



HITRUST

CCSFP Exam

Certified CSF Practitioner 2025 Exam

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Question 1. (Multi Select)

An organization has identified a number of components needed for an assessment. These components cover systems/applications for customers in the states of Massachusetts and Nevada. Assuming management wants corresponding regulatory factors to be included in their assessment, which regulatory factors would apply?

(Select all that apply)

- A: State of Massachusetts Data Protection Act
- B: CMS Minimum Security Requirements (High)
- C: State of Nevada Security of Personal Information Requirements
- D: Texas Health and Safety Code
- E: Subject to De-ID Requirements

Correct Answer: A, C

Explanation:

When performing HITRUST scoping, organizations must include regulatory factors relevant to their operational and geographic context. Since this entity operates in Massachusetts and Nevada, two state-specific privacy and security laws apply:

Massachusetts Data Protection Act (201 CMR 17.00): Requires businesses handling personal data of Massachusetts residents to maintain a written information security program (WISP), including encryption and monitoring controls.

Nevada Security of Personal Information Law (NRS 603A): Mandates encryption for personal information stored or transmitted electronically and requires reasonable security measures.

The CMS Minimum Security Requirements (High) (B) would apply only if the entity processes Medicare/Medicaid-related data. The Texas Health and Safety Code (D) applies only to Texas-based covered entities. Subject to De-ID Requirements (E) is a general data-handling condition, not a state-specific regulatory factor.

Therefore, only Massachusetts Data Protection Act and Nevada Security of Personal Information Requirements apply in this scenario.

Question 2. (Single Select)

The HITRUST QA reservation must be made by the External Assessor at least six months in advance of the submission date.

A: True

B: False

Correct Answer: B

Explanation:

HITRUST requires External Assessors to reserve QA slots prior to submitting validated assessments. This ensures QA capacity is available and assessments are reviewed in a timely manner. However, the guidance does not specify a strict six-month minimum reservation period. Instead, HITRUST recommends assessors reserve QA slots well in advance of their submission target date, based on the anticipated complexity and workload. In practice, reservations may often be made months in advance, but there is no formal rule mandating six months. The flexibility allows assessors to adjust their schedules while ensuring HITRUST can properly plan QA resources. As such, the statement that reservations must always be made six months ahead is False.

Question 3. (HOTSPOT)

Enter the value assigned to each of the following scoring levels on the HITRUST Scoring Rubric.

Select the appropriate association for every element.



Correct Answer:

Select the appropriate association for every element

Mostly Compliant

Association

0%

100%

50%

Somewhat Compliant

Association

0%

100%

50%

Non-Compliant

Association

25%

100%

50%

Fully Compliant

Association

25%

0%

50%

Partially Compliant

Association

25%

0%

100%

Question 4. (Multi Select)

A pharmacy that accepts Medicare/Medicaid and also takes credit cards should include which regulatory factors in their assessment?

A: FISMA

B: FTC Red Flags Rule

C: PCI-DSS

D: FedRAMP

E: CMS (Centers for Medicare and Medicaid Services) Minimum Security Requirements (High)

Correct Answer: B, C, E

Explanation:

Scoping an assessment involves identifying regulatory factors that apply to an organization's operations. In this case, the entity is a pharmacy that accepts Medicare/Medicaid and processes credit cards. Medicare/Medicaid participation introduces obligations under CMS Minimum Security Requirements (High), which adds federal requirements specific to healthcare entities working with Centers for Medicare and Medicaid Services. Credit card acceptance triggers applicability of the Payment Card Industry Data Security Standard (PCI-DSS), a widely recognized standard for protecting cardholder data. Additionally, pharmacies often fall under the FTC Red Flags Rule, which applies to organizations that maintain consumer accounts and must protect against identity theft. By contrast, FISMA applies to federal agencies or contractors, not pharmacies, and FedRAMP applies only to cloud service providers working with the federal government. Therefore, the correct set of regulatory factors is FTC Red Flags Rule, PCI-DSS, and CMS Minimum Security Requirements (High).

Question 5. (Single Select)

When testing, can you sample across a population of ungrouped primary components within an assessment's scope?

A: Yes, across most of the components within scope

B: No, you must test all components within scope

C: Yes, across some of the components within scope

D: Yes, a primary component sample can be produced using guidance from the scoring rubric

Correct Answer: B

Explanation:

HITRUST distinguishes between grouped and ungrouped components. When primary components (e.g., servers, databases, firewalls) are not grouped, they must be tested individually. This is because each ungrouped component may have unique configurations, operational practices, or control implementations, meaning sampling would not yield accurate results. Sampling is only permitted when components are grouped and proven to be functionally identical. In ungrouped situations, the assessor must test each component to validate control effectiveness. This ensures accuracy in scoring and avoids the risk of overlooking control failures in heterogeneous environments. Therefore, when components remain ungrouped, the assessor is required to test all components within scope and cannot rely on sampling methods.



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