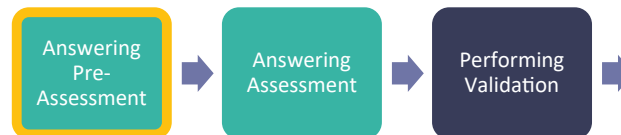


## New HITRUST CSF® Validated Assessment Workflow

### Answering Pre-Assessment



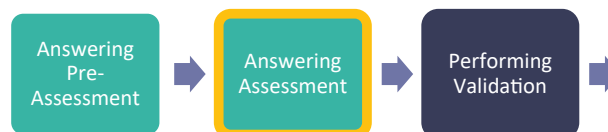
HITRUST CSF Validated Assessments begin in the *Answering Pre-Assessment* phase. The new *Answering Pre-Assessment* phase replaces the legacy *Not Started Assessment* state.

During the *Answering Pre-Assessment* phase, the Assessed Entity is responsible for completing each pre-assessment section outlined below:

- **Name & Security** – Unchanged by this set of enhancements.
- **Organization Information** – The Organization Information section has been redesigned to serve as the primary location for capturing background information about the Assessed Entity and their security organization, as well as their contact information and mailing address. Refer to [HAA 2021-009: HITRUST MyCSF Enhancements – Webforms](#) for more details and instructions for completing the Organization Information webform.
- **Assessment Options** – Unchanged by this set of enhancements.
- **Scope of the Assessment** – This section has been streamlined into a single webform. This updated page also includes a new section for identifying outsourced service providers in tabular format. Refer to [HAA 2021-009: HITRUST MyCSF Enhancements – Webforms](#) for more details and instructions for completing the Scope of the Assessment webform.
- **Default Scoring Profile** – Unchanged by this set of enhancements.
- **Factors** – Unchanged by this set of enhancements.

The *Answering Pre-Assessment* phase concludes when the Assessed Entity completes each pre-Assessment page and clicks the “Create Assessment” button at the bottom of the Factors page.

### Answering Assessment



Once the Assessed Entity completes the pre-assessment and clicks the “Create Assessment” button at the bottom of the Factors page, the assessment enters the *Answering Assessment* phase. At this time, the Assessed Entity’s Account Admins and any

Standard Users assigned to the assessment are notified via email and MyCSF homepage notification that the assessment has entered the **Answering Assessment** phase.

In this phase the Assessed Entity scores the assessment and addresses any triggered potential quality issues (PQIs). This set of enhancements does not change the process of scoring requirement statements or addressing or overriding PQIs.

During the **Answering Assessment** phase, the Assessed Entity is advised to begin the process of signing the Validated Report Agreement (VRA). The VRA that was previously signed offline by the Assessed Entity and manually uploaded to MyCSF is now completed through MyCSF using an electronic signature workflow. For more information, refer to [HAA 2021-009: HITRUST MyCSF Enhancements – Webforms](#). While the VRA is not required to be sent for signature during the **Answering Assessment** phase, MyCSF does require that the VRA be signed by both the Assessed Entity and HITRUST prior to the assessment's submission to HITRUST. For that reason, the Assessed Entity should ensure that the VRA is sent for signature with enough time for both parties to sign the agreement prior to the assessment's planned submission date.

During this phase, the Assessed Entity is also advised to begin working with their External Assessor to determine the planned date for submitting the assessment to HITRUST. While determining an appropriate submission date, the Assessed Entity and External Assessor should be sure to select a date that affords the Assessed Entity the time necessary to input any required CAPs and allows the External Assessor to review those CAPs following the External Assessor's fieldwork and prior to submission to HITRUST. Once the submission date is determined, the Assessed Entity should book the QA Reservation for the assessment. A QA Reservation is required to submit the assessment to HITRUST. Refer to [HAA 2021-001: Reservation System for Scheduling HITRUST Quality Assurance for HITRUST CSF Validated Assessments](#) for more information regarding QA Reservations.

For additional information related to the timing of actions that must be completed prior to submitting the assessment to HITRUST, refer to the [HITRUST CSF Validated Assessment Pre-Submission Timeline](#).

As the Assessed Entity completes the scoring of each assessment domain, they may individually submit each completed domain to their External Assessor for validation. The Assessed Entity's Account Admins, Standard Users and External Assessors assigned to the assessment are notified via email and MyCSF homepage notification as domains are submitted to the External Assessor. The **Answering Assessment** phase concludes when the Assessed Entity has submitted all assessment domains to the External Assessor for validation.

### Performing Validation



Once the Assessed Entity submits all assessment domains to the External Assessor, the assessment enters the **Performing Validation** phase. At this time, the Assessed Entity's Account Admins, and any Standard Users and External Assessors assigned to the assessment, are notified via an email and a MyCSF homepage notification that the assessment has entered the **Performing Validation** phase.

The new **Performing Validation** workflow phase replaces the legacy **Assessment Submitted to External Assessor** state. While this phase's main activity of validating the scores entered by the Assessed Entity remains unchanged by this set of enhancements, there are several changes to the activities that the External Assessor is required to perform during the **Performing Validation** phase as compared to the **Assessment Submitted to External Assessor** state. The activities required to be completed during the **Performing Validation** phase are outlined below.

