

The Honorable Susan R. Donovan, Chair  
House Health & Human Services Committee  
Rhode Island General Assembly

April 23, 2025

Re: House Bill 5857 – the Reproductive Freedom and Gender-Affirming Care Data Privacy Act  
– OPPOSE

Dear Representative Donovan and Distinguished Committee Members,

Thank you for the opportunity to submit comments on House Bill 5857, which would enact the Reproductive Freedom and Gender-Affirming Care Data Privacy Act.

ACLI is proud of the fact that the insurance industry is a conscientious and responsible guardian of customers' highly vulnerable personal information, including health information. Insurers must collect and use health information to underwrite applications for new insurance policies and pay claims submitted under these policies. Our industry has judiciously managed consumers' confidential health information for decades.

Appropriately, insurers have long been subject to comprehensive federal and state laws and regulations governing the collection, use, storage, and disclosure of personal information. These include the Gramm-Leach-Bliley Act, Rhode Island Department of Business Regulation Rule 230-RICR-20-60-7 (Privacy of Consumer Information), and Rhode Island General Laws Sections 27-1-46 et. seq. and 27-2-29 et. seq. (Insurance Data Security). These existing federal and state requirements provide a complex, broad, and rigorous regulatory framework that requires our industry to protect the privacy, use, and security of customers' personal information. They reflect a critically important balance between consumers' legitimate privacy concerns and the proper use of personal information to the benefit of existing and prospective customers.

The financial services industry would be uniquely affected by the establishment of new privacy requirements at the state level. **For this reason, it is crucial that not only data, but also any entity subject to the GLBA be exempted from the scope of the bill.** An entity-level GLBA exemption would eliminate redundancy, complexity, and administrative costs for insurers, helping to avoid additional costs for consumers. It would facilitate seamless compliance for insurers by eliminating conflicting rules, and minimize unnecessary implementation costs, allowing insurers to allocate resources efficiently. An entity-level GLBA exemption is a proactive measure to foster clarity and consistency and mitigate confusion and uncertainty stemming from conflicting rules.

American Council of Life Insurers | 101 Constitution Ave, NW, Suite 700 | Washington, DC 20001-2133

---

The American Council of Life Insurers (ACLI) is the leading trade association driving public policy and advocacy on behalf of the life insurance industry. 90 million American families rely on the life insurance industry for financial protection and retirement security. ACLI's member companies are dedicated to protecting consumers' financial wellbeing through life insurance, annuities, retirement plans, long-term care insurance, disability income insurance, reinsurance, and dental, vision and other supplemental benefits. ACLI's 280 member companies represent 94 percent of industry assets in the United States.

For these reasons, we respectfully urge the Committee to amend H. 5857 to exempt entities subject to the GLBA. Thank you for considering our comments. Please contact me with any questions.

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized 'J' followed by a horizontal line and a small flourish.

Jill Rickard  
Regional Vice President—State Relations  
[jillrickard@acli.com](mailto:jillrickard@acli.com)