



March 24, 2011

Cliff Allenby
Acting Director
California Department of Mental Health
1600 9th Street, Room 151
Sacramento, CA 95814

Michael Cunningham
Acting Director
California Department of Alcohol and Drug Programs
1700 K Street
Sacramento, CA 95811

Dear Mr. Allenby and Mr. Cunningham:


The California Mental Health Directors Association (CMHDA) and the County Alcohol and Drug Program Administrators Association of California (CADPAAC) are increasingly concerned about the need for counties to share information more fluidly between mental health and alcohol and other drug services, including planning for the implementation of Electronic Health Records (EHR). We are writing to request that you ask for technical assistance training from the Substance Abuse and Mental Health Services Administration (SAMHSA) on our behalf, to clarify how 42 CFR Part 2 regulations should be best applied under varying circumstances in the emerging electronic era.

California counties are particularly concerned with these challenging issues because of their recent progress in implementing EHRs, their forward movement toward closer coordination with primary care, and their development of several regional health information organizations. Many California counties are seeking expert advice to revise their confidentiality forms, and many of them would ideally prefer to work together on the best revision possible that they can all adopt uniformly, consistent with federal law.

After receiving technical assistance from SAMHSA, CMHDA would work closely with CADPAAC and your two state Departments through the California Co-Occurring Joint Action Council (COJAC) to disseminate the technical assistance information to counties, to ensure they have examples of best practices regarding the release and sharing of information between mental health and alcohol and other drug programs/services.

Thank you for your consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Pat Ryan". The signature is fluid and cursive, with the first name "Pat" being more prominent than the last name "Ryan".

Patricia Ryan, MPA
Executive Director, CMHDA

A handwritten signature in black ink, appearing to read "Tom Renfree". The signature is fluid and cursive, with the first name "Tom" being more prominent than the last name "Renfree".

Tom Renfree
Executive Director, CADPAAC

cc: dave neilsen, DADP
Marvin Southard, Director, LA County DMH
Cheryl Trenwith, Placer County