



**Chairwoman Heather Bagnall  
House Committee on Health  
Taylor House Office Building, 6 Bladen Street, Room 240  
Annapolis, MD 21401**

**Re: Health Facilities - Confidentiality of Medical Records - Crisis Pregnancy Clinics, HB 615 - FAV**

Dear Chairwoman Heather Bagnall 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 HB 615.

When clients enter crisis pregnancy centers, which I will call CPCs, 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.

However, unlike a traditional medical facility, all of that information is at risk. Because CPCs don't bill insurance or charge for their services, they fall into a blind spot for both HIPAA and existing state health privacy laws. This bill is simply a fix to this loophole.

If you follow the national average of individual CPCs, each seeing around 300 new clients per year, 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. At times, 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. This bill 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