



# Defense Health Agency

## ADMINISTRATIVE INSTRUCTION

NUMBER 8170.02

December 05, 2023

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COMMS

SUBJECT: Guidance for the Public Release of Authored Works

References: See Enclosure 1.

1. PURPOSE. This Defense Health Agency-Administrative Instruction (DHA-AI), based on the authority of References (a) and (b), and in accordance with the guidance of References (c) through (s), establishes the Defense Health Agency's (DHA) procedures for ensuring timely public affairs review and approval for the release of works authored by DHA personnel in an official capacity prior to publication or presentation.
  
2. APPLICABILITY. This DHA-AI applies to all personnel to include assigned or attached active duty and reserve members, federal civilians, members of the Commissioned Corps of the Public Health Service, contractors (when required by the terms of the applicable contract), and other personnel assigned temporary or permanent duties at DHA and DHA Components.
  
3. POLICY IMPLEMENTATION. It is DHA's instruction, pursuant to References (a) through (s), that the DHA will establish procedures for:
  - a. Establishing a process designed to facilitate the review, publication, and presentation of official DoD information, consistent with DoD policy and Principles of Information, for the timely and accurate release of information to the public in alignment with the DoD and DHA professional ethics.
    - (1) An authored work is official DoD information authored by DoD personnel that is intended for public release, such as publication or presentation in a public (outside of DoD) forum.
    - (2) For the purpose of this instruction, "authored work" may include, but is not limited to, journal articles, abstracts, manuscripts, speeches, books, book chapters, PowerPoint slide decks, and scientific posters, and other similar content products, prepared for release in the author's official capacity.

b. See Glossary for additional definitions.

4. RESPONSIBILITIES. See Enclosure 2.

5. PROCEDURES. The goal of this instruction is to outline the requirements authors and Public Affairs Officers/public affairs specialists (PAOs) must adhere to when submitting authored works through their respective chains of command for public affairs review and clearance prior to submission for publication or presentation. See Enclosure 3.

6. INFORMATION COLLECTION.

a. Records created as a result of this instruction, regardless of format or media, must be maintained and dispositioned per the DHA-AI 5015.01 “Records Management Program” available at: <https://info.health.mil/cos/admin/pmss/Pages/Records-Management.aspx>.

b. For questions concerning the management of records related to this instruction or the records disposition schedules, contact the local records manager or the DHA Information Collection Management Officer.

7. PROPONENT AND WAIVERS. The proponent of this publication is the Director, Communications Division. When Activities are unable to comply with this publication the activity may request a waiver that must include a justification, including 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 the Director, Communications Division to determine if the waiver may be granted by the Director, DHA or their designee.

8. RELEASABILITY. **Cleared for public release.** This DHA-AI 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-AI:

a. Is effective upon signature.

b. Will expire 10 years from the date of signature if it has not been reissued or cancelled before this date in accordance with Reference (c).

10. FORMS. The following DHA forms are available at  
[https://info.health.mil/cos/admin/DHA\\_Forms\\_Management/Lists/DHA%20Forms%20Management/AllItems.aspx](https://info.health.mil/cos/admin/DHA_Forms_Management/Lists/DHA%20Forms%20Management/AllItems.aspx)

- a. DHA Form 297, DHA Publications Clearance
- b. DHA Form 299, DHA Authored Works Clearance Annual Summary Report

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TELITA CROSLAND  
LTG, USA  
Director

