

# Memorandum

CD25-19

**ISSUED DATE:** September 15, 2025

**TO:** ☒ Children's Division ☒ Contracted Staff

**FROM:** Sara Smith, Children's Division Director

**SUBJECT:** **HIPAA Reproductive Health Care (RHC)**

**RATIONALE:**

This notice is to inform you that the HIPAA Privacy Rule to Support Reproductive Health Care Privacy (the "RHC" Rule), which included specific requirements for reproductive health care information, was vacated by a federal court on June 18, 2025. As a result, certain requirements of the RHC Rule are no longer in effect.

**OVERVIEW:**

What this Means for Staff:

- **Discontinue Use of Attestation Forms:** You should stop requiring and obtaining attestation forms for disclosures related to reproductive health care information.
- **Review and Update Policies and Procedures:** It is recommended to review and update internal HIPAA policies and procedures to reflect these changes.
- **Remove References to Vacated Rule:** Remove any reference to vacated 2024 Final Rule, including the attestation process or specific prohibitions on reproductive health PHI disclosure.
- **Training Information:** training programs should be updated to ensure staff understand the current requirements.
- If a staff member is asked to complete an attestation while compiling records from an outside entity/agency, please proceed with completing the attestation being requested.

Please review this information and ensure your practices align with the updated requirements. If you have questions or require clarification, please reach out to [Shannon.Mills-Davis@dss.mo.gov](mailto:Shannon.Mills-Davis@dss.mo.gov) or [Joshua.Phillips@dss.mo.gov](mailto:Joshua.Phillips@dss.mo.gov).