



April 11, 2019

The Honorable Joe Manchin
United States Senate
306 Hart Senate Office Building
Washington, D.C. 20510

The Honorable Shelley Moore-Capito
United States Senate
172 Russell Senate Office Building
Washington, D.C. 20510

Dear Senators Manchin and Moore-Capito:

The Confidentiality Coalition (Coalition) is writing to express our strong support for S. 1012 the "Protecting Jessica Grubb's Legacy Act (The Legacy Act)," which would enable the appropriate exchange of necessary information among medical professionals who are treating individuals with substance use disorders, including opioid abuse. Thank you for introducing this important legislation again this Congress.

The Confidentiality Coalition is a broad group of organizations spanning all sectors of healthcare working to ensure that policies are implemented to appropriately balance the protection of confidential health information with the efficient and interoperable systems needed to provide high quality healthcare. Access to timely and accurate patient information leads to both improvements in quality and safety and the development of new lifesaving and life-enhancing medical interventions. The Coalition is comprised of hospitals, medical teaching colleges, health plans, pharmacies, pharmaceutical companies, medical device manufacturers, vendors of electronic health records, biotech firms, employers, health product distributors, pharmacy benefit managers, health information and research organizations, clinical laboratories, and others. Through this diversity, we develop a nuanced perspective on the impact of any legislation or regulation affecting the privacy and security of health consumers.

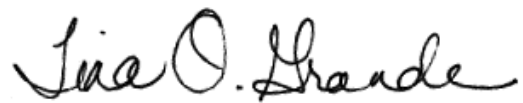
We applaud Congress' continued bipartisan efforts to address this important patient safety issue. As our healthcare delivery system moves toward more robust, integrated care models, every member of a patient's treatment team needs to be aware of a patient's full medical history, including substance use disorder information. Current regulations (under 42 CFR Part 2) (Part 2), stand as a hindrance to whole-person care and must be changed to ensure all patients, regardless of diagnosis, have access to safe, effective, high-quality treatment and care.

The Coalition remains committed to aligning Part 2 with the Health Insurance Portability and Accountability Act (HIPAA) for the purposes of treatment, payment, and healthcare operations (TPO) and as such is pleased to see reintroduction of the Legacy Act. This legislation will bolster the effectiveness of other key provisions in legislation Congress passed previously that

promotes coordinated care and expands access to treatment for opioids.

Thank you again for your leadership on this important issue. We look forward to continuing to collaborate with you and stand ready to work with Congress in implementation of last year's opioid legislation as well as additional efforts to address the opioid crisis. Should you have any questions, please do not hesitate to contact me at 202.449.3433 or tgrande@hlc.org.

Sincerely,

A handwritten signature in black ink that reads "Tina O. Grande". The signature is written in a cursive, flowing style.

Tina Olson Grande
Healthcare Leadership Council on behalf of the Confidentiality Coalition



CONFIDENTIALITY COALITION

MEMBERSHIP

AdventHealth
Aetna, a CVS Health business
America's Health Insurance Plans
American Hospital Association
American Society for Radiation Oncology
AmerisourceBergen
Amgen
AMN Healthcare
Anthem
Ascension
Association of American Medical Colleges
Association of Clinical Research Organizations
athenahealth
Augmedix
Bio-Reference Laboratories
Blue Cross Blue Shield Association
BlueCross BlueShield of North Carolina
BlueCross BlueShield of Tennessee
Cardinal Health
Cerner
Change Healthcare
Children's Hospital of Philadelphia (CHOP)
CHIME
Cigna
Ciox Health
City of Hope
Cleveland Clinic
College of American Pathologists
Comfort Keepers
ConnectiveRx
Cotiviti
CVS Health
Datavant
dEpid/dt Consulting Inc.
Electronic Healthcare Network Accreditation Commission
EMD Serono
Express Scripts
Fairview Health Services
Federation of American Hospitals
Genetic Alliance
Genosity
Healthcare Leadership Council
Hearst Health
HITRUST
IQVIA
Johnson & Johnson
Kaiser Permanente
Leidos
Mallinckrodt Pharmaceuticals
Maxim Healthcare Services
Mayo Clinic
McKesson Corporation
Medidata Solutions
Medtronic
MemorialCare Health System
Merck
MetLife
National Association for Behavioral Healthcare
National Association of Chain Drug Stores
NewYork-Presbyterian Hospital
NorthShore University Health System
Pfizer
Pharmaceutical Care Management Association
Premier healthcare alliance
SCAN Health Plan
Senior Helpers
Stryker
Surescripts
Teladoc
Texas Health Resources
UCB
UnitedHealth Group
Vizient
Workgroup for Electronic Data Interchange
ZS Associates