

Information Access Management Implementation Checklist

Implementation and evidence checklist for 45 CFR 164.308(a)(4) — Information Access Management

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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 for authorizing access to ePHI that are consistent with the applicable requirements of the Security Rule.

45 CFR 164.308(a)(4) · Administrative Safeguards

Risk level	Difficulty	Typical cost	Timeframe
High	Complex	High	3-6 months

Implementation steps

	Develop comprehensive information access management policies including:
	Access authorization procedures
	Access establishment and modification procedures
	Access review and recertification processes
	Emergency access procedures
	Access termination procedures
	Documentation of access decisions
	Key requirements:
	- Isolating healthcare clearinghouse functions
	- Access authorization based on job functions
	- Regular access reviews and updates
	- Emergency access procedures
	- Proper documentation of all access decisions

Evidence to produce and retain

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

	Information access management policies Location: _____ Owner: _____
	Access authorization procedures Location: _____ Owner: _____
	Access establishment and modification procedures Location: _____ Owner: _____

	Location: _____ Owner: _____
	Emergency access procedures Location: _____ Owner: _____
	Access termination procedures Location: _____ Owner: _____
	Documentation of access decisions Location: _____ Owner: _____
	Regular review and update procedures Location: _____ Owner: _____

How this gets tested

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

	Review access management policies and procedures Result: _____ Tested by / date: _____
	Test access authorization processes Result: _____ Tested by / date: _____
	Verify access review and recertification procedures Result: _____ Tested by / date: _____
	Test emergency access procedures Result: _____ Tested by / date: _____
	Review access termination procedures Result: _____ Tested by / date: _____
	Verify documentation of access decisions Result: _____ Tested by / date: _____
	Test monitoring and auditing capabilities Result: _____ Tested by / date: _____

Common failures to check yourself against

- Inadequate access authorization procedures
- Failure to implement regular access reviews
- Lack of emergency access procedures
- Insufficient documentation of access decisions
- Failure to isolate healthcare clearinghouse functions
- Inadequate access termination procedures

Beyond the minimum

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- Implement role-based access control (RBAC)
- Regular access reviews and recertification
- Document all access decisions and rationale
- Implement emergency access procedures
- Use automated access management tools
- Regular training on access management
- Monitor and audit access regularly

NIST mapping: NIST SP 800-66 Rev. 2: Section 3.1.3 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: AC-1, AC-2, AC-3, AC-4, AC-5, AC-6, AC-7, AC-8, AC-9, AC-10, AC-11, AC-12, AC-13, AC-14, AC-15, AC-16, AC-17, AC-18, AC-19, AC-20, AC-21, AC-22

Sign-off

Completed by	Title	Date
Reviewed by	Title	Next review due

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