CSF Assessor Requirements
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Introduction

Purpose
HITRUST requires partner organizations and the individuals of partner organizations to meet certain thresholds before receiving authority to perform HITRUST related work, including assessments and certifications. The purpose of this document is to outline the requirements for those professional services firms and individuals seeking approval to provide services to organizations related to the CSF.

Qualified Resources
HITRUST defines two classifications of qualified resources, CSF Assessors and CSF Practitioners.

CSF Assessors is a designation reserved for organizations with the core business function of providing security, risk, and consulting services to other organizations, particularly in the healthcare industry.

CSF Practitioners is a designation reserved for individuals who have the background, experience, training, and understanding to effectively use the CSF. Such individuals either work for a CSF Assessor organization, a HITRUST member organization, or a firm/practice that provides CSF consulting services.

External References
The following HITRUST documents, located on the HITRUST website under CSF Assurance & Related Programs in the “downloads” tab, should be referenced for program background and familiarity with the CSF as this document only addresses the process and requirements for organizations providing services for the CSF:

- HITRUST CSF Assessment Methodology
- HITRUST CSF Assurance Program Requirements
- CSF and CSF Assurance Program Requirements for Health Information Exchanges

CSF Assessors

General
CSF Assessors are those professional services firms that have been approved by HITRUST for performing assessment and/or certification services associated with the CSF.

Applying to HITRUST
Organizations seeking the CSF Assessor designation must provide a letter from an authorized member of management to HITRUST committing the firm to support HITRUST member organizations with qualified resources for any CSF related service. The organization must also have documented policies and procedures that it follows to help ensure the integrity and ethics of its employees. HITRUST requires the organization to provide a copy of this documentation.
for review. Once approved by HITRUST, this documentation must be held and maintained within the organization’s appropriate records department. Organizations seeking the CSF Assessor designation must complete and provide to HITRUST the following:

- **CSF Assessor application documents (see Appendices A and B):** These documents serve to provide HITRUST with background information on the organization including scope of services offered, years of service in information security and healthcare industry, and the number of individual resources focused in these areas.

- **Documented policies and procedures around how the organization would complete any type of CSF-related engagement:** This documentation is to include the organization’s policies and procedures for conducting assessments and its quality assurance and review process for ensuring high quality of services and deliverables. The documentation should explain at a how the assessment will be conducted, who will be reviewing the assessment results, and the deliverables that will be created. HITRUST will use this documentation to gain confidence that assessments will be performed in a thorough manner and also the type of documentation it can expect to receive for a completed assessment being submitted to HITRUST for its review.

- **Documented policies and procedures the organization follows to ensure the integrity and ethics of its employees**

- **The names and resumes of the individuals committed to be trained as HITRUST CSF Practitioners:** When additional individuals are sent to training to become HITRUST CSF Practitioners, resumes must also be provided prior to the date of the class to verify they have the requisite experience. See CSF Practitioners for what experience is required to apply for CSF Practitioner status.

HITRUST requires the organization to provide a copy of this documentation, which will be used to support decisions surrounding the competence and integrity of the organization, and will keep all documentation fully confidential. Once approved by HITRUST, this documentation must be held and maintained within the organization’s appropriate records department.

Organizations seeking the CSF Assessor designation must adhere to the fee-structure defined by HITRUST and execute the CSF Qualified Assessor Agreement to qualify for providing CSF related services to HITRUST member organizations.

Upon approval of the application and policies, and execution of the CSF Assessor Agreement by HITRUST, HITRUST will submit a letter to the organization’s authorized member of management serving as the agreement that formalizes the organization’s CSF Assessor status.

**Engagement Team Requirements**

At a minimum the following individual(s) from the engagement team performing the assessment and/or certification work must be certified CSF Practitioners:

- Engagement Executive or the Quality Assurance Review Executive
- Onsite team leader/manager responsible for the field work
It is expected that at least a third of the engagement hours would be performed by CSF Practitioners to ensure the team has an appropriate understanding of healthcare and information security, the CSF, and CSF assurance methodologies and tools.

