

July 13, 2026

Stephania Griffin
Chief Privacy Officer
Veterans Health Administration
VA Privacy Service
810 Vermont Avenue, NW
Washington, DC 20420

Re: Docket No. VA-2026-VACO-0001; Privacy Act of 1974; System of Records, “Patient Medical Records–VA” (24VA10)

Dear Ms. Griffin:

On behalf of the physician and medical student members of the American Medical Association (AMA), I thank you for the opportunity to comment on the modified system of records notice for Patient Medical Records–VA. The AMA shares the Veterans Health Administration’s (the Department) commitment to ensuring that veterans receive safe, timely, and well-coordinated care, whether that care is delivered at a VA facility or by a community physician.

We support the provisions of the notice that strengthen the sharing of health information for treatment. When VA and community physicians can exchange complete, current medical records, veterans receive safer care, avoid duplicate tests, and spend less time repeating their medical histories. We offer two requests to strengthen that work, because information sharing succeeds only when veterans trust the system that holds their records.

First, we urge VA to make its data security protections visible to the public. The modifications remove previously published descriptions of how patient records are protected, including locked facilities, escorted access, and expiring credentials. The rationale for replacement cites published VA security directives, which we acknowledge, but the specific access controls cloud vendors must follow, and how VA monitors their compliance, exist only in vendor agreements the public cannot see. Veterans, and the physicians who care for them, should not have to take it on faith that records held by commercial vendors are secure. We respectfully request that VA publish, or summarize in plain language, the access standards in those agreements and describe how compliance is monitored.

Second, we urge VA to ensure veterans clearly understand what happens to records created outside VA. The notice confirms that records created by community physicians who treat veterans become part of VA’s records system and may then be shared with other federal agencies and outside organizations without asking the veteran first. We recognize that the modifications preserve added protections for especially sensitive records and that veterans have certain choices about sharing. Those protections and choices, however, are meaningful only if veterans know they exist. Many veterans may not realize how their information moves, and community physicians are often the ones asked to explain it. We respectfully request that VA describe how veterans are informed of these practices today and commit to clear, plain-language notice at the point of care and in veteran-facing communications.

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The AMA offers these requests in a spirit of partnership and stands ready to work with the Department on both matters. Please reach out to me directly at 312-464-5288 or John.Whyte@ama-assn.org if you have questions or need further information.

Sincerely,

A handwritten signature in black ink, appearing to read "John Whyte", written in a cursive style.

John Whyte, MD, MPH