

ATTN: Drummond Group, LLC  
13359 North Hwy. 183  
Suite B 406-238  
Austin, TX 78750

November 14, 2017  
Audacious Inquiry, LLC  
CALiPR v2

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:

<<https://ainq.com/what-we-do/software/calipr/>>

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.



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## Costs and Limitations of Certified Health IT

| Capability         | Description of Capability   | Costs or Fees<br><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<br><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<br><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> |
|--------------------|---|---|---|---|
| 170.315.c(1)       | CALiPR is capable of recording data needed for eQMs through a user interface or import using structured documents and electronically exporting individual, patient-level eCQM data in QRDA Category I format.   | There may be a one-time cost to establish each interface per practice and yearly licensing/maintenance charges to support ongoing data feeds.   | No contractual limitations  | If a user elects to transmit their clinical data to CALiPR using the C-CDA or QRDA I via an interface, there is risk that any outages in that interface will result in data being missed/not captured which can have an impact on CQM accuracy.   |
| 170.315.c(2)       | CALiPR is capable of calculating eQMs from various standard formats (e.g. C-CDA and QRDA).  | There may be an upfront or time and materials charge to evaluate a user's C-CDA or QRDA Category I files, to ensure data quality and mapping is in place for reliable and accurate results.   | No contractual limitations  | If a user elects to transmit their clinical data to CALiPR using the C-CDA instead of the QRDA Category 1 data format, the number of CQMs possible to be calculated, and the accuracy of the results may be impacted.   |
| 170.315.c(3)       | Users can export patient level eCQM data formatted to QRDA Category I as well as aggregated report (QRDA Category III) with calculated summary data at any time (on-demand) without developer assistance.   | If a user elects to establish an interface to export data (QRDA I or III) electronically, there may be upfront and ongoing costs associated with implementing that interface.   | No contractual limitations  | No technical or practical limitations   |
| 170.315.c(4)       | CALiPR is capable of filtering eCQM results at both patient and aggregate levels based on the following data elements: TIN, NPI, Provider Type, Practice Site Address, Patient Insurance, Patient Age, Patient Sex, Patient Race and Ethnicity, and Patient Problem List. | There are no additional costs or fees associated with utilizing the filtering functionality in CALiPR (none in addition to potential base licensing and maintenance fees for the tool's use).   | No contractual limitations  | If a user elects to transmit their clinical data to CALiPR using the C-CDA instead of the QRDA Category 1 data format, the data necessary to properly use filter functionality may not exist, so the functionality will not work. For example, if TIN is not included in the C-CDA, that filtering functionality will not work properly.                          |
| 170.315.d(1)       | The functionality allows role-based access for each username including what can be accessed and what the user is permitted to do.   | If a user wishes to enable single sign-on (SSO) into CALiPR from another system, there may be a one-time cost to establish SSO and yearly licensing/maintenance charges to support such an integration effort.  | No contractual limitations  | No technical or practical limitations   |
| 170.315.d(2) & (3) | The functionality allows users to create audit reports for a set time period for all actions that can be taken in the system.   | If implementing SSO capability, the audit report functionality may need to be enhanced to capture all necessary   | No contractual limitations  | If implementing SSO from another system, technical limitations may  |

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|              |   | actions/logs. Such a project will require additional implementation costs, but no other ongoing fees are necessary.  |  | manifest that will need to be resolved for audit reporting to function correctly. |
| 170.315.d(5) | CALiPR automatically prevents the user from accessing health information after a period of inactivity expires.            | There are no additional costs or fees associated with this functionality.  | No contractual limitations   | No technical or practical limitations   |
| 170.315.g(4) | CALiPR follows federal recognized quality management system in its development, testing, implementation, and maintenance. | There are no additional costs or fees associated with this functionality.  | No contractual limitations   | No technical or practical limitations   |
| 170.315.g(5) | CALiPR meets federal recognized accessibility-centered design standards for c(1) through c(4) criteria                    | If a user requires CALiPR to be made 508 Compliant in all other areas of certified functionality, outside of c(1) through c(4), then there may be a one-time cost associated with implementing such changes within CALiPR. | CALiPR is not 508 compliant for d(1), d(2), d(3), and d(5) certification criteria. | No technical or practical limitations   |