

HITRUST Bridge Assessment for r2 Certifications

When Delays Occur in HITRUST Re-Certification Efforts

Business Issues and Challenges

- HITRUST recognizes that organizations have made commitments to regulators, customers, and stakeholders to maintain a HITRUST Risk-based, 2-year (“r2”) Certification.
- Some organizations are currently experiencing obstacles in meeting HITRUST r2 Validated Assessment due dates.
 - Organizations that lose their HITRUST r2 Certification may no longer be able to meet contractual obligations, satisfy stakeholders who require assurances, or participate in critical health information sharing activities.
- HITRUST set out to identify an approach that enables organizations to continue providing services based on their current HITRUST r2 Certification.
 - Specifically in instances where a HITRUST r2 Certification holder is unable to complete their next HITRUST r2 Validated Assessment (with the same scope of services) prior to their existing certification’s expiration.

Solution

A **HITRUST Bridge Assessment** allows organizations to maintain *a form of HITRUST r2 Certification status* for an additional 90 days even if their Validated Assessment submission due date is missed.

- A HITRUST Bridge Assessment results in a **HITRUST Bridge Certificate**.

A HITRUST Bridge Certificate **IS**:

- A forward-looking, temporary certificate issued by HITRUST.
- Valid for 90 days from the expiration date of the organization's previous HITRUST r2 Certification.
- A letter meant to accompany the previous/expired HITRUST r2 Certification report.
- A means for the organization to demonstrate that:
 - The scoped control environment is unlikely to have degraded since the expiration of the prior certification,
 - The scoped control environment is unlikely to degrade significantly for the duration of this Certificate, and
 - It intends to complete the next r2 Certification effort (same scope of services).

A HITRUST Bridge Certificate **IS NOT**:

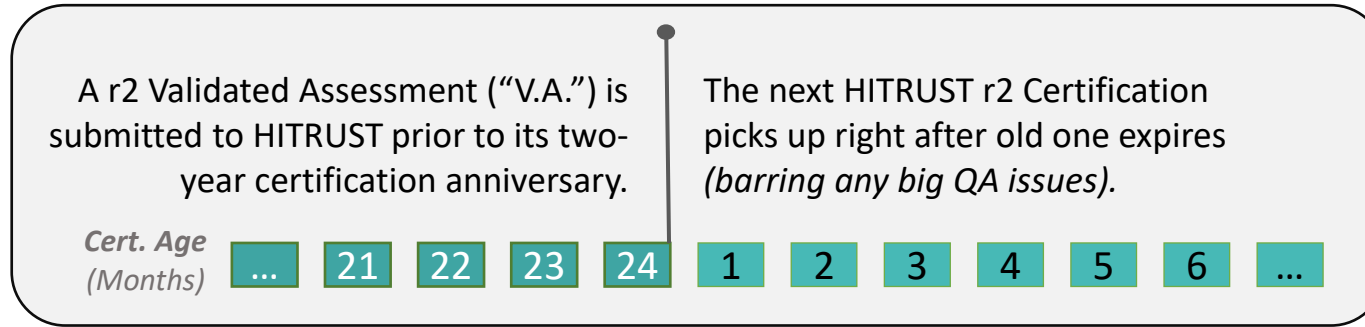
- An extension to the organization's existing certification (which still expires on the two-year certification anniversary), or
- A replacement for a traditional HITRUST r2 Certification (as it does not provide an equivalent level of assurance).
- Offered to extend an i1 Certification