Enclosures

1. References
2. Responsibilities
3. Procedures
4. Requesting Permission for Copyright Use

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, as amended
- (c) DHA-Procedural Instruction 5025.01, “Publication System,” April 1, 2022
- (d) DoD Instruction 5230.09, “Clearance of DoD Information for Public Release,” January 25, 2019, as amended
- (e) DoD Instruction 5230.29, "Security and Policy Review of DoD Information for Public Release," August 13, 2014, as amended
- (f) DoD Directive 5500.07, “Standards of Conduct,” November 29, 2007
- (g) DoD Instruction 5400.13, “Public Affairs Operations,” January 25, 2019
- (h) DoD Instruction 5400.14, “Procedures for Joint Public Affairs Operations,” October 15, 2014
- (i) Code of Federal Regulations, Title 5, Part 2635.807, “Standards of Ethical Conduct for Employees of the Executive Branch,” August 7, 1992
- (j) DoD Instruction 5400.11, “Department of Defense Privacy and Civil Liberties Programs,” January 29, 2019
- (k) DoD Instruction 6025.18, “Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule in Compliance with DoD Health Care Programs,” March 13, 2019
- (l) DoD Instruction 5200.01, “DoD Information Security Program and Protection of Sensitive Compartmented Information,” October 1, 2020
- (m) DoD Manual 5205.02, “DoD Operations Security (OPSEC) Program Manual,” October 29, 2020
- (n) DoD Instruction 3216.02, “Protection of Human Subjects and Adherence to Ethical Standards in DoD Conducted and Supported Research,” April 15, 2020
- (o) DoD Instruction 3216.01, “Use of Animals in DoD Conducted Research and Training,” March 20, 2019
- (p) DHA Procedures Manual DHA-PM 6025.13, Volume 1, “Clinical Quality Management in the Military Health System, Volume 1: General Clinical Quality Management,” August 9, 2019
- (q) DHA Memorandum, “Sensitive Topics Requiring DHA Awareness before Public Release,” April 27, 2023
- (r) United States Code, Title 17
- (s) United States Code, Title 10

ENCLOSURE 2  
RESPONSIBILITIES

1. DIRECTOR, DHA. The Director, DHA must ensure compliance and implementation of this DHA publication. The Director, DHA will:

a. Assign responsibility for tracking the establishment and implementation of this guidance for the public release of authored works to the Director, DHA Communications Division.

b. Ensure each DHA Component assigns responsibilities to comply with the processes outlined in this publication.

c. Support the DHA Components by ensuring resources are in place for them to execute the public release clearance process for authored works.

d. Exercise authority, as outlined in Reference (b), over the program for public release of authored works.

2. DIRECTOR, DHA COMMUNICATIONS DIVISION. The Director, DHA Communications Division will:

a. Be responsible for implementation of the policy and procedures at the headquarters level and overall responsibility for the public release process and its integrity.

b. Provide guidance to all Direct Reporting Organizations (DRO) and all assigned, allocated, or detailed agency personnel or those who perform duties and functions associated with DHA operations, regarding implementation of the clearance process for authored works.

c. Provide and maintain standardized DHA Form 297, DHA Publications Clearance and DHA Form 299, DHA Authored Works Clearance Annual Summary Report for enterprise-wide use.

d. Publish and maintain the list of sensitive topics for authored works identified in Reference (q).

e. Receive copies of DHA Publications Clearance form and products that have been cleared by PAOs across the DHA enterprise when the subject matter of the product is on the sensitive topics list.

f. Identify and coordinate higher-level notification of authored works pertaining to subjects on the sensitive topics list, when appropriate.

g. Receive DHA Authored Works Clearance Annual Summary Report from PAOs across the DHA enterprise.

3. NETWORK OPERATIONS PAO, DHA HEADQUARTERS COMMUNICATIONS DIVISION. The Network Operations PAO must:

- a. Receive and review all authored works for Defense Health Networks only when there is no assigned PAO in those organizations to provide clearances.
- b. Perform Operations Security (OPSEC) review, if trained and credentialed to do so, or coordinate a review of authored works by the local OPSEC program manager or designated appointee, per Reference (m), if an OPSEC review was not completed at the unit level.
- c. Notify authors, in writing, when an authored work has been reviewed and approved for public release.
- d. Forward all authored works covering subjects on the sensitive topics list at Reference (q) to DHA headquarters for senior leader awareness by submitting the product and the DHA Publications Clearance form to the DHA Communications Division using the official DHA tasker system.
- e. Submit an annual summary of all clearances using the DHA Authored Works Clearance Annual Summary Report Form to the DHA Communications Operations mailbox: [dha.ncr.comm.mbx.operations@health.mil](mailto:dha.ncr.comm.mbx.operations@health.mil).

4. DIRECTORS, DROs. Directors of DROs must assign responsibility for implementing this guidance to their staff and ensure compliance with the processes outlined in this publication by supported units and all assigned personnel.

5. PAO, DROS. Direct Reporting Organization PAOs must:

- a. Receive and review all authored works by Direct Reporting Organization personnel.
- b. Receive and review all authored works submitted by MTFs and other DHA Components that do not have a PAO.
- c. Perform Operations Security (OPSEC) review, if trained and credentialed to do so, or coordinate a review of authored works by the local OPSEC program manager or designated appointee, per Reference (m), if an OPSEC review was not completed at the unit level.
- d. Notify authors, in writing, when an authored work has been reviewed and approved for public release.

e. Forward all authored works covering subjects on the sensitive topics list at Reference (q) to DHA headquarters for senior leader awareness by submitting the product and the DHA Publications Clearance form to the DHA Communications Division using the official DHA tasker system.

f. Submit an annual summary of all clearances using the DHA Authored Works Clearance Annual Summary Report Form to the DHA Communications Operations mailbox: [dha.ncr.comm.mbx.operations@health.mil](mailto:dha.ncr.comm.mbx.operations@health.mil).

