

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

CITY OF COLUMBUS, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States of
America, *et al.*,

Defendants.

No. 18-cv-2364-DKC

**DECLARATION OF BALTIMORE CITY
HEALTH COMMISSIONER LETITIA DZIRASA, M.D.**

I, Letitia Dzirasa, M.D., declare under penalty of perjury as prescribed in 28 U.S.C. § 1746:

1. The facts contained in this declaration are known personally to me and, if called as a witness, I could and would testify competently thereto under oath. I submit this sworn declaration in support of Plaintiffs' motion for summary judgment.

2. I am the Commissioner of the Baltimore City Health Department ("BCHD"), the oldest continuously-operating health department in the United States. Prior to joining the Health Department, I worked at Fearless Solutions, a Baltimore based digital services firm that builds custom software solutions for local and federal government clients. I have close clinical ties to the Baltimore community, having trained at the Johns Hopkins Hospital in pediatrics and having worked as medical director for school-based health and quality at Baltimore Medical System from 2013-2016. I obtained my M.D., summa cum laude, at Meharry Medical College in

Nashville, TN, and am currently earning a Masters in Health Systems Management from the University of Baltimore.

3. Baltimore is the largest city in Maryland and the thirtieth largest city in the United States, with a population of around 593,000, according to 2019 Census estimates.¹

4. 2019 Census estimates for the proportion of Baltimore's population without health insurance are unavailable. According to 2018 Census estimates, 8.2% of Baltimore's population under the age of 65 lacks health insurance.²

5. Plaintiff the Mayor and City Council of Baltimore ("Baltimore") is a municipal corporation, organized pursuant to Articles XI and XI-A of the Maryland Constitution, and entrusted with all of the powers of local self-government and home rule afforded by those articles.

6. The Baltimore City Department of Health is a City agency, see Baltimore City Charter, Article VII, §§ 54-56, that has wide-ranging responsibilities for providing health services to residents of the City, including those related to acute communicable diseases, chronic disease prevention, HIV/STD, maternal-child health, school health, and senior services. My duties as Commissioner include oversight of all BCHD health programs. BCHD is staffed by approximately 800 employees and has an annual budget of approximately \$126 million.³

¹ *QuickFacts*, U.S. Census Bureau, <https://www.census.gov/quickfacts/fact/table/philadelphiacitypennsylvania,baltimorecitymaryland,chicagocityillinois,cincinnati-cityohio,columbuscityohio,US/PST045219>.

² *QuickFacts*, U.S. Census Bureau, <https://www.census.gov/quickfacts/fact/table/philadelphiacitypennsylvania,baltimorecitymaryland,chicagocityillinois,cincinnati-cityohio,columbuscityohio,US/PST045219.aa>

³ *About the Baltimore City Health Department*, Baltimore City Health Dep't, <https://health.baltimorecity.gov/about>.

7. In particular, the Baltimore City Health Department operates a number of specialty clinics out of two principal facilities. These include clinics for reproductive health, sexually transmitted diseases, dental and oral health care, and immunizations.⁴

8. The Baltimore City Health Department also provides or subsidizes a number of other services for Baltimore's uninsured and underinsured residents. In particular, the Department funds a visiting-nurse program that makes house calls for individuals who tend to use ambulance services frequently, including those with chronic health conditions like diabetes, hypertension, asthma, and mental health disorders. The Department also funds a number of other programs focused on specific health conditions, including a Community Asthma Program, a Tuberculosis Control Program, a Childhood Lead Poisoning Prevention Program, and programs for substance abuse.⁵ And the Department subsidizes a number of other entities that provide services to Baltimore residents, including the Baltimore Family League and Health Care Access Maryland.

9. An increase in the uninsured rate will similarly impose additional burdens on each of these programs, and therefore require more funding from the city.

10. BCHD's programs face even more strain as a result of the novel coronavirus pandemic. In response to the pandemic, Baltimore City has mounted a comprehensive effort to

⁴ *Health Clinics & Services*, Baltimore City Health Dep't, <https://health.baltimorecity.gov/programs/health-clinics-services>.

⁵ *See, e.g., Asthma*, Baltimore City Health Dep't, <https://health.baltimorecity.gov/node/454>; *Health Clinics & Services*, Baltimore City Health Dep't, <https://health.baltimorecity.gov/programs/health-clinics-services>; *Childhood Lead Poisoning Prevention Program*, Baltimore City Health Dep't, <https://health.baltimorecity.gov/lead/lead-poisoning>; *Substance Use Disorder*, Baltimore City Health Dep't, <https://health.baltimorecity.gov/programs/substance-abuse>; *Tuberculosis*, Baltimore City Health Dep't, <https://health.baltimorecity.gov/node/164>.

connect city residents to housing, food, and other resources.⁶ BCHD clinics have shifted to appointment only and have significantly reduced hours and service coverage.

11. Finally, Baltimore—a city of nearly 600,000 people, with an approximately \$200 billion economy— is harmed by the need to care for a population that is increasingly uninsured. When individuals cannot seek medical treatment, they are necessarily less healthy, less productive, and less able to participate in city life. That has ripple effects throughout the City’s programs and the community.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: August 12, 2020

Baltimore, MD

A handwritten signature in black ink, appearing to read 'LD', with a long horizontal line extending to the right.

Dr. Letitia Dzirasa

⁶ See <https://coronavirus.baltimorecity.gov/>