



**TESTIMONY OF THE STATE ATTORNEY GENERAL
TWENTY-FOURTH LEGISLATURE, 2008**

ON THE FOLLOWING MEASURE:

S.B. NO. 2803, S.D. 1, RELATING TO PERSONAL INFORMATION.

BEFORE THE:

HOUSE COMMITTEE ON FINANCE

DATE: Wednesday, March 26, 2008 **TIME:** 12:30 PM

LOCATION: State Capitol, Room 308
Deliver to: State Capitol, Room 306, 2 Copies

TESTIFIER(S): Mark J. Bennett, Attorney General
or James C. Paige, Deputy Attorney General

Chair Oshiro and Members of the Committee:

The Attorney General opposes the placement of the Information Privacy and Security Council ("Council") within the Department of the Attorney General.

This bill implements the recommendations of the Identity Theft Task Force. The task force did not recommend placement of the Council within the Department of the Attorney General. The task force recommended that the Council be administratively attached to a different department. That department, which is special funded, testified that the Council would be more appropriately placed in a department that receives general funds.

However, the Department of the Attorney General is not the appropriate place for the Council. The extensive duties relating to both civil and criminal matters that are required of the Department of the Attorney General under chapter 28 of the Hawaii Revised Statutes are not consistent with expending limited resources to house and administratively support a separate state entity. While the Department of the Attorney General advises numerous boards and commissions, and would be available to advise the Council, that is entirely different from being required to provide support staff and facilities to an entity that serves an important but different purpose than the department. We therefore ask that the bill be

amended to remove the provisions that place the council within the Department of the Attorney General.



Testimony to the Twenty -Fourth State Legislature, 2008 Session
House Committee on Finance
The Honorable Marcus R. Oshiro, Chair
The Honorable Marilyn B. Lee, Vice Chair

Wednesday, March 26, 2008, 11:00 a.m. (Agenda # 3)
State Capitol, Conference Room 308

by

Thomas R. Keller
Administrative Director of the Courts

WRITTEN TESTIMONY ONLY

Bill No. and Title: Senate Bill No. 2803, S. D. 1, Relating to Personal Information.

Purpose: The purpose of Senate Bill No. 2803 is to implement the recommendations of the December 2007 report of the Hawaii identity theft task force to protect the security of personal information collected and maintained by state and county government.

Judiciary's Position:

The Judiciary supports the intent of this bill. Senate Bill No. 2803, S.D.1 establishes a comprehensive plan for the security of social security numbers and other personal information maintained by state government agencies. The Judiciary recognizes the need to protect against identity theft, and has already taken the initiative to implement practices similar to some procedures described in the bill.

The Judiciary submits the following comments on Sections 4, 9, 10, 14 and 15 of the bill:

Section 4 adds a new section, 487N-C, to Chapter 487N requiring reports to be submitted annually to the legislature containing comprehensive information on the existence and character of each personal information system of each government agency. The Judiciary strongly asks for your reconsideration of this requirement. Such an informative compilation of government personal information systems detailing how personal information is gathered, where this information is stored, what the information contains, the categories of individuals on whom personal information is maintained, etc, constitutes a welcome mat for those with less than



Senate Bill No. 2803, S. D. 1, Relating to Personal Information
House Committee on Finance
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honorable intentions. It begs for attention detrimental to those whose records are accessed and provides a convenient road map for any and all information on government employees.

Section 9 requires that government contracts for the performance of support services by third party vendors include provisions relating to the protection of personal information. The term "support services" may be too broad. There are many contracts, such as equipment maintenance or staff training, that may be considered support service contracts, but do not require the vendor to have access to personal information. Unless "support services" is further defined, there may be confusion on whether provisions for protecting personal information must be included in all support service contracts, even when the vendor does not have access to personal information.

Section 9 also specifies the types of provisions that must be in the contract. Many vendors have comprehensive security policies that may not necessarily include all of the provisions required by the bill. Yet, these policies are adequate for the services to be provided under the contract. The bill should establish guidelines, rather than requirements, for security provisions in government contracts. This approach would give agencies and vendors the flexibility to negotiate specific conditions, applicable to their particular contract, for the protection of personal information.