When the assessment enters the **Performing Validation** phase, the External Assessor is now required to review and approve the contents of each pre-assessment section prior to beginning validation procedures. Until all Pre-Assessment pages are approved by the External Assessor, the External Assessor is prevented from linking documentation or agreeing with requirement statement scoring.

The External Assessor's review of each pre-assessment page is documented by a "thumbs up" or "thumbs down". If any pre-assessment pages are not approved by the External Assessor, the External Assessor is prompted to reject the assessment and send it back to the **Answering Assessment** phase for the Assessed Entity to update. At this time, the Assessed Entity's Account Admins and any Standard Users assigned to the assessment are notified via email and MyCSF homepage notification that the External Assessor has rejected the Pre-Assessment. For detailed instructions, see [Pre-Assessment Webforms](#).

After all Pre-Assessment sections have been approved by the External Assessor, the External Assessor begins reviewing requirement statement scoring, linking relevant documentation, and addressing any triggered potential quality issues (PQIs). This set of enhancements does not introduce any changes to the process of reviewing requirement statement scoring, linking documentation, or resolving or overriding PQIs.

During the **Performing Validation** phase, the External Assessor is also required to complete several required documents including the following:

- **Test Plan** – Unchanged by this set of enhancements.
- **Audits and Assessments Utilized** – The new Audits and Assessments Utilized webform is used to document any third-party attestation reports that were utilized in support of the validation procedures performed by the External Assessor. Refer to [HAA 2021-009: HITRUST MyCSF Enhancements – Webforms](#) for more details and instructions for completing the Audits and Assessments Utilized webform.

Prior to completing the remaining two required documents in this phase, the External Assessor Timesheet and QA Checklist, the External Assessment team members performing the roles of Engagement Executive and QA Reviewer must be assigned in the assessment's Name & Security page. Refer to [HAA 2021-009: HITRUST MyCSF Enhancements – Webforms](#) for more details about assigning the Engagement Executive and QA Reviewer. After assigning the Engagement Executive and QA Review, the following required documents are completed:

- **External Assessor Time Sheet** – This set of enhancements does not introduce any significant changes to the External Assessor Time Sheet. The External Assessor will continue to complete the Time Sheet as usual but will notice that the names of the Engagement Executive and QA Reviewer are automatically populated on the Time Sheet as assigned on the Name & Security page. The External Assessor should note that the Fieldwork Period entered on the Time Sheet represents the External Assessor's fieldwork period (up to a maximum of 90 days). The 90-day fieldwork period does not include the time that the assessment spends in the next two phases (*Inputting CAPs and Signing Rep Letter* and *Reviewing CAPs*).
- **QA Checklist** – The QA Checklist for HITRUST CSF Validated Assessments -- that previously has been signed offline by the External Assessor's Engagement Executive and QA Reviewer -- has been digitalized and integrated into MyCSF as a webform. For more details and instructions, see [HAA 2021-009: HITRUST MyCSF Enhancements – Webforms](#).

While the following documents are not required to be completed during the *Performing Validation* phase, the External Assessor is encouraged to remind the Assessed Entity that these required documents must be completed during the upcoming phases:

- **Validated Report Agreement** – The Validated Report Agreement (VRA) that was previously signed offline by the Assessed Entity and manually uploaded to MyCSF will now be completed through MyCSF using an electronic signature workflow. Upon completion of the VRA webform, an email request for electronic signature of the VRA is sent by MyCSF to the specified Assessed Entity representative. After being signed by the Assessed Entity's representative, the VRA is automatically routed to HITRUST to sign. The Assessed Entity and External Assessor should allow up to one business day for the VRA to be signed by HITRUST. The Assessed Entity may contact their HITRUST Customer Success Manager, or [sales@hitrustalliance.net](mailto:sales@hitrustalliance.net), with any questions related to the signing of the VRA. MyCSF requires that the VRA be signed by both the Assessed Entity and HITRUST prior to the assessment being submitted to HITRUST. For that reason, the Assessed Entity should ensure that the VRA is sent for signature with enough time for both parties to sign the agreement prior to the assessment's planned submission date. For more information, refer to [HAA 2021-009: HITRUST MyCSF Enhancements – Webforms](#).
- **Management Representation Letter** – The management representation letter for HITRUST CSF Validated Assessments, that previously has been signed offline by the Assessed Entity and manually uploaded, will now be completed through MyCSF using an electronic signature workflow. MyCSF will allow the management representation letter to be sent for signature by the Assessed Entity after the External Assessor Time Sheet has been completed. When setting the management representation letter date, the Assessed Entity may select any date on or within two weeks following the end date of the External Assessor's fieldwork period that is entered on the External Assessor Time Sheet. The Rep Letter must be signed before the assessment can exit the *Inputting CAPs and Signing Rep Letter* phase, which comes after the *Performing Validation* phase. For more information, refer to [HAA 2021-009: HITRUST MyCSF Enhancements – Webforms](#).

For more information related to completion of required documents prior to submitting the assessment to HITRUST, refer to the [HITRUST CSF Validated Assessment Pre-Submission Timeline](#).

