



June 1, 2026

The Honorable Christopher Cabaldon
 Chair, Senate Committee on Privacy, Digital Technologies, and Consumer Protection
 1020 N Street, Room 568
 Sacramento, CA 95814

Re: **AB 1337 (Ward): Information Practices Act of 1977
 As amended May 23, 2025 – OPPOSE
 To be heard in the Senate Committee on Privacy, Digital Technologies,
 and Consumer Protection June 8, 2026**

Dear Chair Cabaldon,

On behalf of the California State Association of Counties (CSAC), the Urban Counties of California (UCC), the Rural County Representatives of California (RCRC), the League of California Cities (Cal Cities), California Special Districts Association (CSDA), the Association of California Healthcare Districts (ACHD), County Welfare Directors Association of California (CWDA), California Association of Public Hospitals and Health Systems (CAPH), California Association of Joint Powers Authorities (CAJPA), the County Health Executives Association of California (CHEAC), the Association of California School Administrators (ACSA), the California School Boards Association (CSBA), the California Municipal Clerks Association (CMCA), the District Hospital Leadership Forum (DHLF), the California Hospital Association (CHA), the California Association of Recreation and Park Districts (CARPD), and the Emergency Medical Services Administrators' Association of California (EMSAAC), we write to respectfully oppose AB 1337 (Ward), which would amend the Information Practices Act of 1977 ("IPA," or "the Act") and apply it to all 58 counties, 483 cities, over 1,000 school districts and county offices of education, approximately 2,200 independent special districts, and the hundreds of JPAs, regional bodies, and other public agencies.

AB 1337 raises significant questions regarding how state and local agencies can continue to operate critical safety net programs and impose severe restrictions on data sharing in ways that undermine integrated service approaches that support timely and efficient access to essential benefits for Californians.

AB 1337 ignores the myriad of privacy and confidentiality laws already in place for local governments and, instead, imposes an unclear set of provisions that create conflicts with longstanding confidentiality laws, complicate data reporting needed for accountability efforts, and endanger federal funding, among other risks. This is a costly, unnecessary change that could jeopardize essential services and harm the communities we serve: students, the unhoused, the elderly, and those on the economic margins who rely on public services for healthcare, housing, energy, and the services that comprise the social safety net.

While AB 1337 has many provisions, at its core are three new overlapping restrictions for how local agencies manage public data:

- *Use* of data is constrained to only the purpose for which it was collected, except as authorized or required by state law [Civil Code § 1798.20(b)];
- *Transfer* of data, including between state and local agencies, must be necessary both to perform constitutional and statutory duties and must “further the purpose” for which the data were collected [Civil Code § 1798.24(e)]; and
- *Disclosure* of data, including reporting of aggregated data, is prohibited if it could, instead of the current standard that it would, identify an individual to whom it pertains [Civil Code § 1798.24].

Amendments Do Not Address Core Concerns

The proposed amendments fail to resolve our core concerns with the bill. Even with the proposed amendments, AB 1337 continues to severely restrict how local agencies and the state can use, transfer, or report public data and subjects public agencies to significant costs and implementation challenges. These challenges would include overhaul and, likely, replacement of systems and databases used to store personal information, substantial new training and compliance costs, and interpretation questions that would undoubtedly require resolution through litigation.

Creation and maintenance of databases requires considerable resources and time. For example, the California Statewide Automated Welfare System (CalSAWS) is used

by all 58 counties to streamline eligibility determination, enrollment, and case management for CalWORKs, CalFresh, Medi-Cal CMSP, foster care, and other social safety net programs. The project required many years of work and resources before it could be adopted statewide¹. AB 1337 could completely undo those efforts and require a full redesign of the system, with just a year to accomplish it and unknown impacts to actual service delivery. This is just one example of the costly and labor-intensive efforts that would be required by this bill. Countless other programs at the state and local level would require a similar rapid overhaul, compelling like changes to databases, data use agreements, bargaining agreements, policies, and general operations.