Section 10 of the bill requires agencies to develop and implement plans to protect and redact personal information before disclosing documents within the scope of Hawaii Revised Statutes (HRS) section 92F-12. HRS chapter 92F, however, includes provisions that prevent disclosure of personal information. HRS section 92F-14(b) lists the types of information, including social security numbers, in which individuals have a significant privacy interest. Pursuant to HRS section 92F-13(1), information in which individuals have a significant privacy interest is not subject to disclosure. The Judiciary's experience, both internally and with other agencies, is that government agencies are familiar with the provisions of HRS sections 92F-13 and 92F-14. Personal information is routinely redacted before government records are made available for public inspection.

Section 14 requires that agencies with primary responsibility for human resource functions develop recommended practices to minimize unauthorized access to personal information in various areas, such as personnel recruitment and payroll. The recommended practices must also include technical safeguards to ensure confidentiality of electronically transmitted information.

Human resource staff do not necessarily have the expertise to develop recommended practices in all of the areas described in Section 14. For example, human resource personnel do not have the expertise to make recommendations on best practices to safeguard electronically transmitted information. This section should provide agency heads and directors with more flexibility to designate the appropriate personnel to develop recommended practices.



Senate Bill No. 2803, S. D. 1, Relating to Personal Information
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Section 15 requires government agencies to develop written policies on notification of security breaches of personal information, including contents of the notification and manner in which notification shall be provided. This section duplicates HRS chapter 487N, which establishes legal requirements that government agencies must comply with in the event of a security breach of personal information.

Thank you for the opportunity to testify on Senate Bill No. 2803, S. D.1.

LINDA LINGLE
GOVERNOR OF HAWAII



MARIE C. LADERTA
DIRECTOR

CINDY S. INOUE
DEPUTY DIRECTOR

STATE OF HAWAII
DEPARTMENT OF HUMAN RESOURCES DEVELOPMENT
235 S. BERETANIA STREET
HONOLULU, HAWAII 96813-2437

March 25, 2008

TESTIMONY TO THE
HOUSE COMMITTEE ON FINANCE
For Hearing on Wednesday, March 26, 2008
12:30 p.m., Conference Room 308

BY

MARIE C. LADERTA, DIRECTOR

S.B. No. 2803, S.D. 1
Relating to Personal Information

WRITTEN ONLY

TO CHAIRPERSON OSHIRO AND MEMBERS OF THE COMMITTEE:

The purpose of S.B. No. 2803, S.D. 1, is to implement the recommendations of the December 2007 report of the Hawaii Identity Theft Task Force to protect the security of personal information collected and maintained by the State and county governments.

The Department of Human Resources Development (DHRD) has **concerns** with regard to Section 14.

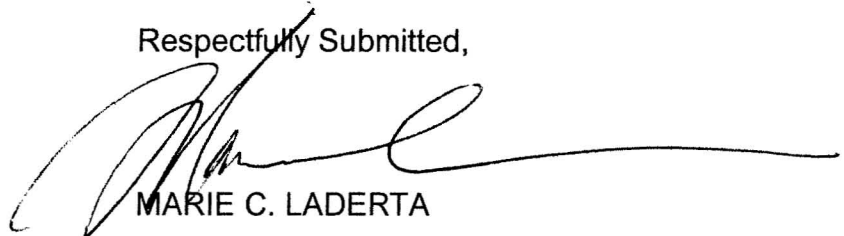
This section requires that the lead human resource agencies for the State and counties develop "written guidelines detailing recommended practices to minimize unauthorized access to personal information and personal information systems relating to personnel recruitment, background checks, testing, employee retirement and health benefits, time reporting and payroll issues". It also requires that the recommended practices developed by the human resource agencies address "Technological safeguards

to ensure the confidentiality and integrity of information transmitted over computer networks, laptop computers, and removable storage devices”.

While we recognize the value in developing such recommended practices, the State and County Human Resource agencies' staff do not have the expertise to provide guidance relating to the areas of employee retirement and health benefits, time reporting and payroll issues, nor in information technology safeguards.

Thank you for the opportunity to testify on this measure.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Marie C. Laderta', with a long horizontal flourish extending to the right.

MARIE C. LADERTA

Date of Hearing: March 26, 2008

Committee: House Finance

Department: Education

Person Testifying: Patricia Hamamoto, Superintendent

Title: S.B. 2803, SD 1 (HSCR1193-08), Relating to personal information

Purpose: To implement recommendations of the 12/2007 report of the Hawaii identity theft task force to protect the security of personal information collected and maintained by state and county government.

