



OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE  
HEALTH AFFAIRS  
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TRICARE  
MANAGEMENT  
ACTIVITY

SEP 9 2004

MEMORANDUM FOR REGIONAL DIRECTORS

**SUBJECT: Request to Appoint TRICARE Regional Office Health Insurance Portability and Accountability Act of 1996 Security Officials**

The Health Insurance Portability and Accountability Act (HIPAA) of 1996, Public Law 104-191, administrative simplification provisions require the protection and privacy of individually identifiable health information. The HIPAA Security rule, signed in February 2003, mandates the standards for the integrity, confidentiality, and availability of electronically protected health information. Full compliance with its requirements must be met by April 21, 2005.

It is requested that a HIPAA Security Official be appointed for each TRICARE Regional Office (TRO). The person selected as the TRO Security Official must possess the requisite experience, knowledge and authority to develop, implement and monitor the security practices, policies and procedures throughout the organization. The HIPAA Security Official will assist health services support contractors and serve as a resource to military treatment facilities and dental treatment facilities (MTFs/DTFs) in the implementation of Department of Defense regulation. The HIPAA Security Official will serve as the TRO liaison for HIPAA Security implementation in the region and receive training and guidance from the TRICARE Management Activity (TMA).

The roles and responsibilities for the TRO HIPAA Security Official are attached. Within two weeks of the date of this memorandum, please forward a copy of your appointment letters to Mr. Sam Jenkins, TMA Privacy Officer, 5111 Leesburg Pike, Suite 810, Falls Church, Virginia, 22041, e-mail: [Sam.Jenkins@tma.osd.mil](mailto:Sam.Jenkins@tma.osd.mil), fax: 703-681-8845.

Richard A. Mayo RADM, MC, USN  
Deputy Director

Attachment:  
As stated

Mr. Sam Jenkins  
Dr. Richard Guerin

**TRICARE REGIONAL OFFICE  
HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT  
SECURITY OFFICIAL  
ROLES AND RESPONSIBILITIES**

**Organizational Need/Function:** The Security Rule of the Health Insurance Portability and Accountability Act (HIPAA) of 1996, Public Law 104-191, requires each covered entity, i.e., the TRICARE health plan and Medical Treatment Facilities and Dental Treatment Facilities (MTFs/DTFs), to assign HIPAA Security responsibilities. The HIPAA Security Official oversees all ongoing activities related to the development, implementation, and maintenance of the organization's policies and procedures covering the security of electronic patient health information. The TRICARE Regional Offices (TROs) are part of the Military Health System (MHS) organized health care arrangement and thus plays an important role in assuring MHS compliance with federal and state regulations. Each TRO Director will appoint a TRO HIPAA Security Official.

**ROLES AND RESPONSIBILITIES**

**Policy Implementation, Oversight, Auditing and Compliance:**

- Establish an interdisciplinary HIPAA Security implementation team.
- Ensure TRO policies and procedures comply with current and future Department of Defense (DoD) Information Assurance and Health Information Security regulations.
- Ensure all staff complete initial HIPAA training using the web based TMA HIPAA training tool.
- Use the web based TMA HIPAA compliance tool to perform map and gap analyses.
- Provide an orientation and follow-on training to all employees
- Initiate, facilitate and promote activities to foster information privacy and security awareness within the organization and related entities.
- Ensure that there is a mechanism within the organization for detecting, documenting, tracking, investigating, and taking action on security incidents involving electronic protected health information.
- Brief HIPAA Security implementation plans to TRO staff.
- Review the security features of existing and new computing systems to ensure that they meet the security requirements of existing policies. Review and propose changes to existing policies and procedures that reflect the existing requirements of the systems to which they apply.
- Monitor entity operations and systems for security compliance. Report to management on the status of security compliance.
- Perform audits, reviews and compliance oversight on request of TRICARE Management Activity (TMA) for components of the MHS to ensure requirements of all applicable HIPAA rules for the security of electronic health information.

### **Liaison Activities:**

Serve as a liaison between the health services support contractors and MTF/DTF on issues related to HIPAA Security implementation.

In coordination with key personnel, develop and implement the following plans and others as required:

- Disaster plan, emergency mode operation plan, back up plan, physical security plan, personnel security plan, access policies, and others. Test and revise plans as necessary to ensure data integrity, confidentiality, and availability.

Ensure consistent action is taken for failure to comply with security policies for all employees on the workforce. Work in cooperation with human resources, administration, and legal counsel, as appropriate.

### **Administration of the MHS HIPAA Security Program:**

Serve as a point of contact for the TRO HIPAA Security rule compliance concerns, issues and policy questions as needed.

Maintain current knowledge of all applicable state, DoD and federal requirements with regard to the security of health information.

Collaborate with other healthcare professionals to ensure appropriate security measures are in place to safeguard protected health information.

Conduct meetings with health services support contractors to ensure that information sharing and dissemination is consistent and in conformity with policy.

Provide information on facility security policies and practices to employees and others with access to health information. Prepare and publish papers/articles on security best practices. Ensure that training conforms to existing policies and procedures.