

SENATE JUDICIARY COMMITTEE
Senator Thomas Umberg, Chair
2021-2022 Regular Session

AB 56 (Salas)
Version: April 12, 2021
Hearing Date: June 29, 2021
Fiscal: Yes
Urgency: No
CK

SUBJECT

Benefits: outgoing mail: claim processing: reporting

DIGEST

This bill extensively regulates the Employment Development Department (EDD). The bill requires EDD to conduct comprehensive assessments of its operations, including its fraud prevention efforts and claimant services. The bill places a number of reporting responsibilities on EDD and mandates specified plans and policies be implemented.

EXECUTIVE SUMMARY

During the COVID-19 pandemic, the economic disruption led to a dramatic rise in unemployment claims. Within nine weeks of the beginning of the pandemic, 38.6 million claims had been filed for unemployment in the United States, or roughly one out of four people working before the pandemic hit.¹ By mid-July, the number surpassed 51 million.² As reported by the FBI, with the rise came a “spike in fraudulent unemployment claims complaints related to the ongoing COVID-19 pandemic involving the use of stolen personally identifiable information.”³

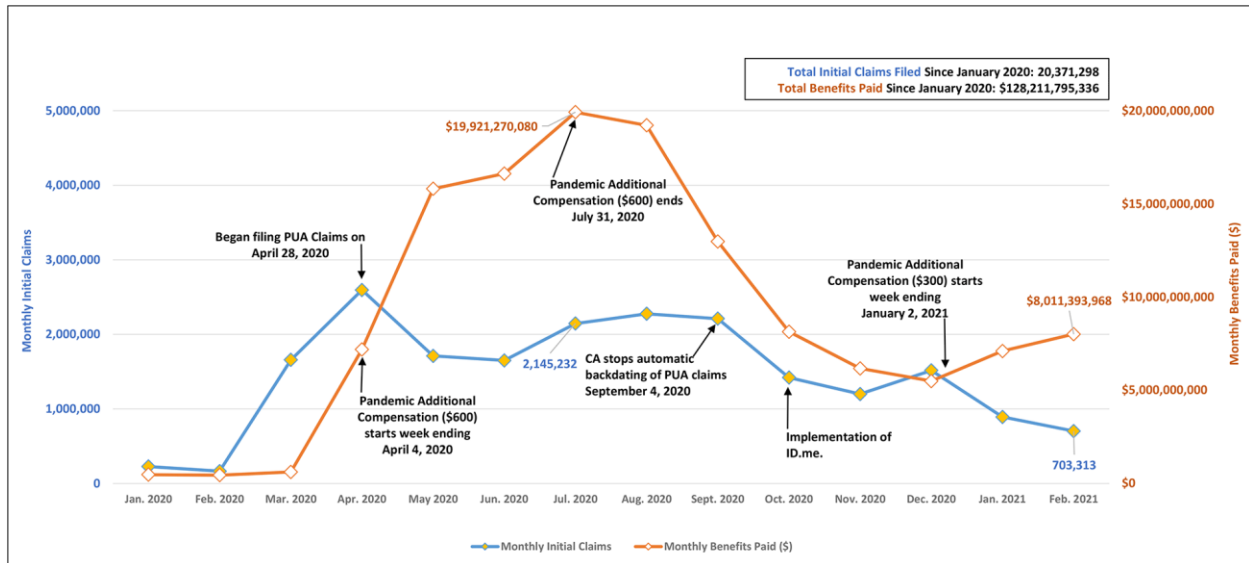
In California alone, EDD reported processing a total of approximately 11.9 million unemployment claims in the first six months, as seen in the chart below, and EDD has acknowledged the attendant rise in fraud.⁴

¹ Scott Horsley, *38.6 Million Have Filed For Unemployment Since March* (May 21, 2020) NPR, <https://www.npr.org/sections/coronavirus-live-updates/2020/05/21/859836248/38-6-million-have-filed-for-unemployment-since-march>. All internet citations are current as of June 14, 2021.

² Danielle Echeverria, *More than 51 million have filed for unemployment under shelter-in-place* (July 16, 2020) San Francisco Chronicle, <https://www.sfchronicle.com/business/article/More-than-50-million-have-filed-for-unemployment-15412510.php>.