After the External Assessor has completed all steps outlined above, the External Assessor will be presented options on the assessment homepage: (1) move the assessment to the ***Inputting CAPs and Signing Rep Letter*** phase or (2) submit the assessment to HITRUST if all required documents, including the management representation letter, have been completed and the assessment does not contain any requirement statements that require CAPs. Note that a QA Reservation is required to submit the assessment to HITRUST. Refer to [HAA 2021-001: Reservation System for Scheduling HITRUST Quality Assurance for HITRUST CSF Validated Assessments](#) for more information regarding QA Reservations.

### Inputting CAPs and Signing Rep Letter



When the External Assessor clicks the banner option to move the assessment into the ***Inputting CAPs and Signing Rep Letter*** phase, the Assessed Entity's Account Admins, and any Standard Users assigned to the assessment, will be notified via email and MyCSF homepage notification that the assessment has entered the ***Inputting CAPs and Signing Rep Letter*** phase. If the External Assessor submits the assessment to HITRUST at the conclusion of the ***Performing Validation*** phase, the assessment skips the ***Inputting CAPs and Signing Rep Letter*** and ***Reviewing CAPs*** phases and instead enters the ***Performing Check-In*** phase.

The External Assessor should note that when the assessment enters the ***Inputting CAPs and Signing Rep Letter*** phase, their fieldwork period has concluded. The External Assessor's 90-day-maximum fieldwork period does not include the time that the assessment spends in the ***Inputting CAPs and Signing Rep Letter*** and ***Reviewing CAPs*** phases.

This set of enhancements does not change the process for entering CAPs. This phase simply moves the CAP input step, which previously occurred after the draft reports were issued. It will now occur prior to the assessment's submission to HITRUST. Moving the CAP input earlier in the workflow allows the Assessed Entity to enter the required CAPs closer to when the deficiencies were identified. This change has several advantages for Assessed Entities in that it allows them to:

- Formulate CAPs as key personnel work to finalize the assessment for submission to HITRUST, helping to ensure the continued engagement of control owners.
- Review CAPs with the External Assessor to ensure the CAPs address the identified deficiencies and will allow the Assessed Entity to show demonstrable progress during the interim assessment.
- Review the draft reports with the CAPs included, which reduces the amount of time between issuance of the draft and final reports.
- Begin actioning CAPs earlier in the assessment process.

When the assessment enters the *Inputting CAPs and Signing Rep Letter* phase, any requirement statements requiring CAPs are identified in MyCSF through the “CAP Required” response status. Once the Assessed Entity links a CAP, the associated requirement statement response status changes to “CAP Provided”. For answers to frequently asked questions related to CAPs, refer to [FAQs: New Assessment Workflows](#).

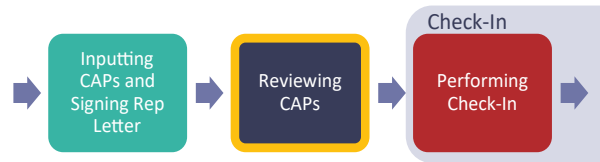
The Assessed Entity should note that the CAPs must be entered by the Assessed Entity and reviewed by the External Assessor prior to the assessment being submitted to HITRUST. Further, the assessment must be submitted to HITRUST by the submission date associated with the assessment’s QA reservation. If the assessment is not submitted by the submission date associated with the QA reservation, the QA reservation will be canceled and the Assessed Entity will be required to make a new QA reservation in order to submit the assessment to HITRUST. Refer to [HAA 2021-001: Reservation System for Scheduling HITRUST Quality Assurance for HITRUST CSF Validated Assessments](#) for more information regarding QA Reservations.

During the *Inputting CAPs and Signing Rep Letter* phase, the Assessed Entity and External Assessor do not have permissions to update the pre-assessment pages, requirement statement scoring, comments, or linked documents. If updates to those areas of the assessment are required, the Assessed Entity and External Assessor are both presented with a banner on the assessment homepage that may be clicked to move the assessment back to the *Performing Validation* phase. Once the assessment has returned to the *Performing Validation* phase, the External Assessor may then update their comments, linked documents, approval of requirement statement scores, and approval of pre-assessment content. By disagreeing with a requirement statement score or a pre-assessment section, the External Assessor can allow the Assessed Entity to make updates. After the necessary updates have been made, the External Assessor may move the assessment back to the *Inputting CAPs and Signing Rep Letter* phase as described above.

In addition to entering any required CAPs, the Assessed Entity is also required to sign the management representation letter during this phase (if it has not already been signed). The management representation letter that previously has been signed offline by the Assessed Entity and manually uploaded into MyCSF will now be completed through MyCSF using an electronic signature workflow. When setting the management representation letter date, the Assessed Entity may select any date on or within two weeks following the end date of the External Assessor’s fieldwork period, as indicated on the External Assessor’s time sheet in MyCSF. The management representation letter must be signed before the assessment can exit the *Inputting CAPs and Signing Rep Letter* phase. For more information, refer to [HAA 2021-009: HITRUST MyCSF Enhancements – Webforms](#).

After the Assessed Entity has added all required CAPs and the management representation letter has been signed, the Assessed Entity is prompted through a banner on the assessment homepage to submit the assessment to the External Assessor for CAP review. Clicking the link within the banner moves the assessment to the *Reviewing CAPs* phase.