Department's Position: The Department of Education (Department) supports improving the security and protection of personal information collected and maintained by the State and counties. As a member of the task force, the Department recognizes the need for security measures to be enforced to protect personnel information. The Department has initiated several measures outlined by the report and will continue to enhance our existing technology and personnel management system.

LINDA LINGLE
GOVERNOR



RUSS K. SAITO
Comptroller

BARBARA A. ANNIS
Deputy Comptroller

**STATE OF HAWAII
DEPARTMENT OF ACCOUNTING
AND GENERAL SERVICES**
P.O. BOX 119
HONOLULU, HAWAII 96810-0119

TESTIMONY
OF
RUSS K. SAITO, COMPTROLLER
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
TO THE
HOUSE COMMITTEE
ON
FINANCE
ON
March 26, 2008

S.B. 2803, S.D. 1

RELATING TO PERSONAL INFORMATION

Chair Oshiro and members of the Committee, thank you for the opportunity to testify on S.B. 2803, S.D. 1.

The Department of Accounting and General Services (DAGS) supports the intent of this bill and has comments for this Committee to consider. This bill's intent is to implement the recommendations of the December 2007 report of the Hawaii Identity Theft Task Force, which were intended to protect the security of personal information collected and maintained by state and county government. A DAGS representative was a member of this task force and participated in the development of the December 2007 report.

This bill addresses broad policy and oversight responsibilities for the protection of personal information. However, it is not implementable in its current form. The bill

should specify the method of selection or the naming of the State and County members of the Information Privacy and Security Council.

To fulfill the bill's intent, the department or agency to which the council is assigned for administrative purposes should be an organization that has the ability to enforce policy directives across all jurisdictions of state and county governments.

It should be made clear that protecting the security of personal information goes beyond information technology and storage media. DAGS has two divisions that may be involved in implementing this bill. One division, the Information and Communication Services Division (ICSD) manages the information processing and telecommunication systems that provide services to various agencies of the State of Hawaii. The other division, the State Archives, is responsible for the official records of the State of Hawaii. Although both divisions can support the efforts of the Information Privacy and Security Council that this bill would establish, they do not enforce policy across all jurisdictions. They do establish standards for IT security and records retention, but these functions are not the main elements of protecting the security of personal information. Day-to-day operating procedures and personnel work habits have the greatest impact on the security of personal information. This argues for placing the responsibility for protecting the security of personal information directly on the departments and agencies themselves.

Thus, one might question the necessity of creating an Information Privacy and Security Council as an ongoing permanent agency. A transitional role may be more appropriate. As an alternative, this bill could be amended to establish a requirement for agencies to be audited on a regular schedule relative to their compliance with procedures for protecting the security of personal information. All State Executive Branch departments have procedures for complying with the identity theft laws passed by this

legislature. Enforcement of procedures and implementation of corrective actions arising out of an audit would be a management responsibility.

Thank you for the opportunity to testify on this matter.



UNIVERSITY OF HAWAII SYSTEM

Legislative Testimony

Written Testimony Presented Before the
House Committee on Finance
March 26, 2008 at 12:30pm

by

David Lassner

Vice President for Information Technology and Chief Information Officer
University of Hawai'i

SB 2803, SD1 – RELATING TO PERSONAL INFORMATION

Chair Oshiro, Vice Chair Lee and Members of the Committee:

The University applauds the Legislature's concern for protecting Hawai'i's citizenry from identity theft. However, we oppose several provisions of the current legislation as proposed.

In the spirit of supporting improved protection of personal information held in the public sector, the University offers the following specific comments:

- 1) The University strongly opposes the creation of the Annual Report on Systems with Personal Information (proposed as §487N-C). The very creation of such a report creates significant new risks for Hawai'i's citizens by establishing a convenient "one-stop shop" for interested hackers and criminals who are targeting personal information in Hawai'i. Any perceived value in creating such a report is more than outweighed by the new risks created by a new public record that gives criminals assistance in finding governmental systems that contain personal information.

The University suggests that the current provisions be replaced with more general language that simply specifies that each agency, in support of their internal programs of protection of personal information, shall be responsible to maintain an inventory of all information systems that include personal information. The legislation must ensure that any such inventories remain confidential and fully protected from disclosure notwithstanding any other rules or statutes.

