DEPARTMENT OF THE ARMY
HEADQUARTERS, UNITED STATES ARMY MEDICAL COMMAND
2050 WORTH ROAD
FORT SAM HOUSTON, TX 78234-6000

REPLY TO
ATTENTION OF

OTSG/MEDCOM Policy Memo 07-042

MCHO-CL-P

18 OCT 2007

Expires 18 October 2009

MEMORANDUM FOR

COMMANDERS, MAJOR SUBORDINATE COMMANDS
DIRECTORS, OTSG/MEDCOM ONESTAFF

SUBJECT: Health Insurance Portability and Accountability Act (HIPAA) Privacy and Security Training

1. References:

a. DoD 6025.18-R, Department of Defense Health Information Privacy Regulation, January 2003, C14.2.

b. DoD 8580.X-R, Department of Defense Health Information Security Regulation (draft).

c. TMA Privacy Office Policy and Guidance, January 2006, subject: Workforce Training.

d. AR 40-66, Medical Record Administration and Health Care Documentation, 22 May 2006, paragraph 2-2c.

e. MEDCOM Regulation 10-1, Organizations and Functions Policy, 26 June 1997, paragraph 1-9b(5).

2. Purpose: To establish a policy for HIPAA privacy and security training.

3. Proponent: Proponents are the Deputy Assistant Chief of Staff for Information Management (HIPAA Security) and the Assistant Chief of Staff for Health Policy and Services (Patient Administration Division) for HIPAA Privacy.

4. Policy:

a. All military, civilian, and contractor personnel who work in the Office of The Surgeon General (OTSG) and MEDCOM organizations listed below must complete core and annual refresher HIPAA training commensurate with their job position. This requirement also applies to volunteers, trainees, and any other person whose conduct, in the performance of

their work, is under the direct control of these organizations, whether or not they are paid by the organizations. These organizations are as follows:

(1) OTSG/MEDCOM Headquarters OneStaff.

(2) Army Executive Agencies.

(3) Dental Command.

(4) Center for Health Promotion and Preventive Medicine.

(5) Medical Research and Materiel Command.

(6) Army Medical Department Center and School.

(7) Regional Medical Command Headquarters and Medical Treatment Facilities (MTFs).

(8) Regional Dental Command Headquarters and Dental Treatment Facilities (DTFs).

b. Personnel working in Veterinary Treatment Facilities (VTF) who access the Composite Health Care System and/or AHLTA and have contact with animal bite reports must complete core and annual refresher HIPAA training.

c. Annual refresher training will be accomplished in the individual's birth month as part of the individual's birth month annual review. Individuals completing core training within 6 months of their birth month will be given credit for completing annual refresher training.

d. Military Healthcare System (MHS) Learn provides the official HIPAA training at https://mhslearn.satx.disa.mil. MHS Learn is the DoD-sanctioned system that provides the content, documents training status, and produces compliance reports. MHS Learn will record all HIPAA Training for compliance monitoring.

5. Responsibilities:

a. MTF, DTF, and VTF Commanders will ensure that personnel working in their facilities complete HIPAA training within 30 days of their arrival and complete annual refresher training in their birth month.

b. Directors of Health Services will coordinate, as required, to make this training available to personnel assigned to battalion aid stations, and will also ensure they are HIPAA-trained within 30 days of their arrival and they complete annual refresher training in their birth month.

c. Commanders of Major Subordinate Commands will ensure all their personnel receive HIPAA core and annual refresher training. These Commanders and Directors will ensure their personnel are HIPAA-trained within 30 days of their arrival and complete annual refresher training in their birth month.

d. The Deputy Assistant Chief of Staff for Information Management (HIPAA Security) and the Assistant Chief of Staff for Health Policy and Services (Patient Administration Division), will monitor training policy compliance and publish periodic compliance reports.

6. Procedures:

a. The completion goal for core training is a minimum of 98%. This allows for personnel who are newly assigned to complete their training within the first 30 days of their assignment.

b. The training completion goal for annual refresher training is a minimum of 98%. The refresher training compliance report should be run on the last work day of the month.

c. Courses in the MHS Learn are assigned by specific HIPAA positions. HIPAA positions in MHS Learn and jobs suggested to be classified into those positions are described in enclosure 1. Volunteers and contractors must register in the MHS Learn within the position for which they are volunteering or are contracted as the course material was created to reflect specific job functions.

d. The course content in MHS Learn includes core and refresher training for both HIPAA Privacy and HIPAA Security. Students must complete all required courses to receive credit for HIPAA training. Upon completion of training, courses are recorded in the student's transcript and a certificate of completion is created for each sub-course. It is recommended that students print certificates of completion and file these in their personal records. These electronic and paper records are proof of training completion. Once a student has completed the HIPAA courses and has a record of the completed courses (either paper or an electronic copy in the MHS Learn), they do not need to re-take the courses when/if they transfer to another facility within the MHS.

e. Training updates must be provided to all personnel whose functions are affected by a material change in policies or procedures. This training must occur within a reasonable period of time after the material change becomes effective.

