

Imprivata Confirm ID: The most comprehensive recordkeeping and auditing solution for EPCS

Key benefits

- Comprehensive recordkeeping for identity proofing, credentialing, access approval, and additional DEA requirements for EPCS
- Streamlined reporting to establish a secure, auditable chain of trust for EPCS compliance
- Configurable audit record retention to meet applicable state-level requirements

Electronic prescribing for controlled substances (EPCS) is governed by the DEA interim final rule (IFR), which outlines the requirements that healthcare delivery organizations and prescribers must meet before they can enable EPCS.

The DEA's goal is to ensure the integrity, authentication, and non-repudiation for controlled substance prescriptions (in a manner consistent with maintaining effective controls against diversion). To accomplish this, the DEA has a number of unique and specific requirements for EPCS, one of the most critical of which is comprehensive recordkeeping, auditing, and reporting.

Imprivata Confirm ID™ is the most complete, end-to-end solution for meeting all of the DEA requirements, including reporting, to help organizations ensure security and compliance throughout the entire EPCS process. Imprivata Confirm ID has been certified by an independent, DEA-approved third-party auditor as meeting the following recordkeeping and reporting requirements for EPCS:

DEA reference #	Requirement	Imprivata Confirm ID functionality
§ 1311.110 Requirements for obtaining an authentication credential—Individual practitioners eligible to use an electronic prescription application of an institutional practitioner	(e) An institutional practitioner that elects to conduct identity proofing must retain a record of the identity-proofing. An institutional practitioner that elects to issue the two-factor authentication credential must retain a record of the issuance of the credential.	<p>Imprivata's proprietary, role-based supervised enrollment utility enables organizations to create an auditable record when checking providers' identification to comply with the DEA requirements for institutional identity proofing.</p> <p>Imprivata Confirm ID establishes the Enrollment Supervisor role for the individuals who will attest to the checking of the provider's government-issued photo identification. The enrollment utility also enforces an authentication by the provider to ensure the identity proofing took place in person in accordance with DEA requirements.</p> <p>Imprivata's enrollment utility also captures and creates a record of the issuance of the two-factor authentication credential(s) providers will use to sign EPCS orders. This binds the identity of the provider to their authentication credential(s) and creates the required audit record of the issuance of the credential(s).</p>

DEA reference #	Requirement	Imprivata Confirm ID functionality
<p>§ 1311.130 Requirements for establishing logical access control— Institutional practitioner</p>	<p>(c) The institutional practitioner must retain a record of the individuals or roles that are authorized to conduct identity proofing and logical access control data entry and execution.</p>	<p>Imprivata Confirm ID allows organizations to assign the Enrollment Supervisor role to those individuals authorized to conduct identity proofing and enroll providers' two-factor authentication credentials. A record is created and stored for the establishment of these roles along with the identity of these individuals. Only the Enrollment Supervisors have the permissions to identity proof and enroll credentials for providers, and only if they follow the necessary steps within the Imprivata Confirm ID enrollment utility.</p> <p>Similarly, Imprivata Confirm ID allows organizations to establish the role of EPCS Access Approver, the individual(s) authorized to approve the granting of EPCS permissions to providers within the electronic prescribing application to comply with the logical access control requirement. A record is created and stored for the establishment of these roles along with the identity of these individuals. These individuals must authenticate using Imprivata Confirm ID as part of the approval workflow, an auditable record of which is also captured.</p> <p>Importantly, the Enrollment Supervisor and EPCS Access Approver roles are kept separate to satisfy the DEA requirement that the individuals conducting identity proofing must be different from those granting or approving EPCS permissions.</p>
<p>§ 1311.150 Additional requirements for internal application audits.</p>	<p>(a) The application provider must establish and implement a list of auditable events.</p> <p>(b) The electronic prescription application must analyze the audit trail at least once every calendar day and generate an incident report that identifies each auditable event.</p>	<p>Imprivata Confirm ID creates real-time records of auditable events as defined by the DEA, including attempted unauthorized access to the electronic prescription application and any setting of or change to logical access controls.</p> <p>Imprivata Confirm ID creates a record of both successful and failed two-factor authentications for EPCS. Similarly, Imprivata Confirm ID creates records when the EPCS Access Approver role is established or modified. This recordkeeping enables organizations to quickly determine if the attempted unauthorized access represents a security incident that must be reported to the DEA.</p> <p>And, Imprivata Confirm ID can be configured to generate daily reports of the identity proofing, credential issuance, logical access approval, as well as potential security incidents such as unauthorized access and changes to the Enrollment Supervisor or EPCS Access Approver role.</p> <p>These reports are contained in Imprivata's appliances and can be easily exported for review to meet the DEA requirements.</p>

DEA reference #	Requirement	Imprivata Confirm ID functionality
<p>§ 1311.305 Recordkeeping.</p>	<p>(b) Records required by this subpart must be maintained electronically for two years from the date of their creation or receipt.</p> <p>(c) Records regarding controlled substances prescriptions must be readily retrievable from all other records. Electronic records must be easily readable or easily rendered into a format that a person can read.</p>	<p>Imprivata Confirm ID retains all records for a minimum of two years to satisfy DEA requirements. However, this can be configured to retain records for a longer period of time if required by state law.</p> <p>All audit records are readily available through the Imprivata administration console and can be exported in an easy-to-read format. This ensures organizations can quickly produce the complete records and reports necessary in the event of an audit or potential security incident.</p>



About Imprivata

Imprivata, the healthcare IT security company, enables healthcare securely by establishing trust between people, technology, and information to address critical compliance and security challenges while improving productivity and the patient experience.

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