- 2) They University strongly opposes the provisions in Part VII that would require the elimination of all governmental uses of the Social Security Number (SSN) other than where required by law. While we no longer use the SSN as a primary identifier in any of our information systems, the fact remains that the SSN was used as an identifier in the past and is still an important element in establishing identity for legitimate purposes. For example, the University would have no way of establishing the identities of hundreds of thousands of our past students without the use of the

Social Security Number, which was formerly used as the Student ID number.

The Social Security Administration notes that:

"The Privacy Act regulates the use of Social Security numbers by government agencies. When a federal, state, or local government agency asks an individual to disclose his or her Social Security number, the Privacy Act requires the agency to inform the person of the following: the statutory or other authority for requesting the information; whether disclosure is mandatory or voluntary; what uses will be made of the information; and the consequences, if any, of failure to provide the information."

We fully support the requirement for development of alternative unique identifiers and have replaced the SSN's use for this purpose in our student and human resources information systems. We urge that the legislature not frustrate our ability to serve our customers throughout the state with overly restrictive legislation that goes so far beyond federal requirements and Social Security Administration guidelines.

- 3) The University notes that a number of new compliance mandates are established in the current draft without specific funding. The bill recognizes the substantial costs associated with some of these new mandates and invites agencies to prepare budget requests for addressing certain requirements. We request that the bill link compliance mandates with the appropriation and release of the funding for each of the provisions that will create new administrative workload for agencies.

Finally, the University notes that while government agencies, including the University, must protect the personal information with which they are entrusted, a singular focus on governmental protection of personal data is a small part of protecting the public against identity theft. National data tells us that:

- More personal data is lost by the private sector than the public sector;
- Most identity theft is not the result of data breaches; and
- Most losses of personal data do not result in identify theft.

True protection against identity theft will only occur with changes in the credit industry, which is where the crime actually occurs. This is of course a much more difficult target for reform.

Nonetheless, the University takes the protection of the personal information with which we are entrusted very seriously, and is will to work with the Legislature to help craft legislation that will reduce risks for Hawai'i's citizenry.

DEPARTMENT OF HUMAN RESOURCES

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR



KENNETH Y. NAKAMATSU
DIRECTOR

March 26, 2008

The Honorable Marcus R. Oshiro, Chair
and Members
House Committee on Finance
State Capitol
Honolulu, Hawaii

Dear Chair Oshiro and Members of the Committee:

I am Ken Y. Nakamatsu, Director of Human Resources, City and County of Honolulu. Senate Bill 2803, SD1 implements the recommendations of the Identity Theft Taskforce. We support the intent of this measure and are committed to working to protect the personal information of our employees and applicants. However, we offer the following comments on Section 14 of the bill.

Section 14 of the bill requires that the Central Human Resources Agency for each government jurisdiction provide guidance on practices to protect personal information. Although we support the idea of providing such guidance, we note that the bill places under our control areas that are covered by other agencies—specifically employee retirement and health benefits, and time reporting and payroll issues. We believe the agencies primarily responsible for these areas are in the best position to set standards on their documents and systems. In addition, we note that the bill requires that Human Resources establish recommended practices for information technology related areas—such as practices to secure electronic records, personal information systems, and the transmission of information over computer networks. We do not believe that Human Resources is best suited to establish recommended practices in the information technology area.

We reiterate our support of the intent of this measure.

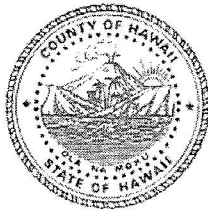
Thank you for the opportunity to testify on SB 2803, SD1.

Sincerely,

A handwritten signature in cursive script that reads "Ken Y. Nakamatsu".

Ken Y. Nakamatsu
Director of Human Resources

Harry Kim
Mayor



Michael R. Ben, SPHR
Director of Human Resources

Ronald K. Takahashi
Deputy Director of Human Resources

County of Hawai'i Department of Human Resources

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March 26, 2008

The Honorable Marcus R. Oshiro, Chair
And Members of the Committee on Finance
House of Representatives
State Capitol
Honolulu, HI 96813

Dear Chairman Oshiro and Members of the Committee on Finance:

Re: SB 2803, SD 1 Relating to Personal Information.

