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February 18, 2022

Chair Gelser Blouin and Members of the Committee,

FindHelp (formerly Aunt Bertha) appreciates the opportunity to provide comments on HB 4150. As you may know, FindHelp is a Public Benefit Corporation founded in 2010 that runs the largest social care network in the United States and has served more than nine million Americans. Our network is used by over 250 health systems, health plans, community health centers, and health departments in the United States to manage social care referrals, as well as by tens of thousands of community organizations. Our mission is to connect people in need with the programs that serve them, with dignity and ease. We share your commitment to creating a more equitable, culturally, and linguistically responsive health care system.

FindHelp is supportive of the Health Information & Technology Oversight Council's convening of the Community Information Exchange (CIE) Workgroup, which would largely be codified in this bill, and appreciates the opportunity that HB 4150 provides for legislators to also thoughtfully consider important questions that the CIE Workgroup must address. With the opportunities that CIE provides to connect social and health care providers as a means to address Social Determinants of Health (SDOH), as well as the sensitive nature of data that is housed within a CIE, the Oregon Legislature has a significant role to play in this conversation. As we shared in our [written comments](#) to the HITOC, privacy and security protections must exist at every level of a CIE to ensure the most vulnerable Oregonian's private information is secure.

One of privacy concerns we have raised is illuminated with the scenario below:

*Jamie Smith is referred to a non-profit domestic abuse organization, which belongs to the Network of providers sharing information in the CIE. Jamie Smith's ex-partner works for a different organization that also has access to the CIE and its social care referral system. The ex-partner has the ability to search individuals by name and date of birth, leaving Jamie Smith's private referral information vulnerable if appropriate privacy security mechanisms, and informed consent, are not in place at every level of the CIE.*

To further underscore the privacy considerations of a CIE, while many people understand the privacy protections that guide medical information under HIPAA, the federal privacy protections for an individual's interactions with social services are less clearly defined. Many social service providers are small, community based organizations, which provide needed social services, but typically are not "covered entities" under the federal HIPAA law. Thus, they are not governed by the same privacy protections and policies that apply to traditional health care providers.

FindHelp looks forward to actively engaging with the CIE Workgroup to raise these, and other, important considerations, and is happy to serve as a resource for policy makers when thinking about the foundational work needed to ensure that CIE remains a public good to the benefit of all Oregonians.

Submitted on behalf of findhelp, a Public Benefit Corporation.