

Security Awareness and Training Implementation Checklist

Implementation and evidence checklist for 45 CFR 164.308(a)(5) — Security Awareness and Training

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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 a security awareness and training program for all members of the workforce (including management).

45 CFR 164.308(a)(5) · Administrative Safeguards

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

Implementation steps

	Develop and implement a comprehensive security awareness and training program including:
	Initial security training for new employees
	Ongoing security awareness training for all workforce members
	Role-specific security training
	Security incident response training
	Regular security updates and communications
	Training effectiveness evaluation
	Key components:
	- Security awareness training program
	- Role-based security training
	- Regular security updates
	- Training documentation and records
	- Training effectiveness measurement
	- Incident response training

Evidence to produce and retain

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

	Security awareness and training program Location: _____ Owner: _____
	Training materials and curricula Location: _____ Owner: _____
	Training schedules and records Location: _____ Owner: _____

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	Role-specific training programs Location: _____ Owner: _____
	Training effectiveness evaluation procedures Location: _____ Owner: _____
	Incident response training materials Location: _____ Owner: _____
	Regular security update procedures Location: _____ Owner: _____

How this gets tested

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

	Review security awareness and training program Result: _____ Tested by / date: _____
	Verify training materials and curricula Result: _____ Tested by / date: _____
	Test training delivery methods Result: _____ Tested by / date: _____
	Review training records and documentation Result: _____ Tested by / date: _____
	Evaluate training effectiveness Result: _____ Tested by / date: _____
	Test incident response training Result: _____ Tested by / date: _____
	Verify regular security updates Result: _____ Tested by / date: _____

Common failures to check yourself against

- Lack of security awareness training program
- Inadequate training for workforce members
- Failure to provide role-specific training
- Insufficient training documentation
- Lack of training effectiveness evaluation
- Failure to provide regular security updates

Beyond the minimum

- Develop comprehensive training program
- Provide role-specific training

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- Regular security awareness updates
- Document all training activities
- Evaluate training effectiveness
- Use interactive training methods
- Provide ongoing security communications

NIST mapping: NIST SP 800-66 Rev. 2: Section 3.1.4 NIST Cybersecurity Framework: PR.AT-1, PR.AT-2, PR.AT-3, PR.AT-4, PR.AT-5 NIST SP 800-53: AT-1, AT-2, AT-3, AT-4, AT-5, AT-6, AT-7, AT-8

Sign-off

Completed by	Title	Date
Reviewed by	Title	Next review due

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