Process

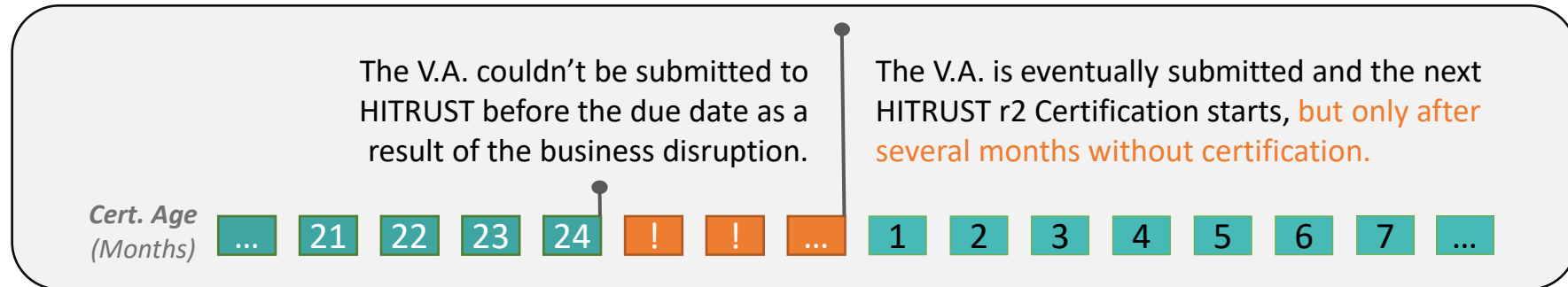
- 1) The qualifying organization obtains a **HITRUST Bridge Assessment object**.
- 2) A HITRUST Authorized External Assessor **tests 19 sampled requirement statements** selected by the HITRUST MyCSF platform.
 - a. If a Validated Assessment effort is already underway, many or all of these **may have already been tested**.
 - b. These tests can be included in the delayed Validated Assessment without needing to be reperformed (i.e., HITRUST **will not require re-testing** of these 19 requirement statements).
- 3) The organization's **management represents** (and the External Assessor must agree) that:
 - a. **No reportable breaches** have occurred in the scoped control environment since the previous HITRUST r2 Certification was issued,
 - b. **No significant changes** in the scoped control environment have occurred since the previous HITRUST r2 Certification was issued, and
 - c. The assessed entity **intends to complete a full r2 Validated Assessment** prior to the expiration of the HITRUST Bridge Certificate.
- 4) HITRUST performs a **fast-tracked Quality Assurance review** of the External Assessor's testing.
- 5) HITRUST issues the **HITRUST Bridge Certificate**.
- 6) The organization then **submits their completed r2 Validated Assessment** to HITRUST before the HITRUST Bridge Certificate expires (i.e., no later than 90 days after the previous certification's expiration).
 - a. The 90 days covered by the HITRUST Bridge Certificate are deducted from the new HITRUST r2 Certification's 24-month validity period.

Illustrative Timelines

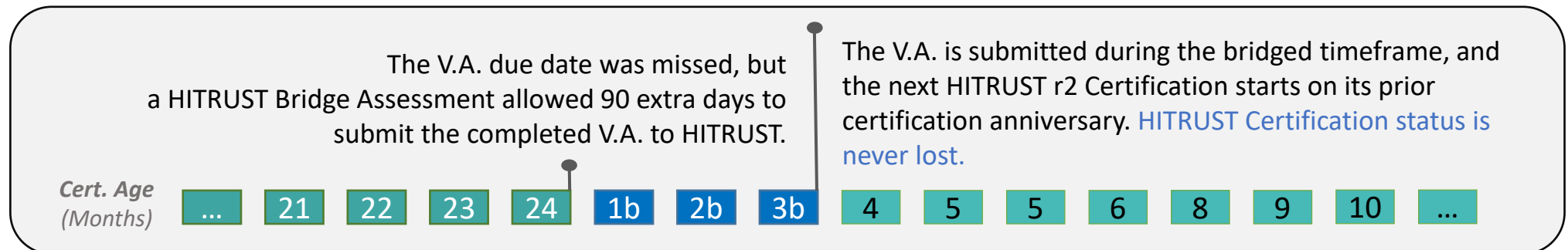
Typical Timeline



Timeline affected by business disruption **without HITRUST Bridge Certificate**



Timeline affected by business disruption **with HITRUST Bridge Certificate**



Anticipated Questions

1. Will all my relying parties accept the HITRUST Bridge Certificate?

HITRUST believes that a HITRUST Bridge Certificate adds value in demonstrating that an organization's scoped control environment is unlikely to have degraded since the last Validated Assessment and that the organization has indicated its commitment to complete a HITRUST r2 Validated Assessment in the next 90 days.

