



Identity Proofing Revalidation Policy

Entity:

Persona Trust™ is an identity proofing service wholly owned and operated by AYIN International, Inc. Persona Trust supervised remote in-person identity proofing service is compliant with NIST 800-63.3a Identity Assurance Level 2 (IAL2) identity proofing and a member of Direct Trust™.

Revalidation Policy Authority:

Identity proofing revalidation policy is derived from [75 Federal Registry \(FR\) 16247 Department of Justice \(DOJ\) Drug Enforcement Administration \(DEA\) Identity Proofing Revalidation interim final rule citing, "revalidation of identity proofing periods will be set by the Credential Service Provider \(CSP\) or Certificate Authority \(CA\)."](#) and,

[Code of Federal Regulations \(CFR\) Title 21 Chapter II Part 1311 regarding identity proofing to electronically prescribe controlled substances \(EPCS\)](#)

Purpose:

The purpose of the identity proofing revalidation policy is to support enrollment integrity and risk management. This policy augments protections against Registrant misrepresentation, fraud, forgery, deception, subterfuge, and mitigate Registrant submission of false or fraudulent identity information in an identity proofing application or address any omission or identity information amendment for any identity proofing application. The policy limits to as great an extent as possible the ability of a "non-identity proofed entity" to obtain an authentication credential and issue unauthorized electronic controlled substance prescriptions.



Revalidation Term and Periods:

All revalidation terms commence in March and end in September of the designated period year. Revalidation will occur every two (2) years. EMR will receive a Revalidated Providers Report (RPR) at the end of every scheduled revalidation period showing both Revalidated and Non-Revalidated Healthcare Providers. Please be advised the two (2) year period is subject to change.

Revalidation Fees:

Revalidation fee is twenty-five dollars (\$25.00) USD due and payable at booking. All revalidation fees shall be direct pay by Registrant.

Penalties:

Title 21-Food And Drugs Chapter 13-Drug Abuse Prevention And Control Subchapter I-Control And Enforcement Part D-Offenses And Penalties 21 USC 843: effective December 8, 2021

Unlawful Acts Offenses and Penalties:

It shall be unlawful for any person knowingly or intentionally- (3) to acquire or obtain possession of a controlled substance by misrepresentation, fraud, forgery, deception, or subterfuge, to present false or fraudulent identification where the person is required to present valid identification. Any person who violates this section shall be sentenced to a term of imprisonment of not more than 4 years, and fined under title 18, or both. Non-compliance to revalidate may result in account suspension subject to Administrator Licensee determination.

Enforcement Recommendation:

EMR/EHR Licensee shall temporarily suspend Healthcare Provider account for non-compliance until identity proofing revalidation is complete.



Revalidation Eligibility:

Shall be determined via internal audit based on the identity proofing anniversary of the Registrant.

Notifications – Registrants shall receive an identity proofing revalidation notice via email. Administrator Licensees will receive notification of completed revalidations complete with a signing certificate. EMR Licensee will receive a Revalidated Healthcare Providers Report (RHPR) at the end of every scheduled revalidation term showing both Revalidated and Non-Revalidated Healthcare Providers.

Scheduling Revalidation – Registrants shall book a revalidation appointment at www.personatrust.net. In the booking service queue, Registrants shall choose “Revalidation” , select a date and time (All times are Pacific Daylight Time (PDT)), pay the revalidation fee and receive a unique appointment confirmation notice via email.

Revalidation Application – Authorized Agent shall access the identity proofing revalidation document for preparation and submission to the Registrant prior to the scheduled appointment.

Contacting Registrants – Authorized Agents shall contact Registrant via direct phone call or video conference.

Authorized Agents – All Authorized Agents must complete revalidation training for certification to perform identity proofing revalidations. All Authorized Agents are expressly prohibited from retaining any form and in any capacity Registrant identity information.

Privacy – Persona Trust and AYIN International, Inc. privacy rules are governed by Federal and State privacy protection regulations.