

Document Scope and Overview

This certification attestation document is used by an organization of an ONC-ACB certified EHR to describe major and minor changes to their certified product and request certification inheritance or module retesting for their new product version.

It describes a template letter for a client to use in summarizing the new certification requested compared to what was previously certified. While many attestations are straightforward in their desired outcome, some can be complicated due to changing of several components. This method allows for the client to describe the request in their own words while providing a framework to cover all of the required elements needed by the DG ONC-ACB.

Contents of Attestation Letter

Though the attestation letter can be written as needed by the client to accurately summarize the request, the letter must contain the following information clearly noted:

- Specify the new Certifications/CHPL entries requested. For more than one, make sure the description can uniquely identify the differences. If there are unusual changes, such as a new product name or introducing new additional software, please note this.
- Reference the current certifications, including the ONC-ACB certification ID on your Certification Certificate.

*NOTE – Do NOT include the CMS EHR Certification ID which comes from the ONC CHPL/Cart feature and looks something like this A014E01IFD9HEAF. Instead, DO include the ACB issued Certification ID. For DG, that ONC Certification ID looks something like this:
14.04.04.0000.Prod.10.1.1.160406 or 08142013-2482-1.*

- Describe your process for verifying the changes made do not adverse impact certification status. This can include internal QA testing or other review activities.
 - *NOTE – While this quality review can be generally summarized, the organization must show some analysis as to why they believe changes do not require retesting. Without this information, the ACB may need to err on the side of caution and require additional retesting to ensure confidence in ONC compliance before granting certification.*
- State which criteria, if any, you believe need retesting based on changes, paying extra attention to the automated measure reporting features as well as privacy and security capabilities.
- Summarize all of the changes made. This is often best done through appending or attaching high-level release notes, but the exact method is left to each organization.
- Summarize version control process used for this product which describes the software development, build and deployment policy used to assure attested certified capabilities are preserved and unchanged across different versions. This is often best done through appending or attaching high-level description of the process, but the exact method is left to each organization.

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- Statements of affirmation that information provided is accurate, that DG Certification Body makes the sole determination of our granting inherited certification status and that product may be chosen for surveillance testing that will occur at no fee to the Client unless the testing reveals the criteria in question have been changed and now require re-testing for certification, in which case re-testing fees apply.

Example Letters

In the sections below, we have provided some sample attestation letters covering different scenarios to illustrate how the letter can be constructed. These are just examples, but they should provide additional information on how to construct the letter.

Instructions

The attestation letter must be signed on company letterhead and sent to Sonia Galvan, Sonia@drummondgroup.com. The DG EHR Certification Body requires this attestation document before granting an inherited certification on a new product-version.

Attestation Request Letter Template Example #1

To Whom It May Concern in the DG ONC-ACB:

We request two new ONC CHPL listings for the following product versions:

- Acme EHR vs 2.1 with additional software of Portal X
- Acme EHR vs 2.1 with additional software of Portal Y

These product versions were previously certified by Drummond Group as follows:

- Acme EHR vs 2.0 with additional software of Portal X [ONC Cert# 14.04.04.0000.Prod.10.1.1.160406]
- Acme EHR vs 2.0 with additional software of Portal Y [ONC Cert# 14.04.04.0000.Prod.20.1.1.160406 or 04062016-0000-1]

Both certifications deal with the same EHR product but use a different portal as additional software.

To determine if changes made to this version impacted or adversely affected the certified functionality, including the automated measure reporting and privacy and security functionality, we conducted an internal quality review on the following date(s) as follows:

- Internal QA Certification Analysis Dry Run test using DG Proctor Sheets on August 10, 2014

As a result, we do not believe that any additional testing is needed for re-certification EXCEPT for:

- Imaging – 314.a.12
- Electronic Notes – 314.a.9

We have attached the following to assist you in the attestation review:

- Summary of the release notes of all changes made to this new version for your review.
- Summary of our version control process which describes the software development, build and deployment policy used to assure attested certified capabilities are preserved and unchanged across different versions.

We affirm that the answers and information you provided to DG is accurate and true.

We affirm the understanding and agreement that the ONC Health IT Certification Program Final Rule statement that DG, as an ONC-ACB, makes the sole determination of our granting inherited certification status based on its status as an ONC-ACB in good standing.

We affirm the understanding and agreement that DG reserves the right to audit test any criteria attested to be unchanged from the previous version due to the ONC Surveillance Program. This surveillance testing will occur at no fee to the Client organization unless the testing



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reveals the criteria in question have been changed and now require re-testing for certification, in which case re-testing fees apply.

Attestation Request Letter Template Example #2

To Whom It May Concern in the DG Group ONC-ACB:

We request one new ONC CHPL listings for the following product versions:

- Beta Blast EHR vs 6.7

This product version was previously certified by Drummond Group as follows:

- Beta EHR vs 6.6 [ONC Cert# 14.04.04.0000.Prod.66.1.1.160406 or 04062016-0000-1]

We have changed our product name in this release, but it is the same product.