³ Press Release, FBI Sees Spike in Fraudulent Unemployment Insurance Claims Filed Using Stolen Identities (July 6, 2020) FBI, <https://www.fbi.gov/news/pressrel/press-releases/fbi-sees-spike-in-fraudulent-unemployment-insurance-claims-filed-using-stolen-identities>.

⁴ News Release, *Nearly \$77 billion in unemployment benefits paid to workers*



In response, the State Auditor has conducted multiple audits; this bill implements a series of those audits’ recommendations. It also further regulates EDD and requires holistic assessments of ongoing practices and requires certain responsive protocols to be put into place.

The bill is author-sponsored. It is supported by the Coalition of California Welfare Rights Organizations. It is opposed by Legal Services for Prisoners with Children and Legal Aid at Work. It passed out of Senate Labor, Public Employment, and Retirement Committee on a vote of 5 to 0.

PROPOSED CHANGES TO THE LAW

Existing law:

- 1) Prohibits state agencies from sending any outgoing United States mail to individuals that contains personal information about an individual, including, but not limited to, an individual’s social security number (SSN), telephone number, driver’s license number, or credit card account number, unless that personal information is contained within sealed correspondence and cannot be viewed from the outside of that sealed correspondence. (Gov. Code § 11019.7(a).)
- 2) Prohibits, as of January 1, 2023, state agencies from sending any outgoing United States mail to individuals that contains an individual’s SSN unless the number is truncated to its last four digits, except in the following circumstances:
 - a) federal law requires inclusion of the SSN;

impacted by pandemic (September 3, 2020) EDD, https://www.edd.ca.gov/About_EDD/pdf/news-20-44.pdf; Unemployment Benefits Data dashboard, *Claims Filed and Benefits Paid by Month*, EDD, <https://www.edd.ca.gov/Newsroom/facts-and-stats/dashboard.htm#TotalUnemploymentClaims>.

- b) the documents are mailed to a current or prospective state employee;
 - c) an individual erroneously mailed a document containing a SSN to a state agency, and the state agency is returning the original document by certified or registered United States mail;
 - d) the Controller is returning documents to an individual previously submitted by the individual pursuant to Code of Civil Procedure section 1500 et seq.; or
 - e) the document is sent in response to a valid request for access to personal information, pursuant to Civil Code Section 1798.34. (Gov. Code § 11019.7(b)(1).)
- 3) Requires, on or before September 1, 2021, each state agency that mails an individual's full or truncated part of a SSN to that individual, other than as permitted by the previous paragraph, to report to the Legislature regarding when and why it does so. If a state agency determines that it is unable to comply with the above requirements, it must submit an annual corrective action plan to the Legislature until it is in compliance. (Gov. Code § 11019.7(b)(2).)
- 4) Establishes the data breach notification law, which requires any agency that owns or licenses computerized data that includes personal information to disclose a breach of the security of the system to any California resident whose unencrypted personal information was, or is reasonably believed to have been, acquired by an unauthorized person. The disclosure must be made in the most expedient time possible and without unreasonable delay, consistent with the legitimate needs of law enforcement, as specified. (Civ. Code § 1798.29(a), (c).)
- 5) Requires, pursuant to the data breach notification law, that any agency that maintains computerized data that includes personal information that the agency does not own to notify the owner or licensee of the information of any security breach immediately following discovery if the personal information was, or is reasonably believed to have been, acquired by an unauthorized person. (Civ. Code § 1798.29(b).)
- 6) Requires the county recorder of each county to establish a SSN truncation program in order to create a public record version of each official record, in an electronic format, and requires the SSN contained in the record to be truncated, as specified. (Gov. Code § 27301.)

