

August 6, 2001

The Honorable Tommy Thompson
Secretary
U.S. Department of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

Dear Secretary Thompson:

The undersigned organizations appreciate the guidance recently issued by the Department on the final privacy rule and urge the Department to move as expeditiously as possible to make modifications through new rulemaking.

The guidance will serve as a starting point for our members as they continue their efforts to interpret the rule and prepare for compliance by April 14, 2003. We are encouraged by your commitment to issue modifications through new rulemaking to ensure that the rule does not adversely affect the quality of health care. As acknowledged in the guidance materials, many of the necessary clarifications to permit compliance will require changes to the rule. The Department has indicated that other changes may also be made to the rule based on the comments received earlier this year.

Our purpose in writing is to convey how imperative it is for the Department to publish these modifications and changes as soon as possible so that our members have adequate time to comply with this complex rule. Organizations impacted by the rule are poised to devote considerable resources to comply with the rule -- it would be unfortunate if these resources were expended before organizations knew what modifications were to be made. We would like to assist the Department in any way possible to expedite this process.

Sincerely,

ACA International
Academy of Managed Care Pharmacy
AdvaMed
American Academy of Dermatology Association
American Academy of Family Physicians
American Academy of Neurology
American Academy of Ophthalmology
American Academy of Otolaryngology-Head and Neck Surgery
American Association for Thoracic Surgery
American Association of Clinical Endocrinologists
American Association of Health Plans
American Association of Neurological Surgeons
American Association of Orthopaedic Surgeons

American Benefits Council
American Clinical Laboratory Association
American College of Cardiology
American College of Chest Physicians
American College of Emergency Physicians
American College of Nuclear Physicians
American College of Obstetricians and Gynecologists
American College of Occupational and Environmental Medicine
American College of Osteopathic Emergency Physicians
American College of Osteopathic Family Physicians
American College of Osteopathic Surgeons
American College of Physicians-American Society of Internal Medicine
American College of Preventive Medicine
American College of Radiology
American College of Rheumatology
American College of Surgeons
American Gastroenterological Association
American Geriatrics Society
American Health Care Association
American Hospital Association
American Managed Behavioral Healthcare Association
American Medical Association
American Medical Group Association
American Osteopathic Association
American Pharmaceutical Association
American Physical Therapy Association
American Society for Gastrointestinal Endoscopy
American Society for Therapeutic Radiology and Oncology
American Society of Anesthesiologists
American Society of Cataract and Refractive Surgery
American Society of Clinical Pathologists
American Society of Consultant Pharmacists
American Society of General Surgeons
American Society of Hematology
American Society of Plastic Surgeons
American Thoracic Society
American Urological Association
Association of American Medical Colleges
Biotechnology Industry Organization
Blue Cross and Blue Shield Association
California Healthcare Institute
College of American Pathologists
Congress of Neurological Surgeons
Disease Management Association of America
Federation of American Hospitals
Food Marketing Institute
Health Insurance Association of America

Healthcare Distribution Management Association
Healthcare Leadership Council
Infectious Diseases Society of America
Medical Group Management Association
National Association of Chain Drug Stores
National Association of Health Underwriters
National Association of Home Builders
National Association of Manufacturers
National Association of Rehabilitation Agencies
National Renal Administrators Association
National Retail Federation
National Rural Health Association
Pharmaceutical Research and Manufacturers of America
Plasma Protein Therapeutic Association
Premier, Inc.
Private Practice Section of the American Physical Therapy Association
Renal Physicians Association
Society for Human Resource Management
Society of Cardiovascular and Interventional Radiology
Society of Critical Care Medicine
Society of General Internal Medicine
Society of Nuclear Medicine
Society of Thoracic Surgeons
U.S. Chamber of Commerce
VHA Inc.
Western Growers Association