REAL WORLD TESTING PLAN

GENERAL INFORMATION

Plan Report ID Number: **20241114ime**

Developer Name: **Imprivata Inc. (FKA Maize Analytics, Inc.)**

Product Name(s): **Explanation Based Auditing System**

Version Number(s): **v1.04**

Certified Health IT Product List (CHPL) ID(s): **15.05.05.2967.MAIZ.01.00.0.181220**

Developer Real World Testing Plan Page URL: **https://www.imprivata.com/onc-certification-disclosures-ebas**

JUSTIFICATION FOR REAL WORLD TESTING APPROACH

Explanation Based Auditing System helps safeguard against inappropriate access to medical records, protect the privacy of patient data, and prevent violations by monitoring and auditing internal access. These capabilities aid in the creation of a culture of privacy, while also supporting risk reduction. Our solution provides health systems with the ability to manage the entire process from alerts to investigations, while reducing risk and improving compliance by enabling more precise and easier to audit user access data across a broader set of enterprise applications. Explanation Based Auditing System is a health IT which supports the ability to export electronic health information (EHI) in an electronic and computable format. The Real World Testing plan was designed to show Imprivata's continued efforts to conform to the below listed criteria.

STANDARDS UPDATES (INCLUDING STANDARDS VERSION ADVANCEMENT PROCESS (SVAP) AND UNITED STATES CORE DATA FOR INTEROPERABILITY (USCDI))

Standard (and version)	The product has no voluntary SVAP standards updates
Method used for standard update	N/A
Date of ONC ACB notification	N/A
Date of customer notification (SVAP only)	N/A

MEASUREMENT(S)/METRIC(S) USED IN OVERALL APPROACH

Description of Measurement/Metric

Measurement/Metric	Description
Export functionality	Assess application ability to export EHI for a single patient in a production environment

Associated Certification Criteria

Certification Criteria	Requirement
§ 170.315 (b)(10) Electronic Health Information Export	(i) Single patient electronic health information export…
	(ii) Patient population electronic health information export…
	(iii) Documentation…

Justification for Selected Measurement/Metric

Measurement/Metric	Justification
Export functionality	Demonstrate the utility of the health information export functionality

Care Setting(s)

Care Setting	Justification
Compliance and Privacy	Our application is designed explicitly to accurately monitor, detect, and investigate internal threats done by the compliance and privacy departments of our customers.

Expected Outcomes

Measurement/Metric	Expected Outcomes
Export functionality	Only users with the permissions for export capabilities can do so from the Report Results page in CSV (Comma Separated Value) format and data fields included in the export capabilities are configurable by end users. The measurement will produce results as a count of records of Patient EHI. We will likely compare those counts to a database report to the accuracy of the export (success or error). We expect this test can be completed with few, if any, technical errors. We will examine results to evaluate the performance of the EHR Module. A successful export indicates compliance with the ONC criteria and that the EHR can create an export of all patient's EHI.

SCHEDULE OF KEY MILESTONES

Key Milestone	Date/Timeframe
Execute testing plans (done monthly with our QA cycle)	January 2025 to December 2025
Analysis of results	On-going 2025
Submit Real World Testing results to ACB	February 1, 2026

ATTESTATION

This Real World Testing plan is complete with all required elements, including measures that address all certification criteria and care settings. All information in this plan is up to date and fully addresses the health IT developer's Real World Testing requirements.

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Date: 10/15/2024