

Date of Hearing: June 27, 2023

ASSEMBLY COMMITTEE ON PRIVACY AND CONSUMER PROTECTION

Jesse Gabriel, Chair

SB 595 (Roth) – As Amended April 13, 2023

AS PROPOSED TO BE AMENDED

SENATE VOTE: 40-0

SUBJECT: Covered California: data sharing

SYNOPSIS

This bill proposes to allow Covered California to share, without first obtaining consent from the individual, the personal information of applicants for the Employment Development Department's (EDD) unemployment insurance, state disability, and paid family leave programs with vendors who are under contract to conduct marketing and outreach for the state's healthcare exchange.

One trip to an emergency room or a ride in an ambulance can cost a person thousands of dollars and instantly saddle them with debilitating debt. According to a 2021 investigation by National Public Radio, more than 100 million people in the United States, including 41 percent of adults, are burdened by medical debt. While this news is not surprising, the problem is far more pervasive than previously thought. A recent study from the Los Angeles County Department of Public Health found that about 810,000 (or one in 10) Los Angeles County adults together owed more than \$2.6 billion in medical debt as of 2021. Given these recent findings and the fact that EDD receives over 100,000 new unemployment claims from Californians every month, the need to help people who are recently unemployed, disabled, or on long-term family leave quickly find health insurance is indisputable.

The Legislature intended to assist these Californians by passing SB 644 (Leyva, Ch. 983, Stats. 2022) last year, a bill that allowed Covered California to receive the personal information for applicants monthly, while still endeavoring to protect the privacy of the applicants. Unfortunately, requiring Covered California to obtain consent from each applicant prior to sharing the information with their outreach vendors rendered the bill unworkable.

As proposed to be amended, this bill would address the technical problems with the previous bill by carving out vendors who are under contract to Covered California from the current prohibition against sharing the information without first receiving consent, while still leaving in place the prohibition for all other entities. This change will allow Covered California to conduct marketing and outreach regarding health insurance to applicants for unemployment compensation, state disability, and paid family leave, as originally intended in SB 644.

This bill is co-sponsored by the California Pan-Ethnic Health Network, Health Access California, and the Western Center on Law and Poverty. It is also supported by close to one dozen other organizations. Electronic Frontier Foundation and Oakland Privacy were previously opposed to this bill, but have now taken a neutral position based on the proposed Committee amendments.

If passed by this Committee, the bill will next be heard by the Assembly Health Committee.

SUMMARY: Eliminates the current prohibition against the California Health Benefits Exchange (Covered California) sharing, absent consent from the individual applicant, personal information that it receives from the Employment Development Department (EDD) regarding applicants with vendors that are under contract with Covered California to conduct marketing and outreach, subject to new privacy protections. Specifically, **this bill:**

- 1) Limits the current list of applicant information that Covered California is allowed to request from EDD to only that which is necessary for conducting marketing and outreach.
- 2) Allows Covered California to release information obtained from EDD related to an individual's application for unemployment compensation, state disability, and/or paid family leave only to an outreach and marketing vendor who is under contract with Covered California.
- 3) Requires Covered California to obtain consent from an EDD applicant before sharing their information with a certified insurance agent, a certified enrollment counselor, or any other entity that is not under contract with Covered California to conduct marketing and outreach.
- 4) States that a person or entity that receives EDD applicant information obtained by Covered California must take all necessary measures to safeguard the confidentiality of the information and prohibits them from sharing that information for any purpose other than to market and publicize the availability of coverage through Covered California.
- 5) Requires that Covered California, at all times, only request from EDD, use, or disclose the minimum amount of applicant information necessary to conduct marketing and outreach.
- 6) Requires a person or entity under contract to Covered California to only request from Covered California, use, or disclose the minimum amount of applicant information necessary to conduct marketing and outreach.
- 7) Restricts the contact methods for Covered California outreach to only the methods intended to reach a person at their residence or through another personal contact channel.
- 8) Requires that all marketing and outreach include, in a conspicuous and easy to access manner, the ability for recipients to decline all future outreach and marketing.
- 9) Requires all information received from EDD to be destroyed in a manner that maintains confidentiality.
- 10) Clarifies in the Unemployment Insurance Code that the applicant information provided by EDD shall only be used for marketing and outreach and that Covered California shall at all times request the minimum amount of information necessary.