### Reviewing CAPs



Once the Assessed Entity completes the *Inputting CAPs and Signing Rep Letter* phase and submits the assessment to the External Assessor, the assessment enters the *Reviewing CAPs* phase. At this time, the Assessed Entity's Account Admins, and any Standard Users and External Assessors assigned to the assessment, are notified via email and MyCSF homepage notification that the assessment has entered the *Reviewing CAPs* phase.

While the previous phase simply moves the CAP input to an earlier point in the workflow, the *Reviewing CAPs* phase introduces a new workflow step. Here, the External Assessor reviews the CAPs entered by the Assessed Entity.

When the assessment enters the *Reviewing CAPs* phase, any requirement statements for which the Assessed Entity has entered a required CAP are identified by the "Awaiting CAP Review" requirement statement-level response status. For each requirement statement identified as "Awaiting CAP Review," the External Assessor is required to review the linked CAP(s) for specificity, clarity, spelling, grammar and the ability of the Assessed Entity to demonstrate progress against the CAP. For all CAPs that meet the review criteria, the External Assessor documents their approval using the "thumbs up" button. Clicking the "thumbs up" button will change the requirement statement-level response status to "CAP Review Completed." The External Assessor documents their disapproval of any CAPs not meeting the review criteria using the "thumbs down" button, which reverts the requirement statement back to the Assessed Entity. The process of reverting a requirement statement back to the Assessed Entity during CAP review returns the requirement statement to the response status "CAP Required" and is like reverting a requirement statement back to the Assessed Entity during the *Performing Validation* phase. For more detailed instructions, refer to [CAP Review](#). For answers to frequently asked questions related to CAPs, refer to [FAQs: New Assessment Workflows](#).

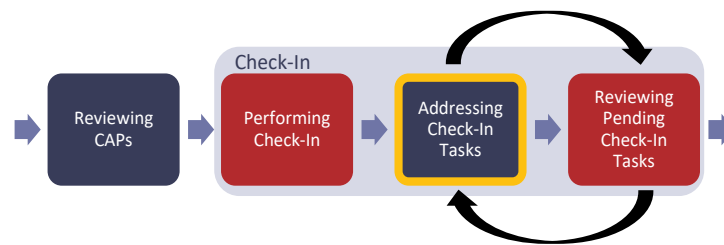
Similar to the *Inputting CAPs and Signing Rep Letter* phase, during the *Reviewing CAPs* phase the Assessed Entity and External Assessor cannot update any of the Pre-Assessment pages or requirement statement scoring, comments, or linked documents. If updates to those areas of the assessment are necessary, the Assessed Entity and External Assessor are both presented with a banner on the assessment homepage that may be clicked to move the assessment back to the *Performing Validation* phase. Once the assessment has returned to the *Performing Validation* phase, the External Assessor may update their comments, linked documents, approval of requirement statement scores, and approval of pre-assessment content. By disagreeing with a requirement statement score or a pre-assessment section, the External Assessor can allow the Assessed Entity to make updates. After the necessary updates have been made, the External Assessor may move the assessment back to the *Inputting CAPs and Signing Rep Letter* phase as described previously. Any CAPs entered prior to reverting the assessment will remain when the assessment re-enters the *Inputting CAPs and Signing Rep Letter* phase. When all CAPs have been entered, the Assessed Entity may move the assessment to the *Reviewing CAPs* phase as described in the previous section.

After all requirement statements with required CAPs have been approved by the External Assessor, the External Assessor is presented with a banner on the assessment homepage to submit the assessment to HITRUST. When the External Assessor clicks the link to submit the assessment to HITRUST, MyCSF checks that the assessment has a QA reservation and that the VRA has been signed by both the Assessed Entity and HITRUST.

- If the assessment does not have a QA reservation, the External Assessor is notified that the Assessed Entity must make a QA reservation prior to submitting the assessment to HITRUST. Refer to [HAA 2021-001: Reservation System for Scheduling HITRUST Quality Assurance for HITRUST CSF Validated Assessments](#) for more information regarding QA reservations.
- If the VRA has not been signed by all parties, a message is displayed notifying the External Assessor that the assessment cannot be submitted until the VRA has been signed. Upon completion of the VRA webform, the VRA is first sent to the designated individual from the Assessed Entity organization for signature using an electronic signature workflow. After signature by the Assessed Entity, the VRA is automatically routed to HITRUST for signature. The Assessed Entity and External Assessor should allow up to one business day for the VRA to be signed by HITRUST. The Assessed Entity may contact their HITRUST Customer Success Manager or [sales@hitrustalliance.net](mailto:sales@hitrustalliance.net) with any questions related to the signing of the VRA.
- If the VRA has been signed by all parties and the assessment has a QA reservation, the assessment will be submitted to HITRUST and will move into the **Performing Check-in** phase

For additional information related to the timing of actions that must be completed prior to submitting the assessment to HITRUST, refer to the [HITRUST CSF Validated Assessment Pre-Submission Timeline](#).

### Performing Check-In



When the assessment is submitted to HITRUST, it enters the **Performing Check-In** phase. At this time, the Assessed Entity's Account Admins, and any Standard Users and External Assessors assigned to the assessment, are notified via email and MyCSF homepage notification that the assessment has been submitted to HITRUST and has entered the **Performing Check-In** phase.