FOR THE COMMANDER:

Encl

WILLIAM H. THRESHER
Chief of Staff

HIPAA Positions and Required Courses

Following is a list of HIPAA positions, descriptions including examples, and required HIPAA courses. Appropriate selection of HIPAA Job Position during self-registration ensures the appropriate assignment of role specific training required by DoD 6025.18R, "DoD Health Information Privacy Regulation." **As the interpretation of HIPAA position descriptions (and subsequent assignment of required HIPAA courses) may vary by facility, this memo is intended as guidance only. Users are advised to contact their supervisors for clarification and/or further direction on selecting the appropriate position.**

HIPAA Job Position	Description	Required HIPAA Courses
Ancillary Clinical	Ancillary clinical staff including technicians *(i.e., Audiologist, Behavioral Health personnel, Chiropractor, Clinical Psychologist, Cytotechnologist, Dietician, Occupational Therapist, Optician, Optometrist, Pharmacist, Physical Therapist, Podiatrist, Preventive Medicine staff, Social Worker, Speech Pathologist, Cardiovascular Technician, Dental Laboratory Technician, Dermatology Technician, Electroneurodiagnostic Technician, Hemodialysis/Apheresis Technician, Histopathology Technician, Medical Laboratory Technician, Nuclear Medicine Technician, Orthopedic Technician, Otolaryngology Technician, Respiratory Therapy Technician, Surgical Technologist, Urology Technician, X-ray Technician, Clinical support volunteers)*	1. Introduction to Privacy and Security 2. Introduction to HIPAA Security 3. Ancillary Clinical Intro and Scenarios 4. Family Discussions and Opt-Out *HIPAA Refresher Course (annually)*
Patient Services *formerly "Administrative Support Staff"*	Patient Assistance staff	1. Introduction to Privacy and Security 2. Introduction to HIPAA Security 3. Patient Services Intro and Scenarios 4. Protected Health Information 5. Notice of Privacy Practices *HIPAA Refresher Course (annually)*

Enclosure

Operations and Finance *formerly "Business/ Finance Office"*	Resource Management, Personnel staff, Medical Operations (Readiness, Education, Training, Security), Headquarters Staff, Executive Agency Staff not elsewhere classified by job position.	1. Introduction to Privacy and Security 2. Introduction to HIPAA Security 3. Operations and Finance Intro and Scenarios 4. Protected Health Information *HIPAA Refresher Course (annually)*

Support Services *formerly "Facility Support Services"*	All non-clinical support personnel *(i.e., Biomedical Repair, Chaplain/Religious Services, Environmental Health Services, Facilities Management- Janitorial, Housekeeping, Maintenance, Food Service, Industrial Hygiene/Safety, Logistics, Occupational Health, Transportation, Supply, Veterinary Services Personnel)*	1. Introduction to Privacy and Security 2. Introduction to HIPAA Security 3. Facility Support Services Intro and Scenarios *HIPAA Refresher Course (annually)*
Information Systems *formerly "Information Management"*	IM/IT (Information Management/Information Technology) staff, Telecommunication/Mailroom, Biomedical Illustrator/Photographer	1. Introduction to Privacy and Security 2. Introduction to HIPAA Security 3. Information Systems Intro and Scenarios 4. Protected Health Information *HIPAA Refresher Course (annually)*
Medical Records	Medical Records staff, Patient Admin staff, Coders, Transcriptionists, Clinical/Ward Admin staff, General Clerical/Secretarial staff, Administrative volunteers	1. Introduction to Privacy and Security 2. Introduction to HIPAA Security 3. Medical Records Intro and Scenarios 4. Protected Health Information 5. Notice of Privacy Practices 6. Authorizations 7. Individual Patient Rights 8. Marketing *HIPAA Refresher Course (annually)*
Nursing	Staff Nurse- RN/LPN/LVN, Nurse Mid-wife, Nurse Anesthetist, Medical Assistants, Dental Hygienist, Dental Assistants	1. Introduction to Privacy and Security 2. Introduction to HIPAA Security 3. Nursing Intro and Scenarios

		4. Protected Health Information 5. Family Discussions and Opt-Out *HIPAA Refresher Course (annually)*

Providers	Physicians- all specialties, Physician Assistants, Dentists- all specialties, Nurse Practitioners, Research Clinicians, Dental Science and Research	1. Introduction to Privacy and Security 2. Introduction to HIPAA Security 3. Physician Intro and Scenarios 4. Protected Health Information 5. Family Discussions and Opt-Out *HIPAA Refresher Course (annually)*
Senior Management *formerly "Senior Executive Staff"*	Commanders, Executive staff/Leadership, General Administration staff, Hospital Legal staff, Public Affairs /Marketing staff	1. Introduction to Privacy and Security 2. Introduction to HIPAA Security 3. Senior Management Intro and Scenarios 4. Protected Health Information *HIPAA Refresher Course (annually)*

As the interpretation of HIPAA job position descriptions (and subsequent assignment of required HIPAA courses) may vary by facility, this memo is intended as guidance only. Users are advised to contact their supervisors for clarification and/or further direction on selecting the appropriate job position.