



Certified Healthcare Privacy Security (CHPS) Content Outline Crosswalk 2010-2022

Executive Summary

In 2022, the American Health Information Management Association (AHIMA) began a job task analysis for the Certified Healthcare Privacy Security (CHPS) professional certification. The purpose of the current job analysis study was to validate the current tasks that are in the content outline for the CHPS program as well as identify additional tasks that may be required of CHPSs in their current role. The result of the CHPS job task analysis study resulted in an updated Content Outline (CO) to ensure the most current state of practice is being tested in the examination.

The steps for conducting a job analysis study include the following methodology:

1. Subject Matter Expert (SME) interview questionnaire
2. Exam Development Committee (EDC) reviews the interview to add new task statements for inclusion in the Job Analysis Survey
3. Updated Content Outline is incorporated into the Job Analysis Survey and administered to individuals practicing within the population to collect ratings on the tasks on importance and frequency of use
4. During a test specifications meeting, the EDC and SMEs review survey ratings and other data from the population to develop an updated Content Outline and Test Design
5. The outcomes from the test specifications meeting are presented to the Commission on Certification for Health Informatics and Information Management (CCHIIM) for review and approval.

Summary of 2022 CHPS Content Outline Updates

The results from the 2022 Certified Healthcare Privacy Security (CHPS) job analysis study indicated that all 4 domains remain relevant for a CHPS practicing professional and that many of the tasks expected by a CHPS remain appropriate. A total of 5 new tasks were added, 4 tasks were removed and combined into other tasks (2 removed all together and 2 combined into other tasks), and several of the subtext was revised throughout for clarification and to update terms. It is also important to note that there was significant reordering of the tasks in each Domain.

The time allotted to complete the exam and the total number of operational items were reviewed/discussed, and it was determined the exam specifications remain appropriate and should remain the same.

The number of items allocated to each domain were discussed and adjusted based off the expertise of the exam specifications panel of SMEs. **Table 1** below portrays the changes in number of items allocated to each domain of the Content Outline. There is a minor change to domain 2's domain name ("Privacy and Security" was added). **Table 2** (page 2-page 8) presents the 2010 Content Outline and maps the number of item changes to the 2022 Content Outline.

Table 1. CHPS Content Outline (CO) Domain Item Allocation

Content Outline (CO) Domain	2010 CO	2022 CO
Ethical, Legal, and Regulatory Issues/ Environmental Assessment	29-34 items	13-23 items
Privacy and Security Program Management and Administration	29-34 items	38-50 items
Information Technology/Physical and Technical Safeguards	29-34 items	30-44 items
Investigation, Compliance, and Enforcement	29-34 items	24-30 items

Note: Candidates will begin being assessed on the 2022 CHPS Content Online on **September 01, 2022.**

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TABLE 2. 2010 CHPS Content Outline mapped to the 2022 CHPS Content Outline

Domain 1: Ethical, Legal, and Regulatory Issues/ Environmental Assessment

2010 Content Outline		2022 Content Outline		Change
Task Number	Task Statement	Task Number	Task Statement	
1	Serve as a resource (provide guidance) to your organization regarding privacy and security laws, regulations, and standards of accreditation agencies to help interpret and apply the standards	2	No Change	n/a
2	Demonstrate privacy and security compliance with documentation, production and retention as required by State and Federal law as well as accrediting agencies	5	No Change	n/a
3	Identify responsibilities as a privacy officer and/or security officer	1	No Change	n/a
n/a	n/a	3	Apply preemption principles to ensure compliance with state regulations that are applicable to privacy	New Topic
n/a	n/a	4	Evaluate the privacy and security policies related to health information exchanges	New Topic
n/a	n/a	6	Analyze the impact of access to protected health information (PHI) during a public health emergency	New Topic

No Change	Revision/Edit	Topic Removed	New Topic
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Domain 2: Privacy and Security Program Management and Administration

