



Maryland  
Hospital Association

March 13, 2024

To: The Honorable Joseline Peña-Melnyk, Chair, House Health & Government Operations Committee

Re: Letter of Concern- House Bill 1100- Health - Child Advocacy Centers - Reporting Requirements and Investigations

Dear Chair Peña-Melnyk:

On behalf of the Maryland Hospital Association's (MHA) member hospitals and health systems, we appreciate the opportunity to comment on House Bill 1100.

Maryland hospitals care for the most vulnerable in our communities and are proud to do so. As drafted, HB 1100 presents many concerns.

Hospital-based sexual assault forensic exam ([SAFE](#)) programs employ forensic nurse examiners who receive special training in evidence collection and are experts in delivering trauma-informed care to survivors of violence and abuse. State law ensures survivors of sexual assault have access to emergency medical treatment for their injuries with no out-of-pocket expense. Most of these programs serve both adults and children.

HB 1100 would create a new definition of "child advocacy center" that would include these hospital-based programs and pediatric emergency departments since they also investigate, diagnose, and treat abused or neglected children. The reporting requirements under the bill are too extensive, including the names and license numbers of behavioral health care providers, the scope of services provided, and the operating policies and guidelines including the transition of care between behavioral health care providers. This reporting under HB 1100 is intended to provide information to the state regarding behavioral health care services delivered outside of a regulated health care facility. It is unclear if hospital-based programs would be exempt because they are within a regulated space. Further clarity is needed to fully understand the impact this legislation could have on these hospital-based programs.

We appreciate the intent of the legislation to ensure quality and continuity of care for children who have been abused and neglected. However, we urge the Committee to consider the far-reaching impact this legislation could have.

For these reasons, we request a *unfavorable* report on HB 1100.

For more information, please contact:  
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