

Dear Senator Gerratana, Senator Somers, Mr. Steinberg, and Public Health Committee Members,

I am writing you to express my opposition to the proposed bill HB 5416 concerning restrictions to the promotion of Pregnancy Resource Centers (PRCs) services. I reside at 3 Pond Road Wilton, CT and have over 20 years of professional experience in life science, medical devices and healthcare services. I served on the Board of Directors of St. Gerard's Center for Life in Hartford, CT from 2014-2015 as Treasurer. I do not speak for St. Gerard's or any particular organization. Based on my professional and personal experience, I respectfully urge you to desist and withdraw the proposed bill as: 1) frivolous and a waste of scarce government resources; 2) discriminatory against constitutionally protected rights of freedom of speech and conscience; 3) redundant and unnecessary given existing statutes and regulations for medical services and; 4) open to abusive, whimsical, and discriminatory application and enforcement.

The proposed bill is frivolous since there is no evidence of real or potential harm to any person from the presumed wrongs of alleged deceptive practices. Recognizing the "time sensitive" nature of prenatal care is a non sequitur which serves as a fig leaf for interfering with a woman's right to fully consider her real pregnancy healthcare options. A reasonable person can only assume that the proposed amendment represents perceived threats to the special interests of certain institutions, not the interests of real persons. It seems to me that the City Committee would be well advised to conserve the municipality's scarce resources for real benefits to its residents rather than expose itself to potentially costly litigation to defend imagined threats to private institutional interests.

The proposed bill is unjustly discriminatory against certain organizations and appears aimed more at limiting the constitutionally protected freedom of expression and free exercise of conscience rights than at enforcing objective healthcare standards. It is baffling to me how PRCs could be assumed to be guilty of deception by virtue of maintaining facilities with proper medical equipment and staff with proper medical attire. How can this "appearance" of professionalism be a presumption of guilt? How is it that this same presumption of deception does not apply to facilities other than PRCs?

The proposed bill is redundant and unnecessary in light of existing statutes and regulations governing reproductive health services. As you know, these existing regulations specify clearly the requirements for the licensure of healthcare providers and facilities as well as the scope and manner of healthcare delivery, including disclosure by practitioners and informed consent from clients. These requirements are codified, broadly accepted, and objectively verifiable. The relevant, qualified agencies are tasked with enforcing compliance to these standards. It seems to me counterproductive and foolhardy to introduce notions of appearance and deception as substitutes for these well considered and well accepted objective criteria. For instance, the bill proposal requires disclosure that all services are provided by or under the supervision of a licensed medical professional on the premises. This is actually an overreaching and confusing requirement. You know that, by statute, not all practitioners require direct, in person supervision by an M.D. Instead, the services and procedures

performed must match the qualifications of the providers. The proposed bill is actually further deceiving and confusing the public by implying that a certain medical licensure and/or supervision must always be provided and, that this specifically applies to PRCs only.

If we accept that the intent of this bill is to prevent confusion and deception of healthcare users, then we have to conclude that this current attempt does nothing to clarify users' healthcare options. Instead, this bill only serves to increase confusion and doubt with no benefit to users. The clarification is apparently left to the discretion of future agencies which have already provided sufficient regulations. This lack of clarity leaves the bill open to whimsical and abusive application and enforcement. This, in turn, is likely to lead to further discord and costly legal confrontation. Is that really what the Committee desires?

I respectfully urge the Committee to withdraw this troublesome and counterproductive proposed bill for the good of the people of Connecticut who you so generously and ably serve.

Respectfully yours,

John W. Juhasz
Wilton, CT
November 18, 2017