



**TESTIMONY OF
CONNECTICUT HOSPITAL ASSOCIATION
SUBMITTED TO THE
GENERAL LAW COMMITTEE
Tuesday, February 21, 2023**

**SB 1058, An Act Concerning The Attorney General’s Recommendations Regarding
Consumer Protection And Financial Reporting By Charitable Organizations**

The Connecticut Hospital Association (CHA) appreciates this opportunity to submit testimony concerning **SB 1058, An Act Concerning The Attorney General’s Recommendations Regarding Consumer Protection And Financial Reporting By Charitable Organizations**. CHA supports the concept of the bill but is seeking additional clarification.

Connecticut hospitals continue to meet the challenges posed by the COVID-19 pandemic and are now facing new challenges of treating sicker patients than they saw before the pandemic, with a dedicated but smaller workforce who are exemplary but exhausted. They are also experiencing significant financial hardships brought on by record inflation. Through it all, hospitals have been steadfast, providing high-quality care for everyone who walks through their doors, regardless of ability to pay.

SB 1058 seeks to add language to existing statutory section 36a-701b to make “precise geolocation data” an additional data element that, if compromised, could require a data holder to provide a specific level of notification to both the Office of the Attorney General and the involved individuals. The definition of “precise geolocation data” in the bill is imported from PA 22-15 (SB 6, 2022 session), now codified at section 42-515 of the general statutes. This is the definition:

(19) “Precise geolocation data” means information derived from technology, including, but not limited to, global positioning system level latitude and longitude coordinates or other mechanisms, that directly identifies the specific location of an individual with precision and accuracy within a radius of one thousand seven hundred fifty feet. “Precise geolocation data” does not include the content of communications or any data generated by or connected to advanced utility metering infrastructure systems or equipment for use by a utility.

CHA appreciates the careful consideration given to determining that this specific data element is important to the privacy of Connecticut residents to the extent it needed to be added to section 36a-701b.

Because this is a developing area of data rights, and because the term “precise geolocation data” is not self-evident, we ask that the Office of the Attorney General provide education and guidance that clarifies what the term means in the context of both section 36a-701b and section 42-515.

Several questions remain that could benefit from clear guidance. Among these:

- When, if ever, is an IP address sufficient to trigger the threshold for being “precise geolocation data”?
- Are legacy data included, or only data captured on or after the effective date of the bill?
- Does information in an electronic record that was entered manually indicating the location at which a person appeared (for an appointment) meet the definition of “precise geolocation data”?

We would welcome the opportunity to partner with the Committee on this important piece of legislation as it moves through the process.

Thank you for your consideration of our position. For additional information, contact CHA Government Relations at (203) 294-7310.