



The Hospital + Healthsystem
Association of Pennsylvania

April 8, 2026

Honorable Members of the House Judiciary Committee:

On behalf of more than 235 members statewide, The Hospital and Healthsystem Association of Pennsylvania (HAP) writes to oppose House Bill 1104, sponsored by Representative Leanne Krueger, which would cap, at \$200, the total cost of obtaining electronic medical records for all requestors, including third parties.

This proposal does not meaningfully improve patient access. Under HIPAA, patients already have the right to obtain their electronic medical records at no cost or at minimal fees, and Pennsylvania prohibits search and retrieval fees for patient requests.

Instead, this proposal is intended to benefit third-party requestors, oftentimes attorneys, creating an unfunded mandate at a time when more than half of Pennsylvania hospitals are operating on negative or razor-thin margins.

Fulfilling a third-party medical records request is not always a simple or automated process. Hospital staff must verify the requestor is authorized, locate records across multiple systems—sometimes including legacy platforms and separate care sites—review and validate the information, and securely transmit the documents to the requestor. Many hospitals rely on vendors to manage this work. A \$200 cap is not reflective of the actual costs of these services or the staff time required to ensure compliance.

Imposing an arbitrary and inadequate fee cap will only increase financial strain on hospitals without improving patient access. Over time, these unreimbursed administrative costs will not disappear. They are absorbed elsewhere by the hospital, further straining already limited resources and undermining hospitals' ability to maintain services and invest in patient care. At a time when Pennsylvania's hospitals desperately need partnership with lawmakers to preserve access to care, particularly in rural and underserved communities, HB 1104 moves in the wrong direction.

HAP respectfully urges members of the Committee to **oppose HB 1104**.

For questions or would like to discuss this issue, please contact [me](#) or [Sarah Lawver](#), senior director of state advocacy.

Sincerely,

Arielle Chortanoff
Vice President, State Advocacy