I am Michael R. Ben, Director of Human Resources for the County of Hawai'i. While we support the intent of this bill and will work towards protecting personal information retained by government agencies, I am testifying to ask for your reconsideration of this bill so as to achieve a more effective, methodical, and efficient means of implementing the recommendations of the Identify Theft Taskforce.

SB 2803, SD 1 in its present form is unduly burdensome

As proposed, SB 2803 SD 1 places unduly burdensome requirements on hundreds of government agencies, every one of which, in all probability, will not know where to begin in their attempt to comply with this bill. They will be doing so with no designated agency that will assist and help them with issues which may arise in the implementation of SB 2803 SD 1. Chaos will be created among all government agencies as they seek to comply with SB 2803 SD 1. People will be inventing and reinventing the wheel as they seek to comply with SB 2803 SD 1.

While the SB 2803 SD 1 will create an information privacy and security council, the staffing appears wholly inadequate for the task the council will undertake and the timetable afforded it. The council will be burden with requests from the hundreds of designated agency employees seeking guidance and assistance from them, notwithstanding the fact that providing such guidance and assistance will not be a function of the council. Likewise, the respective attorney offices of the various jurisdictions will be will overwhelmed with requests for

The Honorable Marcus R. Oshiro, Chair
And Members of the Committee on Finance
March 26, 2008
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assistance and guidance in order to comply with the requirements imposed by the bill.

Create central agency responsible for implementing the identify theft task force recommendations.

I do not believe that the proposed council or the respective attorney offices are prepared and have the necessary knowledge to assist the hundreds of government agencies affected by SB 2803 SD 1.

Please consider establishing an agency whose responsibility will be to implement the identity theft task force recommendations or those recommendations the legislature support. This agency would be responsible for determining how best to achieve the goals and objectives behind the recommendations of task force. It will be central source of information and the authority on the subject matter.

Provide the agency with appropriate levels of staffing, and charge it with providing guidance and assistance to all state and county government agencies in how to protect the security of personal information collected and maintained these state and county agencies.

Section 14 Requirements

SB 2803 SD 1 makes erroneous assumptions on the authority and responsibilities of the lead human resource management agencies of the State and counties. For example, responsibility for protecting all information, not only personal information, in our central computer systems does not rest with our department but with our data systems department. Data systems department has this responsibility because, among other things, they have the necessary expertise to develop and implement physical safeguards for the information. Naturally, they would be in consultation with us to discuss appropriate safeguards for our information.

Again, I ask that you consider establishing an agency as I have requested above.

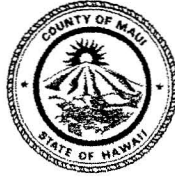
Thank you.

Sincerely,



Michael R. Ben, SPHR
Director of Human Resources

CHARMAINE TAVARES
Mayor



LYNN G. KRIEG
Director

LANCE T. HIROMOTO
Deputy Director

COUNTY OF MAUI
DEPARTMENT OF PERSONNEL SERVICES

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March 25, 2008

The Honorable Marcus Oshiro, Chair
and Members of the Committee on Finance
The House of Representatives
State Capitol
Honolulu, HI 96813

Dear Chair Oshiro and Members of the Committee:

RE: SB 2803, SD1 Relating to Personal Information

I am Lynn G. Krieg, Director of Personnel Services for the County of Maui, and while we support the intent of this measure, we also have some grave concerns about the reasonableness and reality of its far reaching goals and timetable.

In its current form I feel that SB 2803, SD1 is too burdensome and unwieldy. It places burdensome requirements on hundreds of government agencies, regardless of size, function and/or location with no provisions for exceptions or designated agency guidance. What I envision is either total chaos or a total apathetic "no response" for lack of knowing what to do and where to turn for assistance. Perhaps the creation of a central agency to implement the identity task force recommendations is a more viable alternative. This agency could function similar to the function of the Office of Information Practices and act as the "go to" agency for legal opinions, procedural clarifications, etc.

I also have serious issues with Section 14 of this measure as it makes giant assumptions regarding the Central Human Resources Agencies in the various government jurisdictions when it assumes that each human resources agency has control over its jurisdiction's employee retirement and health benefit information, its time reporting processes, its payroll issues, and, much less, the jurisdiction's information technology functions. Each jurisdiction may handle each of these areas differently, but the bottom line concern is that the agencies primarily responsible for these areas are in the best position to set standards on their documents and systems.