While the costs, liability, and burdensome compliance are certainly a top concern, our primary reason for opposing the bill is due to the bill's negative impacts on delivery of services by public agencies. H.R. 1 was designed to remove millions from Medi-Cal and CalFresh through the burdens of paperwork. AB 1337 would compound the consequences of that law and make it even harder for Californians to access needed services.

Complicates Data Sharing and Reporting

Local agencies and the state have made considerable progress in providing wraparound services to those most in need by improving connectivity of resources. This progress has been made under the "no wrong door" approach. AB 1337 would undermine this hard-earned progress.

The proposed amendments to Civil Code § 1798.24(d) & (e) would prohibit government agencies from sharing data with other government agencies unless it "furthers the purpose," for which the data were collected. This vague definition creates more questions than answers compared to the current standard that the data are shared in a way that "is related to," or "compatible with" the purpose for which the information was acquired.

AB 1337 will make benefit applications more time consuming and less efficient by requiring repeated collection of information, representing a step backwards at a time when local agencies are trying to make the public benefit application process simpler and more efficient.

AB 1337 would complicate the efforts of the CalAIM Justice-Involved initiative, which relies on information sharing to ensure that the justice-involved community is connected to healthcare services as they re-enter the community. These same

¹ [CalSAWS Executive Overview](#)

concerns apply to local reentry resource centers, which provide a range of services to help justice-involved individuals reestablish themselves in the community.

By requiring individuals to opt into data sharing, reporting will be biased towards those who choose to opt into sharing their data – creating unknown impacts that will make it harder to discern which populations are underrepresented in service delivery. Civil Code § 1798.24 would prohibit agencies from disclosing any data that *could* identify an individual, rather than the current standard that disclosure *would* identify an individual. This change could have a severe chilling effect on reporting outcomes of public services. Public employees could reasonably choose not to publish reports that, while designed to account for service delivery across demographic and economic strata, could place them at risk of a misdemeanor. We are concerned this provision could undermine the understanding of how agencies succeed or fail to deliver services, weakening public accountability.

Hampers Abilities to Respond to Unlawful Activity

The proposed law would severely restrict the ability of a public agency to respond to a criminal act. The proposed amendments to delete Civil Code § 1798.24(l) & (o) would remove longstanding exceptions to the act that allow disclosures in response to a search warrant or to aid an investigation into unlawful activity.

This change would put agencies in an absurd position when they have knowledge about a member of the public implicated in a crime. If this law were to take effect, agencies would have to obtain permission from an accused individual before they could share identifying information needed to aid an investigation or fulfill a search warrant. Further, local agency employees could be accused of obstruction charges or other penalties from noncompliance in response to search warrants.

For agencies responsible for child and family services, this change could restrict information sharing with law enforcement in ways that could endanger child safety and make it harder for those agencies to evaluate risk and safety. Social workers could be held liable with a misdemeanor or termination for attempting to ensure child safety – an outcome that is clearly not the intent of this bill, but an example of the unintended consequences created when bills are drafted without an understanding of the practical application of its language or the input of impacted local agencies.

Expands Legal Liability for Public Agencies and their Workforce

In addition to applying the IPA to local agencies, the bill would revise the law in several ways that will expose agencies and their workforce to new legal liabilities,

including through a private right of action. The bill would amend Civil Code § 1798.24 to prohibit disclosure of any personal information that “could,” link the information to an individual, rather than the current standard that prohibits disclosure of information that “would,” link to an individual. This change alone will dramatically redefine the IPA in ways that will impose uncertainty on how agencies can share data needed to report outcomes or comply with state and federal grant requirements.

AB 1337 adds to these concerns by expanding liability for public employees. The proposed change to Civil Code § 1798.55 would expose public employees to discipline, including termination, for “negligent” violations of the act, a broad expansion of the current standard for “intentional,” violations. Additionally, the proposed change to Civil Code § 1798.57 would expose public employees to misdemeanor charges even if there is no economic loss or personal injury due to a disclosure. At a time when public agencies are facing serious workforce recruitment and retention challenges, now is not the time to expose public employees to legal liabilities arising from compliance with a law that is suddenly imposed upon them. In addition to damaging the public workforce, these provisions will add to local agency liability as they will be required to respond to legal claims for penalized employees.

