

Suggested Compliance Groups

Group Name	Description and Examples	Consent Requirement	Rationale (Per 42 CFR Part 2)	App Vetting Recommendation
Internal/Interagency	Internal sharing within the same Part 2 program (e.g., peer support specialists in your agency) or to closely affiliated agencies for ops (e.g., qualified service organization agreements for admin tasks).	No consent needed for true internals; general TPO if interagency.	Internal use isn't a "disclosure"; interagency can use a single general consent if for TPO. Exceptions like audits apply here.	Low-threshold: Auto-approve if participants are verified internal (e.g., same domain logins). Flag for general consent if broader; no separate form required.
TPO (Treatment, Payment, Health Care Operations)	External or coordinated sharing for treatment (e.g., referrals to MAT providers), payment (e.g., billing insurers), or health ops (e.g., quality assurance with external consultants). Covers most peer support workflows.	Covered by a single general consent (obtained once by peer specialist, using broad language like "all treating providers and payers").	2024 updates allow one consent for all future TPO uses with general recipient designations. Redisclosure allowed under HIPAA for covered entities.	Medium-threshold: Check for existing general consent; if valid, auto-approve. Prompt to obtain/renew if expired or purpose mismatch.
Legal/Investigative Disclosure	Sharing for legal purposes (e.g., court orders, abuse reporting, or investigations).	Requires separate, specific consent per disclosure (cannot combine with TPO).	Part 2 prohibits combining legal consents with TPO ones; must be explicit and include patient notice of rights. No broad consents here.	High-threshold: Always require separate consent upload; block until verified. Include redisclosure prohibition in every message.
Other Non-TPO	Any non-TPO sharing (e.g., marketing, employment verification, or family communications without exception).	Requires separate consent per instance or type.	Falls outside TPO flexibility; must be narrowly tailored. No single consent suffices.	High-threshold: Treat as default for uncategorized; require specific consent and manual review.
SUD Counseling Notes (Sensitive)	Sharing psychotherapy or SUD counseling notes (separate from general records).	Always requires separate, specific consent (even for TPO).	Explicitly carved out in Part 2 (like HIPAA); cannot be covered by general consents.	Highest-threshold: Separate group to isolate; block by default unless explicit consent linked to the exact notes.