6. PAO, DHA COMPONENTS. Supported Unit (for example, MTFs) PAOs must:

a. Receive and review all authored works by unit personnel.

b. Perform Operations Security (OPSEC) review, if trained and credentialed to do so, or coordinate a review of authored works by the local OPSEC program manager or designated appointee, per Reference (m).

c. Notify authors, in writing, when an authored work has been reviewed and approved for public release.

e. Forward all authored works covering subjects on the sensitive topics list at Reference (q) to DHA headquarters for senior leader awareness by submitting the product and the DHA Publications Clearance form to the DHA Communications Division using the official DHA tasker system.

f. Submit an annual summary of all clearances using the DHA Authored Works Clearance Annual Summary Report Form to the DHA Communications Operations mailbox: [dha.ncr.comm.mbx.operations@health.mil](mailto:dha.ncr.comm.mbx.operations@health.mil).

7. PAO, DHA HEADQUARTERS. All DHA Headquarters PAOs must:

a. Receive and review all authored works by DHA headquarters personnel.

b. Receive and review authored works submitted by DROs and other DHA Components that do not have a PAO.

c. Perform Operations Security (OPSEC) review, if trained and credentialed to do so, or coordinate a review of authored works by the OPSEC program manager or designated appointee, per Reference (m), if an OPSEC review was not completed at the unit level.

d. Notify authors, in writing, when an authored work has been reviewed and approved for public release.

e. Forward all authored works covering subjects on the sensitive topics list at Reference (q) to DHA for senior leader awareness by submitting the product and the DHA Publications Clearance form to the DHA Communications Division using the official DHA tasker system.

f. Submit an annual summary of all clearances using the DHA Authored Works Clearance Annual Summary Report to the DHA Communications Operations mailbox: [dha.ncr.comm.mbx.operations@health.mil](mailto:dha.ncr.comm.mbx.operations@health.mil).

8. LEAD AUTHOR. The lead author seeking to publish or present an authored work must:

a. Submit all proposed authored works electronically, in final form, to the local PAO by the timeline described in Enclosure 3.

b. Submit all proposed authored works that pertain to operational issues, deployment or other topics managed by the service medical departments to the supporting military department PAO or designated official for final review and clearance.

c. Not make commitments to provide any authored work until the authored work has been fully cleared through the review process and approved for public release. All abstracts must be reviewed through the authored works process prior to submission to a publication or conference organizers. Approval of an abstract does not guarantee approval of the final product (e.g., poster, presentation, or journal article).

d. If applicable, ensure each authored work adheres to the standards regarding the protection and use of animals in research, appropriate use of data and intellectual property, and the standards regarding scientific integrity per References (n) through (p).

e. If applicable, ensure each authored work does not contain personally identifiable information (PII), per Reference (j), or protected health information (PHI), per Reference (k).

f. When using digital media content that isn't produced by the author, including photographs or video, provide appropriate credit to the product author or owner. Per Reference (r), aside from limited fair use, the reproduction and use of copyrighted materials is prohibited unless permission is obtained from the copyright owner. In all cases where copyrighted materials are used, authors must ensure the material is identified as being copyrighted, source(s) are appropriately identified, and proper copyright credits are given. A template letter for obtaining permission to use a copyrighted work is at Enclosure 4.

g. Ensure authored works that contain medical quality assurance program data are in compliance with Reference (p) and Section 1102 of Reference (s). Coordinate a review with Clinical Quality Management as applicable.

h. Submit a completed DHA Publications Clearance form to the PAO. Each form must be digitally signed. If the lead author is unable to digitally sign the form, notify the PAO to



determine an alternate course of action. Hard signatures and scanned signatures will be permitted only when digital signatures cannot be obtained.

i. Ensure the review process is initiated at the unit to which they were assigned, detailed, or allocated when the subject matter of the authored work was performed or initiated. For more detailed guidance, see Enclosure 3, Section 4.

j. Seek advice from their servicing DHA legal counsel prior to accepting compensation for any authored work. Per Reference (i), personnel are prohibited from receiving compensation from any source other than the Government for an authored work that relates to the author's official duties.