2010 Content Outline		2022 Content Outline		Change
Task Number	Task Statement	Task Number	Task Statement	
1	Create, document, and communicate information including, but not limited to, minimum necessary protocols	12	Apply the “minimum necessary” standard when creating, documenting, and communicating protected health information (PHI)	Reworded entire task statement
2	Manage contracts and business associate relationships and secure appropriate agreements related to privacy and security (e.g., BAA, SLA, etc.)	3	Manage contracts and business associate relationships and secure appropriate agreements related to privacy and security (e.g., business associate agreement [BAA], service level agreement [SLA], etc.)	Added “business associate agreement” and “service level agreement” in parenthesis
3	Evaluate and monitor facility security plan to safeguard unauthorized physical access to information and prevent theft or tampering	4	Evaluate and monitor the facility security plan to safeguard unauthorized physical access to information, and to prevent theft or tampering	Added “the” before facility and “to” before prevent
4	Develop, deliver, evaluate, and document training and awareness on information privacy and security to provide an informed workforce	6	No Change	n/a
5	Work with appropriate organization officials to verify that information used or disclosed for research complies with organizational policies and procedures and applicable privacy regulations	8	Collaborate with appropriate organization officials to verify that information used or disclosed for research purposes complies with organizational policies and procedures and applicable privacy regulations	Changed “Work” to “Collaborate” Added “purposes”
6	Assess, recommend, revise, and communicate changes to organizational policies, procedures, and practices related to privacy and security	7	Educate workforce members on the changes to organizational policies, procedures, and practices related to privacy and security	Changed “Assess, recommend, revise, and communicate” to “Educate workforce members on the”
7	Assess and communicate risks and ramifications of privacy and security incidents, including those by business associates	10	Assess and communicate risks and ramifications of privacy and security incidents to a designated organizational leadership, including those by business associates	Added “to a designated organizational leadership”
8	Establish a preventative program to detect, prevent, and mitigate privacy/security breaches	5	Establish a preventative program to detect and prevent privacy/security breaches	Removed “mitigate”
9	Recommend appropriate de-identification methodologies	9	Manage appropriate de-identification processes	Changed “Recommend” to “Manage” and “methodologies” to “processes”

No Change	Revision/Edit	Topic Removed	New Topic
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10	Verify that requesters of protected information are authorized and permitted to receive the protected information (subpoena, court orders, search warrants)	11	Verify that requesters of protected information are authorized and permitted access to the protected health information (PHI)	Added “access to”, “health” and “(PHI)” Removed “to receive” and all verbiage in parenthesis
11	Define HIPAA-designated record sets for the organization in order to appropriately respond to a request for release of information	13	Define HIPAA-designated record sets for the organization in order to appropriately respond to a request for release of protected health information (PHI)	Added “protected health” and “(PHI)”
12	Identify information and record sets requiring special privacy protections	14	No Change	n/a
13	Recommend, review, and approve protocols to verify identity and access rights of recipients/users of health information	Removed	n/a	Removed as included in Domain 2, Task 11
14	Establish, maintain, and ensure the distribution process of the organization’s Notice of Privacy Practices	1	Manage the distribution process of the organization’s Notice of Privacy Practices	Changed “Establish, maintain, and ensure” to “Manage”
15	Establish and maintain operational systems to receive, process, and document requests for patients’ rights as outlined in the Notice of Privacy Practices	2	Manage the process for requests for patients’ rights as outlined in the Notice of Privacy Practices (e.g., restrictions, amendments, etc.)	Reworded entire task statement
n/a	n/a	15	Manage disclosures for marketing and fundraising related to protected health information (PHI)	New Topic

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Domain 3: Information Technology/Physical and Technical Safeguards

2010 Content Outline		2022 Content Outline		Change
Task Number	Task Statement	Task Number	Task Statement	
1	Participate in the development and verify maintenance of the inventory of software, hardware, and all information assets to protect information assets and to facilitate risk analysis	15	Develop and maintain the inventory of software, hardware, and all data to protect information assets and to facilitate risk analysis	Changed “Participate in the development and verify maintenance of” to “Develop and maintain” Changed “all information assets” to “all data”
2	Participate in business continuity planning for planned downtime and contingency planning for emergencies and disaster recovery	4	Collaborate in the development of a business continuity plan for planned downtime and contingency planning for emergencies and disaster recovery	Changed “Participate in business continuity planning” to “Collaborate in the development of a business continuity plan”
3	Participate in evaluation, selection, and implementation of information privacy and security solutions	5	Evaluate, select, and implement information privacy and security solutions	Changed “Participate in evaluation, selection, and implementation of” to “Evaluate, select, and implement”
4	Implement a systematic process to evaluate risk to and criticalities of information systems which contain Protected Health Information (PHI)	7	Assess the risk to and criticalities of new information systems which contain protected health information (PHI)	Changed “Implement a systematic process to evaluate” to “Assess the” Added “new” before information systems
5	Participate in media control practices that govern the receipt, removal, re-use, or disposal (internal and external destruction) of any media or devices containing sensitive data	14	Manage the media control practices that govern the receipt, removal, re-use, or disposal (internal and external destruction) of any media or devices containing sensitive data	Changed “Participate in” to “Manage the”
6	Assess and monitor physical security mechanisms to limit the access of unauthorized personnel to facilities, equipment, and information	8	No Change	n/a
7	Establish reasonable safeguards to reduce incidental disclosures and prevent privacy breaches	3	Ensure reasonable safeguards to reduce incidental disclosures and prevent privacy breaches	Changed “Establish” to “Ensure”
8	Participate in the development and management of the organization’s information security plan	1	Develop and manage an organization’s information security plan, taking into consideration 45 CFR 164.306	Changed “Participate in the development and management of the” to “Develop and manage an” Added “taking into consideration 45 CFR 164.306”

