

Facility Access Controls Implementation Checklist

Implementation and evidence checklist for 45 CFR 164.310(a)(1) — Facility Access Controls

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Prepared by	HIPAA Auditors — certified HIPAA lead auditors
Contact	info@hipaaauditors.com · +91-95851-60363
Address	100 Congress Ave, Suite 2000, Austin, TX 78701

How to use this document. This is a working template, not a finished compliance artefact. Replace every bracketed placeholder with your organisation's own detail, delete the guidance notes, and have the result reviewed and formally adopted by your Privacy or Security Officer before you rely on it.

Regulatory basis. References are to the HIPAA Administrative Simplification regulations at 45 CFR Parts 160, 162 and 164, and to NIST SP 800-66 Rev. 2, *Implementing the HIPAA Security Rule*.

The requirement

Implement policies and procedures to limit physical access to electronic information systems and the facility or facilities in which they are housed, while ensuring that properly authorized access is allowed.

45 CFR 164.310(a)(1) · Physical Safeguards

Risk level	Difficulty	Typical cost	Timeframe
High	Moderate	High	2-4 months

Implementation steps

	Develop comprehensive facility access control policies including:
	Physical access controls for facilities housing ePHI systems
	Visitor access procedures and controls
	Employee access procedures and controls
	Maintenance and service personnel access procedures
	Emergency access procedures
	Monitoring and logging of physical access
	Key components:
	- Contingency operations procedures
	- Facility security plan
	- Access control and validation procedures
	- Maintenance records
	- Physical access monitoring and logging

Evidence to produce and retain

Tick only where the artefact exists and you can say where it lives.

	Facility access control policies Location: _____ Owner: _____
	Contingency operations procedures Location: _____ Owner: _____
	Facility security plan Location: _____ Owner: _____

	Location: _____ Owner: _____
	Maintenance and validation procedures Location: _____ Owner: _____
	Physical access monitoring and logging procedures Location: _____ Owner: _____
	Visitor access procedures Location: _____ Owner: _____
	Emergency access procedures Location: _____ Owner: _____

How this gets tested

These are the procedures an auditor is likely to run. Self-test first.

	Review facility access control policies Result: _____ Tested by / date: _____
	Test physical access controls Result: _____ Tested by / date: _____
	Verify visitor access procedures Result: _____ Tested by / date: _____
	Review maintenance procedures Result: _____ Tested by / date: _____
	Test emergency access procedures Result: _____ Tested by / date: _____
	Verify monitoring and logging capabilities Result: _____ Tested by / date: _____
	Review documentation of access controls Result: _____ Tested by / date: _____

Common failures to check yourself against

- Inadequate physical access controls
- Lack of visitor access procedures
- Insufficient monitoring of physical access
- Inadequate maintenance procedures
- Lack of emergency access procedures
- Insufficient documentation of access controls

Beyond the minimum

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- Implement layered physical security
- Use access control systems and monitoring
- Regular review of access permissions
- Document all access control procedures
- Train workforce on physical security
- Regular testing of access controls
- Implement emergency access procedures

NIST mapping: NIST SP 800-66 Rev. 2: Section 3.2.1 NIST Cybersecurity Framework: PR.AC-1, PR.AC-2, PR.AC-3, PR.AC-4, PR.AC-5, PR.AC-6, PR.AC-7 NIST SP 800-53: PE-1, PE-2, PE-3, PE-4, PE-5, PE-6, PE-7, PE-8, PE-9, PE-10, PE-11, PE-12, PE-13, PE-14, PE-15, PE-16, PE-17, PE-18, PE-19, PE-20, PE-21, PE-22, PE-23, PE-24, PE-25

Sign-off

Completed by	Title	Date
Reviewed by	Title	Next review due

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