k. If the author is seeking to publish or present authored work(s) based on materials from a clinical experience outside of the author's training location and the experience is covered by a training agreement, then the author must receive approval for release, in writing, from both the parent unit and training institution. Two examples of this scenario would be a trainee temporarily assigned to another DHA facility for a clinical rotation or a trainee performing a rotation at a civilian facility under a training agreement with their parent institution.

l. Ensure that contractors are not the sole author or presenter, nor the clinical and principal investigator for any published work. Military or government civilian personnel must co-author or co-present all authored works.

m. Ensure all appropriate disclaimer statements are included in the body of the authored work. Sample disclaimer statements are in Enclosure 3.

n. In cases where multiple DoD commands and activities are involved with creating an authored work, ensure the work is properly vetted and cleared for release through the lead author's supervisory chain.

o. Once an authored work has been cleared and is published or presented, must provide a link to the electronic version, if available, to their local PAO within the deadlines described in Enclosure 3.

9. CORRESPONDING AUTHOR. In cases when the lead author is not affiliated with the DHA (e.g., when personnel are assigned to a non-medical command or activity), the authored work must be co-authored by DHA active duty, reserve, or civilian personnel, or active duty personnel who are credentialed and privileged at a DHA hospital or clinic. One of these DHA co-authors will be deemed by the lead author to be the "Corresponding Author". The Corresponding Author will have all responsibilities and perform all duties required of the Lead Author as described in this DHA-AI.

10. CO-AUTHORS. Co-authors are all the other authors besides the Lead or Corresponding Author. Once the Lead or Corresponding Author has notified them of publication clearance, co-

authors should inform their supervisors for awareness and may use the completed DHA clearance form as proof of clearance.

11. DEPARTMENT OF CLINICAL INVESTIGATION/HUMAN RESEARCH PROTECTION.

- a. Delegate the responsibilities of this paragraph to any member of the Human Research Protection Program (HRPP) Office or Clinical Investigations Program, as appropriate.
- b. Review release of authored works requests where the Lead or Corresponding Author has identified the work was associated with an approved Institutional Review Board (IRB) protocol or determination.
- c. Verify the authored works is related to the work associated with an approved IRB protocol or determination.
- d. Verify any relevant research related statements in the Table in Enclosure 3 are included and accurate as appropriate.

12. DEPARTMENT CHAIR. The Department Chair is the lead of a clinical department, such as the Department of Surgery Chair.

- a. If desired, the delegate the responsibilities of this paragraph to other member(s) of the department, but no lower than a Deputy Department Chair, Program Director, Division Director, or Department/Division Research Director.
- b. Review all release of authored work requests of personnel assigned to his/her department. This is the subject matter expert review in addition to ensuring compliance with this DHA-AI.
- c. Provide subject matter expert and supervisory approval of authored works for personnel assigned to his/her department that meet the requirements of this DHA-AI.

13. OFFICE OF GENERAL COUNSEL. (in same organization of PAO conducting the review). Perform legal sufficiency reviews in accordance with Enclosure 3.)

14. CHIEF, CLINICAL QUALITY MANAGEMENT. (in the hospital or clinic)

- a. If desired, the delegate the responsibilities of this paragraph to other member(s) of the department.
- b. Provide subject matter expertise to assist lead authors in complying with Reference (p) and Section 1102 of Reference (s) for the release of Clinical Quality Management (CQM) aggregated statistical data, as applicable to their authored work.

ENCLOSURE 3

PROCEDURES

1. OVERVIEW. These procedures facilitate the review, publication, and presentation of official authored works, in compliance with established national and DoD policies and to determine whether it contains any classified, export-controlled, or other protected information. Pre- publication review and clearance ensures accurate release of information to the public.

a. All products will be cleared for public release at the local unit level. There are two options for obtaining the public affairs clearance.

(1) Option 1: Authors will clear authored works through their supporting DHA PAO. Units without a DHA PAO will forward the product and publication clearance form to a PAO at the next higher DHA organizational element, for example at the Defense Health Network, Direct Reporting Unit or DHA headquarters level.

