# TRICARE MANAGEMENT ACTIVITY

# OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE HEALTH AFFAIRS

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MAY 28 2008

### MEMORANDUM FOR DIRECTORS, TRICARE MANAGEMENT ACTIVITY

SUBJECT: Workforce Training Policy Pursuant to the Department of Defense Privacy
Act Regulations and the Department of Defense Health Insurance Portability
and Accountability Act Privacy and Security Regulations

REFERENCES: (a) DoD 5400.11-R, "Department of Defense Privacy Program," May 14, 2007

- (b) Office of the Secretary of Defense (OSD) Memorandum 15041-07, "Safeguarding Against and Responding to the Breach of Personally Identifiable Information," September 21, 2007
- (c) DoD 6025.18-R, "DoD Health Information Privacy Regulation," January 24, 2003
- (d) DoD 8580.02-R, "DoD Health Information Security Regulation," July 12, 2007
- (e) DoD Instruction 8500.2, "Information Assurance (IA) Implementation," February 6, 2003
- (f) DoD Directive 8570.01, "Information Assurance Training, Certification, and Workforce Management," August 15, 2004

### 1. PURPOSE:

This memorandum establishes policy for the training of TRICARE Management Activity (TMA) workforce members in accordance with Department of Defense (DoD) 5400.11-R, "Department of Defense Privacy Program," DoD 6025.18-R, "DoD Health Information Privacy Regulation," and DoD 8580.02-R "DoD Health Information Security Regulation."

### 2. APPLICABILITY AND SCOPE

- 2.1. The provisions of this policy apply to TMA Directorates, TRICARE Regional Offices, TRICARE Area Offices, and all other organizational entities in TMA.
- 2.2. The provisions of this policy apply to all TMA workforce members; including military personnel, government civilian employees, and TRICARE contractors; when required by contract.

### 3. **DEFINITIONS**:

- 3.1. <u>TMA Workforce</u>. Military and civilian full-time and part-time employees, volunteers, trainees, and other persons (including students and contract personnel as required by contract) whose conduct, in the performance work for TMA is under the direct control of TMA, whether or not they are paid by TMA.
- 3.2. <u>Personally Identifiable Information (PII)</u>. Information which can be used to distinguish or trace an individual's identity; including name, social security number, date and place of birth, mother's maiden name, biometric records, and any other personal information which is linked or linkable to a specified individual.
- 3.3. <u>Protected Health Information (PHI)</u>. Individually identifiable health information created, received, or maintained by a covered entity; including TMA, that is transmitted or maintained by electronic or any other form or medium, except as otherwise contained in employment records held by TMA in its role as an employer.

## 4. POLICY:

It is TMA policy that:

- 4.1. TMA workforce members are required to take training as outlined in References (a) and (b) and annually sign a certification to acknowledge awareness of responsibilities as a prerequisite for gaining permitted access to TMA systems. Signed certifications will be maintained in accordance with the stated references.
- 4.2. TMA workforce members must also be trained in accordance with Reference (c). To the extent practical, the training and documentation required by this subsection will be merged and combined with training required in subsection 4.1 above.
- 4.3. In accordance with Reference (d), TMA workforce must attend security awareness and training which complements the requirements of References (e) and (f) regarding Information Assurance. Documentation of training must be maintained as required in Reference (d). Training provided by TMA that merges References (a), (b) and (c), will supplement, but not repeat the security training that is otherwise part of Information Assurance.
- 4.4. All of the above required training will be conducted through TMA's administration and Military Health System Learn or the current and appropriate TMA learning management system in place to deliver training to meet the above requirements.

# 5. EFFECTIVE:

This policy is effective upon signature. Questions regarding this policy shall be directed to Ms. Leslie V. Shaffer, Director, TMA Privacy Office, at (703) 681-7500.

[Signed]

Elder Granger
Major General, MC, USA
Deputy Director