This bill:

- 1) Provides that if a state agency is unable to comply with the existing requirement to stop sending outgoing mail containing full SSNs, it must submit a corrective action plan by December 15 of each year with, at a minimum, the following elements:

- a) the steps the agency has taken to stop including full SSNs on outgoing United States mail;
 - b) the number of documents sent as outgoing United States mail from which the agency has successfully removed full SSNs and the approximate mailing volume corresponding with those documents;
 - c) the remaining steps that the agency plans to take to remove or replace full SSNs it includes on documents sent as outgoing United States mail;
 - d) the number of documents and approximate mailing volume associated with those documents that the agency has yet to address; and
 - e) the expected date by which the agency will stop sending documents that contain full SSNs as outgoing United States mail to individuals.
- 2) Requires EDD, if it fails to abide by the prohibition on mailing documents with SSNs, to provide access to and pay for identity theft monitoring for any individual who receives outgoing United States mail from the department that contains the individual's SSN.
- 3) Requires EDD, upon appropriation by the Legislature, to carry out a number of actions, including:
- a) reporting biannually on overpayments, as provided;
 - b) performing a risk assessment of, and developing and implementing a plan with regard to, deferred workloads;
 - c) modeling workload projections that account for possible scenarios that would cause a spike in unemployment insurance claims;
 - d) revising its public dashboards with regard to the number of backlogged claims, as provided;
 - e) determining, by June 1, 2022, how many of its temporary automation measures for claims processing it can retain and making those permanent; and
 - f) providing information on its internet website and setting up a separate email box for victims of identity theft who receive incorrect tax forms to contact the department and receive prompt resolution.
- 4) Requires EDD to implement various policies to assess and improve claimant interactions, approval, and payment, including:
- a) identifying, by June 1, 2022, the elements of the department's Benefit Systems Modernization process that can assist the department in making timely payments and that it can implement incrementally;
 - b) implementing a formal policy by May 1, 2022, that establishes a process for tracking and periodically analyzing the reasons why claimants call for assistance and analyzing such data to improve its call center;
 - c) implementing, by May 1, 2022, a policy for tracking and monitoring its rate of first-call resolution, and implementing other call features; and

- d) determining, by June 1, 2022, the reasons that claimants cannot successfully complete their identity verification, and work with vendors to resolve identified problems.
- 5) Requires EDD to request any personal identification information required from the claimant in accordance with the most recent federal National Institute of Standards and Technology Special Publication 800-63 standards, relating to technical requirements for implementing digital identity services, and as those standards may be amended or updated from time to time.
- 6) Provides that, upon appropriation by the Legislature, EDD must convene both of the following working groups by March 1, 2022:
 - a) a working group to assess, and report on, the lessons learned from claim surges and identify the processes that the department can still improve upon; and
 - b) a working group to coordinate the work needed to resolve each complaint of identity theft, make decisions about staffing levels necessary, and add staffing to accomplish the work in order to ensure that the department provides appropriate assistance to victims of identity theft who report fraud through the department's online fraud reporting portal.
- 7) Requires EDD, upon appropriation by the Legislature, by March 1, 2022, to designate a unit as responsible for coordinating all fraud prevention and detection.
- 8) Requires EDD to develop a plan for how it will assess the effectiveness of its fraud prevention and detection tools. EDD must then by January 1, 2023, and biannually thereafter, assess the effectiveness of those tools and eliminate any that are not effective. EDD must update the Legislature on its progress by July 2022. EDD must also assess its system of cross matching claims against information about incarcerated individuals. EDD is required to include these assessments in its annual report on fraud deterrence and detection activities
- 9) Provides that EDD must coordinate with certain financial institutions to immediately obtain a comprehensive list of claimants' accounts that are frozen. EDD must evaluate the list and direct the institution to take action to freeze or unfreeze accounts as appropriate. It must develop and deploy a centralized tracking tool for these purposes.

COMMENTS

1. Particular sensitivity of Social Security Numbers

An individual's SSN has effectively gained use as a national identification number. In fact, the number is used widely as a unique identifier by both the public and the private sector and has been called the most frequently used recordkeeping number in the United States.

SSNs are often used to verify identity, and, in the wrong hands, can be used by an identity thief to fraudulently open credit card or utility accounts, access financial accounts, or obtain loans, among other things. The overall growth in the use of SSNs is important to individual SSN holders because this number is one of the personal identifiers most sought after by identity thieves, making its easy availability, particularly in widespread mailings, of special concern.

