CONNECTICUT HOSPITAL ASSOCIATION

# TESTIMONY OF CONNECTICUT HOSPITAL ASSOCIATION SUBMITTED TO THE GENERAL LAW COMMITTEE Tuesday, March 6, 2012

## SB 315, An Act Prohibiting The Unnecessary Collection Of Social Security Numbers

The Connecticut Hospital Association (CHA) appreciates the opportunity to submit testimony concerning **SB 315, An Act Prohibiting The Unnecessary Collection Of Social Security Numbers**, which would prohibit most businesses from collecting social security numbers. CHA supports the bill in concept, but wishes to clarify one portion.

CHA supports efforts to ensure private information is kept safe. The goal of protecting private information must be balanced with the need to ensure that information is tied to the correct individual. The bill includes various exceptions for transactions and business lines, including financial and insurance-related activities, for which use of social security numbers is essential to ensure proper identification. Until the federal government completes its plan to provide a workable substitute to social security numbers in the context of medical care, healthcare providers need to be able to collect them. The bill, at subsection (c)(5), contains an exception for healthcare providers as follows:

> "The provision of this subsection shall not apply to... a background check on the individual, identity verification, fraud prevention, medical treatment, law enforcement purposes or the individual's employment, including employment benefits."

CHA believes that the phrase "medical treatment" is meant to allow healthcare providers to collect social security numbers, but we are concerned that the phrase "medical treatment" might inadvertently allow too broad of an exception. HIPAA protections expressly extend to social security numbers to ensure that patient information is protected. In order to ensure that the collection of social security numbers by healthcare providers is properly balanced with the need to protect the information, we respectfully request that subsection (c)(5) be revised to state as follows:

> "The provisions of this subsection shall not apply to ... (5) a background check on the individual, identity verification, fraud prevention, healthcare providers, or other practitioners that are HIPAA-covered entities [medical treatment], law enforcement purposes or the individual's employment, including employment benefits."

Thank you for your consideration of our position.

For additional information, contact CHA Government Relations at (203) 294-7310.