



Defense Health Agency

PROCEDURAL INSTRUCTION

NUMBER 6040.10

June 23, 2021

DAD-MA

SUBJECT: MHS GENESIS® Resolution of Procedural Conflicts

References: See Enclosure 1.

1. PURPOSE. MHS GENESIS is a modern electronic health record (EHR) system being implemented across the MHS. When procedural conflicts arise between legacy EHR systems and MHS GENESIS, this Defense Health Agency-Procedural Instruction (DHA-PI), based on the authority of References (a) and (b) and in compliance with Reference (c), establishes Defense Health Agency (DHA) responsibilities and procedures associated with resolving those conflicts. The purpose of this DHA-PI is further supported by References (d) through (n).

2. APPLICABILITY. This DHA-PI applies to DHA, DHA Components (activities under the authority, direction, and control of DHA), and the Military Departments (MILDEPs).

3. POLICY IMPLEMENTATION. It is DHA's instruction, under References (d) through (m), that this DHA-PI defines the applicable policy to improve the quality and safety of health care for beneficiaries of the MHS.

4. CANCELLED DOCUMENTS. This DHA-PI cancels DHA-Interim Procedures Memorandum 20-001, "MHS GENESIS Policy Conflict Resolution," March 12, 2020.

5. RESPONSIBILITIES. See Enclosure 2.

6. PROCEDURES. See Enclosure 3.

7. PROPONENT AND WAIVERS. The proponent of this publication is the Deputy Assistant Director (DAD), Medical Affairs (MA). When Activities are unable to comply with this

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publication the activity may request a waiver that must include a justification, to include an analysis of the risk associated with not granting the waiver. The activity director or senior leader will submit the waiver request through their supervisory chain to DAD-MA to determine if the waiver may be granted by the Director, DHA or their designee.

8. **RELEASABILITY. Cleared for public release.** This DHA-PI is available on the Internet from the Health.mil site at: <https://health.mil/Reference-Center/Policies> and is also available to authorized users from the DHA SharePoint site at: <https://info.health.mil/cos/admin/pubs/SitePages/Home.aspx>.

9. **EFFECTIVE DATE.** This DHA-PI:

- a. Is effective upon signature.
- b. Will expire 10 years from the date of signature if it has not been reissued or canceled before this date in accordance with Reference (c).

/S/
RONALD J. PLACE
LTG, MC, USA
Director

Enclosures

1. References
2. Responsibilities
3. Procedures

Glossary

ENCLOSURE 1

REFERENCES

- (a) DoD Directive 5136.01, “Assistant Secretary of Defense for Health Affairs (ASD(HA)),” September 30, 2013, as amended
- (b) DoD Directive 5136.13, “Defense Health Agency (DHA),” September 30, 2013
- (c) DHA-Procedural Instruction 5025.01, “Publication System,” August 24, 2018
- (d) Public Law 104-191, “Health Insurance Portability and Accountability Act (HIPAA),” August 21, 1996
- (e) United States Code, 2006 Edition, Supplement 4, Title 5, “Government Organization and Employees,” January 7, 2011, Section 552a, “Records maintained on individuals”
- (f) DoD Instruction 6025.18, “Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule Compliance in DoD Health Care Programs,” March 13, 2019
- (g) DoD Instruction 8580.02, “Security of Individually Identifiable Health Information in DoD Health Care Programs,” August 12, 2015
- (h) DoD Instruction 5400.11, “DoD Privacy and Civil Liberties Programs,” January 29, 2019, as amended
- (i) DoD Instruction 5015.02, “DoD Records Management Program,” February 24, 2015, as amended
- (j) DoD Instruction 6040.45, “DoD Health Record Life Cycle Management,” November 16, 2015, as amended
- (k) Code of Federal Regulations, Title 5, Part 293
- (l) DoD Instruction 8500.01, “Cybersecurity,” March 14, 2014, as amended
- (m) DoD Instruction 8510.01, “Risk Management Framework (RMF) for DoD Information Technology (IT),” March 12, 2014, as amended
- (n) DoDM 6025.18, “Implementation of the Health Insurance Portability and Accountability (HIPAA) Privacy Rule in DoD Health Care Programs,” March 13, 2019

ENCLOSURE 2

RESPONSIBILITIES

1. DIRECTOR, DHA. The Director, DHA, will:
 - a. Ensure military medical treatment facilities (MTFs) have the capabilities, including personnel, equipment, and information technology support, required to provide or coordinate MHS GENESIS resolution of procedural conflicts.
 - b. Oversee compliance with this issuance by the MTFs.

2. MILITARY DEPARTMENTS. The Secretaries of the MILDEPs will ensure compliance with this instruction.

3. DAD-MA, DHA. The DAD MA will:
 - a. Monitor compliance with this DHA-PI.
 - b. Collaborate with the DAD, Healthcare Operations (HCO) to communicate this DHA-PI to Markets, Small Market and Stand-Alone MTF Organization (SSO), Defense Health Agency Regions (DHARs), and MTFs and ensure compliance with the instructions in this DHA-PI.

4. DAD-HCO. The DAD-HCO will:
 - a. Ensure the Market, SSO, and DHAR Directors have sufficient resources to fulfill the requirements of this DHA-PI.
 - b. Collaborate with DAD-MA to communicate the information of this DHA-PI to the Markets, SSO, and DHARs and MTFs.

