

Intervention Risk Management Summary

December 9, 2024

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I. Disclosure Attestation

Disclaimer: Qualifacts Systems LLC (“Qualifacts”) Certified Electronic Health Record Technologies are compliant with the ASTP/ONC Certification Criteria for Health IT § 170.315(b)(11) and have been certified by an ONC-ACB in accordance with the applicable certification criteria adopted by the Secretary of Health and Human Services. This certification does not represent an endorsement by the U.S. Department of Health and Human Services.

This Intervention Risk Management (IRM) Summary is provided to ensure transparency regarding the Predictive Decision Support Interventions available to Qualifacts EHR customers utilizing CareLogic, Credible, and InSync EMR/PM software. This summary is posted publicly at <https://www.qualifacts.com/onc-certification-and-costs/> and on the ONC Certified HealthIT Product List (CHPL).

Qualifacts agrees to review and update the Intervention Risk Management Summary annually as required by §170.315(b)(11) and notify the respective ONC-ACBs of any and all future changes to IRM practices. Furthermore, Qualifacts understands and agrees that the ASTP/ONC Health IT Certification Program Final Rule statement gives ONC-ACBs the sole responsibility for ensuring compliance and determining appropriate consequences if EHR Technology developers fail to divulge accurate transparency and disclose information.

In addition, Qualifacts understands and agrees to provide our respective ONC-ACBs with copies of or access to any and all websites, marketing materials, communication statements, and other assertions made by Qualifacts regarding the ASTP/ONC certification status of our certified products in a reasonable time to ensure the transparency and accuracy of the information disclosed.

Authorized Representative Name:	Hope Winkowski, Vice President of Product Compliance
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Date of Attestation:	December 9, 2024
Authorized Representative Signature:	<i>Hope D. Winkowski</i>

II. EHR Software General Information:

Developer Name:	Qualifacts Systems, LLC
Product Name:	CareLogic
Version Number:	Enterprise S3
Certified Health IT Product List (CHPL) ID:	15.04.04.3124.Care.S3.00.1.181220
ONC-Authorized Certification Body:	Drummond Group
Certification Date:	December 20, 2018

Developer Name:	Qualifacts Systems, LLC
Product Name:	Credible Behavioral Health
Version Number:	Version 11
Certified Health IT Product List (CHPL) ID:	15.04.04.3124.Cred.11.01.1.221230
ONC-Authorized Certification Body:	Drummond Group
Certification Date:	December 30, 2022

Developer Name:	Qualifacts Systems, LLC
Product Name:	InSync EMR/PM
Version Number:	Version 10
Certified Health IT Product List (CHPL) ID:	15.02.05.3124.INSY.01.03.1.220314
ONC-Authorized Certification Body:	SLI Compliance
Certification Date:	March, 14, 2022

III. Artificial Intelligence Acceptable Use Commitment

At Qualifacts, we are committed to harnessing the power of Artificial Intelligence (AI) to enhance healthcare outcomes and improve patient care.

Qualifacts maintains internal policies and procedures regarding the development, deployment, implementation, and maintenance of AI technologies in accordance with applicable ISO standards and requirements established by the Assistant Secretary of Technology Policy and Office of the National Coordinator (ASTP/ONC).

Customer data is handled and maintained in accordance with the customer's Business Associate Agreement (BAA) and Master Services Agreement (MSA) with Qualifacts.

The use of AI tools can help to build efficiencies in day-to-day operations. As the technology continues to develop rapidly and the Behavioral Health and Healthcare Industries advance the use of AI in their business operations, Qualifacts is dedicated to providing our customers with AI products that augment the clinician's workflow for improved efficiency and aid the clinician in providing high-quality care.

IV. Predictive Decision Support Intervention

The Assistant Secretary of Technology Policy and Office of the National Coordinator (ASTP/ONC) defines predictive decision-support interventions as technology that uses algorithms or models to support decision-making using various techniques, including machine learning, algebraic equations, and natural language processing.

V. Intervention Risk Management Practices

Qualifacts has instituted internal policies and procedures governing the use of AI to align with the requirements of the Health Data, Technology, and Interoperability: Certification Program Updates, Algorithm Transparency, and Information Sharing (HTI-1) and the National Institute of Standard and Technology (NIST) AI Risk Management Framework. Qualifacts designed and will continue to align IRM practices with ASTP/ONC FAVES principles of fairness, appropriateness, validity, effectiveness, and safety. Qualifacts IRM

processes assess a product/feature/functionality's reliability, robustness, intelligibility, security, and privacy.

Qualifacts' AI and Data Governance Committee for the oversight of Data and AI Innovations reviews and approves all AI use cases for new product development and monitors existing AI technologies and partnerships to ensure the ethical development of Predictive Decision Support Interventions (PDSI). This cross-functional committee consists of subject matter experts in the areas of clinical direct care, regulatory compliance, medical billing, patient advocacy, customer implementation, data science, quality assurance testing and monitoring, Engineering, and Information Security, to name a few.

In alignment with the Qualifacts' Core Values of Innovation, Customer-First, Action, Respect, and Enjoyment, as well as the FAVES principles established by the Assistant Secretary of Technology Policy and Office of the National Coordinator (ASTP/ONC), employees developing PDSI are required to review and comply with all applicable policies and procedures. Additionally, in collaboration with the employees developing the PDSI, the AI and Data Governance Committee completes risk assessments and analysis to ensure the development of ethical, secure, private, and equitable products and identify potential operational and regulatory risks. As risks are identified, mitigation strategies and procedures are implemented to adjust algorithms, input, and/or UI/UX. Items identified are prioritized based on risk and addressed according to severity and impact.

All AI models used for the development of PDSI will be reviewed and monitored to ensure compliance with Qualifacts' policies and procedures and applicable regulatory requirements. Employees developing PDSI, as part of the IRM practices, review and monitor AI model trustworthiness, development, testing, deployment, data handling – including how data is acquired, data is managed, and data is used - incident management, and internal audits. The AI and Data Governance Committee ensures monitoring processes are enforced and reviews, tracks, and evaluates internally reported adverse incidents related to PDSI and informs impacted stakeholders.