



**Via US Mail**

March 20, 2025

Attorney General Jeff Jackson  
Office of the Attorney General  
114 West Edenton Street  
Raleigh, NC 27603

**Re: Potentially Deceptive Privacy Practices of Crisis Pregnancy Centers**

Dear Attorney General Jackson,

The Electronic Frontier Foundation (“EFF”) is a member-supported, non-profit civil liberties organization that has worked to protect free speech and privacy rights in the online world for more than thirty years. With more than 30,000 active donors and dues-paying members nationwide, EFF represents the interests of technology users in courts, legislatures, and broader policy debates regarding law, technology, and civil liberties.

We write to draw your attention to potential violations of the privacy and consumer rights of people in your state who have provided sensitive health data to crisis pregnancy centers (“CPCs”). CPCs are facilities that offer pregnancy tests, counseling, and information, as well as limited medical services in some cases, but not reproductive healthcare such as abortion or contraception. Some are licensed medical clinics; many are not. Nationally, there are an estimated 2,750 of these facilities and the vast majority are affiliated with one or more of three national organizations: Care Net, Heartbeat International, and the National Institute of Family and Life Advocates. CPCs reportedly received \$1.4 billion in revenue in 2022, including substantial federal and state funds.<sup>1</sup>

As you may be aware, last year researchers at the Campaign for Accountability filed a series of complaints asking Attorneys General in five states—Idaho, Minnesota, Washington, Pennsylvania, and New Jersey—to investigate crisis pregnancy centers in those states that had allegedly misrepresented, through their client intake process and/or via their websites, that information provided to them was protected by the Health Insurance Portability and Accountability Act (“HIPAA”).<sup>2</sup>

An incident in Louisiana also suggests that some CPCs may be sharing client information with other centers in their affiliated networks, without appropriate privacy or anonymity protections.<sup>3</sup> In that incident, a software training video shared the names and personal information of roughly a dozen patients.

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<sup>1</sup> See <https://www.theguardian.com/world/2024/feb/14/anti-abortion-centers-funding>

<sup>2</sup> See <https://campaignforaccountability.org/watchdog-asks-state-attorneys-general-to-investigate-crisis-pregnancy-centers-for-deceptive-practices/>

<sup>3</sup> See <https://campaignforaccountability.org/watchdog-asks-louisiana-ag-to-investigate-deceptive-pregnancy-center-following-leak-and-hhs-determination/>

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As advocates for consumer privacy, we are concerned that CPCs in your state may be engaged in similar practices. For example, The Pregnancy Network (<https://thepregnancynetwork.org/>) claims, “*We gladly adhere to HIPPA standards to protect our clients’ sensitive information throughout their pregnancies and beyond*” on its website in a blog post titled “Your information is safe with us.” See Exhibit 1.

Alpha Life Pregnancy Center (<https://alphalife.org/>) claims that: “*This center does not engage in any transactions covered under the Health Insurance Portability and Accountability Act (HIPAA). The privacy practices described in this notice are voluntarily undertaken and is not intended to create any contractual or legal rights on behalf of clients.*” See Exhibit 2.

And Gateway Women’s Care (<https://gatewaywomens.care/>) claims that “, *we hold your right to confidentiality with the utmost care and respect and comply with HIPAA privacy standards, which protect your personal and health information.*” on its website in a blog post titled “Is My Visit Confidential?” See Exhibit 3.

All three of these centers receive funding from the state of North Carolina.<sup>4</sup>

EFF is concerned that people in your state may rely on these representations when they share personal information with these centers and others with similar practices. Please note that some CPCs have changed the language on their sites in the past few months, apparently in response to public complaints and media coverage. However, they may still be referring to HIPAA when they meet with clients.

Accordingly, we respectfully urge your office to investigate whether CPCs in North Carolina are violating privacy and consumer protection laws by deceiving clients as to how their private information will be retained and used. If you have any questions, please do not hesitate to contact me.

Sincerely,



Corynne McSherry  
Legal Director  
Electronic Frontier Foundation

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<sup>4</sup> <https://www.causeiq.com/organizations/carolina-pregnancy-care-fellowship,562074962/grantmaking>

## Exhibit 1 – The Pregnancy Network

### The Pregnancy Network “Your Information is Safe with Us”

<https://web.archive.org/web/20250305202049/https://thepregnancynetwork.org/blog/your-information-is-safe-with-us/>, captured on March 5, 2025



 The Pregnancy Network has served women in the Triad with [compassionate, confidential care since 1985](#). It is our mission to see women move from undecided to equipped and empowered in their pregnancies. We do this by providing [free medical services, education](#) and [resources](#), and an opportunity to find community through the [Connect program](#).



