

Enclosure 11



DEPARTMENT OF THE ARMY
528th SUSTAINMENT BRIGADE (SPECIAL OPERATIONS) (AIRBORNE)
FORT BRAGG, NORTH CAROLINA 28310

AOSC-MED

23 February 2023

MEMORANDUM FOR Record

SUBJECT: 528th HPW Assessment Program HIPPA, PHI, and PII Security Program

1. At the direction of the United States Army Special Operations Command (USASOC), the 528th Sustainment Brigade Human Performance and Wellness (HPW) program has begun routine screening and assessment of the Health, Spiritual, Family, and Financial needs of all assigned Soldiers.

2. As dictated by USASOC, part of this screening and assessment program involves the Tactical Performance Index Questionnaire (TPIQ). This is a 75 item questionnaire that involves a self-reported status on all of the Preservation of the Force and Family (POTFF) domains to include physical, spiritual, family/social, cognitive and financial well-being. This involves self-reporting on overall status of these functional areas and the Soldier's knowledge and/or involvement with the HPW program in the past. There is no soliciting of specific past medical or behavioral health history in this regard.

3. As a consequence, there is potential for the TPIQ, and the HPW assessment program in general, to generate HIPPA, PHI, and PII covered information. Therefore the following safeguards will be implemented as a matter of SOP:

a. Administrative Safeguards:

i. A **Notice of Privacy Practices** is provided to the Soldier at the beginning of the TPIQ before any self-reported information is given. All Soldiers will be given the opportunity to Opt-in or Opt-out of the TPIQ.

ii. All Soldiers will be given the opportunity to Opt-in or Opt-out of self-reported data. This does not apply to the objective data obtained by In-body testing as this is a part of the Army's ABCP program.

iii. All members of the 528th HPW team will complete HIPPA training. This will be an annual requirement, and records of completion will be maintained locally.

iv. Access to identifiable information generated by the HPW assessments will be restricted to HPW members. Commanders will only have access to aggregate scores of their units without the ability to access individual results.

b. Physical Safeguards:

- i. Access to the HPW office is restricted by a locked door that can only be accessed by HPW team members.
- ii. All tablets used to input of the HPW assessments during intake are to be locked in a locker that will remain behind the access restricted HPW office noted above.

c. Technical Safeguards:

- i. No input self-reported data will be stored on the individual tablets used to conduct the self-reported HPW surveys.
- ii. Survey input on tablets is de-identified by provision of a roster number only. No PII is transmitted on the tablets.
- iii. All self-reported data input will be uploaded onto a secure server where it will be stored and aggregated via MS Forms on a specific 528th account that is password protected. No data will be stored on tablets. Once the patient selects "submit" at the end of the TPIQ all data is automatically deleted from the tablets.
- iv. Information that can be accessed via MS Forms by HPW staff will default to aggregate data without individual results. However, as a matter of day-to-day operations, individual results have the option to be accessed and displayed as a collective report IOT facilitate a holistic service model that forms the basis of the POTFF program concept. In the event a collective individual report is generated as noted above, it will be done so as a password protected document and transferred to HPW members via DODSAFE to prevent unauthorized disclosures.
- v. Pending further software development into Microsoft Power BI, the collective individual results reports noted above will need to be accessed to evaluate the individual results of screening and assessment data IOT better serve the Soldier and provide them with the necessary HPW resources. This will ensure that the data obtained can be actioned upon to impact the Soldier appropriately and be more than just collected data.
- vi. Once Microsoft Power BI is full developed, access to individual results will be limited to HPW members only. Commanders will be limited to aggregate, non-identifiable data for their unit only.
- vii. In the event a collective individual report is generated as noted above, it will be done so as a password protected document and transferred via DODSAFE to prevent unauthorized disclosures.

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4. The policies outlined in the SOP are to ensure protection of HIPPA, PHI, and PII information, but also to allow the 528th HPW program to action the assessed data to best serve the Soldier and their physical, mental, spiritual, family, and financial needs.

5. POC for this memorandum is the undersigned at robert.c.sawyer.mil@socom.mil or (910)908-6070.

SAWYER.ROBERT.CHRISTIAN.1030060900
RISTIAN.1030060900

Digitally signed by
SAWYER.ROBERT.CHRISTIAN.1030
060900
Date: 2023.02.23 12:53:26 -05'00'

ROBERT C SAWYER, MD
MAJ(P), MC
Brigade Surgeon