(2) Option 2: Only for military members who are assigned, allocated, detailed to, or otherwise used to perform duties and functions associated with DHA facilities, they may clear authored works through a supporting Military Department PAO and provide that clearance form to DHA. DHA will accept public affairs clearances granted by Military Department PAOs in accordance with service guidance. Authors will forward a copy of the service clearance form and the product to the supporting DHA PAO for proof of clearance.

b. Presentations must be submitted in their original format. If cleared, presentations will be approved for use for a period of one (1) year from the date annotated on the Publications Clearance form. If a presentation is updated or revised or the topic is on the sensitive topics list, the author must resubmit for review as a new presentation.

c. All authored works must be submitted to the lead author's local servicing DHA legal personnel.

d. Scientific posters must be submitted in their original format. If approved, the poster can be used at all venues listed on the Publications Clearance form, for a period of one (1) year from the date annotated on the form. Posters must follow DHA brand and style guidelines available at [health.mil/brand](http://health.mil/brand).

e. For journal articles, all authored works must be submitted in final form for review. The author may request simultaneous approval for up to three publications. All publications must be clearly listed in the Publications Clearance form. If cleared for public release, approval for journal article submissions expires one (1) year from the approval date and is only valid for the publications outlined on the Publications Clearance form.

f. Abstract approval does not constitute approval of subsequent posters, articles, presentations, or any other products created as a result of said abstract. Subsequent products must

also be submitted for review, with documentation of abstract approval. These separate products cannot be submitted simultaneously and must each be reviewed on their own merits.

g. PAOs have the authority to clear information at their level for public release.

h. PAOs will forward all authored works covering subjects on the sensitive topics list at Reference (q) to DHA for senior leader awareness using the DHA official tasker system.

## 2. DOCUMENTATION AND APPROVALS

a. Publications Clearance Form. The routing and approval process for public release of authored works must be documented on DHA Form 297, DHA Publications Clearance. Lead authors or corresponding authors will fill out the Publications Clearance form, fields 1-24, to provide more information about the product such as topic, audience, the venue or publication where the product will be released, and potential media interest in the subject matter.

b. Required Signatures on DHA Publication Clearance Form. DHA Publications Clearance form contains the positions that must approve and sign before a PAO can review and clear.

### (1) Required Signatures for All Submissions.

(a) Lead or Corresponding Author

(b) Department Chair or designee (for personnel assigned to an MTF), or a supervisor for all others.

(c) OPSEC

### (2) Required Signatures for Selected Submissions

(a) Designee from HRPP Office or Clinical Investigations Program for all requests including an IRB approved protocol or having had a research determination.

(b) Legal Counsel. If meeting criteria in paragraph 5g.

(c) Contracting Officer Representative. Required if the lead author is a contractor.

(d) Deputy Assistant Director. Required if lead or corresponding author is assigned to DHA headquarters.

(e) Assistant Director. Required if lead or corresponding author is assigned to DHA headquarters and the subject(s) of the author work is on the sensitive topics list at Reference (q).

## 3. DISCLAIMER STATEMENTS

a. An authored work completed in an official capacity, or funded by the U.S. Government, must identify the author with complete name, military grade, title, and unit, and include a disclaimer statement identified in the Table.

b. All publications and presentations must disclose all sources of funding, including the author's unit or institution. An example is identified in the Table.

c. Authored works involving research with human subjects or animal research data must acknowledge the research has received applicable Institutional Review Board or Institutional Animal Care and Use Committee review and approval and must be referenced in the DHA Publications Clearance form. Certifications must include: the name of approving institution; relevant human research or animal research Department of Defense protocol number; and the title of the authored work. All publications and presentations concerning research involving human subjects must prominently show the disclaimer identified in the Table.

d. If material is a report of the Clinical Investigation Program, or its sponsored research, the statement identified in the Table must be included in the written materials.

e. All publications and presentations concerning research involving animals must prominently include the disclaimer identified in the Table.

f. If submitting authored works for publication, not in conjunction with official duties, authors must ensure the subject matter is not in conflict with Reference (f) and the writing is not done during normal working hours or with the use of U.S. Government facilities, property, or personnel. Per Reference (f), if the author uses or permits the use of their military grade or includes or permits the inclusion of their title or position as one of several biographical details provided to identify them in connection with the work to be published, the author is required to make the disclaimer identified in the Table. Uniformed personnel are always required to use the disclaimer.

g. Authors must not enter into an agreement that offers the publication exclusive rights to the author's work. Authored works prepared by U.S. Government employees in the course of their official duties cannot be copyright protected. The copyright statement provided in the Table must be attached to all Government work.