The sensitivity of the information in these records coupled with their increasing availability online prompted legislation enacted in 2007 to protect against identity theft. In relevant part, the law requires the county recorder of each county to establish a SSN truncation program in order to create a public record version of each official record, in an electronic format, and requires the SSN contained in the record to be truncated.

AB 458 (Peace, Ch. 685, Stats. 1997) also responded to growing concerns about identity theft. AB 458 established Government Code section 11019.7, which prohibited a state agency from sending any outgoing United States mail to an individual that contains personal information about that individual, including, but not limited to, the individual's SSN, telephone number, driver's license number, or credit card account number, unless that personal information is contained within sealed correspondence and cannot be viewed from the outside of that sealed correspondence.

2. EDD and the California State Auditor

In response to a request from the Joint Legislative Audit Committee, the California State Auditor's Office conducted an audit specifically focused on EDD's "privacy protection practices when mailing documents to its customers."⁵ The audit report was released in March 2019 and was entitled *Employment Development Department, Its Practice of Mailing Documents Containing Social Security Numbers Puts Californians at Risk of Identity Theft*. The report found that in fiscal year 2017-2018 alone, EDD sent more than 17 million pieces of mail with full SSNs. The report acknowledged that EDD had undertaken efforts to reduce individuals' SSN exposure, but concluded that those efforts were

⁵ *Employment Development Department, Its Practice of Mailing Documents Containing Social Security Numbers Puts Californians at Risk of Identity Theft* (March 2019) California State Auditor, <https://www.auditor.ca.gov/pdfs/reports/2018-129.pdf> (March 2019 audit report).

“insufficient to fully address privacy concerns.” The report asserted that the evidence “showed that EDD exposed nearly 300 claimants to the risk of identity theft when it inappropriately disclosed their personal information – including SSNs – to others.

The Auditor proposed various solutions to EDD, including one involving the replacement of full SSNs with a modified unique identifier. The report states: “EDD management indicated that this solution would be the least disruptive to its existing systems, policies, and procedures, and that EDD supports this solution compared to the others we identified.”

The report also made a number of recommendations to the Legislature. In response, AB 499 (Mayes, Ch. 155, Stats. 2020) carried out those recommendations, building on AB 458. AB 499 prohibits, “commencing on or before January 1, 2023,” state agencies from sending mail to individuals that contains an individual’s SSN unless the number is truncated to its last four digits. However, it provides various exceptions under the following circumstances:

- federal law requires inclusion of the SSN;
- the documents are mailed to a current or prospective state employee;
- an individual erroneously mailed a document containing a SSN to a state agency, and the state agency is returning the original document by certified or registered United States mail;
- the Controller is returning documents to an individual previously submitted by the individual pursuant to Code of Civil Procedure section 1500 et seq.; or
- the document is sent in response to a valid request for access to personal information, pursuant to Civil Code Section 1798.34. (Gov. Code § 11019.7(b)(1).)

AB 499 further requires all agencies that mail SSNs, other than as provided above, to report to the Legislature on or before September 1, 2021, when and why it does so. If a state agency, “in its own estimation,” is unable to comply with the above requirements, it must submit an annual corrective action plan to the Legislature until it is in compliance. (Gov. Code § 11019.7(b)(2).) Both of these were drawn from the audit report’s recommendations.

In November 2020, the California State Auditor issued a follow-up letter on the March 2019 audit, finding:

EDD has not yet removed SSNs from some of the most commonly mailed documents as we recommended, meaning that EDD has continued to place Californians at risk of identity theft. The recent surge in unemployment insurance (unemployment) claims resulting from the COVID-19 pandemic has further revealed the dangers of EDD’s practices. As millions more Californians filed unemployment benefit claims, the number of pieces of mail that EDD sent with SSNs printed on them

increased dramatically. EDD must take swift action to end its potentially harmful practice and better safeguard the identities of the residents it serves.⁶

The letter specifically highlighted EDD's agreement, at the time of the audit, to immediately implement one of the Auditor's suggested solutions: replacing full SSNs with a modified unique identifier. The report indicates that EDD failed to carry out such actions adequately, finding "EDD has updated only two of the 10 forms" they reviewed, which did not include any of the three forms the audit report recommended it prioritize.

