

Kreick and Tanabe in AHLA: HIPAA Reproductive Health Care Privacy Rule Vacated

July 25, 2025 Jennifer Kreick, Thomas Tanabe

PRACTICES Health Privacy (HIPAA) and Healthcare IT, Healthcare and Life Sciences

A federal judge in Texas vacated most of the 2024 HIPAA Privacy Rule amendments concerning reproductive health care, ruling that the Department of Health and Human Services exceeded its authority. Haynes Boone Partner [Jennifer Kreick](#) and Associate [Thomas Tanabe](#) authored an article for the American Health Law Association discussing the new requirements for regulated entities.

Read an excerpt below.

On June 18, 2025, Judge Mathew J. Kacsmaryk of the U.S. District Court for the Northern District of Texas issued a Memorandum Opinion and Order in *Purl v. United States Department of Health and Human Services* vacating most of the 2024 amendments to the Health Insurance Portability and Accountability Act of 1996 (HIPAA) Privacy Rule (2024 Privacy Rule) for reproductive health care privacy. For covered entities and business associates (Regulated Entities), the nationwide vacatur provides some welcome clarity as to the future enforcement of the 2024 Privacy Rule, but Regulated Entities should continue to monitor the litigation landscape and review and potentially update their policies and forms (including removing previously required attestations), training, and business associate agreements to align with the decision.

[Read the full AHLA article here.](#)