Table. Disclaimer Statements

<b>Situation</b>	<b>Disclaimer Statement</b>	<b>Instructions</b>
<p>Authored work completed in official capacity</p>	<p><i>“The views expressed in this [insert type of publication] are those of the author and do not necessarily reflect the official policy or position of the Defense Health Agency, Department of Defense, nor the U.S. Government.”</i></p> <p>or</p> <p><i>“The views expressed in this [insert type of publication] reflect the results of research conducted by the author(s) and do not necessarily reflect the official policy or position of the Defense Health Agency, Department of Defense, nor the U.S. Government.”</i></p>	<p>Choose the most appropriate disclaimer statement from the two options and display on the product.</p>
<p>Disclose sources of funding</p>	<p><i>“This work is supported by funding from _____.”</i></p>	<p>Prominently display the disclaimer on the product.</p>
<p>Research with human subjects or animal research data</p>	<p><i>“The study protocol was approved by the [pertinent organization or command] Institutional Review Board in compliance with all applicable Federal regulations governing the protection of human and animal subjects.”</i></p>	<p>Prominently display the disclaimer on the product.</p>
<p>Clinical Investigation Program, or its sponsored research</p>	<p><i>“Research data were derived from an approved [pertinent organization or command] Institutional Review Board protocol number [000].”</i></p>	<p>Include disclaimer in written materials.</p>
<p>Animal research</p>	<p><i>“The experiments reported herein were conducted in compliance with the Animal Welfare Act and per the principles set forth in the “Guide for Care and Use of Laboratory Animals,” Institute of Laboratory Animals Resources, National Research Council, National Academy Press, 1996.”</i></p>	<p>Prominently display the disclaimer on the product.</p>
<p>Authored work not in conjunction with official duties</p>	<p><i>“Neither the Defense Health Agency, any other component of the Department of Defense nor the U.S. government has approved, endorsed, or authorized this product [or promotion, or service, or activity].”</i></p>	<p>The disclaimer must be prominently positioned in the work or, if orally presented, the disclaimer may be provided at the beginning of the presentation. Failure to provide the disclaimer may result in disciplinary action for both military and civilian personnel.</p>
<p>Copyright statement</p>	<p><i>“I am a military service member [or employee of the U.S. Government]. This work was prepared as part of my official duties. Title 17, U.S.C., Section 105 provides that copyright protection under this title is not available for any work of the U.S. Government. Title 17, U.S.C., Section 101 defines a U.S. Government work as a work prepared by a military service member or employee of the U.S. Government as part of that person’s official duties.”</i></p>	<p>Attach statement to the authored work.</p> <p>Note: It is common practice for publications to copyright the layout and design of an article. However, if the authored work is released as a U.S. Government work, there is no copyright limitation on its distribution in addition to the civilian publication.</p>

4. LEAD AUTHOR PROCEDURES. Lead authors must follow the following procedures:

a. Initiate the review process at the unit to which they were assigned when the authored work was prepared.

b. If necessary, designate a military or government civilian co-author as the Corresponding Author in order to release the product on behalf of the government.

c. Complete the DHA Publications Clearance form and obtain required signatures outlined in paragraph 2 of this Enclosure.

d. If the author is seeking to publish or present authored work(s) based on materials from another DHA facility or training institution where they were assigned when they collected the materials to be presented, then the author must receive approval for release, in writing, from both the parent unit and training institution. Two examples of this scenario would be a trainee temporarily assigned to another DHA facility for a clinical rotation or a trainee performing a rotation at a local civilian facility under a training agreement with their parent institution.

e. In cases where multiple DoD commands and activities are involved with creating an authored work, ensure the work is properly vetted and cleared for release through the lead author's supervisory chain. The co-authors should also notify their supervisors of approved publication clearance for situational awareness.

f. Include required disclaimer statements identified in paragraph 3 of this Enclosure on the product.

g. Attribute all photos, videos, or graphics not created by the author to the source. Authors may contact their local unit PAO for additional guidance. Per Reference (r), aside from limited fair use, the reproduction and use of copyrighted materials is prohibited unless permission is obtained from the copyright owner. In all cases where copyrighted materials are used, authors must ensure the material is identified as being copyrighted, source(s) are appropriately identified, and proper copyright credits are given. A template letter for obtaining permission to use a copyrighted work is at Enclosure 4.

h. If applicable, ensure each authored work adheres to the standards regarding the protection and use of animals in research, appropriate use of data and intellectual property, and the standards regarding scientific integrity per References (n) through (p).

i. If applicable, ensure each authored work does not contain personally identifiable information (PII), per Reference (j), or protected health information (PHI), per Reference (k).