No Change	Revision/Edit	Topic Removed	New Topic
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9	Participate in the organizational risk analysis plan to identify threats and vulnerabilities	Removed	n/a	
10	Monitor compliance with the security policies and ensure compliance with technical, physical, and administrative safeguards	6	No Change	n/a
11	Establish internal policies, procedures, and rules to protect information and participate in development of guidelines, procedures, and controls to ensure the integrity, availability, and confidentiality of communication across networks	2	Manage policies, procedures, and rules to protect the integrity, availability, and confidentiality of communication of health information across networks	<p>Changed “Establish internal” to “Manage”</p> <p>Removed “information and participate in development of guidelines procedures, and controls to ensure”</p> <p>Added “of health information” after communication</p>
12	Ensure appropriate technologies are used to protect information received from or transmitted to external users	11	No Change	n/a
13	Advocate the use of event triggering to identify abnormal conditions within a system (e.g. intrusion detection, denial of service, and invalid log-on attempts)	13	Identify event triggers for abnormal conditions within a network system (e.g., intrusion detection, denial of service, and invalid log-on attempts)	<p>Changed “Advocate the use of event triggering to identify” to “Identify event triggers for”</p> <p>Added “network” before system</p>
14	Establish and manage facilitate process for verifying and controlling access authorizations, authentication mechanisms, and privileges including emergency access	12	Manage the process for verifying and controlling access authorizations, authentication mechanisms, and privileges including emergency access	Changed “Establish and manage facilitate” to “Manage the”
15	Evaluate the use of encryption for protected health information and other sensitive data	9	Assess and monitor technical security mechanisms to control access and protect electronic protected health information (PHI)	Reworded entire task statement
n/a	n/a	10	Perform ongoing risk assessments for existing information systems which contain protected health information (PHI)	New Topic

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Domain 4: Investigation, Compliance, and Enforcement

2010 Content Outline		2022 Content Outline		Change
Task Number	Task Statement	Task Number	Task Statement	
1	Monitor and assess compliance with state and federal laws and regulations related to privacy and security to update organizational practices, policies, procedures, and training of workforce	1	Monitor and assess compliance with state and federal laws and regulations on a routine basis related to privacy and security to update organizational practices, policies, procedures, and training of workforce	Added “on a routine basis”
2	Coordinate the organization’s response to inquiries and investigations from external entities relating to privacy and security to provide response consistent with organizational policies and procedures	8	Coordinate the organization’s response to inquiries and investigations from external entities relating to privacy and security to provide response consistent with organizational policies and procedures within the required timeframe	Added “within the required timeframe”
3	Develop performance measures and reports to monitor and improve organizational performance and report to appropriate organizational body	Removed	n/a	
4	Enforce privacy and security policies, procedures, and guidelines to facilitate compliance with federal, state, and other regulatory or accrediting bodies	5	No Change	n/a
5	Monitor access to protected health information	6	Monitor and audit access to protected health information (PHI)	Added “and audit” and “(PHI)”
6	Establish an incident/complaint investigation response, develop response plan, and identify team members to respond to a privacy or security incident	3	Establish an incident/complaint investigation process, and develop a response plan to mitigate a privacy or security incident	Changed “response” to “process and” and “respond to” to “to mitigate” Added “a” before response plan Removed “, and identify team members to”
7	Coordinate mitigation efforts	Removed	n/a	Removed as included in Domain 4, Task 3
8	Develop policy and procedure for breach notification (federal)	2	Develop policy and procedure for breach notification	Removed “(federal)”
9	Educate workforce on reporting requirements for breach notification (federal)	4	Ensure workforce is knowledgeable on how to report a potential privacy or security incident	Reworded entire task statement
10	Perform risk assessment for breach notification (federal)	7	Perform risk assessment for breach notification	Removed “(federal)”

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11	Notify appropriate individuals/agencies/media within time frame for breach notification (federal)	9	Notify appropriate individuals/agencies/media within time frame for breach notification	Removed "(federal)"
12	Maintain the appropriate documentation for breach notification (federal)	10	Maintain the appropriate documentation for breach notification	Removed "(federal)"

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