



March 10, 2026

The Honorable Carol Hagan McEntee, Chairwoman  
House Judiciary Committee  
State House  
Providence, RI 02903

Re: H.7509 An Act Relating to Criminal Offenses - Identity Theft Protection Act of 2015

Dear Chairwoman McEntee:

The undersigned members of the Rhode Island Business Coalition respectfully oppose the passage of H.7509, An Act Relating to Criminal Offenses – Identity Theft Protection Act of 2015 as it is currently written.

First, the proposal significantly expands the scope of regulated data by introducing a broad definition of “personally identifiable information,” which includes information that could identify an individual when combined with other data. Without clear boundaries, this definition may encompass a wide range of routine business records and digital identifiers, increasing compliance burdens across industries.

Second, the bill requires any entity that stores or processes personally identifiable information about Rhode Island residents to implement and maintain a “risk-based information security program” that aligns with an “approved and industry recognized cybersecurity framework.” While the intent is understandable, the bill does not clearly identify which frameworks would satisfy this requirement. This ambiguity may create uncertainty for employers and expose organizations to potential liability despite good-faith compliance efforts.

In addition, the legislation imposes new operational requirements such as mandated contractual cybersecurity standards for third-party vendors and strict breach notification timelines. While many businesses already implement similar safeguards, codifying these provisions without flexibility may impose additional administrative costs, particularly for small and mid-sized employers that lack extensive cybersecurity infrastructure.

While it is crucial to safeguard residents from identity theft, the current provisions may create more challenges than they resolve, particularly for smaller businesses.

The Rhode Island Business Coalition represents 50 industries and 6,280 businesses that employ 231,200 people throughout Rhode Island.

Thank you for your consideration of our concerns.

Sincerely,

David Chenevert, Chairman, Rhode Island Business Coalition

East Greenwich Chamber of Commerce

Greater Newport Chamber of Commerce

National Federation of Independent Business

Rhode Island Hospitality Association

Rhode Island Marine Trade Association

Rhode Island Small Business Economic Summit Regulations Committee

Rhode Island Small Business Economic Summit Tax and Budget Committee

Rhode Island Staffing Association

cc. House Judiciary Committee members