To determine if changes made to this version impacted or adversely affected the certified functionality, including the automated measure reporting and privacy and security functionality, we conducted an internal quality review on the following date(s) as follows:

- Evaluation of all checked-in software files updated by development team since previous version (ongoing effort).

As a result, we do not believe that any additional testing is needed for re-certification.

We have attached the following to assist you in the attestation review:

- Summary of the release notes of all changes made to this new version for your review.
- Summary of our version control process which describes the software development, build and deployment policy used to assure attested certified capabilities are preserved and unchanged across different versions.

We affirm that the answers and information you provided to Drummond Group is accurate and true.

We affirm the understanding and agreement that the ONC Health IT Certification Program Final Rule statement that DG, as an ONC-ACB, makes the sole determination of our granting inherited certification status based on its status as an ONC-ACB in good standing.

We affirm the understanding and agreement that DG reserves the right to audit test any criteria attested to be unchanged from the previous version due to the ONC Surveillance Program. This surveillance testing will occur at no fee to the Client organization unless the testing reveals the criteria in question have been changed and now require re-testing for certification in which case re-testing fees apply.

Attestation Request Letter Template Example #3

To Whom It May Concern in the DG ONC-ACB:

We request three new ONC CHPL listings for the following product versions:

- Charlie EHR vs 4.2 Complete EHR with Additional Software Gamma
- Charlie EHR vs 4.2 Complete EHR with Additional Software Hector
- Charlie EHR vs 4.2 EHR Module

These product versions were previously certified by DG as follows:

- Charlie EHR vs 4.1 Complete EHR with Additional Software Gamma [ONC Cert# 14.04.04.0000.Prod.41.1.1.160406 or 04062016-0000-1]
- Charlie EHR vs 4.1 EHR Module [ONC Cert# 14.04.04.0000.Prod.41.1.0.160406 04062016-0000-1]

We are now offering a new Patient Education functionality using additional software product Hector as well as our with additional software component Gamma and also with neither

To determine if changes made to this version impacted or adversely affected the certified functionality, including the automated measure reporting and privacy and security functionality, we conducted an internal quality review on the following date(s) as follows:

- Internal QA Analysis by development and testing team during month of August 2014

As a result, we do not believe that any additional testing is needed for re-certification EXCEPT for:

- Patient Education – 314.a.15 (with additional software Hector)
- Automated Measures – 314.g.2 (for reporting with additional software Hector)

We have attached the following to assist you in the attestation review:

- Summary of the release notes of all changes made to this new version for your review.
- Summary of our version control process which describes the software development, build and deployment policy used to assure attested certified capabilities are preserved and unchanged across different versions.

We affirm that the answers and information you provided to DG is accurate and true.

We affirm the understanding and agreement that the ONC Health IT Certification Program Final Rule statement that DG, as an ONC-ACB, makes the sole determination of our granting inherited certification status based on its status as an ONC-ACB in good standing.

We affirm the understanding and agreement that DG reserves the right to audit test any criteria attested to be unchanged from the previous version due to the ONC Surveillance Program. This surveillance testing will occur at no fee to the Client organization unless the testing reveals the criteria in question have been changed and now require re-testing for certification, in which case re-testing fees apply.



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Attestation Request Letter Template Example #4

To Whom It May Concern in the DG ONC-ACB:

We are notifying you of minor changes made to our EHR product previously certified by DG as follows:

- Delta EHR vs 3.0 [ONC Cert# 14.04.04.0000.Prod.30.1.1.160406 or 04062016-0000-1]

However, we are not requesting a new CHPL entry as this version is a sub-release of our certified product-version identified internally as:

- Delta EHR vs 3.0.1

To determine if changes made to this version impacted or adversely affected the certified functionality, including the automated measure reporting and privacy and security functionality, we conducted an internal quality review on the following date(s) as follows:

- Code review by development team on August 19-20, 2014
- On-going internal QA testing (process summarized in attached document)

As a result, we do not believe that any additional testing is needed for re-certification.

We have attached the following to assist you in the attestation review:

- Summary of the release notes of all changes made to this new version for your review.
- Summary of our version control process which describes the software development, build and deployment policy used to assure attested certified capabilities are preserved and unchanged across different versions.

We affirm that the answers and information you provided to DG is accurate and true.

We affirm the understanding and agreement that the ONC Health IT Certification Program Final Rule statement that DG, as an ONC-ACB, makes the sole determination of our granting inherited certification status based on its status as an ONC-ACB in good standing.

We affirm the understanding and agreement that DG reserves the right to audit test any criteria attested to be unchanged from the previous version due to the ONC Surveillance Program. This surveillance testing will occur at no fee to the Client organization unless the testing reveals the criteria in question have been changed and now require re-testing for certification, in which case re-testing fees apply.

Revisions (Drummond Group Internal)

Date	Change
01-Sep-2014	Initial version.
17March2015	Changes for 17065
7April20015	Updates for change in ownership
1Oct2015	Updates for change in staff
31Dec2015	Updates for process tweak
15April2016	Updates for new ONC Cert ID process
1Aug2018	Updates attestation point person to Sonia Galvan