

ACHIEVING HITRUST CERTIFICATION: A PRACTICAL GUIDE FOR 2025

As cybersecurity threats continue to evolve, organizations processing sensitive data, particularly PHI (Protected Health Information) and PII (Personally Identifiable Information), must prioritize robust governance, risk, and compliance (GRC) strategies. One of the most recognized and trusted standards is the HITRUST CSF (Common Security Framework), often regarded as the gold standard for managing security risks and regulatory compliance.

In this guide, we break down the HITRUST certification requirements for 2025, explain the practical steps to achieve HITRUST Compliance status and how to choose the right certification service provider.



What is HITRUST Compliance?

HITRUST compliance helps organizations stay secure, handle risks, ensure vendors align with the regulatory compliance and risk management. It also guides organizations to imbibe ongoing improvements to adapt to changing cybersecurity needs consistently.

HITRUST CSF is a comprehensive security and privacy framework designed to help organizations proactively manage risk while ensuring compliance with multiple regulatory standards. It provides prescriptive controls, mapping across industry frameworks like:



HIPAA

(Health Insurance Portability and Accountability Act)



NIST

(National Institute of Standards and Technology)



ISO 27001

(Information Security Management System)



PCI DSS

(Payment Card Industry Data Security Standard)



GDPR

(General Data Protection Regulation)



Who Needs HITRUST Compliance Certification?

Although HITRUST certification isn't federally mandated, it has become a go-to framework for organizations handling critical or regulated data. Key beneficiaries include:



Healthcare and Life Sciences: Hospitals, pharmaceutical firms, telehealth providers, and laboratories.



Cloud and SaaS Providers: Companies hosting or processing regulated data in multi-tenant environments.



Financial Services: Banks, FinTech platforms, and payment processors managing sensitive client data.



Third-Party Vendors: Business associates, suppliers, or partners that handle PHI or PII.



By pursuing HITRUST certification, these entities signal a strong commitment to data privacy, regulatory alignment, and a robust security posture, giving them an edge in competitive markets.

9 Practical Steps to Achieve HITRUST Certification in 2025

1 Project Initiation and Key Roles

Assemble Your Team: Appoint a project coordinator or manager to oversee every aspect of the HITRUST compliance journey. Identify key personnel (e.g., security officers, subject matter experts) who will be involved in assessment and evidence collection.

Establish a Project Plan: In collaboration with your chosen External Assessor (e.g., Ampcus Cyber), create a detailed project plan outlining timelines, milestones, communication channels, and escalation procedures.

Define Responsibilities: Ensure all stakeholders understand their specific roles and have access to required resources (internal systems, documentation, MyCSF platform).

2 Pre-Assessment Phase and Scope Definition

Scoping in MyCSF: Accurately define the in-scope business units, applications, systems, and data flows in the HITRUST MyCSF tool. This aligns your assessment with organizational requirements and relevant regulatory obligations like HIPAA, NIST, FISMA, PCI DSS, etc.

Awareness Session: Attend or host a thorough briefing (often led by the assessor) on HITRUST methodologies, sampling techniques, inheritance guidelines, and MyCSF navigation. This session helps everyone understand the assessment process and how to classify controls as “Not Applicable” if justified.

Project Kick-Off: Formally kick off the project once scoping is complete. Ensure relevant stakeholders are informed of timelines, responsibilities, and the “target submission date” for your formal HITRUST assessment.



3 Purchase MyCSF tool

Set Up MyCSF: Purchase and configure HITRUST's MyCSF platform (required for certification). This SaaS tool streamlines control scoping, evidence submission, and reporting.