EXISTING LAW:

- 1) Provides, pursuant to the California Constitution, that all people are by nature free and independent and have inalienable rights. Among these is a fundamental right to privacy. (Cal. Const. art. I, § 1.)

- 2) Establishes the Information Practices Act of 1977, which places restrictions on state agencies collecting and sharing an individual's personal information. (Civ. Code § 1798 et seq.)
- 3) Requires that each state agency maintain in its records only personal information that is relevant and necessary to accomplish the purpose of the agency. (Civ. Code § 1798.14)
- 4) Requires that each agency collect personal information to the greatest extent practicable directly from the individual who is the subject of the information rather than from another source. (Civ. Code § 1798.15)
- 5) States that the "right to privacy is a personal and fundamental right protected by Section 1 of Article I of the Constitution of California and by the United States Constitution and that all individuals have a right of privacy in information pertaining to them." Further states the following findings of the Legislature:
 - a) The right to privacy is being threatened by the indiscriminate collection, maintenance, and dissemination of personal information and the lack of effective laws and legal remedies.
 - b) The increasing use of computers and other sophisticated information technology has greatly magnified the potential risk to individual privacy that can occur from the maintenance of personal information.
 - c) In order to protect the privacy of individuals, it is necessary that the maintenance and dissemination of personal information be subject to strict limits. (Civ. Code § 1798.1.)
- 6) Establishes the California Health Benefit Exchange, also known as Covered California, as California's health benefit exchange for individual and small business purchasers as authorized under the federal Patient Protection and Affordable Care Act (ACA). (Gov. Code § 100500 et seq.)
- 7) Requires the director of the Employment Development Department (EDD) to permit the use of any information in the director's possession to the extent necessary to carry out certain enumerated purposes, including to enable federal, state, or local governmental departments or agencies, to verify or determine the eligibility or entitlement of any applicant for, or a recipient of, public social services, as specified, when the verification or determination is directly connected with, and limited to, the administration of public social services. (Unemp. Ins. Code § 1095.)
- 8) Requires Covered California, starting no later than September 1, 2023, and at least monthly thereafter, to request specified information from EDD of each new applicant for unemployment compensation, state disability, and paid family leave. This includes the following information:
 - a) Full name.
 - b) Social security number.
 - c) Date of birth.
 - d) Race or ethnicity, to the extent available.

- e) Preferred language.
 - f) Gender.
 - g) All mailing addresses, including city, state, and ZIP Code.
 - h) All telephone numbers, including home, work, and cellular.
 - i) Email address, to the extent available.
 - j) Date of most recent job loss, to the extent available.
 - k) Wages or prior wages.
 - l) The EDD program for which the applicant filed.
 - m) Date the claim was filed.
 - n) Claimant eligibility status.
 - o) Date initial payment was approved by EDD.
 - p) The weekly benefit amount.
 - q) The benefit period start date.
 - r) The benefit period end date. (Gov. Code § 100503.9(a).)
- 9) Requires Covered California to use this information to market and publicize the availability of health care coverage through Covered California and engage in outreach activities to the individuals whose information was shared. (Gov. Code § 100503.9(b)(1).)
- 10) Prohibits Covered California from disclosing personal information obtained from EDD without the consent of the applicant. (Gov. Code § 100503.9(b)(3).)
- 11) Requires Covered California to, at all times, take reasonable measures to safeguard the confidentiality of any personal information obtained by EDD and not disclose that information for any purpose other than to market and publicize the availability of health care coverage through Covered California to the individuals whose information it has received. (Gov. Code § 100503.9(b)(4).)
- 12) Provides that all personal information received from EDD shall at all times be subject to applicable privacy and information security-related requirements arising under federal and state law. (Gov. Code § 100503.9(b)(5).)

FISCAL EFFECT: As currently in print this bill is keyed fiscal.

COMMENTS:

1) **Background.** Enacted in March 2010, the federal Patient Protection and Affordable Care Act (ACA) provides the framework, policies, regulations and guidelines for the implementation of

comprehensive health care reform by the states. The ACA expands access to quality, affordable insurance and health care. As of January 1, 2014, insurers are no longer able to deny coverage or charge higher premiums based on preexisting conditions. These aspects of the ACA, along with tax credits for low and middle income people buying insurance on their own in new health benefit exchanges, make it easier for people to gain insurance coverage who would previously have been uninsured.

