



COUNTY OF SISKIYOU

Board of Supervisors

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June 9, 2026

The Honorable Christopher Cabaldon
Chair, Senate Judiciary Committee
1021 O Street, Room 568
Sacramento, CA 95814

Subject: Opposition to Assembly Bill 1337 (Ward), As Amended June 15, 2026
To be heard in the Senate Committee on Privacy, Digital Technologies, and Consumer Protection June 15, 2026

Dear Chair Cabaldon,

The Siskiyou County Board of Supervisors writes in opposition to AB 1337 (Ward), which would amend the Information Practices Act of 1977 (IPA) and apply it to all 58 counties.

AB 1337 would raise significant questions for 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.

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, complicates data reporting needed for accountability efforts, and endangers federal funding, among other risks. This is a costly, unnecessary change that could jeopardize essential services and harm the communities we serve: the homeless, 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].

Proposed Amendments Do Not Address Core Concerns

The proposed amendments fail to resolve our core concerns with the bill. With the proposed amendments, AB 1337 would continue to severely restrict how local agencies and the state can use, transfer, or report public data and would subject public agencies to significant costs and implementation

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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.

While the costs, liability, and burdensome compliance requirements are significant concerns, our primary reason for opposing the bill is its negative impact on public agencies' ability to deliver services effectively. AB 1337 would create additional barriers to service delivery and make it more difficult for Californians to access essential public 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 more efficient.

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 could undermine the understanding of how agencies succeed or fail to deliver services, undermining 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 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 misdemeanors even if there is no economic loss or personal injury due to a disclosure. At a time when public agencies are facing 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 harming the public workforce, this will add to local agency liability as they will be required to respond to legal claims for penalized employees.

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 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 technological changes, including in many cases new equipment, coding for proprietary systems and software purchases, in addition to legal analysis and 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, it 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 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.

To add to these challenges, the bill allows state and local agencies little time to prepare for compliance. Since the bill would take effect January 1, 2028, and 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 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.

In summary, we do not believe the costs, administrative burden, and potential risks imposed by this bill are justified for public agencies.

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

Sincerely,

Signed by:

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Ray A. Haupt
Chair, Board of Supervisors

CC: Siskiyou County Board of Supervisors
Shaw Yoder Antwih Schmelzer & Lange
Assemblywoman Heather Hadwick
Senator Megan Dahle
Rural County Representatives of California
The Honorable Chris Ward
California State Assembly Members and Consultants
Senate Committee on Privacy, Digital Technologies, and Consumer Protection