5. MARKET, SSO, AND DHAR DIRECTORS. The Market, SSO, and DHAR Directors will:
 - a. Communicate the contents of this issuance to MTF Directors within the Market, SSO, or DHAR.
 - b. Provide oversight of MTF activities within the Market, SSO, or DHAR to assure compliance with this DHA-PI.

6. MARKET, SSO, AND DHAR CHIEF MEDICAL OFFICER (CMO). The Market, SSO, and DHAR CMOs, in coordination with Market, SSO, or DHAR Clinical Quality Management, will

communicate regularly with subordinate MTF CMOs to ensure alignment and support of MHS GENESIS resolution of procedural conflicts per this DHA-PI.

7. MTF DIRECTORS. The MTF Directors will enable and support compliance of MTF personnel responsibilities outlined in Enclosure 3, paragraph 1d(3).

ENCLOSURE 3

PROCEDURES

1. PROCEDURES. In accordance with References (d) through (j):

a. This DHA-PI, based on the authority of References (a) and (b), establishes DHA procedures for MHS GENESIS Resolution of Procedural Conflicts in compliance with Reference (c).

b. The potential exists for conflicts to occur between current Office of the Secretary of Defense (OSD), Service, or MTF policies, and newly-approved business and patient care processes as a result of implementing the new electronic medical record system, MHS GENESIS.

c. MHS GENESIS implementation will continue throughout the MHS until the end of April 2024. This deployment promises the significant benefit of workflow and process standardization across the MHS. With implementation of MHS GENESIS across the enterprise, occasional procedural conflicts are expected and will need correction over time. This DHA-PI provides guidance on how to resolve those procedural conflicts.

d. The following are required actions:

(1) MHS GENESIS trained workflows supersede all legacy system policies.

(2) MHS GENESIS enterprise training products and plans supersede all locally developed plans and products.

(3) MTFs and associated clinics are required to use MHS GENESIS as the official system of record to document health care information in the EHR system. In support of this requirement, immediately upon implementation of MHS GENESIS, these facilities are required to use MHS GENESIS-approved workflows and capabilities.

(4) If existing OSD, Service, or MTF procedures are in conflict with the agreed-upon workflows in MHS GENESIS, the workflow of MHS GENESIS will be used, and the MTF director/commander will notify the appropriate MHS Market/SSO/DHAR and appropriate DHA DADs.

(5) The appropriate level of governance, as determined by the MHS Market/SSO/DHAR and appropriate DHA DADs, will work to resolve the OSD, Service, or MTF policy to match the MHS GENESIS workflow, unless the result would adversely affect patient safety or the change would markedly impede or degrade another process.

(6) If the procedural conflict results in a patient safety issue or significantly impedes or degrades mission accomplishment, cease using the MHS GENESIS workflow, ensure an Issue

Report is submitted into the MHS GENESIS Issue Resolution Process, and coordinate with the MTF Informatics Steering Committee. Then report the issue, via the appropriate MHS Market and appropriate DHA DAD, who will coordinate with DHA-Health Informatics to assess the workflow.

(7) If the procedure prevents compliance with DoD regulation or policy above the MHS, report the issue via appropriate MHS Market, SSO, or DHAR leadership and DHA DADs.

e. In regard to health information privacy and security:

(1) If the conflicting procedure in any way impacts health information privacy or security, involved parties of the conflict will adhere to the privacy and security requirements of protected health information (PHI) and personally identifiable information (PII) under References (d) and (e), respectively, in accordance with the higher authority guidance as applicable in References (f), Reference (g) and Reference (h). All compliance-related issues regarding health information privacy should be coordinated through the DHA Privacy and Civil Liberties Office.

(2) PHI and PII data must be secured at all times and appropriate safeguards taken for the use, storage and maintenance, transit, and final disposition of all data, to prevent unauthorized use or disclosure of PHI and PII, including but not limited to, encryption of electronic PHI and electronic PII data at rest and in transit per all applicable Federal and State laws and DoD regulations. Any instance of actual or possible unauthorized use or disclosure of PII/PHI must be reported to the DHA Privacy and Civil Liberties Office.

f. In regard to records management and information management control:

(1) Records created as a result of this notice, regardless of media and format, must be managed in accordance with References (i) and (j).

(2) All information management must adhere to DHA cybersecurity requirements according to Reference (j).

GLOSSARYPART I. ABBREVIATIONS AND ACRONYMS

AHLTA	Armed Forces Health Longitudinal Technology Application
CHCS	Composite Health Care System
CMO	Chief Medical Officer
DAD	Deputy Assistant Director
DHA	Defense Health Agency
DHA-PI	Defense Health Agency-Procedural Instruction
DHAR	Defense Health Agency Region
EHR	electronic health record
HCO	Healthcare Operations
MA	Medical Affairs
MILDEP	Military Department
MHS	Military Health System
MTF	military medical treatment facility
OSD	Office of the Secretary of Defense
PHI	Protected Health Information
PII	Personally Identifiable Information
SSO	Small Market and Stand-Alone Medical Treatment Facility Organization

PART II. DEFINITIONS

EHR. The electronically accessible and stored information comprising a person's health record. Armed Forces Health Longitudinal Technology Application (AHLTA) and Composite Health Care System (CHCS) are the legacy EHR systems for which a user must have had an account.

MTF Informatics Steering Committee. Provides oversight of the EHR. It is empowered to make decisions, advocate for policy modifications, guide infrastructure upgrades, and implement standards, patient safety measures, and business practices to create an atmosphere for change and to resolve issues at the lowest level possible.