



May 16, 2023

*Megan Williams, DNP,  
FNP-C, FAANP  
Interim CEO*

The Honorable Krista Griffith  
411 Legislative Ave.  
Dover, DE 19901

**RE: HB 154 Data Bill & Request for HIPAA-Entity Level Exemption**

Dear Representative Griffith,

*Nemours Children's  
Health  
Mark Mumford,  
Executive Vice President  
Chief Executive,  
Nemours Delaware  
Valley Operations*

Thank you for the opportunity to comment on HB 154. The Delaware Healthcare Association respectfully requests a HIPAA entity-level exemption from this bill.

*Bayhealth  
Terry Murphy,  
President & CEO*

While we thank you for your efforts to protect personal data, we have concerns that the bill currently does not include an entity-level exemption for those entities covered by HIPAA – the Health Insurance Portability and Accountability Act. Hospitals and other health care providers are already governed by these stringent federal privacy protection requirements.

*Beebe Healthcare  
David A. Tam,  
MD, MBA,  
President & CEO*

In addition, an entity-level exemption is provided in the bill to financial institutions governed under the Gramm-Leach-Bliley Act, but a comparable exemption is not provided for HIPAA-governed entities. DHA respectfully requests that there be an exemption for HIPAA-covered entities.

*ChristianaCare  
Janice E. Nevin,  
MD, MPH  
President & CEO*

Thank you again for the opportunity to comment on HB 154.

*TidalHealth Nanticoke  
Penny Short, MSM, BSN,  
RN  
President & CEO*

Sincerely,

A handwritten signature in blue ink that reads 'Megan Williams'.

*Saint Francis Hospital  
Christopher Cullom,  
MSHA, MBA  
President, Saint Francis  
Hospital*

Megan Williams, DNP, FNP-C, FAANP  
Interim CEO

*Delaware Healthcare  
Association  
Megan Williams, DNP,  
FNP-C, FAANP  
Interim CEO*

*DHA represents hospitals and health care delivery systems in Delaware and provides policy and advocacy leadership in creating an excellent environment to support our members in helping every Delawarean to be as healthy as they can be.*

