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For information, contact:  
Matthew Celentano, Executive Director

Testimony  
for the House Health & Government Operations Committee  
In **OPPOSITION** to

**House Bill 1375 – Health Information Exchanges – Electronic Health Information – Sharing and Disclosure**

**March 19, 2021**

The League of Life and Health Insurers of Maryland Inc. respectfully **opposes** House Bill 1375 and urges the committee to give the bill an unfavorable report.

The League of Life and Health Insurers of Maryland, Inc. (the League), is the state's trade association representing life and health insurers doing business in the State. We are writing today to express our concerns on the potential passage of HB 1022 and HB 1375 which would have significant impact to the interactions between payors, health care providers, vendors, and the health information exchange (HIE).

The League appreciates the Maryland Health Care Commission's intent with the bill. This is an important area of law and health technology that deserves careful consideration and cull stakeholder engagement and vetting. Unfortunately HB 1375 was a late introduction and has not had the stakeholder engagements it deserves.

As you are aware, the League did not take a position on HB 1022 at the hearing and are aware that HB 1022 is progressing through the legislative process. We have significant concerns with the potential impact of the interaction between that legislation and HB 1375 if adopted. We are still trying to wrap our heads around the impact of HB 1022 if passed – to incorporate another level of complexity to the policy change with HB 1375 – which does not incorporate the changes within HB 1022 including definitional changes that need to be reconciled between the bills seems inappropriate at this late juncture of Session.

Carriers have been analyzing these bills since introduction and are deeply concerned about how they would fit into the modified definitions of the HIE. We understand that the Maryland Health Care

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Commission team is trying to modernize data sharing and how we access clinical information, but there are new parameters about how carriers share data, some of which is information that has never been provided before to any agency. We have many unanswered questions about the harmonization of the bills and how it would impact carriers and existing data sharing protocols.

While we do not object to the intent of the public health approach, we are concerned about wide ranging impact these bills could create. We want to get it right, and would respectfully request the chance this Interim to sit down with the Maryland Health Care Commission to discuss the most appropriate way forward on this important policy discussion. It is worth reiterating that the potential to improve data sharing is important to carriers as well. We believe that consumers should have options and ownership of their data, but we have not had a chance to deeply analyze what the significant shift to the landscape would have on carriers operations and how that trickles down to consumer use.

Should you have any questions please do not hesitate to contact me. I sincerely hope that we will be able to come to a solution that works for all stakeholders during the Interim.

For the above reasons, we urge the committee to give House Bill 1375 an unfavorable report.

Very truly yours,

A handwritten signature in black ink, appearing to read "Matthew Celentano", with a long horizontal line extending to the right.

Matthew Celentano  
Executive Director