



# THE PARTNERSHIP TO AMEND

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# 42 CFR PART 2

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