The ACA required exchanges, also known as marketplaces, to be established in every state by January 1, 2014; otherwise, the federal government would establish one in the state. The central purpose of these new marketplaces is to enable low and moderate income individuals, and small employers to obtain affordable health coverage. The new marketplaces are required to carry out a number of different functions, including determining eligibility and enrolling individuals in appropriate plans; conducting plan management activities; assisting consumers; and ensuring plan accountability.

California was the first state in the nation to enact legislation creating an exchange under the ACA; the California Health Benefits Exchange (Covered California) is now the largest state-run exchange in the nation. Additionally, Covered California is the only place to get federal premium assistance to help Californians buy health insurance. As stated on Covered California's website:

The Covered California Health Exchange is the government agency offering subsidized Obamacare plans for this state. The California Health Exchange was created to assist citizens and legal residents with applying for marketplace coverage in order to comply with the Affordable Care Act ("ACA"). When the law was passed in 2010, each of the 50 states had to decide to either create a state-run health insurance exchange or offer enrollment through a federally-operated exchange. This state chose to create their own exchange and called it "Covered California". (*What is Covered California?* California Health Exchange, available at <https://www.healthforcalifornia.com/covered-california>.)

2) **Purpose of this bill.** Since its creation, Covered California has invested immense resources in marketing and outreach to ensure all that need health care coverage are able to secure it. In fact, Covered California is statutorily obligated to undertake whatever activities are necessary to market and publicize the availability of health care coverage and federal subsidies. It is also required to undertake outreach and enrollment activities that seek to assist people in enrolling Covered California's exchange in the least burdensome manner, including populations that may experience barriers to enrollment, such people with disabilities and those with limited English language proficiency. (*Ibid.*)

However, a group of nonprofit organizations working to ensure broad access to health care expressed that Covered California's efforts would benefit from access to data from the Employment Development Department (EDD) that would assist it in directly targeting those most likely in need of health insurance. As jobs and health care insurance in this country are closely linked, oftentimes when a person loses their employment, they also lose their health coverage. While EDD would share information with its clients about Covered California, this would only occur after a claim was successfully approved.

In 2022, SB 644 (Leyva, Ch. 983, Stats. 2022) sought to address this issue by requiring Covered California, starting no later than September 1, 2023, and at least monthly thereafter, to request from EDD information on each new applicant for unemployment compensation, state disability,

and paid family leave. The requested information is extensive, comprising the 18 items set forth in paragraph 8) under **EXISTING LAW** above.

SB 644 requires Covered California to use this information to market and publicize the availability of health care coverage and engage in outreach activities to the individuals whose information was shared. (Gov. Code § 100503.9(b)(1).)

While providing this information to Covered California serves a noble purpose, privacy concerns always arise when such sensitive data is exchanging hands. Therefore, SB 644 was amended to include various privacy and security protections. First, it included use limitations; Covered California was prohibited from using or disclosing the information for “any purpose other than to market and publicize the availability of health care coverage through the Exchange.” Secondly, the bill established an obligation for Covered California to take reasonable measures to safeguard the confidentiality of any personal information obtained. SB 644 also stated that the personal information received is “subject to applicable privacy and information security-related requirements arising under federal and state law.”

Finally, and most relevant here, SB 644 prohibited Covered California from disclosing personal information obtained from EDD without the consent of the applicant. This was meant to ensure applicants had some measure of control over their information. It is this latter protection that this bill seeks to loosen, because Covered California does not directly handle the outreach and marketing that is done to individuals. Currently, Covered California contracts with a third party vendor to handle the outreach and marketing. As a result, EDD is able to share applicant information with Covered California and Covered California is able to receive it. However, Covered California would need to get consent from each applicant in order to share the information with their marketing and outreach vendors who are tasked with conducting the outreach to the applicants. This is a burdensome task which defeats the purpose of ensuring that the recently-unemployed and others who have fallen into hardship quickly learn about and obtain health insurance coverage.

When signing AB 644 into law, the Governor noted that additional work on this policy would be required in order to make the bill workable. In his signing message he stated:

I am signing Senate Bill 644, which enhances partnership between Covered California and the Employment Development Department by enabling Covered California to conduct proactive and targeted outreach to applicants of unemployment insurance and other benefits. In doing so, this legislation provides Californians with important and timely information about affordable health coverage options when they may need it the most.

