



MedPlus Pharmacy

Policy Statement on the Confidentiality of Substance Use Disorder (SUD) Patient Records (42 CFR Part 2 & 42 U.S.C. 290dd-2)

Effective Compliance Date: May 12, 2026

Corporate Entity: MedPlus Pharmacy

Physical Facility: 5130 Duke Street, Suite # 2, Alexandria, VA 22304

I. Regulatory Overview and Purpose

MedPlus Pharmacy operates as a premier, independently owned pharmaceutical provider serving the Washington DC metropolitan area, including Alexandria, Arlington, and Pentagon City. In strict accordance with Federal law—specifically 42 U.S.C. 290dd-2 and 42 CFR Part 2 (commonly referred to as "Part 2")—this institution enforces heightened confidentiality protections for records regarding patients receiving services for Substance Use Disorders (SUD).

We understand that apprehensions regarding discrimination or legal vulnerability can deter individuals from seeking necessary SUD treatment. MedPlus Pharmacy guarantees that all specialized medication logs, consultations, and related diagnostic information (collectively termed "Part 2 Records") are handled with absolute discretion and legal compliance.

II. Scope of Application

The statutory mandates of Part 2 apply directly to:

- **MedPlus Operations:** Any specialized pharmacy program, therapeutic referral framework, or medication-assisted treatment (MAT) dispensing function performed by our clinical staff.
- **Downstream Entities:** All individuals and secondary organizations that lawfully receive Part 2 Records from our database. This includes external healthcare providers, Qualified Service Organizations (QSOs), HIPAA-covered entities, business associates, intermediaries, and administrative or investigative agencies.

III. Operational Rules for Use and Disclosure

MedPlus Pharmacy manages Part 2 Records according to the following strict statutory boundaries:

- **Strict Sharing Limitations:** Our pharmacy is strictly prohibited from sharing any data that identifies a patient as having, or having had, a substance use disorder. Information will not be released unless explicitly permitted under Part 2 regulatory criteria.

- **Written Patient Consent:** Outside of narrow statutory exceptions, such as immediate emergency medical treatment, records will only be disclosed upon receipt of a valid, signed patient written consent form.
- **Treatment, Payment, and Healthcare Operations (TPO):** Patients may choose to execute a single, comprehensive "TPO Consent." This authorizes MedPlus Pharmacy to use and disclose Part 2 Records for ongoing therapeutic coordination, insurance billing, and core operational metrics.
- **Downstream Redisclosure Rules:** When a HIPAA-covered healthcare provider or health plan receives a Part 2 Record from us via a valid TPO Consent, that entity may redisclose the record in accordance with standard HIPAA provisions. However, they remain strictly prohibited from utilizing this data in any legal proceeding against the patient.
- **Absolute Prohibition on Legal Proceedings:** Part 2 categorically prohibits the use or disclosure of SUD patient records in any criminal, civil, administrative, or legislative proceeding against a patient. This restriction stands unless an explicit written patient consent is provided, or a specialized federal court order and subpoena are issued concurrently.

IV. Modern Regulatory Alignment (CARES Act & The 2024 Final Rule)

Pursuant to the Coronavirus Aid, Relief, and Economic Security (CARES) Act and the subsequent 2024 Part 2 Final Rule, the Department of Health and Human Services (HHS) closely aligned Part 2 mandates with the HIPAA Privacy, Breach Notification, and Enforcement Rules, as well as the HITECH Act.

As a result, MedPlus Pharmacy enforces the following updated regulatory protocols:

- **Patient Privacy Rights:** Patients maintain enhanced rights to request restrictions, inspect electronic logs, and demand formal accounting metrics regarding disclosures of their SUD information.
- **Breach Notification Mandates:** In the event of an unauthorized acquisition, access, use, or disclosure of unsecured Part 2 Records, MedPlus Pharmacy will execute emergency breach notifications matching standard HIPAA Enforcement Rule protocols.
- **Civil and Criminal Penalties:** Any compliance infractions are subject to formal civil monetary penalties and criminal liabilities as managed under 45 CFR Part 160 (Subparts C, D, and E).

V. Oversight, Enforcement, and Grievance Procedures

The administrative enforcement and regulatory oversight of 42 CFR Part 2 are directed by the Office for Civil Rights (OCR) within the U.S. Department of Health and Human Services.

Filing an Official Complaint

If you believe that MedPlus Pharmacy, or any secondary entity handling your records, has disclosed SUD patient data in noncompliance with Part 2 mandates, you have the right to file an official complaint.

- **Internal Grievances:** Contact our internal corporate office directly via the channels provided below.
- **Federal Grievances:** Submit a written complaint or an official Part 2 Breach Report to the Secretary of HHS through the OCR portal.

MedPlus Pharmacy strictly prohibits any form of corporate retaliation, intimidation, or service alteration against patients who choose to file a privacy complaint.

VI. Official Corporate Contact Channels

For detailed inquiries regarding our substance use disorder record encryption protocols, or to exercise your statutory privacy rights, please communicate directly with our corporate office:

- **Designated Official:** Privacy & Compliance Officer
- **Central Telephony Line:** (703) 751-1111
- **Secure Electronic Mail:** pharmacy@mplusrx.com
- **Physical Store Location:** 5130 Duke Street, Suite # 2, Alexandria, VA 22304
- **Regional Service Footprint:** Washington DC, Arlington, Bailey's Crossroads, Landmark, Pentagon City, Potomac, Alexandria, Huntington, Rose Hill.