

Device and Media Controls Implementation Checklist

Implementation and evidence checklist for 45 CFR 164.310(d)(1) — Device and Media Controls

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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 that govern the receipt and removal of hardware and electronic media that contain ePHI into and out of a facility, and the movement of these items within the facility.

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

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

Implementation steps

	Develop comprehensive media control policies including:
	Media receipt and removal procedures
	Media movement and tracking procedures
	Media sanitization and disposal procedures
	Media inventory and management procedures
	Media security and protection procedures
	Media access control procedures
	Key components:
	- Media receipt and removal
	- Media movement tracking
	- Media sanitization
	- Media inventory management
	- Media security controls
	- Media access controls

Evidence to produce and retain

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

	Media control policies and procedures Location: _____ Owner: _____
	Media receipt and removal procedures Location: _____ Owner: _____
	Media movement and tracking procedures Location: _____ Owner: _____

	Media sanitization and disposal procedures Location: _____ Owner: _____
	Media inventory and management procedures Location: _____ Owner: _____
	Media security and protection procedures Location: _____ Owner: _____
	Media access control procedures Location: _____ Owner: _____

How this gets tested

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

	Review media control policies Result: _____ Tested by / date: _____
	Test media tracking procedures Result: _____ Tested by / date: _____
	Verify media sanitization methods Result: _____ Tested by / date: _____
	Review media inventory management Result: _____ Tested by / date: _____
	Test media security controls Result: _____ Tested by / date: _____
	Verify media access controls Result: _____ Tested by / date: _____
	Review policy compliance Result: _____ Tested by / date: _____

Common failures to check yourself against

- Lack of media control policies
- Inadequate media tracking procedures
- Insufficient media sanitization
- Poor media inventory management
- Inadequate media security controls
- Insufficient media access controls

Beyond the minimum

- Develop comprehensive media control policies
- Implement effective media tracking

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- Use proper media sanitization methods
- Maintain accurate media inventory
- Implement strong media security controls
- Control access to media
- Regular review and update of procedures

NIST mapping: NIST SP 800-66 Rev. 2: Section 3.2.3 NIST Cybersecurity Framework: PR.DS-1, PR.DS-2, PR.DS-3, PR.DS-4, PR.DS-5, PR.DS-6, PR.DS-7, PR.DS-8 NIST SP 800-53: MP-1, MP-2, MP-3, MP-4, MP-5, MP-6, MP-7, MP-8

Sign-off

Completed by	Title	Date
Reviewed by	Title	Next review due

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