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## **SB 748 / HB 1022 – Public Health-State Designated Exchange-Clinical Information**

### **Position: Favorable with Amendments**

Thank you for the opportunity to provide written comments on SB 748 / HB 1022. The policy goal of this bill is to enhance the authority of State-Designated Health Information Exchange (HIE) to enable health care data collection and sharing to support effective public health response efforts for COVID-19 and future initiatives. To this end, the bill requires that an “electronic health network” (EHN) provide administrative transactions to the HIE for public health and clinical purposes. EHN is defined as “an entity involved in the exchange of electronic health care transactions between a payor, health care provider, vendor, and any other entity.”

CareFirst is committed to driving the transformation of the healthcare experience with and for all our members and communities, with a focus on quality, equity, affordability, and access to care. CareFirst is supportive of the policy goal of improving data exchange to enable transparency, improved public health, and higher quality care.

However, we have a number of concerns with the breadth of the bill as drafted. We believe the bill needs further definition and clarity in a number of places, and that its interaction with upcoming federal regulations relating to the interoperability of health information must be addressed.

We look forward to partnering with legislators, the Maryland Health Care Commission, public health groups, and other stakeholders to work on amendments to accomplish these goals.

### **We urge a favorable with amendments report.**

#### **About CareFirst BlueCross BlueShield**

*In its 83rd year of service, CareFirst, an independent licensee of the Blue Cross and Blue Shield Association, is a not-for-profit healthcare company which, through its affiliates and subsidiaries, offers a comprehensive portfolio of health insurance products and administrative services to 3.4 million individuals and employers in Maryland, the District of Columbia, and Northern Virginia. In 2019, CareFirst invested \$43 million to improve overall health, and increase the accessibility, affordability, safety, and quality of healthcare throughout its market areas. To learn more about CareFirst BlueCross BlueShield, visit our website at [www.carefirst.com](http://www.carefirst.com) and our transforming healthcare page at [www.carefirst.com/transformation](http://www.carefirst.com/transformation), or follow us on [Facebook](#), [Twitter](#), [LinkedIn](#) or [Instagram](#).*