The California State Auditor subsequently conducted an "emergency audit of EDD's response to the COVID-19 pandemic, including its backlog of unemployment claims, its call center performance, and the adequacy of its information technology infrastructure." Released in January 2021, the audit report highlights "significant weaknesses in EDD's approach to fraud prevention."⁷ The report again laid out recommendations moving forward. It urged the Legislature to pass legislation requiring EDD to "assess the effectiveness of its fraud prevention and detection tools, eliminate those that are not effective, and reduce duplication in its efforts." The audit report recommended that "EDD should plan in advance which UI fraud prevention and detection mechanisms it can adjust during recessions to effectively balance timely payment with fraud prevention."

3. Building on AB 499 and further implementing the auditor's recommendations

This bill takes steps toward better protecting an individual's sensitive information by building upon the framework set up by AB 499 and further implementing the suggestions found in the series of relevant audit reports over the last several years. It also requires an assessment of existing practices and a requirement to implement new practices and policies moving forward. According to the author:

California families are suffering and need immediate relief from the EDD. Common sense solutions are needed to resolve widespread issues and help working families put food on the table and make it through the current crisis. AB 56 will help protect taxpayers, create accountability, and move the state forward by reforming the EDD. We must ensure that California families are put first and receive the assistance they need during these tough times.

⁶ *Follow-Up – Employment Development Department Since the COVID-19 Pandemic It Continues to Mail Documents Containing Social Security Numbers and Put Californians at Risk of Identity Theft* (November 19, 2020) California State Auditor, <http://auditor.ca.gov/reports/2020-502/index.html>.

⁷ *Employment Development Department, Significant Weaknesses in EDD's Approach to Fraud Prevention Have Led to Billions of Dollars in Improper Benefit Payments* (January 2021) California State Auditor, <http://www.auditor.ca.gov/pdfs/reports/2020-628.2.pdf>.

a. Social Security Numbers and identity theft

As indicated, AB 499 requires agencies unable to comply with the mandate to stop sending SSNs in outgoing mail to submit an annual corrective plan to the Legislature. This bill reworks the provision to require a corrective plan when an agency is unable to comply and requires it to be submitted by December 15 of each year. The bill lays out what must be included in such a plan, at a minimum, as follows:

- the steps the agency has taken to stop including full SSNs on outgoing United States mail;
- the number of documents sent as outgoing United States mail from which the agency has successfully removed full SSNs and the approximate mailing volume corresponding with those documents;
- the remaining steps that the agency plans to take to remove or replace full SSNs it includes on documents sent as outgoing United States mail;
- the number of documents and approximate mailing volume associated with those documents that the agency has yet to address; and
- the expected date by which the agency will stop sending documents that contain full SSNs as outgoing United States mail to individuals.

These requirements are lifted directly from the March 2019 audit report and work to ensure more transparent oversight over the progress being made by agencies. The audit report urged further action should be required of agencies that fail to abide by the statute:

Finally, if a state agency cannot remove or replace full SSNs that it includes on documents that it mails to individuals by January 2023, the Legislature should require the agency to provide access to and pay for identity theft monitoring for any individual to whom it mails documents containing SSNs.

The bill carries out this recommendation as to EDD only, requiring the department to provide access to and pay for such monitoring upon appropriation by the Legislature. This requirement is similar to that laid out in California's data breach notification law, as applied to persons and businesses, wherein a responsible entity is required to "offer to provide appropriate identity theft prevention and mitigation services," as specified. (Civ. Code § 1798.82.)

