



March 31, 2026

The Honorable Victoria Gu, Chairwoman
Senate Artificial Intelligence and Emerging Technologies Committee
State House
Providence, RI 02903

Re: S.2638 An Act Relating to Criminal Offenses - Identity Theft Protection Act of 2015

Dear Chairwoman Gu:

The undersigned members of the Rhode Island Business Coalition are writing to express concerns regarding S.2638, An Act Relating to Criminal Offenses – Identity Theft Protection Act of 2015 as it is currently written. We thank you for meeting with the Coalition to discuss our concerns and look forward to continued discussions on this legislation.

As a follow-up to our conversation, we believe having information regarding technology best practices on the Division of Enterprise Technology and Strategy Services (ETSS) website will be helpful for businesses. Thank you for discussing that with ETSS. We would suggest some additional language that would provide for some educational outreach to businesses, see below.

“The division of enterprise technology strategy and services shall institute an information campaign to educate the public, including but not limited to business owners, and employers, regarding the current best practices of an approved and industry recognized cybersecurity framework.”

In addition, we understand the reason for ETSS to receive notifications of a breach, however we would reiterate our suggestion that the Attorney General be tasked with sharing this information rather than additional reporting by businesses.

Lastly, 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.

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

We agree that it is crucial to safeguard residents from identity theft, we also want to ensure that businesses, particularly small businesses, have the tools needed to comply with the additional requirements.

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

Northern Rhode Island Chamber of Commerce

Rhode Island Bankers Association

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

TechNet

cc. Senate Artificial Intelligence and Emerging Technologies Committee members