



REPLY TO  
ATTENTION OF

**DEPARTMENT OF THE ARMY**  
HEADQUARTERS, U.S. ARMY MEDICAL COMMAND  
2748 WORTH ROAD  
JBSA FORT SAM HOUSTON, TEXAS 78234-6000

OTSG/MEDCOM Policy Memo 16-035  
**11 MAY 2016**

MCHO-CL-P

Expires 11 May 2018

**MEMORANDUM FOR**

Commanders, MEDCOM Major Subordinate Commands  
Directors, OTSG/MEDCOM OneStaff

**SUBJECT: Privacy Act (PA) and 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, paragraph C14.2, Jan 03.

b. DoD 5400.11-R, Department of Defense Privacy Program Regulation, paragraph C.7, 14 May 07.

c. Office of the Secretary of Defense, Administration and Management, Senior Privacy Official Memorandum, 5 Jun 09, subject: Safeguarding Against and Responding to the Breach of Personally Identifiable Information (PII).

d. AR 40-66, Medical Record Administration and Health Care Documentation, paragraph 2-2e, 4 Jan 10.

e. MEDCOM Regulation 10-1, Organizations and Functions Policy, paragraph 1-12 b. (2)(a), 12 Jun 13.

f. DoDI 8580.02, Security of Individually Identifiable Health Information in DoD Health Care Programs, Enclosure 3, paragraph 8c, 12 August 2015.

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

**3. Proponent: The proponents for this policy are the OTSG/MEDCOM Freedom of Information Act /Privacy Act (FOIA/PA) Officer for the PA, the Office of the Chief Information Officer/G6 for HIPAA security and the Patient Administration Division, MEDCOM for HIPAA privacy.**

**\*This policy memo supersedes OTSG/MEDCOM Policy Memo 13-068, 19 Dec 13, subject: Privacy Act (PA) and Health Insurance Portability and Accountability Act (HIPAA) Privacy and Security Training.**

MCHO-CL-P

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

4. Policy:

a. All military, civilian, and contractor personnel who work in the Office of The Surgeon General and US Army Medical Command organizations listed below must complete annual PA and HIPAA training. This requirement also applies to contractors, volunteers, trainees, activated Reservists 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) Medical Research and Materiel Command
- (4) Army Medical Department Center and School
- (5) Regional Health Command headquarters and Military Treatment Facilities (MTF)
- (6) Regional Dental Command headquarters and Dental Treatment Facilities (DTFs)
- (7) Regional Public Health Command headquarters, subordinate districts, and Veterinary Treatment Facilities (VTFs)

b. Individuals will complete annual training NLT than the 12<sup>th</sup> month anniversary of their previous training.

c. Joint Knowledge Online (JKO) (Defense Health Agency Education and Training) <https://jkodirect.jten.mil/Atlas2/faces/page/login/Login.seam?ORG=MHS> is the official PA and HIPAA training site. JKO is the Department of Defense sanctioned system that provides the content, documents training status, and produces compliance reports. All PA and HIPAA training is recorded and compliance monitored in JKO.

d. Each organization's in- and out-processing procedures should include verification of PA and HIPAA training completion.

e. Personnel are not authorized access to electronic networks containing personally identifiable information (PII) or protected health information (PHI) until completion of the PA and HIPAA training has been verified. Personnel not completing annual training will lose access to electronic networks containing PII or PHI.

**MCHO-CL-P**

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

**5. Responsibilities:**

a. MTF, DTF, and VTF commanders will ensure that personnel working in their facilities complete PA and HIPAA training immediately upon their arrival, if their training is not current, and complete annual training thereafter. MTF, DTF, and VTF commanders are responsible for the training of their personnel on local policies and procedures for safeguarding personally identifiable information to include protected health information.

b. Directors of Health Services will encourage unit surgeons to ensure that personnel assigned to battalion aid stations are PA and HIPAA trained immediately upon their arrival, if their training is not current, and annually thereafter.

c. Commanders of Major Subordinate Commands, Directors of Executive Agencies, and Directors, OneStaff will ensure their personnel are PA and HIPAA trained immediately upon their arrival, if their training is not current, and annually thereafter.

**6. Procedures:**

a. JKO asks enrollees to select an HIPAA job position upon enrollment in the PA and HIPAA course. The relationships of students' jobs to HIPAA job positions are shown at the enclosure. Volunteers and contractors must enroll in the PA and HIPAA course within the job position for which they are volunteering or are contracted.

b. JKO will send a reminder email to students on the 12<sup>th</sup> month anniversary of their previous training. For example, if a student takes the course in January, JKO will send the student a reminder email the following January. The course content in JKO is relatively easy to navigate. Students must take a challenge test (pre-test). If the student scores 100, the student is given credit for the training. If students score less than 100, the students must complete the sub courses that the program refers them to and score a minimum of 75 on each sub course examination to receive credit for PA- and HIPAA training.

c. Upon completion of training, courses are recorded in the students' transcript and a certificate of completion is created. It is recommended that students print certificates of completion and file these in their personal records. They should also provide a copy of the certificate to their Digital Training Management System (DTMS) Manager to record their completed annual training in DTMS. These electronic and paper records are proof of training completion.

d. The training completion goal for annual training is 100% of assigned personnel.

MCHO-CL-P

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

e. Personnel will also be trained on local policies for uses and disclosures of personally identifiable information to include protected health information. Training updates must be provided to all personnel whose functions are affected by a material

f. change in policies or procedures. This training must occur within a reasonable period of time after the material change becomes effective.

g. Organizations may have/assign as many JKO HIPAA Training Administrators as needed to manage the PA and HIPAA training for their organizations. Requests for approval of JKO HIPAA Training Administrators should be sent to Patient Administration Division (PAD), MEDCOM and should include name, rank, duty position, telephone number, organization, and e-mail address.

FOR THE COMMANDER:

Encl

  
ULDRIC L. FIOBE, JR.  
Chief of Staff

## HIPAA Job Positions and Required Courses

The following is a list of HIPAA job position descriptions including examples. Appropriate selection of the HIPAA job position ensures the appropriate assignment of role specific training required by DoD 6025.18R, "DoD Health Information Privacy Regulation." **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.**

<b>HIPAA Job Position</b>	<b>Description</b>
Ancillary Clinical	Ancillary clinical staff including technicians <i>(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)</i>
Patient Services	Patient Assistance staff.
Medical Records	Medical Records staff, Patient Admin staff, Coders, Transcriptionists, Clinical/Ward Admin staff, General Clerical/Secretarial staff, Administrative volunteers
Nursing	Staff Nurse- RN/LPN/LVN, Nurse Mid-wife, Nurse Anesthetist, Medical Assistants, Dental Hygienist, Dental Assistants
Providers	Physicians- all specialties, Physician Assistants, Dentists- all specialties, Nurse Practitioners, Research Clinicians, Dental Science and Research
Operations and Finance	Resource Management, Personnel staff, Medical Operations (Readiness, Education, Training, Security), Headquarters Staff, Executive Agency Staff not elsewhere classified by job position.
Support Services	All non-clinical support personnel <i>(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)</i>
Information Systems	IM/IT (Information Management/Information Technology) staff, Telecommunication/Mailroom, Biomedical Illustrator/Photographer
Senior Management	Commanders, Executive staff/Leadership, General Administration staff, Hospital Legal staff, Public Affairs /Marketing staff