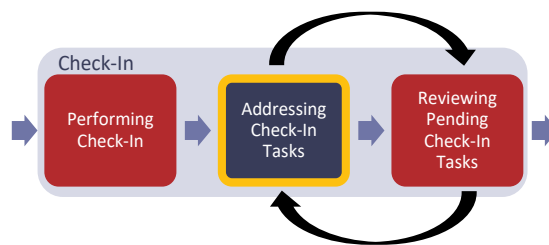
With this set of enhancements, the new workflow phases of **Performing Check-In**, **Addressing Check-in Tasks**, and **Reviewing Pending Check-In Tasks** are introduced to provide transparency into the check-in process that previously occurred within the **Assessment Submitted to HITRUST** state.

In this phase, HITRUST performs automated QA checks and a high-level review of the assessment, accompanying required documents, and webforms (Organization Information, Scope of the Assessment, Factors, VRA, Management Representation Letter, Test Plans, External Assessor Time Sheet, QA Checklist, and Audits and Assessments Utilized) to determine if the assessment is ready for a QA Analyst to review.

Depending on the results of HITRUST's check-in review, there are three possible outcomes:

1. When the results of the check-in review determine that the assessment is ready for a QA Analyst to review, HITRUST accepts the assessment and the assessment enters the **Pending Quality Assurance** phase.
2. When the check-in review identifies a small number of potential issues, typically related to the required documents and webforms (Organization Information, Scope of the Assessment, Factors, VRA, Management Representation Letter, Test Plans, External Assessor Time Sheet, QA Checklist, and Audits and Assessments Utilized), HITRUST creates check-in tasks within the assessment for the External Assessor and Assessed Entity to address. After the necessary check-in tasks are created by HITRUST, the assessment enters the **Addressing Check-In Tasks** phase.
3. When the check-in review identifies a larger number of potential issues, typically present throughout various areas of the assessment, HITRUST reverts the assessment back to the **Performing Validation** phase and gives the External Assessor and Assessed Entity a set of pre-QA quality recommendations to use to address potential issues identified. A workbook outlining the pre-QA quality recommendations is uploaded by HITRUST into MyCSF, and the External Assessor and Assessed Entity are notified via email. The External Assessor and Assessed Entity can action the pre-QA quality recommendations and then resubmit the assessment. In this scenario, the External Assessor must be careful to ensure that the assessment is resubmitted to HITRUST prior to the Wednesday before the beginning of the reserved QA block. If the assessment is not resubmitted by that date, the assessment's QA Reservation will be canceled, and the Assessed Entity will be required to make a new QA reservation. When the assessment is resubmitted to HITRUST, it will enter the **Performing Check-In** phase for a second check-in review to occur.

### Addressing Check-In Tasks



After HITRUST has created any check-in tasks, the assessment enters the **Addressing Check-In Tasks** phase. If HITRUST's check-in review determines that the assessment is ready for a QA Analyst to review, HITRUST accepts the assessment and the assessment skips the **Addressing Check-In Tasks** and **Reviewing Pending Check-In Tasks** phases and instead enters the **Pending Quality Assurance** phase.

When the assessment enters the **Addressing Check-In Tasks** phase, the Assessed Entity's Account Admins, and any Standard Users and External Assessors assigned to the assessment, are notified via email and MyCSF homepage notification that the assessment has entered the **Addressing Check-In Tasks** phase. The email contains the number of tasks that have been assigned to each party.

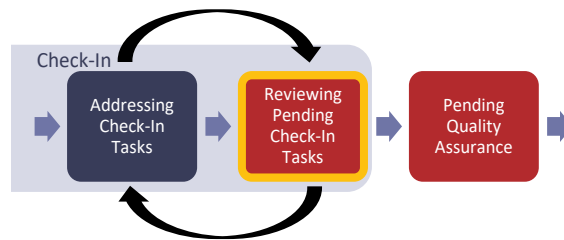
During this phase, the Assessed Entity and External Assessor address the tasks created by HITRUST during check-in. Throughout this phase, the External Assessor and Assessed Entity receive periodic emails that summarize all new and open items that

must be addressed during the **Addressing Check-In Tasks** phase. For more information regarding tasks and related notifications, refer to [HAA 2021-010: HITRUST MyCSF Enhancements – Tasks & Notifications](#).

If the action taken to address a task adds requirement statements to the assessment, those requirement statements must be scored by the Assessed Entity and validated by the External Assessor prior to resubmission of the assessment. Similarly: If the action taken to address a task adds required CAPs to the assessment, those CAPs must be entered by the Assessed Entity and reviewed by the External Assessor. When all tasks have been returned to HITRUST and all new requirement statements and / or CAPs have been reviewed by the External Assessor, the assessment automatically enters the **Reviewing Pending Check-In Tasks** phase.

Please note that the External Assessor and Assessed Entity must send all tasks back to HITRUST and address all additional requirement statements and CAPs prior to the Wednesday before the beginning of the reserved QA block. If all items are not resolved and HITRUST has not accepted the assessment by the beginning of the reserved QA block, the assessment's QA reservation will be canceled, and the Assessed Entity will be required to make a new QA reservation.