j. Label and appropriately maintain any authored works that contain quality assurance-protected information and coordinate a review of the authored work by Risk Management.

k. Ensure requests for the release of Clinical Quality Management (CQM) aggregated statistical data are in accordance with Reference (p) and Section 1102 of Reference (s). Any presentation of case counts should follow the threshold rule of four to protect the identity and privacy of individual patients. Withhold any data with numerical values below “4”. Limiting disclosure to a threshold rule of four is not mandatory in every instance where the information presented is sufficiently broad and lacks meaningful identifying demographic groupings. On a case-by-case basis in consultation with legal counsel, sufficiently broad information may be released, where a determination has been made that the identity and privacy of the individual patients and providers involved is not likely subject to identification. Such a determination must include consideration of compliance with the HIPAA Privacy Rule, to include situations where the data includes geographic subdivisions smaller than a state (e.g., MTF-specific data).

l. Submit all proposed authored works electronically, in final form, to the local PAO, according to the following timelines:

(1) Authored work is an abstract or product less than 100 pages in length: 10 business days prior to the suspense date determined by the Lead Author.

(2) Authored work is 100 pages or more: 20 business days prior to the suspense date determined by the Lead Author.

(3) Authored works submitted for review that do not comply with the timelines listed above will be reviewed on a case-by-case basis at the discretion of the PAO or designated appointee.

m. Submit abstracts for review and clearance separately from the associated research poster, presentation, manuscript or other products. Clearance for public release of an abstract does not constitute approval to release the follow-on products.

n. Seek advice from their unit ethics counselor or Judge Advocate General prior to accepting compensation for any authored work.

o. Once an authored work has been cleared, if it is published by an external source (for example: book chapter, podcast, journal article, organization or conference website), provide to the local PAO a link to the electronic version (from the publisher) within 10 business days.

5. PAO PROCEDURES. PAOs must:

a. Review Publications Clearance Form for completeness and required subject matter expert and leadership signatures.

b. Provide an OPSEC review, if trained and credentialed to do so, or coordinate a review of the authored work by the local OPSEC program manager or designated appointee, per Reference (m), if an OPSEC review was not completed at the unit level.



c. If applicable, ensure each authored work does not contain PII, per Reference (j), or PHI, per Reference (k).

d. Ensure required disclaimer statements, per paragraph 3, are included on the product.

e. Ensure requests for the release of CQM aggregated statistical data are in accordance with Reference (p) and Section 1102 of Reference (s). Any presentation of case counts should follow the threshold rule of four to protect the identity and privacy of individual patients. Withhold any data with numerical values below “4”. Limiting disclosure to a threshold rule of four is not mandatory in every instance where the information presented is sufficiently broad and lacks meaningful identifying demographic groupings. On a case-by-case basis in consultation with legal counsel, sufficiently broad information may be released, where a determination has been made that the identity and privacy of the individual patients and providers involved is not likely subject to identification. Such a determination must include consideration of compliance with the HIPAA Privacy Rule, to include situations where the data includes geographic subdivisions smaller than a state (e.g., MTF-specific data).

f. Review the product for security and policy issues, accuracy, and propriety to ensure compliance with established national and DoD policies and to determine whether it contains any classified, export-controlled, copyrighted, or other protected information.

g. Request a legal review if any of the following apply:

(1) Articles and abstracts for external publications such as journal articles and books

(2) Appearance of endorsement of a product/device

(3) Use of copyrighted materials

(4) Use of QA protected information

(5) Involves privacy related concerns or questions

(6) Involves potential or inherent controversy or high visibility topics, which are likely to receive media coverage or publicity, or discusses DoD policy, to include a research or clinical matter associated with a sensitive topic

(7) Any questions or concerns that, in the judgment of anyone in this approval process, it would be prudent to have a legal review

(8) The published work involves another Federal agency, elected officials, or judges

(9) There are any questions about the wording of the disclaimer language

(10) There are questions about whether the authored work has any ghost (or shadow) writers

- h. If any issues or concerns arise from review – highlight the concern to the lead or co-author and ask them to address the concern and resubmit for review.
- i. Approve the product for public release and sign the Publications Clearance form if the authored work meets the requirements of this DHA-AI.
- j. Forward all authored works covering subjects on the sensitive topics list at Reference (q) to DHA headquarters for senior leader awareness by submitting the product and the DHA Publications Clearance form to the DHA Communications Division using the official DHA tasker system. This step is for awareness only. Local PAOs provide the clearance for public release.
- k. Notify authors, in writing, when an authored work has been reviewed and approved for public release.
- l. Ensure that when the authored work is published online that a link to the product is annotated in the appropriate field of the Publications Clearance form.
- m. Record data pertaining to the authored works clearance in the DHA Authored Works Clearance Annual Summary Report.
- n. Submit an annual summary of all clearances to the DHA Communications Operations mailbox, [dha.ncr.comm.mbx.operations@health.mil](mailto:dha.ncr.comm.mbx.operations@health.mil), not later than 30 January for the previous calendar year using the DHA Authored Works Clearance Annual Summary Report.