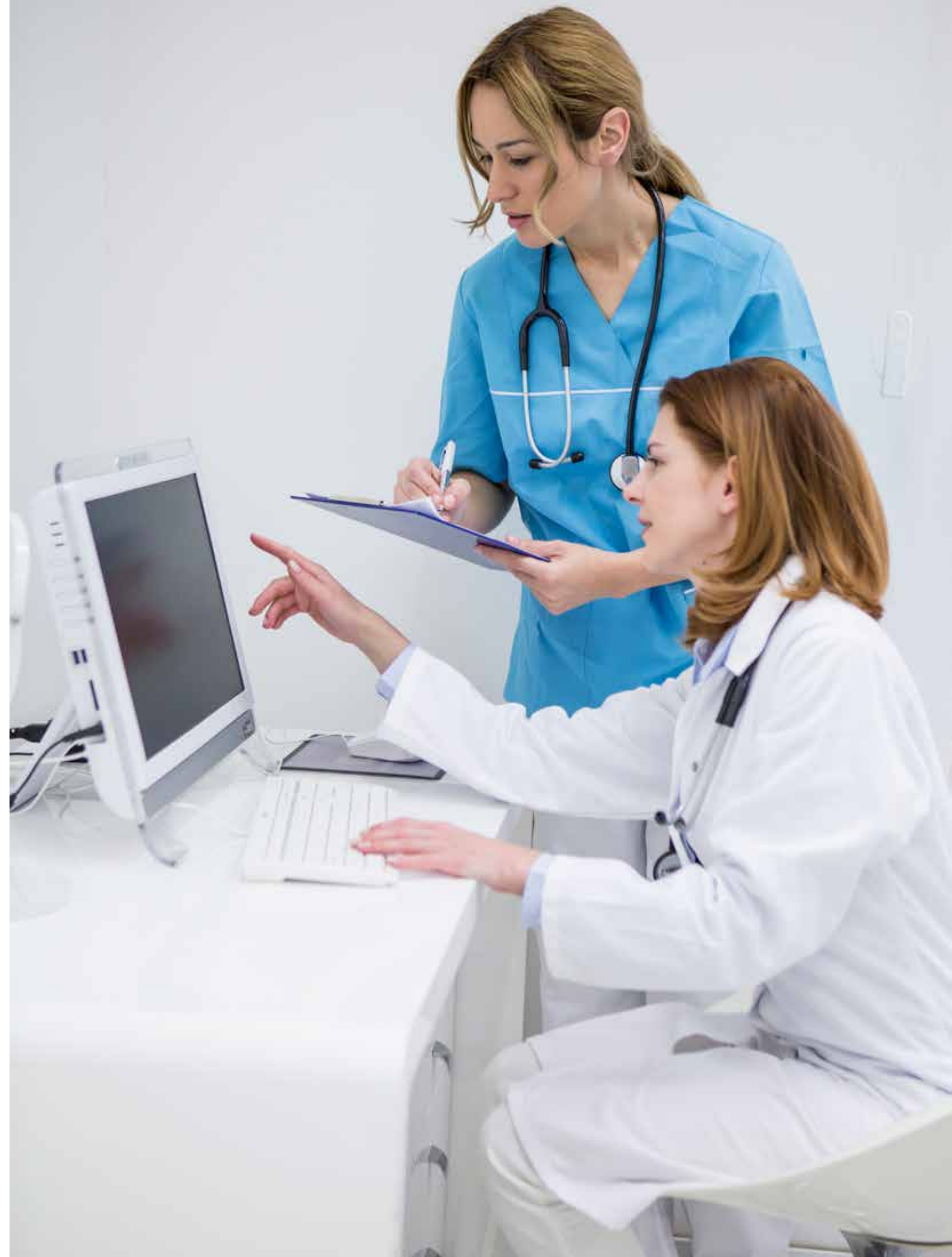
Framework: The tool supports getting compliant on the recent HITRUST CSF releases. Currently, the latest CSF version is v11.4.0 incorporated within MyCSF tool.

4 Test Plan Creation, Readiness Assessment, and Gap Analysis

Create a Test Plan: The assessor (e.g., Ampcus Cyber) will extract the relevant controls from MyCSF and compile a test plan in Excel or a similar tool. This plan details the controls, testing procedures, and required evidence.

Initial Gap Analysis: Collaborate with the assessor to compare your existing policies, procedures, and implementations against HITRUST controls. Identify non-compliant areas and their root causes.

