

Security Officer Implementation Checklist

Implementation and evidence checklist for 45 CFR 164.308(a)(2) — Security Officer

Issued	9 August 2026
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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*.

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The requirement

A covered entity must designate a security official who is responsible for developing and implementing its security policies and procedures.

45 CFR 164.308(a)(2) · Administrative Safeguards

Risk level	Difficulty	Typical cost	Timeframe
High	Moderate	Medium	1-3 months

Implementation steps

	Designate a qualified individual as the Security Officer with clear responsibilities including:
	Developing and implementing security policies and procedures
	Conducting regular security risk assessments
	Managing security incidents and breaches
	Ensuring workforce training on security policies
	Monitoring compliance with security requirements
	Coordinating with other departments on security matters
	The Security Officer should have appropriate authority, resources, and reporting structure to effectively carry out these responsibilities

Evidence to produce and retain

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

	Security Officer designation letter Location: _____ Owner: _____
	Job description and responsibilities Location: _____ Owner: _____
	Organizational chart showing reporting structure Location: _____ Owner: _____
	Security Officer training records 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.

	Verify Security Officer designation is documented Result: _____ Tested by / date: _____
	Review Security Officer job description and responsibilities Result: _____ Tested by / date: _____
	Confirm Security Officer has appropriate authority and resources Result: _____ Tested by / date: _____
	Test Security Officer knowledge through interviews or assessments Result: _____ Tested by / date: _____
	Review documentation of security policy development and implementation Result: _____ Tested by / date: _____
	Verify regular review and update of security policies Result: _____ Tested by / date: _____

Common failures to check yourself against

- No designated Security Officer
- Security Officer lacks appropriate authority or resources
- Inadequate documentation of Security Officer responsibilities
- Failure to regularly review and update security policies
- Security Officer not properly trained on HIPAA requirements

Beyond the minimum

- Ensure Security Officer has appropriate technical and administrative background
- Establish clear reporting structure to senior management
- Provide ongoing training and professional development
- Document all security-related decisions and actions
- Regular communication with workforce about security matters
- Coordinate with Privacy Officer and other compliance personnel

NIST mapping: NIST SP 800-66 Rev. 2: Section 3.1.1 NIST Cybersecurity Framework: ID.AM-6, PR.IP-1 NIST SP 800-53: AC-2, AC-3, 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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