Ignores and Conflicts with Existing Privacy and Confidentiality Laws

Local agencies are already required to comply with a variety of state and federal data privacy laws tailored to conform with specific programs, including the following examples.

Health

- The Health Insurance Portability and Accountability Act (HIPAA) and the Confidentiality of Medical Information Act (CMIA) regarding Medi-Cal beneficiaries and those receiving care at public hospitals;
- 42 CFR Part 2 for confidentiality of substance use disorder patient records;
- Welfare and Institutions Code (WIC) § 5325.1 regarding the right to privacy for persons receiving treatment for a mental illness;
- WIC § 827 regarding the right to privacy for juvenile records; and
- Penal Code § 13823.5(c)(2) regarding confidentiality of sexual assault examination records.

Social Services

- WIC § 10850 *et seq.* regarding confidentiality of applications and records related to public social services;

- WIC § 17006 regarding confidentiality of county general assistance records;
- WIC § 17006.5 regarding disclosure of county general assistance records to law enforcement;
- WIC § 14100.2 regarding confidentiality and management of Medi-Cal records; and
- Penal Code § 11675 for case records related to child protective services claims.

Elections

- Elections Code §§ 2166, 2166.5, and 2166.7 regarding requests for confidentiality of voter records;
- Elections Code § 2194 regarding confidentiality of an affidavit of voter registration and limitations on its use; and
- Elections Code § 17100(c) regarding limitations on public access to nomination documents and petitions.

Schools

- Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g) regarding students' privacy.

Criminal Justice

- Penal Code § 11100 *et seq.* regarding custody of criminal records and statistics;
- Penal Code § 11164 *et seq.* regarding confidentiality of child abuse and neglect reports; and
- Penal Code § 13100 *et seq.* regarding records and data for criminal offenders.

Finance

- Revenue and Taxation Code §§ 63.1(i) and 69.5(n) regarding confidentiality of property transfer records; and
- Revenue and Taxation Code §§ 408, 408.1, 408.2, 451, 481, and 1609.6 regarding the confidentiality and disclosure rules related to assessor duties.

Public Utilities

- Public Utilities Code § 8381 for customers of publicly-owned utilities.

Libraries

- Gov. Code § 7927.105 for confidentiality of registration and circulation records of library users; and

- Welfare and Institutions Code §§ 10850 and 14100.2 for confidentiality of records and data sharing of personal identifying information.

In addition to state and federal law, several counties have adopted local ordinances and established departments specifically focused on data privacy and confidentiality.

Put simply, local agencies take data privacy and confidentiality seriously and comply with a network of specific privacy and confidentiality laws. AB 1337 upends this longstanding framework with a blanket policy that directly conflicts with many existing laws or creates confusion and inconsistent compliance based on how agencies are used to compliance. While the California Consumer Privacy Act expressly provides that its requirements do not apply to information governed by CMIA, AB 1337 provides only a limited acknowledgement of its conflicts with CMIA.

For example, under HIPAA, de-identified individual data cannot be disclosed without authorization. However, population-level data are generally available to the public for statistical research if the data cannot reasonably ascertain an individual's identity. HIPAA includes significant detail as to how disclosures and covered entities are required to provide an accounting of disclosures to individuals. AB 1337 imposes a new overlapping requirement that any data disclosed "cannot identify any individual," creating a confusing standard that competes with longstanding principles.

To cite another conflict, HIPAA allows covered entities to disclose protected health information without an individual's consent for purposes including treatment, payment, or health care operations². AB 1337 ignores these carefully designed rules and imposes significant uncertainty as to how patient data can be shared for delivery of medical care by public hospital systems.