As previously stated, while I support the intent of this measure, I feel there are some serious issues that must be addressed.

Thank you for the opportunity to submit written testimony on this measure.

Sincerely,

A handwritten signature in black ink, appearing to read "Lynn G. Krieg".

LYNN G. KRIEG
Director of Personnel Services

cc: Mayor Charmaine Tavares

HAWAII FINANCIAL SERVICES ASSOCIATION

c/o Marvin S.C. Dang, Attorney-at-Law

P.O. Box 4109

Honolulu, Hawaii 96812-4109

Telephone No.: (808) 521-8521

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March 26, 2008

Rep. Marcus R. Oshiro, Chair,
and members of the House Committee on Finance
Hawaii State Capitol
Honolulu, Hawaii 96813

Re: **Senate Bill 2803, Senate Draft 1 (Personal Information)**
Hearing Date/Time: Wednesday, March 26, 2008, 12:30 P.M.

I am the attorney for the **Hawaii Financial Services Association ("HFSA")**. The HFSA is the trade association for Hawaii's financial services loan companies.

The HFSA **supports** this Bill.

The purpose of this Bill is to implement recommendations of the December 2007 report of the Hawaii Identity Theft Task Force to protect the security of personal information collected and maintained by the State and County governments. The December 2007 Report of the Identity Theft Task Force is a continuation of the work that started with the State's Anti-Phishing Task Force which was created in 2005.


I was appointed by the Senate President to be a member of the Hawaii Identity Theft Task Force as a representative of the financial services industry. I served as Vice Chair of that Task Force. I was also a Senate President appointee of the predecessor Anti-Phishing Task Force.

The members of the Identity Theft Task Force agreed that much needs to be done within the State and County governments to protect people's personal information that exists in millions of government records. Social security numbers and other personal information have been available to the public in the Judiciary's court files and at the Bureau of Conveyances. While other government records with personal information are not open to the public, those records need to be safeguarded. The Report's recommendations address these concerns.

One key recommendation of the Task Force involves the creation of an entity (information privacy and security council) attached to a State executive branch department. The entity would develop guidance and best practices to improve personal information security measures for State and County government agencies. The entity would also review plans of the agencies to reduce the collection and use of social security numbers.

A proposed H.D. 1 being circulated would put the council with the Department of Accounting and General Services. Additionally, an identity theft task force working group would be created to provide continuity from the work of the Identity Theft Task Force. Because safeguarding the personal information of our citizens needs to be given a high priority, we urge your Committee to pass this Bill as amended by the proposed H.D. 1.

Thank you for considering this testimony.


MARVIN S.C. DANG

Attorney for the Hawaii Financial Services Association

Members: American General Financial Services of Hawaii, Inc./American International Group • Beneficial Hawaii, Inc./HSBC North America • CitiFinancial, Inc./Citigroup • House of Finance, Inc. • Kauai Island Finance, Inc. • Maui Industrial Loan & Finance Company, Inc. • Safety Loan Company, Ltd. • Wells Fargo Financial Hawaii, Inc./Wells Fargo Financial, Inc.



Representative Marcus Oshiro, Chair
Representative Marilyn Lee, Vice Chair
Committee on Finance
State Capitol, Honolulu, Hawaii 96813

HEARING Wednesday, March 26, 2008
 Agenda #3 / 12:30 pm
 Conference Room 308

RE: SB2803, SD1, Relating to Personal Information

Chair Oshiro, Vice Chair Lee, and Members of the Committee:

Retail Merchants of Hawaii (RMH) is a not-for-profit trade organization representing about 200 members and over 2,000 storefronts, and is committed to support the retail industry and business in general in Hawaii.

RMH supports SB2803, SD1, which implements the recommendations of the Identity Theft Task Force.

As a member of the Identity Theft Task Force, representing retail and the small business community, I was enlightened and sometimes appalled with the complexity of the issues and the gravity of the concerns of government and private industry. SB2803, SD1 provides recommendations, guidelines and best practice solutions that will help us all accomplish our goals.

Thank you for your consideration and for the opportunity to comment on this measure.

A handwritten signature in cursive script, appearing to read 'Carol Prejill'.

President