



March 31, 2026

The Honorable Victoria Gu  
Chair, Senate Artificial Intelligence & Emerging Technologies Committee  
Rhode Island State House  
Providence, Rhode Island 02903  
[Slegislation@rilegislature.com](mailto:Slegislation@rilegislature.com)

OPPOSE S 2638

On behalf of the Greater Providence Chamber of Commerce, I write to express our opposition to S 2638, which proposes significant amendments to the Identity Theft Protection Act of 2015.

We strongly support the goal of protecting Rhode Islanders' personal information and recognize the importance of maintaining robust cybersecurity practices. However, this legislation, as drafted, raises several concerns regarding implementation, cost, and the potential for unintended consequences for businesses operating in our state.

The bill expands existing requirements by mandating that any entity handling personally identifiable information implement and maintain a "risk-based information security program" aligned with evolving, industry-recognized cybersecurity frameworks. While this standard is conceptually sound, it introduces ambiguity and uncertainty for businesses—particularly small and mid-sized employers—who may struggle to interpret and continuously meet undefined "current best practices" as they evolve over time.

Additionally, the legislation imposes new and accelerated breach notification timelines, along with expanded reporting obligations to state agencies and other entities. These requirements may prove difficult to meet in the immediate aftermath of a cybersecurity incident, when businesses are focused on containment, investigation, and coordination with law enforcement. Rigid timelines, without sufficient flexibility, risk creating conflicting obligations and could ultimately hinder effective incident response.

The bill also significantly increases potential penalties for noncompliance on a per-record basis. While accountability is important, these enhanced penalties—particularly when combined with evolving and potentially unclear compliance standards—create substantial liability exposure for businesses acting in good faith. This could have a chilling effect on economic activity and discourage companies from expanding or locating in Rhode Island.

We are further concerned that the legislation may create duplication and inconsistency with existing federal standards and industry-specific regulatory frameworks. Many businesses are already subject to comprehensive cybersecurity requirements under federal law or sector-specific regulations. Layering additional state-specific mandates risks increasing complexity without necessarily improving outcomes for consumers.

For these reasons, the Chamber respectfully urges the Committee to oppose S 2638 as currently drafted. We welcome the opportunity to work with the sponsors and stakeholders to develop a more balanced approach—one that strengthens data protection while providing clear, achievable standards and recognizing the operational realities faced by Rhode Island employers.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, consisting of a stylized, continuous line that starts with a horizontal stroke, dips down, and then extends horizontally to the right.

Laurie White  
President  
Greater Providence Chamber of Commerce