### Reviewing Pending Check-In Tasks



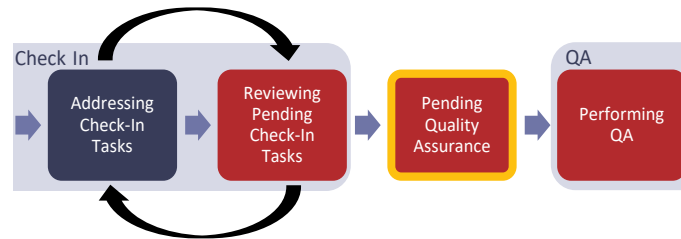
When the External Assessor and Assessed Entity have reviewed all requirement statements and / or CAPs and have submitted all check-in tasks to HITRUST, the assessment automatically enters the **Reviewing Pending Check-In Tasks** phase. At this time, the Assessed Entity's Account Admins, and any Standard Users and External Assessors assigned to the assessment, are notified via email and MyCSF homepage notification that all items have been addressed and the assessment has entered the **Reviewing Pending Check-In Tasks** phase.

During this phase, HITRUST reviews all tasks addressed by the Assessed Entity and External Assessor. HITRUST closes the tasks that have been resolved and sends any tasks requiring additional attention back to the External Assessor with additional comments or instructions.

If a task is assigned to the External Assessor or Assessed Entity during this phase, the assessment automatically returns to the **Addressing Check-In Tasks** phase. Please note that if all check-in items are not resolved by the beginning of the reserved QA block, the assessment's QA reservation will be canceled and the Assessed Entity will be required to make a new QA reservation.

After all tasks have been resolved by the Assessed Entity and External Assessor and closed by HITRUST, HITRUST will accept the assessment. This moves the assessment to the **Pending Quality Assurance** phase.

### Pending Quality Assurance

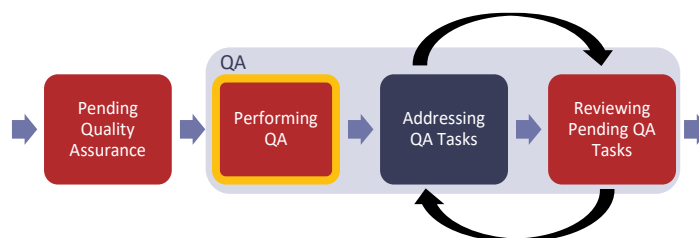


When HITRUST's check-in reviews indicate that the assessment is ready for QA review, HITRUST accepts the assessment and it enters the **Pending Quality Assurance** phase. At this time, the Assessed Entity's Account Admins, and any Standard Users and External Assessors assigned to the assessment, are notified via email and MyCSF homepage notification that the assessment has been accepted and is pending the QA review that will begin the week of the reserved QA block.

The **Pending Quality Assurance** phase is included in the new workflow to provide transparency into the period between the assessment's acceptance by HITRUST and the start of HITRUST's QA review. In the legacy workflow, validated assessments remained in the **Undergoing QA** state from the time HITRUST accepted the assessment until the QA Analyst completed the QA review and reverted the assessment to the External Assessor for QA responses. The new workflow divides the **Undergoing QA** state into two distinct phases -- **Pending Quality Assurance** and **Performing QA** -- to provide clear visibility into when the QA Analyst begins the QA review of the assessment.

When the QA Analyst assigned to the assessment begins the QA review during the week of the reserved QA block, the assessment will enter the **Performing QA** phase.

### Performing QA



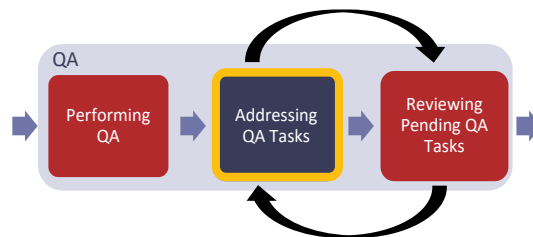
The assessment enters the **Performing QA** phase when the HITRUST QA Analyst begins the QA review of the assessment. At this time, the Assessed Entity's Account Admins, and any Standard Users and External Assessors assigned to the assessment, are notified via email and MyCSF homepage notification that the QA review has begun. The email notification contains the name and email address of the HITRUST QA Analyst assigned to the assessment.

During this phase, the QA Analyst reviews the following:

- **Pre-Assessment:** Information captured on the *Organization Information, Scope of the Assessment, Assessment Options,* and *Factors* pre-assessment pages.
- **Required Documents and Webforms:** Information captured in the *Management Representation Letter, Test Plans, External Assessor Time Sheet,* and *Audits and Assessments Utilized* required documents.
- **Core QA:** A selection of requirements where HITRUST reviews the External Assessor's testing against the stated control maturity scoring.
- **Not Applicable Rationales:** A review of all requirements marked as Not Applicable to ensure that (a) the rationale sufficiently addresses the requirement, (b) the rationale would be clear to a reader of the report, and (c) the applicability of requirements addressing a common topic (e.g., dial-up) is consistent.
- **Measured and Managed Scores:** All requirements containing scoring on the measured and managed levels are subject to additional QA procedures.
- **CAPs:** A review of all CAPs for specificity, clarity, spelling, grammar, and the ability of the Assessed Entity to demonstrate progress against the CAP.
- **Overridden PQIs:** A review of all PQIs that were overridden by the Assessed Entity or External Assessor to ensure that the override is appropriate.

