



Centers for Disease Control
and Prevention (CDC)
Atlanta, GA 30333
August 28, 2013

To Whom It May Concern:

The Centers for Disease Control and Prevention (CDC) is an agency of the U.S. Department of Health and Human Services and is a public health authority as defined by the Health Insurance Portability and Accountability Act (HIPAA), Standards for Privacy of Individually Identifiable Health Information; Final Rule (Privacy Rule)(45 CFR §164.501). Pursuant to §164.512(b) of the Privacy Rule (45 CFR §164.512(b)), covered entities may disclose protected health information to public health authorities "...authorized by law to collect or receive such information for the purpose of preventing or controlling disease, injury, or disability, including, but not limited to, the reporting of disease, injury, vital events such as birth or death, and the conduct of public health surveillance, public health investigations, and public health interventions..." The definition of public health authority includes "...a person or entity acting under a grant of authority from or contract with such public agency..." (45 CFR §164.501).

The American Association of Poison Control Centers (AAPCC) is acting under a contract with CDC to conduct the National Poison Data System (NPDS). Through this mechanism, CDC has provided the AAPCC with a grant of authority to conduct this activity and thus function as a public health authority to whom covered entities may disclose protected health information for this purpose.

The NPDS is a public health activity, specifically public health surveillance as described by §164.512(b) referenced above, and is authorized by the Public Health Service Act, 42 U.S.C. Sections 241, 247b, 280b-1, and 280b-2. The information being requested represents the minimum necessary to carry out the public health purposes of this project consistent with §164.514(d) of the Privacy Rule (45 CFR §164.514(d). The Privacy Rule specifies that covered entities "...may rely, if such reliance is reasonable under the circumstances, on a requested disclosure as the minimum necessary for the united purposes when: (A) Making disclosures to public officials that are permitted under §164.512, if the public official represents that the information requested is the minimum necessary for the stated purpose(s)".

If you have any questions or concerns please contact Gail Horlick, J.D., M.S.W., Privacy Coordinator at (404) 639-4613 or Adrienne Holmes, M.P.H., Deputy Chief, Health Studies Branch at (770) 488-3404.

Sincerely,

A handwritten signature in blue ink that reads "Judith Qualters".

Judith Qualters, Ph.D., M.P.H.

Director

Division of Environmental Hazards
and Health Effects

National Center for Environmental Health