



March 18, 2020

Privacy Regulations Coordinator
California Office of the Attorney General
300 South Spring Street, First Floor
Los Angeles, CA 90013

Re: California Consumer Privacy Act of 2018 Regulations

Dear Attorney General Becerra,

The SPARK Institute, Inc. writes to submit comments supporting the changes your office made on March 11, 2020 (the “Revised Proposal”) to its proposed regulations under Chapter 20 of the California Code that had been published on October 11, 2019 and then initially revised on February 10, 2020 (the “Initial Proposals”). We appreciate your office’s notable efforts to address the unique challenges facing employers and their benefit programs, as raised in our prior comments and hearing testimony.

We appreciate the efforts the Attorney General’s office has made to address concerns of employers and others providing benefits and continue to request that your office provide a model notice at collection for employers and that the regulations make it clearer that the collection and sharing of information gathered from identified fraudsters is acceptable, as it is a vital way of protecting participants and beneficiaries from the theft of their benefits.

Today we write to emphasize the need to ensure that the employment and benefits specific pieces of CCPA do not sunset at the end of 2020. We believe it is a goal of all branches of California’s government to protect employees, their families, and their beneficiaries by encouraging employers to provide benefits. We are already hearing concerns about the problems that would arise if these provisions were allowed to sunset. Given the unrelated economic disruptions that have already impacted employers this year, we ask that you ensure that the employment and benefits specific pieces remain in place beyond 2020.

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The SPARK Institute appreciates the opportunity to provide these comments to the Attorney General. If you have any questions or would like more information regarding this letter, please contact me or the SPARK Institute’s outside counsel, David Levine and Kevin Walsh, Groom Law Group, Chartered (dlevine@groom.com or kwalsh@groom.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Tim Rouse".

Tim Rouse
Executive Director