Over the normal course of QA, the QA Analyst performs their review of the items outlined above, as well as the QA Tasks for the External Assessor and Assessed Entity to address. When the QA Analyst has entered all tasks from their review, the assessment is moved to the **Addressing QA Tasks** phase. However, if the QA review identifies more significant QA concerns than normal, rather than creating tasks, HITRUST will provide the External Assessor with a workbook outlining the QA concerns, will communicate via email to the External Assessor and Assessed Entity, and will meet with the External Assessor to review the concerns to bring them to resolution.

### Addressing QA Tasks

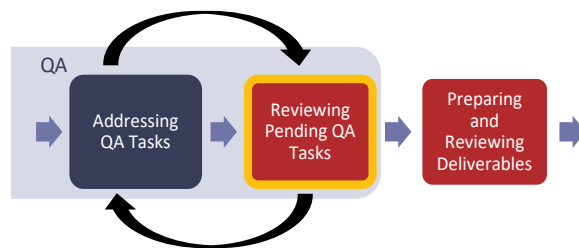


The assessment enters the **Addressing QA Tasks** phase after the QA analyst has entered all tasks during the **Performing QA** phase. At this time, the Assessed Entity's Account Admins, and any Standard Users and External Assessors assigned to the assessment, are notified via email and MyCSF homepage notification that the assessment has entered the **Addressing QA Tasks** phase. The email notification contains the number of tasks assigned to each party.

The **Addressing QA Tasks** phase replaces the legacy **Awaiting External Assessor Response to QA** state. In this phase the Assessed Entity and External Assessor address the QA tasks created by HITRUST. Throughout this phase, the External Assessor and Assessed Entity receive periodic emails that summarize all new and open tasks to be addressed. For more information regarding tasks and related notifications, refer to [HAA 2021-010: HITRUST MyCSF Enhancements – Tasks & Notifications](#).

If the action taken to address a task adds requirement statements to the assessment, those requirement statements must be scored by the Assessed Entity and validated by the External Assessor. Similarly, if the action taken to address a task adds required CAPs to the assessment, those CAPs must be entered by the Assessed Entity and reviewed by the External Assessor. When all tasks have been returned to HITRUST and all new requirement statements and / or CAPs have been reviewed by the External Assessor, the assessment automatically enters the **Reviewing Pending QA Tasks** phase.

### Reviewing Pending QA Tasks



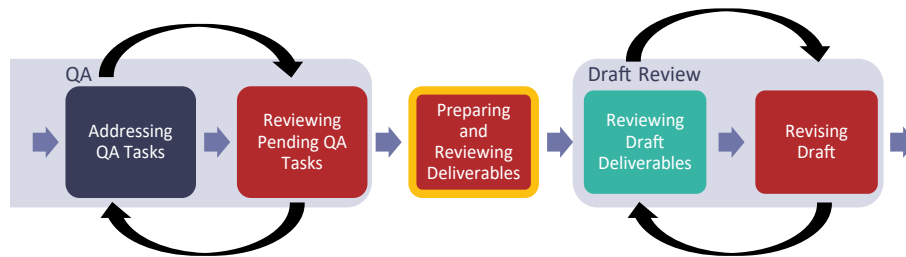
When the External Assessor and Assessed Entity have resubmitted all tasks to HITRUST and have addressed all requirement statements and / or CAPs for review, the assessment automatically enters the **Reviewing Pending QA Tasks** phase. At this time, the Assessed Entity's Account Admins, and any Standard Users and External Assessors assigned to the assessment, are notified via email and MyCSF homepage notification that all items have been addressed and the assessment has entered the **Reviewing Pending QA Tasks** phase.

During this phase, which replaces the legacy **External Assessor Response Received** state, HITRUST reviews the QA Tasks addressed by the Assessed Entity and External Assessor. HITRUST closes all tasks that have been resolved and sends any tasks that still require attention back to the External Assessor with additional comments or instructions.

If a task is assigned to the External Assessor or Assessed Entity during this phase, the assessment automatically returns to the **Addressing QA Tasks** phase.

After all QA Tasks have been resolved by the Assessed Entity and External Assessor and closed by HITRUST, QA is complete and the assessment moves to the **Preparing and Reviewing Deliverables** phase.

### Preparing and Reviewing Deliverables

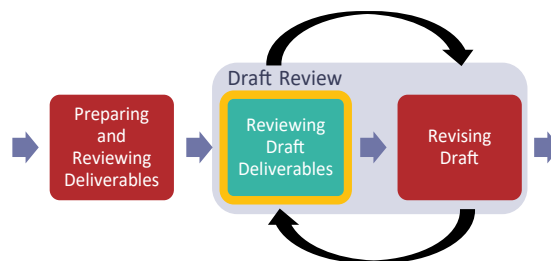


After all QA Tasks are resolved and closed by the QA Analyst, the assessment enters the *Preparing and Reviewing Deliverables* phase. At this time, the Assessed Entity's Account Admins, and any Standard Users and External Assessors assigned to the assessment, are notified via email and MyCSF homepage notification that the assessment has entered the *Preparing and Reviewing Deliverables* phase.

