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TRICARE
MANAGEMENT
ACTIVITY

JUN 30 2000

MEMORANDUM FOR SURGEON GENERAL OF THE ARMY
SURGEON GENERAL OF THE NAVY
SURGEON GENERAL OF THE AIR FORCE

SUBJECT: Policy for Surveys and Other Information Requirements within the Military Health System

This memorandum updates previous survey policy guidance, dated November 18, 1996.

This guidance identifies the four major surveys sponsored by the Office of the Assistant Secretary of Defense for Health Affairs and the TRICARE Management Activity (OASD(HA)/TMA). It also outlines the procedures to obtain approval for surveys or information requirements designed to meet information needs not addressed in the four surveys.

Surveys are defined as systematic data collections, using personal or telephonic interviews, or self-administered questionnaires, from a sample of ten or more persons as individuals or representatives of agencies. The questionnaires or interview protocols contain identical questions that elicit attitudes, opinions, behavior and related demographic, social and economic data to be used for statistical compilations for research and/or policy assessment purposes. An information requirement is the functional area expression of need for data or information to carry out specified and authorized functions or management purposes that require the establishment or maintenance of forms and formats or reporting or record-keeping systems, whether manual or automated.

Table 1 (attached) provides a summary of the various required Departmental approval processes that govern surveys and other information collection activities. DoDI 1100.13, "Surveys of DoD Personnel," is one of the key documents guiding survey requirements. In accordance with DoDI 1100.13, the Under Secretary of Defense for Personnel and Readiness (USD(P&R)) shall approve all surveys that require participation of personnel in more than one DoD Component (cross Service lines), or Components other than the Component sponsoring the survey. This DoDI also gives the Defense Manpower Data Center (DMDC) the function of reviewing survey requests and making recommendations concerning approval. This approval is required before a survey can be submitted for licensure by the Director, Washington Headquarters Services/Directorate for Information Operations and Reports (WHS/DIOR) in accordance with DoDD 8910.1, "Management and Control of Information Requirements." In accordance with this Directive, surveys and other information requirements within the Military Health System are submitted to WHS/DIOR through OASD(HA)/TMA. OASD(HA)/TMA also is responsible for sponsoring health-related surveys and submitting them to DMDC for review under DoDI 1100.13.

In keeping with DoDD 8910.1 and DoDI 1100.13, OASD(HA)/TMA cooperates with DMDC to ensure that all sponsored surveys are necessary, non-duplicative, efficacious and cost-effective. In addition, surveys must protect individual privacy and not present an undue burden on respondents.

DoDI 1100.13 does not prevent a DoD Component from conducting a survey of its own personnel when executed entirely within the Component.

In addition, Military Treatment Facilities (MTFs) may conduct local level surveys of beneficiaries and assigned personnel to address the need for more specific information on clinic operations and/or services within that specific MTF. These surveys should primarily be administered on site and the results published and/or utilized at the local level. Surveys of this nature will not require OASD(HA)/TMA level review and approval, however, they should be designed to avoid excessive duplication with existing TMA sponsored surveys, and conform to guidance relative to cost, burden, and privacy.

DoD 8910.1-M, "DoD Procedures and Policies for Management of Information Requirements," Sections C3.8.2.3.5 and C4.4.10, exempts clinical research from survey licensing requirements addressed in this memorandum. Clinical research is defined as: facts or opinions, obtained initially or in follow-up requests, from individuals (including individuals in control groups) under treatment or clinical examination in connection with research on, or prophylaxis to prevent, a clinical disorder; direct treatment of that disorder; or the interpretation of biological analyses of body fluids, tissues, or other specimens; or the identification or classification of such specimens. This includes medical records established as a result of this type of action. TMA, Health Program Analysis and Evaluation (HPA&E) is available to work with the clinical research review and approval authorities within the Services to ensure proper implementation of this requirement.

The OASD(HA)/TMA currently sponsor the following four surveys that are designed to meet the majority of the MHS's requirements for patient-level information:

1. Annual Health Care survey of DoD Beneficiaries: conducted by TMA(HPA&E) in response to a Congressional mandate. This survey collects worldwide data from beneficiaries eligible for military health care relative to access, satisfaction, health status and use of services.

2. Customer Satisfaction Survey: measures satisfaction with a recent, specified MTF visit. Questions are restricted to satisfaction with the appointment. This allows direct comparison of MTFs over time, of MTF vs. MTF and with civilian HMO benchmarks.

3. Health Enrollment/Evaluation Assessment Review: a clinically oriented questionnaire to be completed by patients as they enroll in TRICARE Prime. It identifies high utilizers and chronic conditions, assesses the need for preventive services and motivates behavioral change.

