

Shared Responsibility and CSF v9.3 Update FAQs

FAQs are specific to this webinar. Visit our [General FAQs here](#).

Q: What version of SOC2® controls does HITRUST® map to?

A: AICPA TS 2017.

Q: When is v10 of the HITRUST CSF® slated to be released?

A: HITRUST CSF v10 has a targeted release date of Q4 2020.

Q: Can HITRUST provide the v9.3 Summary of Changes and assessment requirement statements in spreadsheet or CSV format instead of hard-coded PDF?

A: The Summary of Changes can be exported from Adobe to Excel, and the option to export requirement statements into either format is available for all organizations with active annual HITRUST MyCSF® (MyCSF) subscriptions.

Q: Are the MyCSF domains at some point going away, moving eventually to the HITRUST CSF control category structure only?

A: Yes, domains will be retired as part of v10 and assessment structure will instead focus on core controls.

Q: Where is HITRUST in mapping shared controls against FedRAMP certification levels?

A: FedRAMP Moderate is already in the platform. High and Low are both on our backlog of candidate authoritative sources for future integration.

Q: Will 'Shared Responsibility' be a new domain? I.e., the 20th domain?

A: For HITRUST CSF v9.x, the Shared Responsibility Matrix is relevant to all of the existing assurance domains and corresponding controls and requirement statements. For HITRUST CSF v10, shared responsibility will have critical input on the development of the framework and control design to further enhance new MyCSF control inheritance features and functionality.

Q: How can a data center tenant demonstrate compliance with HITRUST controls that aren't included in a SOC/PCI report?

A: Tenants demonstrate compliance with controls by 1) scoping assessments to include them 2) providing supporting evidence for the controls they are responsible for and 3) selecting a participating cloud service provider (CSP) from whom they can inherit controls they are responsible for.

Q: Will you support the inheritance of controls if it is a shared requirement? If so, how will MyCSF still require appropriate evidence from the candidate?

A: MyCSF will continue to support both full and partial control inheritance for controls required for a HITRUST CSF Validated Assessment and/or applicable risk and regulatory factors; also, the assessed entity will be permitted to share, at their discretion, the appropriate level of supporting evidence.

Q: My company is a small business. Will there be any way to alleviate the high cost associated with the certification/audit process?

A: Consistent with HITRUST's overall strategic business objectives, the HITRUST® Shared Responsibility Program is objective is to help ease the burden of an organization's compliance/assurance efforts, including cost, by benefiting from economies of scale and reducing redundant efforts with the use of control inheritance.

Q: What should External Assessors do when a CSP's HITRUST CSF Validated Report is not eligible for inheritance via MyCSF and the CSP declines to provide the full HITRUST CSF Validated Report, yet we need to know if they passed a particular requirement statement (such as having fire extinguishers every 50 feet, for example)?

A: Inheriting from or obtaining a copy of a HITRUST CSF Validated Report are the easiest ways to meet these requirements. Other options are as follows:

1. Do a direct test of the CSP's environment (performed by either by the tenant or External Assessor on the tenant's behalf)
2. Obtain a copy of another valid and current third-party assessment (i.e., SOC) that addresses the control requirement statement(s)
3. Score a zero across all maturity levels for the control requirement statement(s)

Q: Let's say we're performing a HITRUST CSF Validated Assessment and the client uses a CSP. We need to get assurance over several requirement statements performed by this CSP. What will the Shared Responsibility Matrix provide that will allow us to 'rely' on those things we need?

A: For each HITRUST CSF requirement statement, the HITRUST Shared Responsibility Matrix clarifies how to distinguish control ownership or shared responsibility between the CSP and their tenants. The Shared Responsibility Matrix is also intended to align to the scope as well as both fully or partially inheritable controls included in a CSP's HITRUST assessment.

Additionally, the HITRUST Shared Responsibility Matrix can be a useful tool for tenants and CSPs to aid in contractual negotiations and other vendor due diligence activities to obtain mutual agreement on shared obligations over security and privacy compliance assurances.

Q: How are you leveraging the assessments already provided by CSPs on the CSTAR Registry?

A: The HITRUST and CSA STAR assurance/certification programs are fully independent, and therefore, there is no cross-pollination of information. That said, given that the HITRUST CSF includes the mapping of the CSA Cloud Controls Matrix (CCM) v3.01 as an authoritative source, tenants could potentially benefit from leveraging information about common security and privacy controls if the CSP has opted to participate in both assurance/certification programs.