</p> <p>Criteria: §170.314.e.1- View, Download, and Transmit to 3rd Party §170.314.e.3 – Secure Messaging §170.314.b.2.- Transitions of care §170.314.h.1 - Direct project</p>	<p>Carelogic Enterprise S2.15 includes an External Message Center which is a secure messaging platform within CareLogic Enterprise S2.15 that enables the HIPAA-compliant transfer of patient health information. In order to provide this secure messaging capability, Carelogic Enterprise S2.15 has interfaced with a third party Health Information Service Provider (HISP), MaxMD DIRECT. A Direct messaging email address is required for sending and receiving external messages, as well as for sending and receiving a summary of care to providers outside the agency.</p> <p>MaxMD is also required in order for a patient to send a CCDA or Secure message from the portal to an external provider.</p> <p>CareLogic Enterprise S2.15 has the means to collect the data on how often the patient views, downloads or transmits that clinical summary from the Healthvault patient portal.</p>	<p>In order to be able to use the External Message center, each user who wants to send secure messages or transmit and/or receive a Summary of Care must have a MaxMd secure Messaging Address.</p> <p>Qualifacts provides one address at no cost. Any additional addresses are provided at a fee per month per address.</p>	<p><i>No contractual limitations</i></p>	<p><i>Technical limitation- MaxMD is the only HISP Carelogic Enterprise S2.15 is interfaced with. If a user wanted to use a different HISP, we would have to build an interface and there would be fees associated with that interface. There are no practical limitations.</i></p>
<p>Carelogic Enterprise S2.15 includes the ability to securely report required health information data to public entities.</p> <p>Criteria: §170.314.f.2- Transmission to immunization registries</p>	<p>If your agency is required to report immunization data to a public entity immunization registry, Qualifacts includes a secure file (HL7) to download the data from Carelogic S2.15 and upload the data to the immunization entity.</p>	<p>There is no additional cost for using our standard HL7 file for downloading then uploading the immunization data to the immunization registry. If the user’s immunization registry does not use our standard HL7 file, there may be a onetime fee to modify or build a custom file.</p>	<p><i>No contractual limitations</i></p>	<p><i>If the user’s immunization registry does not use our standard HL7 file, there may be a onetime fee to modify or build a custom file. No practical limitations.</i></p>

<p>Carelogic Enterprise S2.15 include the ability to save and store external documents, in each patient’s electronic health record, to a document library.</p> <p>Criteria: §170.314.b.1-Transitions of care:</p>	<p>When a user receives an external document such as the CCDa via the external messaging feature or an image result from the patient via mail, email, or fax (for example), that document can be uploaded to each patient’s document library for storage and to view as part of the electronic health record.</p>	<p>Qualifacts charges a flat rate per month per agency for the first 50GB of storage and an additional flat rate per month for each additional 50 GB of storage.</p>	<p><i>No contractual limitations</i></p>	<p><i>No technical or practical limitations</i></p>
<p>Carelogic Enterprise S2.15 provides an ad hoc report writing tool that can be used to build, modify, and run reports.</p> <p>Criteria §170.314.g.2. –Automate Measure Calculation</p>	<p>User can use our ad hoc reporting tool, called Pentaho, to modify the Measure report if the workflow used when building the report to collect data differs from the workflow the provider uses. The tool can also be used to build other reports such as patient lists for research or patient lists to determine who needs a patient reminder about such things as a flu shot, for example.</p>	<p>Qualifacts charges a per report writer per month fee to have Pentaho report writing capability.</p> <p>We provide a user console for users who just want to run reports or make simple changes at no cost to the user.</p>	<p><i>No contractual limitations</i></p>	<p>Practical limitation-If a Provider wants to change our report, a report writer must know some SQL in order to write ad hoc reports with the Pentaho Report Writer.</p> <p><i>No technical limitations.</i></p>
<p>Carelogic Enterprise S2.15 includes many clinical quality measures in Carelogic S2.15 for the provider to use for attesting to the quality payment programs.</p> <p>Criteria: §170.314. c.1.-3- Clinical Quality Measures – capture and export, Clinical Quality measures-import and calculate.</p>	<p>One of the clinical quality measures in Carelogic Enterprise S2.15 includes a requirement to use a diagnostic tool for depression screening called the PHQ-9. If the provider chooses this particular Clinical quality measure, he will need to incorporate the PHQ-9 score into the electronic health record for Clinical Quality Measure capture. The provider has the option of manually documenting the PHQ-9 score in the electronic health record or using our integrated Assessment tool called IMPACT.</p>	<p>Qualifacts charges a per month per Carelogic Enterprise S2.15 user fee for the IMPACT assessment tool.</p>	<p><i>No contractual limitations</i></p>	<p><i>No technical or practical limitations</i></p>
<p>Carelogic Enterprise S2.15 has an interface (connection) with the Healthvault patient portal that allows us to track when a patient views, downloads, or transmits their summary of care.</p> <p>Criteria: 170.314.e.1 - View Download Transmit 3rd Party</p>	<p>Carelogic Enterprise S2.15, through its External Message Center, provides the user a way to share the patient’s summary of care (CCDA) with the patient each time and any time new information is available. This process allows the user to send the summary of care to any Direct Message address, however, we currently only have the means to collect the data</p>	<p>There is no fee for the patients or the providers for this patient portal.</p>	<p><i>No contractual limitations</i></p>	<p>We offer Healthvault as part of our solution and this criteria requires it. There is a technical limitation that we only have a relationship set up with Healthvault patient portal to gather the</p>