To ensure Covered California can effectively reach Californians, and to maximize the important impact SB 644 can have to keep Californians in need covered, I strongly encourage Covered California and the Legislature to work together on subsequent legislation next year to ensure that the provisions of the bill enable timely communication to individuals to reduce burdens of applying for health care and minimize gaps in coverage.

This bill is the clean-up bill for SB 644. It proposes loosening the privacy protections in current law by allowing marketing vendors under contract to Covered California to obtain the necessary EDD contact information without first obtaining consent, in order to conduct outreach to applicants for EDD’s programs.

3) **Author's statement.** According to the author:

Access to information regarding health insurance options is one of the primary barriers to achieving universal healthcare coverage in the State, especially as Californians experience transitions in employment and income. SB 595 is follow-up legislation to Senator Leyva's SB 644, which was signed into law last year. It will make certain that the provisions of the bill enable timely communication to individuals to reduce burdens of applying for health insurance and to minimize gaps in coverage. SB 595 is a simple fix that maintains the greater accessibility to health insurance established by SB 644—while protecting Californians from receiving cold calls from outside entities.

4) **How this bill would work.** As discussed previously, requiring Covered California to obtain prior consent from individuals who had applied for EDD programs made it difficult for them to carry out the intent of SB 644. In the current version of the bill in print, the Committee is being asked to undo those privacy protections and allow the extensive amount of information provided on EDD applicants to be shared by Covered California without obtaining permission, with the exception of sharing the information with an insurance agent or enrollment counselor.

With the Committee amendments, detailed below, the bill would include additional privacy protections to help mitigate the loss of the ability of EDD applicants to consent to the use of their information for marketing. As detailed in the **SUMMARY**, this bill would do the following:

1. Allow Covered California to request, on a monthly basis, the minimum amount of information necessary from EDD to conduct outreach and marketing to new applicants for unemployment compensation, state disability, and/or paid family leave.
2. Remove the blanket requirement that Covered California obtain the EDD applicant's permission before sharing the applicant's personal information. Instead, Covered California is allowed to share the minimum amount of data necessary with their contracted vendors who conduct marketing and outreach on the department's behalf.
3. Retain the existing prohibition in current law against sharing the information with insurance agents, enrollment counselors, and any other entity without the applicant's consent.
4. Require Covered California and its marketing and outreach contractors to take all necessary measures to protect the EDD applicant information. In addition, it strictly prohibits them from using the data for any purpose other than outreach.
5. Limit the outreach contact methods to only those intended to reach a person at their residence or through another personal contact channel, rather than allowing Covered California to use *any* contact method available.
6. Require Covered California to provide a conspicuous and easy to access method for EDD applicants to opt out of any future marketing or outreach related to the Health Care Exchange.

5) **Analysis.** One trip to an emergency room or a ride in an ambulance can cost a person thousands of dollars and instantly saddle them with debilitating debt. According to a 2021 investigation by National Public Radio, more than 100 million people in the United States,

including 41 percent of adults, are burdened by medical debt (Levey, *100 Million People in American Are Saddled With Health Care Debt*, KFF Health News (Jun. 16, 2022), available at <https://kffhealthnews.org/news/article/diagnosis-debt-investigation-100-million-americans-hidden-medical-debt/>). While this news is not surprising, the problem is far more pervasive than previously thought. A recent study from the Los Angeles County Department of Public Health found that about 810,000 (or one in 10) Los Angeles County adults together owed more than \$2.6 billion in medical debt as of 2021 (Work, *Personal Medical Debt in Los Angeles County Tops \$2.6 Billion, Report Finds*, California Healthline (Jun. 7, 2023), available at <https://californiahealthline.org/news/article/la-county-california-medical-debt-burden-report/>).

Given these recent findings and the fact that EDD receives over 100,000 new unemployment claims from Californians every month (see <https://edd.ca.gov/en/newsroom/facts-and-stats/dashboard/>), the need is indisputable to help people quickly find health insurance if they are recently unemployed, disabled, or on long-term family leave. The Legislature intended to assist these Californians by passing SB 644 (Leyva) last year, a bill that allowed Covered California to receive information from EDD for applicants monthly, while still endeavoring to protect the privacy of the applicants. Unfortunately, as described above, requiring Covered California to obtain consent prior to sharing the data with their outreach vendors rendered the bill unworkable.

