



**Senator Pamela Beidle
Senate Finance Committee
3 East Miller Senate Office Building
Annapolis, Maryland 21401**

**Re: Health Facilities - Confidentiality of Medical Records - Crisis Pregnancy Clinics,
S.B.563 - FAV**

Madam Chair and members of the committee:

My name is Gloria Totten and I'm the president of the Public Leadership Institute. I am here to testify today in support of S.B.563.

When clients enter crisis pregnancy centers, they are often asked to fill out intake forms similar to what you'd receive in a traditional medical facility. These forms ask for typical, personal health information but, often, also include things like a history of sexual partners, citizenship/documentation status, housing situation, and more. Over 80% of centers in Maryland also advertise obstetric ultrasounds, indicating they also perform medical scans and are in possession of that imaging data.

However, unlike a traditional medical facility, all of that information is at risk. CPCs fall into a blind spot for both HIPAA and existing state health privacy laws. This bill is simply a fix to that loophole.

If you follow the national average of client numbers for individual CPCs, Maryland's centers could be collecting the private health information of as many as 10,000 women every year. Further, the information of up to 100,000 prior clients could already be stored and at risk.

Even if these pregnancy centers already maintain health information confidentiality, it would be appropriate to require them to do so formally under state medical privacy law. However, there is ample evidence that across the nation, this isn't regularly the case. Such centers frequently violate clients' privacy by placing their personal information in online databases accessible to third parties outside the pregnancy center.

Heartbeat International, one of the largest CPC parent organizations, even brags about designing their own platform and centralized database for client information, NextLevel. NextLevel has no required privacy protections and is, instead, promoted as a way the organization can better track their clientele. Further, these centers have even been found to leak clients' sensitive personal and private health information publicly.

Any organization that provides medical services or collects clients' medical information should be required to keep this information private without the explicit permission of the client to share it. Maryland is already a national leader in creating state medical privacy laws to fill gaps in HIPAA and make it easier to enforce confidentiality. Passing S.B. 563 would ensure that these privacy protections are applied across the board.

Gloria A. Totten
President, Public Leadership Institute
1823 Jefferson Place NW, Washington, DC 20036

