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TTY: 771
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May 21, 2026

The Honorable Melissa A. Murray, Chair
Senate Committee on Health and Human Services
State House
82 Smith St.
Providence, RI 02903

RE: S 3256 – An Act Relating to Health and Safety -- Public Health Data Privacy and Protection Act

Dear Chair Murray:

Please accept this letter regarding S 3256, legislation that would create the *Public Health Data Privacy and Protection Act* to limit the release and dissemination of data relating to reportable diseases and immunization administration in the possession of the Rhode Island Department of Health (RIDOH). This legislation was introduced at the request of RIDOH.

The Act would limit record-level Rhode Island Child and Adult Immunization Registry (RICAIR) and reportable disease data sharing. Record-level data can also be known as individual-level or line-level data. These data can include protected health information (PHI) and other identifiable information, or it could be redacted, limiting what information is included.

Currently, RIDOH has concerns about data stewardship, data utilization, data interpretation and potential re-identification of Rhode Islanders by matching RIDOH data to other public health datasets. Additional concerns include the fact that the US Department of Health and Human Services staff who have access to the data may conduct analyses without the authorization and review of RIDOH prior to dissemination. As stewards of confidential health information, RIDOH is legally and ethically obligated to ensure that such risks are minimized. Additional concerns include:

- The potential for data to be accessed by individuals or entities outside of State Health and Human Services oversight;
- Limited visibility regarding who is accessing the data, what analyses are being conducted, and for what purposes;
- Lack of advanced notice to jurisdictions regarding data access and use;
- Absence of mechanisms for review or approval prior to dissemination of analyses or findings;
- Risks related to misinterpretation or misuse of data outside appropriate public health context.

Thank you for the opportunity to support this important public health legislation which will, if enacted, ensure that immunization information collected within the State is managed, shared, and

protected in a manner that safeguards the privacy and confidentiality of personally identifiable health data; promotes transparency and accountability in data use; enables necessary public health surveillance and coordination; and builds and maintains public trust in public health and immunization programs.

Sincerely,

A handwritten signature in black ink that reads "Jerome M. Larkin" with a long horizontal flourish extending to the right.

Jerome M. Larkin, MD
Director

CC: The Honorable Members of the Senate Committee on Health and Human Services
The Honorable John P. Burke
Kristen Silvia, Director of Legislation and Deputy Chief of Staff
Patricia Resende, Director of Senate Policy