The question before the Committee is how to allow Covered California to share with their vendors an extensive amount of personal information for over one million people a year without first obtaining the individuals' consent, while still protecting their privacy to the greatest extent possible. With the Committee amendments enumerated below, Covered California will be able to obtain and share with their contracted vendors all of the information necessary to conduct outreach. At the same time, it and its vendors will be required to take all necessary measures to protect that information. Covered California will continue to be prohibited from sharing this with anyone who is not under contract with it to conduct marketing and research, absent individual consent.

In addition, the amendments add two additional consumer protections. First, the amendments require Covered California to make it easy for individuals to opt-out of future marketing efforts. Second, the amendments restrict the outreach efforts of Covered California to those that are intended to reach people at their places of residence. The original legislation allowed for unlimited outreach and marketing to any phone number, address, or email, potentially resulting in marketing calls and emails to a person's current or former place of business.

Staff believes that these changes strike the proper balance between the need for people to quickly access healthcare when their employment circumstances change, while still protecting their constitutional right to privacy.

6) **Proposed Committee amendments.** The specific changes to the current bill language are the following:

In Section 1 of the bill: Section 100503.9 of the Government Code is amended to read:

100503.9. (a) (1) Beginning no later than September 1, 2023, and at least monthly thereafter, the Exchange, *subject to the restrictions in (b)(5)*, shall request from the Employment Development Department the following information of each new applicant for unemployment compensation, state disability, and paid family leave:

This amendment is intended to limit the information requested by Covered California to only that which is necessary to conduct marketing and outreach.

100503.9. (a) (2) The Exchange may use any contact method *that is intended to reach the person at their residence or other personal contact channel* to communicate with and inform an individual whose ~~contact~~ information the Exchange receives pursuant to subdivision (a) of available health care coverage options through the exchange and to assist those individuals in obtaining health care coverage.

100503.9. (a) (3) (A) *The Exchange may disclose information obtained from the Employment Development Department to outreach and marketing vendors under contract to the Exchange.*

(B) The Exchange shall not disclose **personal** information obtained from the Employment Development Department to a certified insurance agent, ~~or~~ a certified enrollment counselor *or any other entity without the consent of the applicant, except that allowed pursuant to (b)(3)(A).*

This amendment addresses concerns raised by privacy advocates that the original language was too broad and eliminated the prohibition on sharing with any and all parties and replaced it with a specific prohibition of just two certified insurance agents and certified enrollment counselors. Instead, the broad prohibition remains and carves out for exception only those specific vendors under contract with Covered California to conduct outreach.

100503.9. (a) (4) *Any outreach and marketing, pursuant to this section, must include, in a conspicuous and easy to access manner, the ability for individuals to decline all future outreach and marketing.*

100503.9. (a) (5) The Exchange shall ~~at all times take reasonable~~ *take all necessary* measures to safeguard the confidentiality of any ~~personal~~ information obtained ~~by~~ *from* the Employment Development Department and shall at no time use or disclose that information for any purpose other than to market and publicize the availability of health care coverage through the Exchange to individuals whose ~~contact~~ information the Exchange receives pursuant to paragraph (1) of subdivision (a). *The Exchange shall at all times only request from the Employment Development Department, use, or disclose the minimum amount of information necessary to accomplish the purposes for which it was obtained.*

The above amendments limit the information that Covered California can receive to only that which is necessary for marketing and outreach. In addition, the amendments increase applicable security standards by requiring that Covered California take all necessary measures to protect the information.

100503.9. (a) ~~(5)~~ (6) A person or entity that receives **personal** information from the Exchange pursuant to this section shall ~~at all times take reasonable~~ *take all necessary* measures to safeguard the confidentiality of any ~~personal~~ information obtained from the Exchange and shall at no time use or disclose that information for any purpose other than to market and publicize the availability of health care coverage through the Exchange to individuals, as directed by the Exchange. *A person or entity shall at all times only request from the Exchange, use, or disclose the minimum amount of information necessary to accomplish the purposes for which it was received.*

Similar to the previous amendment, this change strictly limits the information that Covered California can share with their vendors to only that which is necessary for the vendor to conduct outreach. In addition, it increases the security standards by requiring that vendors take all necessary measures to protect the information.

100503.9. (a) ~~(6)-(7) Personal~~ Information received by the Exchange from the Employment Development Department shall:

(A) At all times be subject to applicable privacy and information security-related requirements arising under both federal and state law.

