Sphere Technology Inc.
16690 Collins Ave, Suite 1102
Sunny Isles Beach, FL 33160

ATTN: Drummond Group, LLC
3622 Lyckan Parkway, Suite 3003
Durham NC 27707

05/12/2026
Sphere Technology Inc
Sphere EHR 1.0

To Drummond Group:

The Mandatory Disclosure statement of costs and any additional transparency information 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://spheretechnology.com/mandatory-disclosure

We agree to notify Drummond Group of 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 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.

[Signature Block of Authorized Senior Company Representative]
[Name of Authorized Senior Company Representative]
[Title of Company Representative]

[Company Contact Information

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*
CPOE: Medications	Clinicians create, change, cancel, and refill medication orders electronically. Required order data elements are captured, modifiable, and persisted in the patient's record.	N/A
Drug-Drug / Drug-Allergy Interaction Checks	The system automatically checks medication orders against the patient's active medication list and allergy/ intolerance list and presents interaction alerts to the ordering clinician. Administrators can adjust severity thresholds within limits permitted by the certification rule.	N/A
Demographics	Captures and records patient demographic data including race and ethnicity (OMB and CDC categories), preferred language, sex, sexual orientation, gender identity, date of birth, and date of death, using the vocabularies required by the rule.	N/A
Family Health History	Records and updates family health history observations using SNOMED CT problem codes.	N/A
Implantable Device List	Records, changes, and accesses a patient's implantable device list. Captures FDA Unique Device Identifiers (UDIs) and parses them into the underlying GUDID data elements.	N/A
Transitions of Care	Creates, transmits, and receives Consolidated CDA Release 2.1 documents (Continuity of Care Document, Referral Note, Discharge Summary) for transitions and referrals of care. Validates documents against the C-CDA Companion Guide.	N/A
Clinical Information Reconciliation and Incorporation	Reconciles and incorporates medications, medication allergies, and active problems from an inbound transition-of-care C-CDA document into the patient's record. Tracks the reconciliation event.	N/A
Electronic Health Information (EHI) Export	Allows authorized users to schedule, time-limit, and execute exports of a single patient's, or all patients', electronic health information in a computable, documented format with an accompanying data dictionary. Patient and population exports are available from the clinician UI and the export API.	N/A

Decision Support Interventions (DSI)	Configures and presents evidence-based DSIs, including predictive DSIs, with required source attribute disclosures (e.g. funding source, bibliographic citation, intervention developer, intended use, cautioned uses, input data, output value, and feedback mechanism). Provides feedback channels for end users.	N/A
CQMs: Record and Export	Records the data required for the CMS-specified electronic clinical quality measures and exports patient-level QRDA Category I files.	N/A
CQMs: Import and Calculate	Imports patient-level QRDA Category I data, calculates CMS-specified CQM results from imported and locally captured data, and displays the calculations.	N/A
CQMs: Report	Generates QRDA Category III aggregate clinical quality measure reports conforming to the CMS Implementation Guide.	N/A
View, Download, and Transmit to a Third Party	Allows patients to view, download, and transmit their health information, in human-readable and machine-readable C-CDA form, to a third party of their choice via Direct or via download.	N/A
Patient Health Information Capture	Enables patients to electronically submit health information to the EHR (questionnaire responses, patient-generated health data, device data, and family history) and routes the submission for clinician review.	N/A
Accessibility-Centered Design	Applies an accessibility-centered design process aligned with WCAG 2.0 AA across the in-scope certification capabilities and publishes the conformance approach.	N/A
Consolidated CDA Creation Performance	Demonstrates Consolidated CDA Release 2.1 document creation conformance against the C-CDA Companion Guide and the SITE-issued reference documents for the in-scope b-series criteria.	N/A
Application Access: Patient Selection	Provides a FHIR R4 API endpoint that, given the required input parameters, returns a unique patient identifier for a single patient for use by registered third-party applications.	N/A
Application Access: All Data Request (Bulk Export)	Provides FHIR R4 Bulk Data Access (Flat FHIR) endpoints for asynchronous, population-level export of all USCDI v3 data classes and elements for a group of patients.	N/A

Standardized API for Patient and Population Services	Provides a standardized HL7 FHIR R4 API covering all USCDI v3 data classes and elements, with SMART-on-FHIR app registration, OAuth 2.0 authorization, refresh-token issuance, and standalone-launch and EHR-launch flows. Free third-party application registration is provided through the Sphere-EHR developer portal.	N/A
Direct Project	Sends and receives health information using the Direct Project standard (S/MIME over SMTP) with a DirectTrust-anchored trust bundle.	N/A
Safety-Enhanced Design	Applies a user-centered design process (NISTIR 7741) to the in-scope certification capabilities and publishes the testing process, results, and remediation plan.	N/A
Authentication, Access Control, and Authorization	Verifies user identity before granting access and restricts what data and functions a user may exercise based on assigned role and permissions.	N/A
Auditable Events and Tamper-Resistance	Records the auditable events listed in ASTM E2147 to an append-only audit log with tamper-resistant storage and integrity verification. Administrators cannot disable audit logging.	N/A
Audit Report(s) (Cures Update)	Generates filterable and sortable audit reports of recorded auditable events, with the data elements required by the Cures Update.	N/A
Amendments	Accepts and tracks patient requests to amend their health record, including accept, deny, append, and notification outcomes.	N/A
Automatic Log-off	Automatically terminates electronic sessions after a configurable period of inactivity and requires re-authentication to resume.	N/A
Emergency Access	Permits an identified set of users to access electronic health information during emergency situations with a recorded justification and full audit trail.	N/A
End-User Device Encryption	Sphere-EHR is delivered as a browser-based SaaS; electronic health information is not persisted to end-user devices by default. Where local storage of EHI on an end-user device is configured, the data is encrypted using FIPS 140-2 validated algorithms.	N/A
Integrity	Verifies that electronic health information has not been altered in transit using SHA-2 (or stronger) hashing for each transmission.	N/A

Trusted Connection	Establishes a trusted connection for the transmission and receipt of electronic health information using TLS 1.2 or higher with mutually authenticated certificates where required.	N/A
Auditing Actions on Health Information	Records the specific action taken on patient records (create, read, update, delete, print, export) for each auditable event and binds it to the acting user, timestamp, patient, and resource.	N/A
Encrypt Authentication Credentials	Stores authentication credentials only in encrypted form using a one-way hash algorithm with per-credential salt and a work factor consistent with current NIST guidance.	N/A
Multi-Factor Authentication	Supports multi-factor authentication for users accessing electronic health information, including TOTP, WebAuthn/ FIDO2, and SMS-fallback authenticator types.	N/A
Quality Management System	Operates a quality management system aligned with ISO 9001:2015 / IEC 62304 over the design, development, testing, deployment, and maintenance of the certified product.	N/A