During this phase, which replaces the legacy *QA Complete*, *Awaiting Compliance* and *Undergoing Compliance Review* states, HITRUST prepares and reviews the draft reports. If any questions arise during this phase, the QA Analyst creates additional tasks and the assessment returns to the *Addressing QA Tasks* phase. From there, the assessment progresses through the *Addressing QA Tasks* phase, *Reviewing Pending QA Tasks* phase, and the *Preparing and Reviewing Deliverables* phase, as described previously.

Once the draft reports are internally reviewed by HITRUST and any follow-up questions are resolved, the QA Analyst uploads the draft reports to MyCSF. This causes the assessment to enter the *Reviewing Draft Deliverables* phase.

### Reviewing Draft Deliverables



When the QA Analyst uploads the draft reports to MyCSF, the assessment enters the *Reviewing Draft Deliverables* phase. At this time, the Assessed Entity's Account Admins, and any Standard Users and External Assessors assigned to the assessment, are notified via email and MyCSF homepage notification that the draft reports have been uploaded for the Assessed Entity's review.

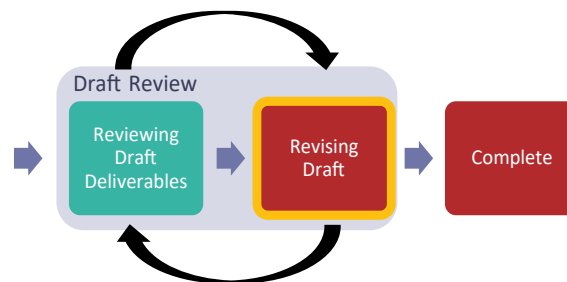
During this phase, which replaces the legacy *Draft Posted* states, the Assessed Entity has 30 days to review the draft reports. [HAA 2021-011: HITRUST MyCSF Enhancements – HITRUST CSF Report Format Changes](#) discusses updates to the HITRUST CSF Validated report format that are introduced as part of this suite of enhancements.

After the Assessed Entity has reviewed the draft reports, they may either:

1. Approve the Draft Reports: If the Assessed Entity does not need to request revisions to the draft reports, the Account Admins or Assessment Leads approve the draft reports by clicking the “Approve HITRUST CSF Draft Report” button within the HITRUST CSF Reports section of the assessment. When the draft reports are approved, the assessment enters the *Revising Draft* phase.
2. Request Revisions: If the Assessed Entity would like to request revisions to the draft reports, the Account Admins or Assessment Leads do so by clicking the “Request Revision” button within the HITRUST CSF Reports section of the assessment. This loads a new webform that allows the Assessed Entity to clearly identify each revision request individually. For more information about the new Revision Request webform, refer to [HAA 2021-009: HITRUST® MyCSF Enhancements – Webforms](#). After the Assessed Entity submits revision requests to HITRUST, the assessment enters the *Revising Draft* phase.

If the Assessed Entity does not approve the draft reports or request revisions within 30 days, the draft reports are automatically approved by MyCSF; the assessment enters the *Revising Draft* phase; and HITRUST issues the final reports.

### Revising Draft



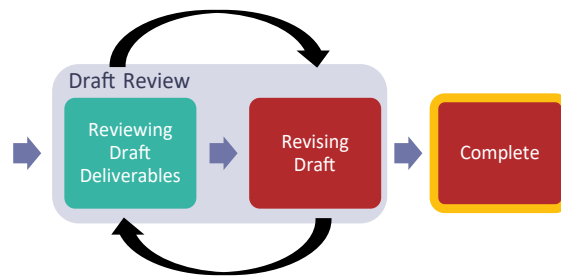
The assessment enters the *Revising Draft* phase when the Assessed Entity has either approved the draft reports or requested revisions to the draft reports. At this time, the Assessed Entity’s Account Admins, and any Standard Users assigned to the assessment, will be notified via email and MyCSF homepage notification that the assessment has entered the *Revising Draft* phase. The email and notification specify whether the assessment entered this phase due to the draft reports being approved or revisions being requested.

The *Revising Draft* phase is included in the new workflow to provide transparency into the draft review process. In the legacy workflow, an assessment remained in the *Draft Posted* state from initial draft report upload until final report upload. The new workflow divides the *Draft Posted* state into two distinct phases, *Reviewing Draft Deliverables* and *Revising Draft* to clarify ownership during the draft review process.

When the assessment enters the *Revising Draft* phase after the Assessed Entity has requested one or more draft revisions, the QA Analyst reviews the requested revisions and updates the status of each request to Not Started, Completed, or Not Accepted by HITRUST. For any requests Not Accepted by HITRUST, the QA Analyst provides an explanation within the “Rationale” section of the webform. Once all the revision requests are addressed by HITRUST, the assessment returns to the *Reviewing Draft Deliverables* phase to provide the Assessed Entity the opportunity to either approve the draft reports or request additional revisions.

When the assessment enters the *Revising Draft* phase due to the Assessed Entity approving the draft reports, the QA Analyst builds the final reports and uploads them to MyCSF. When the final reports are uploaded, the assessment enters the *Complete* phase.

### Complete



After the draft reports have been approved by the Assessed Entity and HITRUST has uploaded the final reports to MyCSF, the assessment enters the *Complete* phase, which replaces the legacy *Final Reports Posted* state. At this time, the Assessed Entity's Account Admins, and any Standard Users and External Assessors assigned to the assessment, are notified via email and MyCSF homepage notification that the final reports are available on MyCSF.