Organizations will provide HITRUST with a resume of each individual selected by the organization to be a CSF Practitioner to validate education, years of working experience, responsibilities and any relevant certifications. Organizations will attest that the individuals seeking qualification have passed a criminal background check at the time of hire, which shall include at a minimum:

- Education for the highest-awarded degree.
- Prior full-time employment.
- Criminal records for as far back as the county/state/federal governments have records.

When additional individuals are sent for training, the organization will have to attest that they have performed a criminal background check for these individuals as well. See Appendix C for a letter template that can be used during the initial assessor application process and when sending additional people for training.

At a minimum, members of the assessment team will possess the technical competence to match the classification of the HITRUST member organization to which services are being provided. For example, if a hospital system was being assessed, at a minimum the team lead, and any functional leaders, would be expected to have provider healthcare knowledge and experience.

Peer Review
To ensure adherence to both HITRUST’s and the organization’s policies and procedures, HITRUST reserves the right to perform a review of the CSF Assessor organization. Based on the organization and its past performance of CSF related work, the peer review would be one or a combination of the following approaches:

- HITRUST will re-perform the assessment/review of a member organization to validate the results documented by the CSF Assessor.
- HITRUST will select an engagement that was performed during the past twelve (12) months and perform a more rigorous review of the work papers, identify how well the assessment/review activities were documented, and identify how well the activities complied with the CSF Assessor’s and HITRUST’s policies and procedures.

1 The organization must commit a minimum of 5 individuals to support HITRUST services. If this provision cannot be met due to constraints on the number of client servicing individuals focused on healthcare or information security, the organization shall notify HITRUST to discuss alternatives.
CSF Practitioners

General

CSF Practitioners are those individuals working as part of a CSF Assessor organization or HITRUST member organization who provide or perform CSF related services or activities.

Prerequisites

Individuals seeking the CSF Practitioner designation must meet the following requirements:

- Have, at a minimum, two (2) years of expertise in the healthcare industry (e.g., payer, provider, clearinghouse, federal).
- Have, at a minimum, two (2) years of information security expertise (e.g., security and privacy policy development/implementation, risk management, risk assessment/analysis/mitigation).

As noted above a resume for each individual working for an assessor organization and seeking status as a Certified CSF Practitioner must be provided to HITRUST to validate the individual’s education, years of working experience, individual work-related responsibilities, and any relevant certifications achieved where required. Also as noted above the assessor organization must attest to performing a background check of the individual.

Training

Individuals seeking the CSF Practitioner designation that have been approved by HITRUST as mentioned above must initially attend and complete the training offered by HITRUST, and again every third (3rd) year to ensure current and consistent knowledge of the CSF and related tools and methodologies. At the end of training, the individual must successfully pass the final examination associated with the course to demonstrate competence.

Continued Education

Individuals who have attained the CSF Practitioner designation must meet the following continued education requirements to maintain the designation:

- Obtain a minimum of 120 CPEs every three (3) years
- Annually attend a HITRUST training refresher course
- Attend the complete training offered by HITRUST every third (3rd) year and pass the associated examination
- Maintain employment in the field of information security

Audit of Continued Education

HITRUST reserves the right to request further evidence of attendance at any training course that a CSF Practitioner has attended in conjunction with the 120 CPE three year requirement. On an annual basis HITRUST will randomly select certain certified CSF Practitioners and ask them to submit proof of such training. Where the Practitioner possesses complimentary certifications (e.g., CISSP, CISM, CISA) providing HITRUST his/her certification number will suffice as that allows HITRUST to verify compliance.
Appendix A: CSF Assessor Application Letter
  • CSF Assessor Application Letter Template

Appendix B: CSF Assessor Application
  • CSF Assessor Application Template

Appendix C: CSF Assessor Background Check
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Appendix D: CSF Assessor Application Process
  • CSF Assessor Application Process