Based on customer feedback, EHNAC now provides most of its programs with two options for the Security criteria section:

1. EHNAC’s standard security criteria, which is based on NIST 800-171, NIST Cybersecurity Framework, and HIPAA; or
2. HITRUST-aligned security criteria, a much larger set of security criteria based on the most recent version of the HITRUST CSF© (scoping and regulatory factors used are available upon request).

Additional information outlining the differences between these two programs is provided below.

<table>
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<tbody>
<tr>
<td>Privacy Related Criteria</td>
<td>Number of criteria depends upon which privacy rules apply; others are Not Applicable. Includes separate sections for HIPAA/HITECH, GDPR, CCPA and personal health and wellness data.</td>
<td>Beginning January 2022, the privacy sections of all programs include EHNAC’s proprietary privacy criteria (as shown in previous column).</td>
</tr>
<tr>
<td>Security Criteria</td>
<td>Based on HIPAA/HITECH, NIST 800-171 Rev 2 and NIST Cybersecurity Framework V1.1.</td>
<td>Includes HITRUST CSF© requirements based on the most recent version¹ of the HITRUST CSF© (scoping and regulatory factors used are available upon request).</td>
</tr>
<tr>
<td>Total Security Criteria (in January 2022 Release)</td>
<td>Approx. 195</td>
<td>Approx. 373</td>
</tr>
<tr>
<td>Use of Industry Standards</td>
<td>HIPAA/HITECH; NIST 800-171 Rev 2 (subset of 800-53 Rev 4); NIST Cybersecurity Framework V1.1. Other Industry Standards include CCPA, GDPR, personal health and wellness data, as well as breach requirements. Certain programs include other stakeholder-specific authoritative sources such as DEA, 21st Century Cures Act, X12, HL-7, CAQH CORE, and others.</td>
<td>The HITRUST CSF© is drawn from a large number of security standards, with EHNAC’s scoping specifically addressing HIPAA/HITECH.</td>
</tr>
</tbody>
</table>
| Program Structure (For most programs) | I. Candidate Environment and Governance  
II. Privacy - HIPAA HITECH  
III. Privacy - Personal Health & Wellness Data  
IV. Privacy - General Data Protection Regulations  
V. Privacy - California Consumer Privacy Act  
VI. Technical Requirements  
VII. Security | I. Introduction to Candidate Environment  
II. Privacy - HIPAA HITECH  
III. Privacy - Personal Health & Wellness Data  
IV. Privacy - General Data Protection Regulations  
V. Privacy - California Consumer Privacy Act  
VI. Technical Requirements  
VII. Business Practices  
VIII. Resources  
IX. Security (From HITRUST CSF©) |

¹ EHNAC keeps the HITRUST CSF© version as current as possible.