The recent emergency audit report also provided that "[t]o ensure that [EDD] provides appropriate assistance to victims of identity theft" EDD should form a working group "to coordinate the work needed to resolve each complaint of identity theft, make decisions about staffing levels necessary, and add staffing to accomplish the work." This bill implements this recommendation and requires EDD to convene such a working group by March 1, 2022, upon appropriation by the Legislature. In the

meantime, and in anticipation of identity theft victims receiving incorrect tax forms, EDD is required to provide information on its internet website and set up a separate email box for those individuals to contact the department and receive prompt resolution.

b. Fraud prevention and detection

In the emergency audit released earlier this year, the State Auditor found that EDD had been relying on “uninformed and disjointed techniques to prevent impostor fraud.” However, the report identified recent tools being implemented by EDD:

One of the key ways that EDD attempts to prevent impostor fraud is by verifying the identities of prospective claimants as a condition to providing benefits, as federal law requires. Historically, this process has included basic automated verifications to ensure that the information that claimants submit to EDD, such as SSNs and driver’s license numbers, match the information retained by the U.S. Social Security Administration and California Department of Motor Vehicles. If these verifications detect discrepancies, EDD activates a manual identity verification process to confirm whether the claimant is the true owner of the identity. When it activates the manual identity verification process, EDD’s system suspends or stops payments to the affected claim while EDD attempts to verify the claimant’s identity. EDD will pay eligible claimants whose identities it confirms for the weeks their payments were paused.

This process does not block the claimants’ access to UI benefit payments that EDD has already issued. However, in October 2020, EDD introduced a new online identity verification tool, ID.me, as part of its efforts to process claims faster while preventing impostor fraud at the onset of a claim. EDD has indicated that ID.me makes it easier for claimants to verify their identities, reduces the amount of manual work by EDD staff necessary to process claims, and includes more robust protections against impostor fraud.

This bill provides some quality assurance protocols in connection with these verifications. It requires EDD, upon appropriation by the Legislature, and by June 1, 2022, to identify why claimants are unable to successfully complete their identity verification through secure identity verification networks, including ID.me. EDD is required to work with its vendors to resolve any problems. The bill requires ongoing monitoring of the verification process “to ensure that it consistently minimizes unnecessary staff intervention.”

This bill also sets a baseline standard for EDD’s process of requesting and receiving information from claimants, requiring it to request any necessary personal identification

from claimants in accordance with the latest National Institute of Standards and Technology standards. These industry accepted standards relate to technical requirements for implementing digital identity services.

The emergency audit report also recommended that “[t]o ensure that [EDD] can approach UI fraud prevention in a comprehensive and coordinated manner,” EDD should establish a central unit responsible for coordinating all fraud prevention and detection efforts and to develop a plan for assessing its fraud prevention and detection tools. This bill carries out these recommendations. Furthermore, while currently EDD is required to report to the Legislature annually on its fraud deterrence and detection activities, the bill additionally requires the department, by January 1, 2023, and biannually thereafter, to specifically assess the effectiveness of its fraud prevention and detection tools and determine the degree to which those tools overlap or duplicate one another with no corresponding benefit. Any tools that lack evidence of effectiveness are to be eliminated.

The bill also requires an assessment of EDD’s ongoing system of cross-matching claims against information about incarcerated individuals, which EDD has highlighted as “a positive step it took to combat fraud during the pandemic.” The department shall include these assessments in its annual report on fraud deterrence and detection activities. By July 2022, EDD is required to update the Legislature on its progress.

c. Assessing the past, present, and future

The bill also includes a number of additional provisions that require EDD to assess its practices, including identifying elements of its processes that can assist the department in making timely payments; analyzing the reasons why unemployment insurance claimants call for assistance; monitoring its rate of first-call resolution; and determining how many of its temporary automation measures for claims processing it can retain. It also requires various policies to be implemented to ensure EDD is prepared for future scenarios and that it can adequately handle customer service issues.

But while looking forward, the bill also requires EDD to immediately obtain from any federally chartered financial institution or other financial institution it uses to make benefit payments a comprehensive list of claimants’ accounts that are currently frozen. It must then evaluate the list, including considering using ID.me to verify claimants’ identities and to identify accounts that should be unfrozen. To utilize this data, EDD must establish a centralized tracking tool that allows it to review and stop payment on claims, as appropriate. The department shall use this tool to monitor its own internal decisions and track whether the claimant responds to its requests for identity information and should, therefore, have their account unfrozen.

