



February 12, 2015

The Honorable Bill Pascrell, Jr.
2370 Rayburn House Office Building
Washington, D.C. 20515

Dear Representative Pascrell:

The undersigned members of the Physician Clinical Registry Coalition thank you for introducing a bill to require the Secretary of Health and Human Services to issue guidance on the application of the Common Rule to clinical data registries. The Physician Clinical Registry Coalition (Coalition) represents 21 national medical specialty societies and other physician-led groups that sponsor clinical data registries that collect and analyze clinical outcomes data to identify best practices and improve patient care.

As you know, there are many areas of uncertainty with respect to the application of the Common Rule (and other equivalent federal regulations) to clinical data registries. At the same time, most clinical data registries are covered by the broader and more stringent protections for identifiable patient data under the HIPAA privacy and security rules. Your bill is a step in the right direction in directing the Secretary to clarify these areas of uncertainty and redundancy. We look forward to working with you and your staff to develop more specific directions for the Secretary in this area, particularly with respect to the overlapping and duplicative requirements of HIPAA and the Common Rule.

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Thank you again for submitting your bill. If you have any questions or would like additional information, please contact Rob Portman of Powers Pyles Sutter & Verville at 202-872-6756 or rob.portman@ppsv.com.

Sincerely,

AMERICAN ACADEMY OF DERMATOLOGY ASSOCIATION
AMERICAN ACADEMY OF NEUROLOGY
AMERICAN ACADEMY OF OPHTHALMOLOGY
AMERICAN ACADEMY OF PHYSICAL MEDICINE AND REHABILITATION
AMERICAN ASSOCIATION OF NEUROLOGICAL SURGEONS
AMERICAN COLLEGE OF EMERGENCY PHYSICIANS
AMERICAN COLLEGE OF SURGEONS
AMERICAN GASTROENTEROLOGICAL ASSOCIATION
AMERICAN JOINT REPLACEMENT REGISTRY
AMERICAN SOCIETY FOR RADIATION ONCOLOGY
AMERICAN SOCIETY OF CLINICAL ONCOLOGY
AMERICAN SOCIETY OF NUCLEAR CARDIOLOGY
AMERICAN SOCIETY OF PLASTIC SURGEONS
AMERICAN UROLOGICAL ASSOCIATION
ANESTHESIA QUALITY INSTITUTE/AMERICAN SOCIETY OF ANESTHESIOLOGISTS
GIQUIC/ AMERICAN COLLEGE OF GASTROENTEROLOGY
NATIONAL ASSOCIATION OF SPINE SPECIALISTS
SOCIETY FOR VASCULAR SURGERY
SOCIETY OF INTERVENTIONAL RADIOLOGY
SOCIETY OF NEUROINTERVENTIONAL SURGERY
THE SOCIETY OF THORACIC SURGEONS