



Kaiser Foundation Health Plan of the Mid-Atlantic States, Inc
2101 East Jefferson Street
Rockville, Maryland 20852

February 25, 2021

The Honorable Delores G. Kelley
Senate Finance Committee
3 East, Miller Senate Office Building
11 Bladen Street
Annapolis, Maryland 21401

RE: SB 579 – Letter of Information

Dear Chair Kelley and Members of the Committee:

Kaiser Permanente appreciates the opportunity to provide comments on SB 579, “Health Care Facilities – Restrooms – Requirements.”

Kaiser Permanente is the largest private integrated health care delivery system in the United States, delivering health care to over 12 million members in eight states and the District of Columbia.¹ Kaiser Permanente of the Mid-Atlantic States, which operates in Maryland, provides and coordinates complete health care services for approximately 775,000 members. In Maryland, we deliver care to over 450,000 members.

Kaiser Permanente operates 18 health facilities in ten Maryland counties and offers the following feedback on SB 579:

- Many of our restrooms already meet the proposed requirements of this legislation. However, some restrooms, especially those in buildings that we lease, may not meet the space requirements that would be necessary to make the proposed alterations. The bill does not include a process by which a health care facility could request an exception.
- Our restrooms are cleaned and disinfected using best practices and monitored to ensure there are adequate supplies (e.g., toilet paper, paper towels, hand soap). To the extent that the bill is intended to ensure adequate sanitary practices, we believe that cleaning procedures would achieve the same goal.
- The bill doesn’t differentiate between a multi-stall restroom and a single-stall restroom, and there may be important reasons to have different standards for each. For example, there is a greater need for a patient to touch the door handle in a single-stall restroom if it has a locking mechanism.

¹ Kaiser Permanente comprises Kaiser Foundation Health Plan, Inc., the nation’s largest not-for-profit health plan, and its health plan subsidiaries outside California and Hawaii; the not-for-profit Kaiser Foundation Hospitals, which operates 39 hospitals and over 650 other clinical facilities; and the Permanente Medical Groups, self-governed physician group practices that exclusively contract with Kaiser Foundation Health Plan and its health plan subsidiaries to meet the health needs of Kaiser Permanente’s members.

- The bill also requires the Department of Health to consider information about a health care facility's compliance with this legislation in making any determination regarding certificate of need. Not all facilities subject to this legislation are subject to certificate of need requirements, so this provision may be confusing.

Thank you for the opportunity to comment. Please feel free to contact Allison Taylor at Allison.W.Taylor@kp.org or (202) 924-7496 with questions.

Sincerely,

A handwritten signature in cursive script that reads "Allison Taylor".

Allison Taylor
Director of Government Relations
Kaiser Foundation Health Plan of Mid-Atlantic States, Inc.