CHECKLIST · HIPAA

2026 HIPAA Technical Safeguards Checklist

23-point checklist covering every mandatory technical control under the updated HIPAA Security Rule.

2 pages · PDF · Updated May 2026 · **goironfort.com**

Use this checklist to verify your organization's compliance with the technical safeguard requirements under 45 CFR §164.312 and the 2026 NPRM updates. Mark each item as implemented (✓), in progress, or not started.

Access Control (§164.312(a))

- ☐ Unique user identification assigned to every workforce member
- ☐ Emergency access procedures documented and tested
- ☐ Automatic logoff after defined period of inactivity (≤15 minutes recommended)
- ☐ Encryption and decryption of ePHI at rest (required under 2026 NPRM)
- ☐ Multi-factor authentication enabled for all ePHI system access (required 2026)
- ☐ Role-based access controls in place; principle of least privilege enforced
- ☐ Access provisioning and deprovisioning procedures documented and followed

Audit Controls (§164.312(b))

- ☐ Audit logging enabled on all systems that access, store, or transmit ePHI
- ☐ Audit log retention policy documented (minimum 6 years)
- ☐ Audit logs protected from unauthorized modification or deletion
- ☐ Regular review of audit logs for anomalous activity
- ☐ Audit logging coverage includes login events, access failures, data exports

Integrity (§164.312(c))

- ☐ Data integrity mechanisms in place (checksums, digital signatures, or equivalent)
- ☐ Integrity verification procedures documented for ePHI in transit and at rest

- Process for detecting and responding to unauthorized ePHI alteration or destruction

Transmission Security (§164.312(e))

- TLS 1.2 or higher enforced for all ePHI transmissions
- End-to-end encryption for ePHI transmitted over open networks
- Encryption key management procedures documented

2026 NPRM Additions

- Vulnerability scanning program operational (at least every 6 months)
- Critical vulnerabilities (CVSS ≥9.0) remediated within 15 days
- Technology asset inventory maintained and reviewed annually
- Patch management policy documented with defined SLAs

> ■ *Iron Fort monitors all 23 of these controls continuously and alerts you when any fail. Book a free gap assessment at goironfort.com/demo*