(B) *Be destroyed in a manner that maintains confidentiality.*

100503.9. (a) (8) *The Exchange shall ensure that information disclosed to outreach and marketing vendors or any other entity pursuant to this section shall comply with paragraph (7).*

This amendment enshrines in the statute that Covered California's contractors are bound by the same privacy requirements as Covered California, and that contractors are also required to properly destroy the EDD applicant information they receive.

In section 2 of the bill -- Section 1095 of the Unemployment Insurance Code is amended to read:

1095. (ar)(2) Assist the California Health Benefit Exchange or the State Department of Health Care Services in determining eligibility for the insurance affordability programs administered by those state agencies. ~~Upon the request of either the California Health Benefit Exchange or the State Department of Health Care Services, the department shall also provide to the relevant state agency information on new applicants for unemployment insurance, state disability insurance, and paid family leave. This information shall include the data points listed in paragraph (1) of subdivision (a) of Section 100503.9 of the Government Code, and shall be sent in a manner that is encrypted or otherwise complies with government data security best practices, as specified by the California Health Benefit Exchange.~~ The determination of eligibility or entitlement shall include efforts by either the California Health Benefit Exchange or the State Department of Health Care Services to assist those individuals in obtaining that coverage, including informing those individuals potentially eligible for health coverage of the availability of that coverage.

1095. (ar)(4) *Upon the request of either the California Health Benefit Exchange or the State Department of Health Care Services, the department shall also provide to the relevant state agency information on new applicants for unemployment insurance, state disability insurance, and paid family leave. They shall at all times request from the department the minimum amount of information necessary from the information listed in paragraph (1) of subdivision (a) of Section 100503.9 of the Government Code, to accomplish the purposes of Section 100503.9 of the Government Code. The information shall be sent in a manner that is encrypted or otherwise complies with government data security best practices, as specified by the California Health Benefit Exchange. This information shall only be used for the purposes of outreach and marketing.*

These amendments to the Unemployment Insurance Code ensure that the restrictions for the amount of data that can be requested and how that data can be used mirror those in the Government Code section of the bill.

The proposed Committee amendments set forth above incorporate provisions requested by Electronic Frontier Foundation and Oakland Privacy, which previously opposed the bill. Both groups have removed their opposition based on these proposed amendments.

7) **Related legislation.** SB 644 (Leyva, Chap. 983, Stats. 2022) required Covered California, starting no later than September 1, 2023, and at least monthly thereafter, to request from EDD information on each new applicant for unemployment compensation, state disability, and paid family leave. Covered California is required to use this information to market and publicize the availability of health care coverage through Covered California and engage in outreach activities to the individuals whose information was shared. Prior to sharing the information with its marketing and outreach vendors, Covered California is required to obtain consent from the applicants to share their personal information.

SB 260 (Hurtado, Chap. 845, Stats. 2019) required Covered California to enroll an individual or individuals using electronic information from Medi-Cal or the Children's Health Insurance Program in the lowest cost silver Covered California plan. Required a health plan or insurer to annually notify an individual that when they cease to be enrolled in coverage, their contact information will be provided to Covered California to assist them in obtaining other coverage, or that they may opt out of this transfer of information.

ARGUMENTS IN SUPPORT: Co-sponsors of the bill, Western Center on Law and Poverty, write in support:

California continues to take strides towards universal coverage and SB 595 is part of that solution. This important piece of legislation would ensure unemployed Californians are contacted and enrolled in health care coverage and avoids increasing the uninsured populations, which can become incredibly costly for the state. Without the passage of SB 595, Covered CA and their outreach vendors will be unable to fulfill their outreach duties and we risk leaving thousands of community members throughout the state without quality health care coverage.

REGISTERED SUPPORT / OPPOSITION:

Support

California Pan-Ethnic Health Network (co-sponsor)
Health Access California (co-sponsor)
Western Center on Law & Poverty (co-sponsor)
Bueno Vecino
Central Valley Immigrant Integration Collaborative
Children's Partnership, the
Coalition of California Welfare Rights Organizations
Courage California
Latino Coalition for A Healthy California
Maternal and Child Health Access
Multi Ethnic Collaborative of Community Agencies

National Health Law Program
Small Business Majority
South Asian Network

Opposition

None on file.

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