ENCLOSURE 4

FORMAT FOR REQUESTING PERMISSION FOR COPYRIGHT USE

(LETTERHEAD)

(Date)

(Name of copyright owner or agent)  
(Address)  
(City, State, Zip)

(Salutation)

(Name of Activity) requests your permission as copyright owner or agent for the right to reproduce the identified material for the use(s) shown for the Defense Health Agency.

(Complete identification of the material)  
(Designation of exact portion of the material to be copied)  
(Statement of intended use(s) of the material)  
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If the requested permission is granted, please sign below and return this original letter in the enclosed self-addressed envelope. A copy of this letter is included for your records.

(Complimentary close)

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PERMISSION:

The requested permission is granted, royalty-free. A notice of copyright and credit line is desired as listed:

(Leave at least 8 lines for credit line.)

I hereby certify that I have the authority to grant this permission.

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DATE: \_\_\_\_\_ BY: \_\_\_\_\_  
\_\_\_\_\_  
(Title) GLOSSARY

## PART I. ABBREVIATIONS AND ACRONYMS

ASD(HA)	Assistant Secretary of Defense for Health Affairs
CQM	Clinical Quality Management
DHA	Defense Health Agency
DHA-AI	Defense Health Agency-Administrative Instruction
DRO	Direct Reporting Organization
HIPAA	Health Insurance Portability and Accountability Act
HRPP	Human Research Protection Program
IRB	Institutional Review Board
MTF	military medical treatment facility
OPSEC	operations security
PAO	public affairs officer
PHI	protected health information
PII	personally identifiable information
U.S.C.	United States Code

## PART II. DEFINITIONS

authored work. An authored work is official DoD information authored by DoD personnel that is intended for public release, such as publication or presentation in a public (outside of DoD) forum.

corresponding author. In cases when the lead author is not affiliated with the DHA (e.g., when personnel are assigned to a non-medical command or activity), the authored work must be co-authored by DHA active duty, reserve, or civilian personnel, or active duty personnel who are credentialed and privileged at a DHA hospital or clinic. The lead author designates one of these DHA personnel co-authors as the corresponding author. The corresponding author has the responsibilities and duties of lead author.

Clinical Investigation Program. Programs in which clinical investigations are conducted for health sciences education or for the advancement of medical science and its military and nonmilitary application to patient care.

CQM. A collection of programs that emphasize leadership, commitment to quality performance, regardless of the practice site (including operational platforms), a supportive organizational culture, and the evaluation of the effectiveness of clinical performance improvement activities.

DHA Components. Activities under the authority, direction, and control of DHA.

DROs. Direct Reporting Organizations, such as: DHA Public Health, DHA Research and Development.

lead author. An author of a work with multiple authors who is the principal investigator or is responsible for obtaining approvals, submitting work to a journal or conference, or preparing correspondence related to the work.

official capacity. Refers to working on or producing an authored work as part of one's official job duties or expertise or through the use of rank, job title, or affiliation in an authored work byline or biography. Official capacity does not necessarily preclude working on authored works during non-working hours.

OPSEC. A process of identifying critical information and analyzing friendly actions attendant to military operations and other activities to: identify those actions that can be observed by adversary intelligence systems; determine indicators and vulnerabilities that adversary intelligence systems might obtain that could be interpreted or pieced together to derive critical information in time to be useful to adversaries, and determine which of these represent an unacceptable risk; then select and execute countermeasures that eliminate the risk to friendly actions and operations or reduce it to an acceptable level.

public release. Information disseminated or shared outside of the authors' directorate, specialty community, or agency, and is accessible to news media representatives or to members of the general public.

sensitive. The term sensitive refers to authored works related to topics identified in Reference (q) or any subsequent notice identifying topics that are deemed sensitive in nature. A sensitive topic also refers to any topic likely to attract the attention of national or international news media outlets.