Assessed entities should consult with their stakeholders and relying parties to determine if they will accept a HITRUST Bridge Certificate while they await receipt of the intended HITRUST r2 Validated Report with Certification.

A Bridge Certificate should not be accepted *in place of* a complete HITRUST r2 Certification, as it does not convey the same level of assurance.

2. Who qualifies?

Any organization that (a) has a HITRUST Validated Report (after 1/1/22 called an "r2" Validated Report) with Certification, (b) will miss their validated assessment submission due-date, (c) hasn't missed that due date by more than 30 days, and (d) did NOT have any significant changes in the scoped control environment since the previous HITRUST Certification was issued.

3. Please verify what the charge will be for the HITRUST Bridge Assessment.

The HITRUST Bridge Assessment object and subsequent certificate costs \$3,000 to cover our costs.

4. If my organization's operations have been affected by activating our business continuity plan, do I still qualify?

Yes, as long as the scoped control environment hasn't degraded while operating in emergency mode.

5. Which 19 requirements will be selected for testing?

These will be randomly selected by MyCSF in an automated fashion.

Anticipated Questions — continued

6. When can I create the HITRUST Bridge Assessment object in MyCSF?

The HITRUST Bridge Assessment object can be created no more than 60 days before and up to 30 days after the expiration date of the HITRUST r2 Certification.

7. When can I start a HITRUST Bridge Assessment?

A HITRUST Bridge Assessment object can be created in MyCSF up to 60 days prior to the existing HITRUST r2 Certification's expiration.

8. When can I submit a completed HITRUST Bridge Assessment to HITRUST?

The HITRUST Bridge Assessment object can be submitted to HITRUST no more than 30 days before and up to 30 days after the expiration date of the HITRUST r2 Certification.

9. What are the anticipated turn-around times on HITRUST Bridge Certificates?

Between two and three weeks.

10. Are the randomly selected HITRUST r2 requirement statements picked during the HITRUST Bridge Assessment object creation?

Yes.

11. Is one requirement statement per domain selected for testing (similar to how requirements are selected for interim assessments)?

Yes.

Anticipated Questions — continued

12. What is the assurance that HITRUST will complete turn-around of the HITRUST Bridge Certificates in the proposed two- to three-week time frame?

- HITRUST Bridge Assessment submissions will be handled in the same fashion as interim assessment submissions which are consistently processed in a similar timeframe.
- HIEs, HINs, and healthcare providers are being prioritized in working these submissions. In effect, HITRUST Bridge Assessment submissions for these types of organizations will be expedited free of charge.
- HITRUST has QA Analysts who are focused exclusively on processing HITRUST Bridge Assessment submissions.

13. During interim assessments, corrective action plans (CAPs) are tested in addition to the 19 randomly selected requirements. Why aren't CAPs tested in a HITRUST Bridge Assessment?

- HITRUST r2 Certifications are issued with a stated requirement that assessed entities must complete or make significant progress towards completion of all CAPs. Interim assessments include testing of CAPs to ensure that this requirement is met. As indicated during interim assessments, most CAPs are completed/remediated prior to the interim assessment. Because HITRUST Bridge Assessments are taking place up to 12 months after the interim assessment (and up to 24 months after the CAPs were identified), HITRUST expects that the vast majority of previously identified CAPs are completed/remediated long before the HITRUST Bridge Assessment takes place.

Anticipated Questions — continued

14. Please provide examples of “significant changes” that might preclude performance of a HITRUST Bridge Assessment.

HITRUST will evaluate changes on a case-by-case basis and is happy to engage with assessed entities to discuss specifics.