Awareness of NA Criteria: Clarify criteria for "Not Applicable" controls; you must document valid business justifications for any NA items.



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Remediation and Incubation Period

Gap Remediation: Address any control deficiencies uncovered during the gap assessment. This may involve updating policies, refining procedures, and deploying new technical or administrative safeguards.

Incubation Requirements: After fixing identified gaps, maintain a mandatory incubation period to prove sustainability:

- Policy and Procedure Incubation: 60 days
- Implementation Incubation: 90 days

Evidence Logging: Retain clear records (policy revisions, updated procedure documents, etc.) that demonstrate ongoing compliance throughout remediation and incubation.

6

Perform Self-Assessment and Evidence Collection

Self-Assessment Questionnaire: Complete the official HITRUST questionnaire to map your organization's size, risk factors, and operational scope to the appropriate control set.

Evidence Gathering: Start collecting evidence for each control domain (access control, incident response, data protection, etc.). Evidence must be dated within 90 days of your final submission to prove current operational effectiveness.

Sample Selection: Follow assessor guidance on providing population files from which representative samples can be drawn. If no relevant data exists for a given control (zero population), document that context clearly.



7 Assessment and Validation Phase

External Audit (Fieldwork): Engage an authorized HITRUST External Assessor to review your provided evidence, validate control implementation, and confirm consistency with your test plan.

Continuous QA and Communication: The assessor will conduct ongoing quality checks, note any discrepancies, and communicate requests for clarifications or additional artifacts via agreed-upon collaboration tools.

MyCSF Closure: Once all validations are complete, the assessor finalizes documentation in MyCSF and prepares the submission package. Ensure all required permissions remain active, so the assessor can complete uploads without issue.

8 HITRUST Submission, QA, and Certification

Submit to HITRUST: The assessor submits your assessment through MyCSF by the planned “target submission date.”

HITRUST Quality Assurance: HITRUST’s QA team rigorously reviews the submission, verifying control justifications, evidence adequacy, and any “Not Applicable” claims. They may issue QA tasks asking for clarifications or further evidence.

Final Review and Scoring: After QA tasks are resolved, HITRUST assigns a final score to your assessment and, if successful, issues the certification. If short of requirements, you will receive a corrective action plan for resubmission.

9 Maintain Certification and Continuous Compliance

Ongoing Monitoring: Continuously track control performance, update policies to align with HITRUST’s new releases, and regularly re-check evidence.

Periodic Reviews: Schedule internal audits or self-checks to identify gaps before they become major compliance issues.

Renewal or Interim Assessments: Depending on your certification type (e.g., i1 or r2), plan for interim or renewal assessments in line with HITRUST guidelines to sustain compliance and uphold your security posture over time.

How long does it take to get HITRUST certified?

Certification timelines often vary by organizational complexity, typically taking anywhere from 9 to 18 months. Here is the breakdown of the certification process:



Readiness Assessment: 4–8 weeks



Remediation and Gap analysis: 4–12 weeks



Validation Assessment: 4–9 months



Review and HITRUST Accreditation Process: 1–3 months

Choosing the Right HITRUST Compliance Service Provider

When selecting a HITRUST partner, focus on these key attributes:

- **Relevant Experience:** Proven track record in e1, il, and r2 assessments.
- **Regulatory Expertise:** Deep familiarity with rules from HIPAA, NIST, PCI DSS, and GDPR.
- **Comprehensive Support:** Assistance through readiness, gap remediation, external validation, and ongoing advisory.



Conclusion

HITRUST certification for 2025 is more than a box to check, it's a strategic investment in your organization's cybersecurity resilience and organizational reputation. By merging multiple regulations into a unified framework, HITRUST empowers you to better protect sensitive data, maintain compliance, and cultivate trust with customers and partners.

If you want to future-proof your security posture, now is the ideal time to explore HITRUST certification. Taking proactive measures, such as in-depth readiness assessments, AI-driven risk mitigation, and engaging experienced HITRUST advisors, can position your organization for success in an ever-evolving threat landscape.

Protect your organization's data and build trust. Start your HITRUST certification journey now!