To improve transparency, the bill requires, by March 1, 2022, EDD to revise its public dashboards with regard to the number of backlogged claims. The dashboard must

clearly describe the difference between those waiting for payment and those that are not, and indicate the number of claims that have waited longer than 21 days for payment, as provided. According to the existing dashboard on EDD's internet website, as of June 5, 2021, EDD's backlog of claims past 21 days pending EDD action is at 221,340 claims.⁸

The bill also requires EDD to perform a risk assessment of its deferred workloads and develop a plan for prioritizing them. The bill imposes additional reporting requirements related to overpayments, responding to EDD's report of "more than 110,000 UI overpayments due to fraud – or payments that EDD expected claimants to return to EDD – totaling \$116.8 million in UI benefits paid in 2019." These reports must be posted on EDD's website at least twice each year until the repayment period for the relevant overpayment notices has elapsed.

In addition to the working group discussed above, the bill calls for another working group to be convened to assess the lessons learned from recent claim surges and to identify processes that can still be improved. The group is to issue a report of its findings by January 1, 2023.

SUPPORT

Coalition of California Welfare Rights Organizations

OPPOSITION

Legal Services for Prisoners with Children
Legal Aid at Work

RELATED LEGISLATION

Pending Legislation:

SB 39 (Grove, 2021) requires the Department of Corrections and Rehabilitation and counties to provide the names and SSNs of current inmates to EDD for the purposes of preventing payments on fraudulent claims for unemployment compensation benefits, as specified. It requires EDD to use such information for verification purposes. This bill is currently in the Assembly Appropriations Committee.

SB 390 (Laird, 2021) requires EDD to develop and implement a comprehensive plan to prepare for an increase in unemployment insurance compensation benefits claims due to an economic recession. The plan shall detail how to respond to economic downturns

⁸ *California Unemployment Insurance (UI) Claims Data Dashboard*, EDD,
<https://www.edd.ca.gov/Newsroom/facts-and-stats/dashboard.htm#TotalUnemploymentClaims>.

with a predetermined strategy that has considered the full effect on EDD'S operations. This bill is currently in the Assembly Appropriations Committee.

SB 420 (Umberg, 2021) establishes the Unemployment Insurance Integrity Enforcement Program within the Department of Justice, administered by the Attorney General. The bill requires the Attorney General to establish a task force, including the State Auditor, charged with coordinating with local district attorneys and, when available and necessary, with the United States Attorney's Office to pursue available methods to recover improper benefit payments made by EDD. The bill would require the task force, prior to pursuing any civil or criminal action, to prepare a cost-benefit analysis, as specified. This bill is currently in the Assembly Insurance Committee.

AB 12 (Seyarto, 2021) requires state agencies to stop sending any outgoing United States mail to an individual that contains the individual's SSN unless the number is truncated, except in specified circumstances, as soon as is feasible, but no later than January 1, 2023. This bill is also being heard in this Committee on June 29, 2021.

AB 110 (Petrie-Norris, 2021) requires the Department of Corrections and Rehabilitation to provide the names and SSNs of current inmates to EDD for the purposes of preventing payments on fraudulent claims for unemployment compensation benefits, as specified. It requires EDD to use such information for verification purposes. This bill is currently in the Senate Public Safety Committee.

Prior Legislation:

AB 499 (Mayes, Ch. 155, Stats. 2020) *See* Comment 2.

SB 447 (DeSaulnier, 2012) would have prohibited a state agency from sending any communication to any individual that contains the full SSN of that individual unless required by federal law. This bill was vetoed by Governor Brown, who asserted in his veto message that "federal and state laws provide numerous protections against identity theft and fraud." He argued the bill would "hinder the ability of state agencies to promptly and accurately provide information to run essential programs."

AB 458 (Peace, Ch. 685, Stats. 1997) *See* Comment 1.

PRIOR VOTES:

Senate Labor, Public Employment, and Retirement Committee (Ayes 5, Noes 0)
Assembly Floor (Ayes 77, Noes 0)
Assembly Appropriations Committee (Ayes 16, Noes 0)
Assembly Insurance Committee (Ayes 13, Noes 0)
Assembly Privacy and Consumer Protection Committee (Ayes 11, Noes 0)
