

## Center of Excellence for Protected Health Information (CoE-PHI)

### Community of Practice (CoP) Charter Implementing 2024 Part 2 Final Rule Requirements: Consent Forms, Policies, and Staff Training

#### Overview

The Center of Excellence for Protected Health Information (CoE-PHI) is launching a Community of Practice (CoP) to support health systems in implementing the changes to 42 CFR Part 2 required by the 2024 Final Rule. Whether you're just getting started, midway through updating key documents and staff training, or perhaps you've already made updates and want to double-check your work, this Community of Practice is designed to meet you where you are.

The CoP will use a brief competitive application process to identify and engage four organizations that provide behavioral health services. Selected agencies will assemble a multidisciplinary team who will participate in structured process, with subject matter experts and with their peers, to take steps toward ensuring they have documents and staff training that support compliance with updated federal confidentiality regulations for substance use disorder (SUD) treatment information.

Through four live virtual sessions, each lasting up to 90 minutes, and individualized TA between sessions, teams who participate in the CoP will work toward achieving the following goal and objectives:

**Community of Practice Goal:** Align organizational consent forms, patient notices and related staff training with updated regulatory requirements through structured peer learning and individualized technical assistance.

#### Community of Practice Objectives

- Understand the changes requirements of the 2024 Part 2 Final Rule and their intersection with HIPAA and state laws.
- Apply the revised Part 2 requirements to update TPO consent forms and Patient Notices for Part 2 Programs to support regulatory alignment.
- Identify staff training needs and changes necessary to support implementation of the Final Rule across participating organizations.

## Eligibility Criteria

To be eligible to apply, participants for this Community of Practice must be healthcare organizations that provide substance use disorder services and meet the criteria listed below.

- Must be able to assemble a team, comprised of 2-4 individuals, with decision-making authority related to privacy, compliance, clinical operations, or health information management.
- Demonstrate readiness to review and update TPO consent forms, patient notices, internal policies, and staff training plan.
- Commit to full participation in all CoP sessions, proactive technical assistance, and required pre- and post-work.
- Be willing to share challenges, lessons learned, and successes with peers to support collective learning.

## Benefits of Participation

Through participation in the Community of practice healthcare organizations will have the opportunity to:

- Establish a network of peers across the country implementing changes to 42 CFR Part 2.
- Free access to both leading legal subject matter experts (SMEs) and Process Management Experts (PMEs) in both virtual sessions and individual TA sessions.
- Update organizational TPO consent forms, Patient Notice and a staff training plan that aligns with updated Part 2 regulations.

## Commitments for Participation

Healthcare organizations selected to participate in the Community of Practice commit to:

- Designate a *Team Lead*\* who will serve as the primary point of contact and be present at all CoP sessions and TA meetings.
- Participating in all four live virtual group learning sessions and participating in individualized proactive TA between sessions.
- Completing pre-work and follow-up assignments as applicable.

\*While full participation from all team members is strongly encouraged, the Team Lead will be responsible for coordinating participation, ensuring completion of assignments, and communicating updates between the CoP facilitators.

### Duration and Time Commitment

The CoP will run from March 2026 through August 2026. Estimated time commitment for participating in CoP virtual sessions with peers and virtual individual TA sessions with SMEs is 8.5 hours. In addition, each team will be working independently, as identified, to update key documents. Summary of time commitment is described below.

- Four Live Virtual Group Learning Sessions (90 minutes each)
- Five Proactive TA Sessions (30 minutes each)
- Completion of pre-work and interim assignments (e.g., updating of key documents or materials to support alignment with Part 2 changes)

### Key Community of Practice Activities and Timeline

Date	Activity	Duration
March 4, 2026	Opportunity Made Available	
April 3, 2026	Application Deadline	
April 10, 2026	Sites Selected and Informed	
April 22, 2026	CoP Orientation – Virtual Session	90 minutes
June 3, 2026	Live Virtual CoP Session 2	90 minutes
July 15, 2026	Live Virtual CoP Session 3	90 minutes
August 12, 2026	Closing - Live Group Virtual Session 4	90 minutes
April – August 2026	Proactive TA Scheduled with Teams	30 minutes each

### How will we Measure Success

Success of the CoE-PHI Community of Practice will be measured through participant engagement, completion of key deliverables, and demonstrated readiness to implement the 42 CFR Part 2 Final Rule.

- 1. Completion of Activities Toward Updating Key Documents**
  - a. TPO Consent Forms that align with 42 CFR Part 2 and applicable state laws
  - b. Part 2 Patient Notice that aligns with Part 2
  - c. Updated staff training plan and approach
- 2. Engagement and Participation**
  - a. Participation in live virtual CoP Sessions

- b. Participation in scheduled proactive TA sessions
- 3. Evaluation of Healthcare Organization Team's Experience**
  - a. Participant ability to apply what they have learned to their practice
  - b. Whether participants viewed participation as a good use of time
  - c. To what extent participation connected teams with peers and identified resources

### **Application Process**

Applicants should complete and [submit a brief application](#) by Friday, April 3, 2026 by 5:00pm ET. The application should take 5-10 minutes to complete.

Individual follow-up conversations (30 minutes each) will be scheduled with applicants to confirm readiness and inform selection for participation.

### **For More Information or Support in Completion of Application**

To request assistance or if you have any questions in completing an application, please reach out to the CoE-PHI by contacting CoE-PHI Project Manager, Madelynn Bovasso:

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*Disclaimer: Please note that resources, training, technical assistance, and any other information provided through the CoE-PHI do not constitute legal advice.*