

December 8, 2025

The Honorable Robert F. Kennedy, Jr.
Secretary
U.S. Department of Health and Human Services
Hubert H. Humphrey Building
200 Independence Avenue, SW
Washington, DC 20201

Dear Secretary Kennedy:

The undersigned organizations, representing a broad range of clinicians, providers, and other health care stakeholders nationwide, have united to oppose the Department of Health and Human Services' (HHS) Office for Civil Rights (OCR) *Notice of Proposed Rulemaking: HIPAA Security Rule To Strengthen the Cybersecurity of Electronic Protected Health Information*.¹ This Rule, originally proposed during the Biden Administration, should be immediately withdrawn without further consideration. We instead encourage HHS to conduct a collaborative outreach initiative with our organizations and other regulated entities that are impacted to develop practical and actionable cybersecurity standards for more robust protections of individuals' health information, without the extreme and unnecessary regulatory burden that health care providers and other stakeholders would face under the crushing and unprecedented provisions of this Proposed Rule.

Our organizations share a firm conviction of the importance of the Health Insurance Portability and Accountability Act of 1996, and the cybersecurity safeguards it provides. However, the Proposed Rule would place substantial new financial burdens on health care providers and includes unreasonable implementation timelines that make it difficult to reconcile with the information technology complexities of modern health care delivery organizations.

The Proposed Rule runs counter to President Trump's robust deregulatory agenda. We support updating cybersecurity standards for health care, and they must be flexible enough to accommodate the wide range of provider organizations. Standards should set strong protections while allowing innovation so providers can respond effectively to evolving cybersecurity risks.

Cybersecurity is a patient safety issue. An effective policy must be developed with providers and patients to ensure protections fit seamlessly into clinical workflows, adapt to emerging threats, and safeguard both care delivery and patient trust. We urge you to withdraw the Proposed Rule; our organizations stand ready to work with the Trump Administration to ensure that we develop a more innovative approach and address cybersecurity concerns without imposing excessive burdens on the health care sector. We remain deeply committed to enhancing cybersecurity policies collaboratively and thoughtfully.

Thank you for your attention to these critical issues.

Sincerely,

AAMC
ADVION Advocates
Advocate Health

¹ These proposed revisions are set forth in the Department of Health and Human Services' (HHS) Office for Civil Rights (OCR) *Notice of Proposed Rulemaking: HIPAA Security Rule To Strengthen the Cybersecurity of Electronic Protected Health Information*, 90 Fed. Reg. 898 (proposed January 6, 2025).

American Academy of Allergy, Asthma & Immunology
American Academy of Dermatology Association
American Academy of Family Physicians
American Academy of Hospice and Palliative Medicine
American Academy of Neurology
American Academy of Ophthalmology
American Academy of Pediatrics
American Association of Neurological Surgeons (AANS) Congress of Neurological Surgeons (CNS)
American Association of Orthopaedic Surgeons
American College of Allergy, Asthma and Immunology
American College of Cardiology
American College of Physicians
American Dental Association
American Health Care Association/National Center for Assisted Living
American Medical Association
American Nursing Informatics Association
American Psychiatric Association
American Society of Anesthesiologists
American Society of Consultant Pharmacists (ASCP)
Baptist Health (Jacksonville, FL)
Bayhealth Medical Center
Beacon Health
Blanchard Valley Health System
Borland Groover Clinic PA
Bryan Health
Christie Clinic
CHRISTUS Health
Claiborne Memorial Medical Center
Cleveland Clinic
College of Healthcare Information Management Executives (CHIME)
Corewell Health
Dayton Children's
EHS, Inc.
Faith Regional Health Services
Federation of American Hospitals
FirstHealth of the Carolinas
Fisher-Titus Health
Group Health Cooperative of South Central Wisconsin
Helio Health
Highmark Health Including Allegheny Health Network
Hill Physicians Medical Group
Holzer Health System
Horizon Health Services, Inc.
Illinois Rural Community Care Organization
Inova Health
International Pain and Spine Intervention Society
Lake Charles Memorial Health System
Lakeland Regional Health Systems.
Lakewood Health System
LeadingAge
LifeBridge Health

Long Term and Post Acute Care Health IT Collaborative
MaineHealth
Marshall Browning Hospital
Mary Washington Healthcare
Mason District Hospital
MedStar Health
Methodist Health System, Dallas, Texas
Michigan Health & Hospital Association
Midland Health
Midwest Medical Center
Nathan Littauer Hospital & Nursing Home
Natividad Medical Center
Neighborhood Health
NMC Health
Northeast Georgia Health System
Oregon Health & Science University
Orlando Health
OrthoVirginia
Ozarks Healthcare
Presbyterian Living
Rady Children's Health
Reid Health
Riverside Health
RiverSpring Living
Salt River Pima-Maricopa Indian Community
Schneck Medical Center
Sharp Healthcare
Shields Health
Signature Healthcare, Brockton, MA
Southcoast Health
Southwest General Health Center
SSM Health
St. Bernards Healthcare
St. Joseph's Health
Stanford Medicine Children's Health
The Guthrie Clinic
The Medical Group Management Association
The University of Kansas Health System and Medical Center
THRIVE Wellness and Recovery
Trinity Rehabilitation Services
United Health Services, Inc.
University of Utah Hospitals and Clinics
UVM Health
Valley-Wide Health Systems, Inc.
Vandalia Health
WakeMed Health and Hospitals
Wooster Community Hospital Health System
Yale New Haven Health System