#### What does it mean that we're HIPAA compliant?

[The Health Insurance Portability and Accountability Act of 1996](#), or HIPAA, ensures the protection of sensitive patient health information from being disclosed without knowledge or consent. The Pregnancy Network is an independent organization; therefore, we are not required to adhere to HIPAA standards by law. However, we gladly adhere to HIPAA standards to protect our clients' sensitive information throughout their pregnancies and beyond.

#### Hear From Our Staff

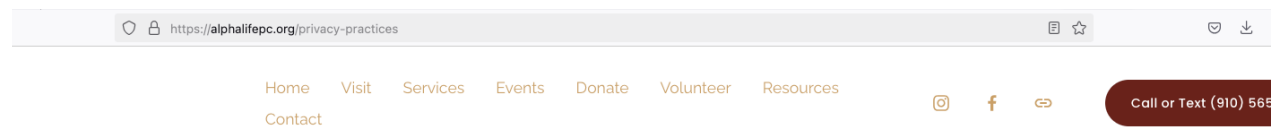
"The quality and confidentiality of our client's care has always been our top priority. We want the women we serve to feel cared for, safe, and protected from the moment they step through our doors through the course of our relationship with them. We follow HIPAA guidelines not because we have to, but because it's in the best interest of our clients."

**Anna Wiles, Director of Nursing at The Pregnancy Network**

## Exhibit 2 – Alpha Life Pregnancy Center

### Alpha Life Pregnancy Center Notice of Privacy Practices

<https://web.archive.org/web/20250305203046/https://alphalifepc.org/privacy-practices>, captured on March 5, 2025



#### Notice of Center Privacy Practices

This notice describes how personal information about you given to this center may be disclosed and how you can access this information. PLEASE REVIEW IT CAREFULLY.

This center does not engage in any transactions covered under the Health Insurance Portability and Accountability Act (HIPAA). The privacy practices described in this notice are voluntarily undertaken and is NOT INTENDED TO CREATE ANY CONTRACTUAL OR LEGAL RIGHTS ON BEHALF OF CLIENTS. We reserve the right to modify our privacy practices and this notice at any time. The most recent copy of this Notice is available upon request or may be downloaded from our website: [www.alphalifepc.org](http://www.alphalifepc.org)

##### 1. Safeguarding Your Personal Information

Individually identifiable information about you, including your SSN, date of birth, home address, telephone number, relationship with this organization, presenting concerns, or services received are considered "Protected Personal Information" (PPI). We will extend certain protections to your PPI. This Notice explains how, when, and why we may use or disclose your PPI. Except in specified circumstances, we will only use or disclose the minimum necessary PPI to accomplish the intended purpose of the use or disclosure.

## Exhibit 3 – Gateway Women’s Care

### Gateway Women’s Care “Is My Visit Confidential?”

<https://web.archive.org/web/20250305204812/https://gatewaywomens.care/is-my-visit-confidential-2/>, captured on March 5, 2025

The screenshot shows a web browser window with the URL <https://gatewaywomens.care/is-my-visit-confidential-2/>. A notification bar at the top reads "North Carolina abortion ruling notice." The website header includes a green navigation bar with "CONTACT" and "BLOG" links, and a white navigation bar with "get care", "get info", and "who we are" dropdown menus. The Gateway Women's Care logo is on the left. The main content area features the article title "Is My Visit Confidential?" in green, published on January 01, 2023, by Gateway Staff. Below the title are links for "Am I Pregnant", "Pregnancy Decisions", and "Pregnancy Support". To the right of the text is a vertical image of a woman's silhouette against a sunset background.

#### Need help, but no one knows?

You may be nervous to visit our center if no one knows you might be pregnant. Carrying that news by yourself can be very stressful. We can help.

Rest assured that at Gateway Women's Care, we hold your right to confidentiality with the utmost care and respect and comply with HIPAA privacy standards, which protect your personal and health information.

Any and all communication and information exchanged between you and Gateway Women's Care is kept strictly confidential and is not released to any agency, family member or health care provider without your express permission.\*