March 2, 2020

The Honorable Shelley Moore Capito
United States Senate
127 Russell Senate Office Building
Washington, DC 20510

The Honorable Joe Manchin
United States Senate
306 Hart Senate Office Building
Washington, DC 20510

Dear Senator Moore Capito and Senator Manchin:

The undersigned Partnership to Amend 42 CFR Part 2 (Partnership) members, a coalition of nearly 50 health care stakeholder organizations committed to aligning 42 CFR Part 2 (Part 2) with the Health Insurance Portability and Accountability Act (HIPAA) for the purposes of health care treatment, payment, and operations (TPO), and additional stakeholder organizations applaud your leadership on the issue of substance use disorder privacy records and strongly support the reintroduction of the Protecting Jessica Grubb’s Legacy Act.

We appreciate that your bill streamlines the process of coordinating addiction records for the purposes of TPO while allowing patients to opt-in before their information may be shared. This compromise alleviates the roadblocks to patient-centered care, while providing strong protections, and more importantly providing those suffering with addiction comfort knowing they can share medical records, enforced with real penalties.

Alignment of Part 2 with HIPAA will allow appropriate access to patient information that is essential for providing safe, effective, whole-person care while still protecting their privacy. We strongly believe that the modernization of privacy regulations for persons with substance use disorders is a critical component for tackling the opioid crisis and will improve the overall coordination of care in the United States.

We thank you for continuing to lead this effort and look forward to working with you to advance this important bipartisan legislation.

Sincerely,

Academy of Managed Care Pharmacy
Adventist Health Policy Association
Alabama Association of Health Information Management Association
Alliance of Community Health Plans
Allina Health
American Association on Health and Disability
American Health Information Management Association (AHIMA)
American Psychiatric Association
America’s Essential Hospitals
America’s Health Insurance Plans
Anthem, Inc.
Arkansas Health Information Management Association
Arizona Health Information Management Association
Association for Behavioral Health and Wellness
Association for Community Affiliated Plans
Beacon Health Options
Blue Cross Blue Shield Association
California Health Information Association
Catholic Health Association of the United States
Centerstone
College of Healthcare Information Management Executives (CHIME)
Colorado Health Information Management Association
Confidentiality Coalition
Delaware Health Information Management Association
Employee Assistance Professionals Association (EAPA)
Florida Health Information Management Association
Georgia Health Information Management Association
Global Alliance for Behavioral Health and Social Justice
Hazelden Betty Ford Foundation
Healthcare Leadership Council
Health Innovation Alliance
Illinois Health Information Management Association
Indiana Health Information Management Association
InfoMC
Iowa Health Information Management Association
The Joint Commission
Kansas Health Information Management Association
The Kennedy Forum
Kentucky Health Information Management Association
Louisiana Health Information Management Association
Medicaid Health Plans of America
Mental Health America
Michigan Health Information Management Association
Mississippi Health Information Management Association
Missouri Health Information Management Association
Montana Health Information Management Association
National Alliance on Mental Illness
National Association for Rural Mental Health
National Association of ACOs
National Association of Addiction Treatment Providers
National Association of Behavioral Healthcare
National Association of County Behavioral Health and Developmental Disability Directors
National Association of State Mental Health Program Directors (NASMHPD)
National Health IT Collaborative for the Underserved
Nebraska Health Information Management Association
Netsmart
New Directions Behavioral Health
New York Health Information Management Association
North Carolina Health Information Management Association
North Dakota Health Information Management Association
OCHIN
Ohio Health Information Management Association
Opioid Safety Alliance
Oregon Health Information Management Association
Oregon Primary Care Association
Pennsylvania Health Information Management Association
Population Health Alliance
Premier healthcare alliance
Primary Care Collaborative
Puerto Rico Health Information Management Association
Rhode Island Health Information Management Association
Shatterproof
South Carolina Health Information Management Association
South Dakota Health Information Management Association
Strategic Health Information Exchange Collaborative (SHIEC)
UPMC Health Plan
UPMC Health System
Washington Association for Community health
Washington State Health Information Management Association
West Virginia Health Information Management Association
Wisconsin Health Information Management Association

As of 3/2/2020