

Gazelle Consulting, LLC - S.71



Dear Members of the Vermont Legislature,

My name is Christina Glabas and I am the owner and founder of Gazelle Consulting, LLC, a HIPAA focused data privacy and security firm out of Portland, Oregon since 2015. I served as a technical HIPAA expert for Oregon's DOJ Consumer Privacy Task Force for 4 years, contributing directly to consumer privacy legislation and have been retained as a legislative consultant by a state Attorney General for my expertise.

My professional background includes consulting extensively with healthcare entities, non-profits, and technology companies, particularly on compliance related to children's data protection and international privacy laws. I have seen over 100 businesses of all sizes, shape, scope, maturity, and motivation go through evolutions in data security maturity in the last 10 years. All businesses can and must do this work if we are to develop a resilient digital infrastructure and healthy digital citizens.

I am writing today to express my strong support for the Vermont Consumer Privacy Bill and to share critical insights gained through my experience as a HIPAA privacy consultant.

The Urgent Need for Digital Privacy Protections

On February 26th, 2025, Instagram Reels was inundated with explicit and violent content of the most soul-crushing kind imaginable. For hours, if not multiple days, all over the globe, millions of children worldwide were exposed to videos including an elephant stomping a man in half (and many worse than that), which went viral on the platform because no one could look away. This terrible incident, a global trauma event, vividly demonstrates the vulnerabilities inherent in our current digital platforms.

This troubling event serves as a stark reminder that digital safety must be addressed with the same seriousness and urgency as physical safety. Such failures profoundly impact psychological well-being, especially for younger users who are most vulnerable, the citizens of Vermont that were impacted by this or any other traumatic event online have a right to accountability and to withdraw their information from these sick systems.

Given Vermont's longstanding commitment to child welfare, it is critical that digital safety measures explicitly prioritize the protection of minors. Effective age verification and explicit parental consent are essential components for safeguarding young Vermonters from exposure to harmful digital content. Clear and actionable regulatory measures must be enacted immediately to protect our youth effectively.

Vermont has long prioritized the maintenance and improvement of physical infrastructure, recognizing these as vital to community well-being and safety. Digital privacy warrants equal prioritization as it has become foundational to our daily lives. By proactively managing algorithmic risks and establishing robust standards for digital infrastructure, Vermont can protect residents from exploitation and systemic privacy failures, ensuring a resilient digital future.

It is important to recognize that Vermonters' personal data generates significant economic benefits for corporations without corresponding benefits or adequate protections for consumers themselves. This economic imbalance calls for strong privacy protections to halt unchecked monetization of personal information.

Strong privacy standards will help rectify the current unfair economic landscape and ensure ethical treatment of Vermonters' data. Transparency is fundamental to maintaining and restoring public trust, especially following significant privacy incidents. Businesses must be legally required to communicate clearly about data collection, breaches, and prevention strategies. In addition, robust and enforceable accountability standards must be established to address corporate negligence and to safeguard citizens from digital harm.

Filling Critical Regulatory Gaps in Privacy and HIPAA Coverage

Through my professional experience consulting on HIPAA compliance, I have observed considerable gaps in existing regulatory frameworks. HIPAA currently applies only to health information directly linked to insurance transactions, leaving sensitive data related to social determinants of health—such as housing and food insecurity—largely unprotected. This regulatory gap creates confusion and risk for non-profit organizations and healthcare entities alike.

Vermont urgently needs comprehensive privacy standards through either expanded HIPAA Business Associate Agreements or robust state-level consumer privacy protections. It is critical that cybersecurity responsibilities are distributed clearly among all entities handling consumer data, and Vermont must avoid broad entity-level exemptions that risk undermining protections and consumer rights.

Vermont's Opportunity to Lead

Vermont has a distinguished history of pioneering civil protections. The passage of comprehensive digital privacy legislation provides a unique opportunity for Vermont to reinforce this legacy and to attract businesses and residents aligned with ethical practices and transparency. Given the bipartisan appeal of privacy issues, Vermont can unify stakeholders and act decisively to secure the well-being and economic resilience of our communities.

I urge you to support and pass this essential legislation, ensuring robust protection for Vermonters, fostering economic fairness, and maintaining Vermont's tradition of leadership in civil rights and consumer protection.

Thank you for your attention and consideration.

Christina Glabas
Owner / Founder
Gazelle Consulting, LLC