4. DoD Survey of Health Related Behaviors Among Military Personnel: conducted approximately every three years, this survey collects worldwide data from active duty personnel on drug and alcohol abuse and other health related behaviors.

Survey data will be provided to the Services/Lead Agents and will be available to researchers to conduct independent analyses. If other patient and/or staff level information is necessary to meet management requirements (e.g., inpatient satisfaction surveys or surveys targeted to specific clinical groups such as pregnant women or diabetics) HA and TMA will generally sponsor such surveys which meet the criteria in DoDI 1100.13. In addition, consideration may be given to expanding existing approved surveys to incorporate appropriate additional requirements. Given the length and complexity of several of the review/approval processes, it is advisable to plan and provide sufficient lead-time when requesting survey approval though HA and TMA

High priority for approval will be given to surveys and information collections which:

- address HA and TMA key programs, initiatives and policies, and/or have applicability across the MHS, and/or
- are directed by Congress, Public Law, DoDD or DoDI, or
- are recommended by MHS audits and reviews, e.g., GAO, IG, etc., and
- can be readily incorporated into existing HA surveys or information collections, to capture information not currently being collected.

Each Service should, when feasible, appoint a representative to serve as a coordinator or point of contact for health-related surveys and information collection activities. This person will serve as the focal point for all HA and TMA sponsored surveys as well as other MHS surveys; and will be a valuable, knowledgeable liaison and resource to both groups. This coordinator should maintain a close working relationship with their Service's representative on the Inter-Service Survey Coordination Committee (ISSCC).

Non-exempt surveys without USD(P&R) approval and WHS/DIOR licensure are unauthorized. In addition, beneficiaries should not be solicited to respond to such surveys. Personnel at all levels of the MHS conducting unlicensed or unauthorized surveys must either discontinue them and/or initiate the approval process. TMA(HPA&E), Directorate for Survey Oversight and Information Control is the primary office of responsibility for MHS surveys; for assistance contact Ms. Kim Frazier on (703) 681-4263 x3027, or kim.frazier@tma.osd.mil.

H. James T. Sears, M.D.
Executive Director

Attachment:
As stated

TABLE 1: DEPARTMENTAL APPROVAL PROCESSES FOR SURVEYS AND INFORMATION COLLECTIONS

Information Requirements/ Proponent	Prescribing Authority	Purpose	Estimated Timeframe for Processing	Key Players	Examples of MHS Collections
DoD Public Information Collections **(Surveys)**/OMB	Title 5 CFR 1320, Ref(a); P.L. 104-13 (amended) The Paperwork Reduction Act; Health Insurance Portability and Accountability Act of 1996	License information collections that require responses from members of the public which **includes MHS dependents of retirees, contractors, separated military personnel, reservists**	3 to 4 months	AO, WHS, DMDC, Privacy Office, OMB, Federal Register Office	PGI Surveys, TRICARE Enrollment Survey, HCFA Claim Form, Third Party Collection Program, Women's Health Surveys
DoD Internal Information Collections **(Surveys)**/DMDC - WHS	DoDI 1100-13 Surveys of DoD Personnel ; DoD 8910.1; DoD 8910.1-M	Review license information required at any level within DoD for internal management, to report to one or more Components	3 to 4 weeks	AO, IMCO, WHS, DMDC, OSD Privacy Office	Breast Care Survey, Healthy Behaviors Survey, Annual Beneficiary Survey, Customer Satisfaction Survey, Mental Health Assessment, Dental Satisfaction Survey
DD Forms - WHS	DoDI 7750.7	License information collections requiring standard forms/ formats, reports	3 to 4 weeks	AO, IMCO, WHS, TMA (Data Standard)	Prevention Initiative, Overseas AD Claims, Continued Health Care Benefit Program, Pre-Post Deployment Form
Interagency Information Collections - WHS	Title 41 CFR, Chapter 101	Licenses collections by DoD from other Federal Agencies	no estimate available	AO, IMCO, WHS, GSA	Some efforts with Coast Guard, NOAA
Privacy Act Issues - WHS	Title V, USC Privacy Act of 1974; DoD 5400.11-R	Covers treatment of personal information being collected on individuals and data matching/ sharing, etc.	1 to 2 weeks	AO, IMCO, OSD Privacy Office, WHS, DMDC, OMB	All of the above

Action Officer (AO); Information Management Control Officer (IMCO); Washington Headquarters Services (WHS); Office of Management and Budget (OMB)
Defense Manpower Data Center (DMDC); General Services Administration (GSA)

(Attachment)