County child welfare and behavioral services laws restrict even acknowledging whether an individual is receiving care, unless an entity is specifically authorized by law³. AB 1337 establishes contrary rules that endanger child privacy by allowing for the release of information upon consent and by other circumstances established in Civil Code § 1798.24.

² 5 C.F.R. § 164.502(a)(1)

³ California Welfare & Institutions Code § 827 et seq. (child welfare); 42 C.F.R. Part 2 (behavioral health); Lanterman-Petris-Short Act (behavioral health).

Endangers Federal Funding

AB 1337 would prohibit data sharing with the federal government unless expressly authorized by state law. This change alone could threaten federal funding agreements and create preemption issues that local governments would be forced to navigate. By restricting data sharing with the federal government, vital funding for homelessness services, public health grant programs, victim witness programs, and task forces to combat human trafficking, among others, would be threatened.

Imposes Expensive and Sudden Requirements on Local Agencies

The bill in its current form does not account for the vast technical effort that would be required for thousands of state and local agencies to come into compliance. The effort would certainly require considerable technological changes, including in many cases new equipment, coding for proprietary systems, and software purchases—in addition to legal analysis and guiding, as well as staff training efforts.

The Act was not designed with local agencies in mind and is peppered with requirements that do not make sense in that context. Application of the IPA to local agencies would not only require time and staff capacity, but would also require significant financial resources that are not provided in the bill. AB 1337 clearly imposes a state mandate by requiring a new program and higher level of service for data management. State mandates require reimbursement to local agencies and, in this case, could total many millions of dollars just for the initial implementation, not including the ongoing support needed to sustain compliance.

Even though section 32 of the bill asserts that no reimbursement is required by the act, we believe the bill clearly mandates considerable new obligations for local agencies: compliance with the IPA, which requires significant changes to software, internal practices, and duties of local agency workforces.

To add to these challenges, the bill allows state and local agencies little time to prepare for compliance. Because the bill would take effect January 1, 2028, and because state and local agencies may not know if the bill will become law until the Governor's September 30, 2026, deadline to sign or veto bills, state and local agencies could have a little more than a year to prepare for compliance with the amended IPA. Agencies would be compelled to rapidly complete legal review, train staff, update forms, and implement new procedures for data management without any financial resources and in the midst of the dramatic workload changes that are anticipated with implementation of H.R. 1.

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Heightens fiscal pressure on public agencies

Public agencies are facing considerable cost pressure from all fronts and AB 1337 creates a new, costly mandate without a clear need. These burdens have been proposed in light of existing statutory protections for public employees as well as locally bargained labor agreements.

For schools, local educational agencies (LEAs) are facing fiscal strains due to declining enrollment, growing special education program demands and health care costs. For counties, implementation of H.R. 1. is expected to result in up to [\\$9.5 billion in new annual costs to counties](#) once fully implemented as it fundamentally shifts certain administrative fiscal responsibilities for safety net programs to counties. For all public agencies, liability exposure due to AB 218-related claims and general liability claims is resulting in multi-million-dollar settlements and unpredictable special assessments that grow each year.

Collectively, these forces are significantly straining public agency budgets, impacting not just health and human services programs, but all essential services that public agencies provide that serve all California communities. In this fiscal environment, we are deeply concerned about legislation that has new costs or that places additional workload pressures on public agencies.

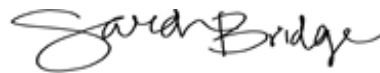
Put simply, we do not believe the costs, burden, and risks brought by this bill are necessary for public agencies.

For the reasons above, we must respectfully oppose AB 1337 and urge your “no” vote.

Sincerely,



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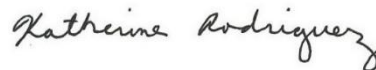
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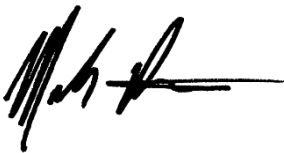
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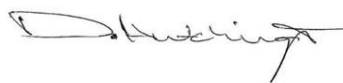
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