- *Examples of activities that might be considered significant changes include:*
 - Moving from an on-premise data center into a public cloud environment,
 - Moving the organization's physical headquarters,
 - Decommissioning a data center and moving all assets to a different data center,
 - Replacing in-scope platforms (e.g., moving from SAP to Oracle EBS),
 - Changing an in-scope system so it uses a NoSQL backend instead of a relational database,
 - Moving away from an outsourced IT model by standing up an internal IT function,
 - Decommissioning the helpdesk ticketing system, and/or
 - New functionality in an in-scope platform enabling it to be accessed from a public location.

15. Please provide examples of changes that are not alone typically significant enough to preclude performance of a HITRUST Bridge Assessment.

Decommissioning servers, creating new user accounts, updating the business continuity plan, hiring a new CISO, patching endpoints, applying software enhancements through the organization’s SDLC, invoking a work-from-home strategy as part of business continuity activities, and/or adding a new vendor in observance of the organization’s third-party onboarding and review process.

Anticipated Questions — continued

16. Why is the three-month period of the HITRUST Bridge Certificate deducted from the organization's next HITRUST r2 Certification?

The HITRUST Bridge Certificate is designed to assist organizations who need to maintain HITRUST r2 Certification but may be experiencing challenges in completing their next HITRUST r2 Validated Assessment.

The HITRUST Bridge Assessment links the two HITRUST r2 Validated Assessments by offering a limited level of assurance during the period when the next HITRUST r2 Validated Assessment is being completed. This limited level of assurance is not sufficient to stand alone without the completion of a subsequent HITRUST r2 Validated Assessment where the level of assurance can only be maintained for 24 months.

17. What if I've changed External Assessors since my last HITRUST r2 Certification was issued?

A HITRUST Bridge Assessment can be performed by any HITRUST Authorized External Assessor.

18. What if the organization's 2020 certification was on a prior version of the HITRUST CSF, and the 2022 Validated Assessment effort is using/will use CSF v9.6? How will this impact the HITRUST Bridge Assessment?

The requirements tested during the HITRUST Bridge Assessment are from the older/prior version. So, 19 requirement statements would be randomly selected for testing from the applicable requirements in the 2020 assessment. The next Validated Assessment is performed using v9.6.

19. How does a bridge assessment affect the interim assessment due date?

The interim assessment is still due on the one-year anniversary of the certification date. A hypothetical timeline: An organization's HITRUST r2 Certification is set to expire on 5/31/22 and this organization is awarded a HITRUST Bridge Certificate. This organization submits a completed r2 Validated Assessment to HITRUST prior to the Bridge Certificate's expiration which results in a HITRUST r2 Certification. The organization's newly issued HITRUST r2 Certification is dated 6/1/22, and the interim assessment would be due to HITRUST no later than 6/1/23.

19. What's the first step down the path of doing a HITRUST Bridge Assessment and obtaining a HITRUST Bridge Certificate?

Organizations interested in this option should contact their HITRUST Customer Success Manager or call HITRUST at 1-855-HITRUST to get the name of their CSM.

Anticipated Questions — continued

20. What should I date the Management Representation letter when submitting the next HITRUST r2 Validated Assessment during the 90-day bridge period?

The new HITRUST r2 Certification picks up where the prior certification expires so the Management Representation letter should be dated accordingly. For example, if an organization's HITRUST r2 Certification expires on 5/31/22 then the Management Representation letter included in the next HITRUST r2 Validated Assessment submission should be dated 6/1/22 (even if submitted during the 90-day bridge period after 5/31/22).

21. My organization is a cloud service provider (CSP) participating in the HITRUST Inheritance Program. If my organization obtains a HITRUST Bridge Certificate, can customers still inherit applicable assessment information from our HITRUST r2 Assessment Report?

As previously stated, Bridge Certificates do not extend the expiration date of HITRUST r2 Validated Reports with Certification. Instead, they represent a form of certification that offers less assurance than HITRUST r2 Validated Reports with Certification. As such, inheritance from HITRUST r2 Validated Reports with Certification past the stated expiration date is not allowed (regardless of whether a Bridge Certificate was awarded to the organization).

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