

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*.<sup>1</sup> This Rule, originally proposed during the Biden Administration, should be immediately withdrawn without further consideration.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

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<sup>1</sup> 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