HIPAA AUDITORS

Workforce Security Implementation Checklist

Implementation and evidence checklist for 45 CFR 164.308(a)(3) — Workforce Security

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*.

The requirement

Implement policies and procedures to ensure that all members of the workforce have appropriate access to electronic protected health information (ePHI) and to prevent those workforce members who do not have access from obtaining access to ePHI.

45 CFR 164.308(a)(3) · Administrative Safeguards

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

Implementation steps

- [ ] **Develop and implement workforce security policies including:**
- [ ] **Background checks and screening procedures for new hires**
- [ ] **Access authorization procedures based on job functions**
- [ ] **Regular review and update of access permissions**
- [ ] **Procedures for terminating access when employees leave**
- [ ] **Monitoring of workforce access to ePHI**
- [ ] **Training on workforce security policies**
- [ ] **Key components:**
- [ ] **- Pre-employment screening and background checks**
- [ ] **- Role-based access control (RBAC)**
- [ ] **- Regular access reviews and recertification**
- [ ] **- Proper termination procedures**
- [ ] **- Ongoing monitoring and auditing**

Evidence to produce and retain

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

- [ ] **Workforce security policies and procedures**
  Location: _____ Owner: _____
- [ ] **Background check procedures and forms**
  Location: _____ Owner: _____
- [ ] **Access authorization procedures**
  Location: _____ Owner: _____
- [ ]

	Job function descriptions and access requirements Location: _____ Owner: _____
	Access review and recertification procedures Location: _____ Owner: _____
	Termination procedures and checklists Location: _____ Owner: _____
	Training records and materials Location: _____ Owner: _____

How this gets tested

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

	Review workforce security policies and procedures Result: _____ Tested by / date: _____
	Verify background check procedures are implemented Result: _____ Tested by / date: _____
	Test access authorization processes Result: _____ Tested by / date: _____
	Review access review and recertification procedures Result: _____ Tested by / date: _____
	Verify termination procedures are followed Result: _____ Tested by / date: _____
	Test monitoring and auditing capabilities Result: _____ Tested by / date: _____
	Review training records and materials Result: _____ Tested by / date: _____

Common failures to check yourself against

- Inadequate background checks or screening
- Failure to implement role-based access control
- Lack of regular access reviews
- Inadequate termination procedures
- Insufficient monitoring of workforce access
- Failure to train workforce on security policies

Beyond the minimum

- Implement comprehensive background check procedures
- Use role-based access control (RBAC) principles

- Conduct regular access reviews and recertification
- Implement proper termination procedures
- Monitor and audit workforce access regularly
- Provide ongoing security training
- Document all access decisions and changes

NIST mapping: NIST SP 800-66 Rev. 2: Section 3.1.2 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: PS-1, PS-2, PS-3, PS-4, PS-5, PS-6, PS-7, PS-8

Sign-off

Completed by	Title	Date
Reviewed by	**Title**	**Next review due**