	on how often the patient views, downloads or transmits that clinical summary from the Healthvault patient portal.			data for the view, download, transmit behaviors of the patient. <i>No practical limitations.</i>
<p>The American Psychiatric Association (APA) requires users to gain permission before using the DSM-5 codes as they are proprietary to the APA.</p> <p>Criteria: §170.314.a.8.-Clinical Decision Support §170.314. a.15- Patient Specific Education Resources §170.314.e2- Transitions of care §170.314.a.5 Problem List §170.314.b.4- Clinical Information Reconciliation §170.314.c.1.-3- Clinical Quality Measures §170.314.b.7- Data Export</p>	Because we are a Behavioral Health Electronic Health record, our diagnosis functionality includes the capability to assign a patient a DSM-5 diagnosis as well as an ICD-10 diagnosis. A user must have permission to use the APA DSM-5 diagnoses and descriptions because the DSM-5 content is proprietary property of the APA.	Qualifacts collects a per DSM-5 user per month fee for permission to use the DSM-5 codes and descriptions. We then pay a fee to the APA for each user of the DSM-5.	<i>No contractual limitations</i>	<i>No technical or practical limitations</i>
<p>Data Portability is about the ability to create a summary of care for a group of patients in an EHR and batch them up for transport.</p> <p>Criteria: §170.314.b.7- Data Portability</p>	Carelogic includes the ability to create a summary of care for a group of patients in an EHR and batch them up for transport.	Qualifacts does not charge a fee for this service.	<i>No contractual limitations</i>	<p>As a practical limitation, the user can only run the batch between the hours of 7pm and 7am central time. The user is prevented from running the batch between 7am and 7pm central time.</p> <p><i>No technical limitations.</i></p>
<p>Carelogic has the capability to generate a Category 1 file and a Category 3 file for providers. Carelogic also displays the CQM report data in the user interface.</p> <p>Criteria- Test Criteria: 170.314.c.1-c3 Clinical Quality Measures</p>	Carelogic has the capability to generate an electronic file for the provider's CQM data as well as display the CQM report data in the user interface of Carelogic.	Qualifacts does not charge a fee for this service.	<i>No contractual limitations</i>	As a practical limitation, the user is limited to only be able to run one report at a time for a single provider.
The patients of Carelogic Customers use Healthvault to VDT their summary of care (C-CDA) for the Patient Electronic Access criteria.	Each time a patient goes into their Healthvault Patient Portal and views, downloads, or transmits their summary of care(C-CDA), Healthvault documents that	There is no cost associated with this feature for the patient or the Qualifacts customer.	<i>No contractual limitations.</i>	As a practical limitation, Qualifacts runs a job, once a night, to pull the VDT

170.314.g.2 Automated Measure Calculation-Patient Electronic Access	event. The data is then sent to Carelogic via an API.			data back from Healthvault into Carelogic. The data is not available for the customer's Carelogic VDT report real time.
Audit Report data 170.314 d.3 Audit Reports	The user is able to pull audit data back through the user interface in the form of a report.	There is no cost associated with this feature for the Qualifacts customer.	<i>No contractual limitations.</i>	As a practical limitation, the user can only pull 90 days' worth of audit log data back from the user interface. They must submit a help desk ticket to get more historical data.