

OFFICE OF INFORMATION PRACTICES

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To: House Committee on Judiciary & Hawaiian Affairs

From: Carlotta Amerino, Director

Date: January 28, 2025, 2:00 p.m.
State Capitol, Conference Room 325

Re: Testimony on H.B. No. 131
Relating to Research

Thank you for the opportunity to submit testimony on this bill, which would authorize government agencies to disclose nonpublic records to a researcher for a research purpose under chapter 92F, HRS, the Uniform Information Practices Act (UIPA). The Office of Information Practices (OIP) **supports** this bill.

This bill will resolve an existing inconsistency in the UIPA. Currently, OIP is required by section 92F-42(14), HRS, to adopt rules setting forth uniform standards for disclosure of records for research purposes, but there is no statutory authorization of research requests for OIP to implement via rules. The UIPA's substantive provisions instead set a general "any person" standard for record disclosure. Members of the general public are all equally entitled to access government records as a general rule, so an agency cannot disclose a record to some members of the public but withhold it from others.

Agencies are specifically authorized to disclose nonpublic records in only two situations, as set out in the UIPA. First, under part III of the UIPA, when an individual requests records "about" him or her those are his or her "personal records" and the standard exceptions to government record disclosure cannot be

used to deny access (although there are exemptions to personal record disclosure in section 92F-22, HRS, that can apply). Second, under section 92F-19, HRS, an agency can share nonpublic records with another government agency in specified circumstances without waiving its ability to withhold those records from the general public.

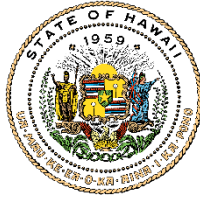
This bill will add a third situation in which agencies are authorized to disclose nonpublic records without waiving their ability to withhold them from the general public under the UIPA: agencies would now be able to disclose nonpublic records to a researcher for research purposes.

Because this amendment will provide the missing statutory authorization for agencies to disclose nonpublic records to researchers, OIP will now be able to implement that authorization through the adoption of rules. However, the clear statutory authorization also means that agencies will not need to wait for OIP to adopt rules before they can disclose records to researchers; instead, agencies can begin doing so once the new provision comes into effect. OIP can then assess based on the agencies' experience handling research record requests what part of the process needs further guidance or uniform standards, and propose rules as needed to address those areas. OIP supports this bill, and respectfully requests that this Committee pass it out.

Thank you for considering OIP's testimony.

JOSH GREEN, M.D.
GOVERNOR | KE KIA'ĀINA

SYLVIA LUKE
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII'
DEPARTMENT OF LAND AND NATURAL RESOURCES
KA 'OIHANA KUMUWAIWAI 'ĀINA

P.O. BOX 621
HONOLULU, HAWAII 96809

DAWN N.S. CHANG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

RYAN K.P. KANAKA'OLE
FIRST DEPUTY

CIARA W.K. KAHANE
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE
MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES
ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

Testimony of
DAWN N.S. CHANG
Chairperson

Before the House Committee on
JUDICIARY AND HAWAIIAN AFFAIRS

Tuesday, January 28, 2025
2:00 PM

State Capitol Conference Room 325 and Videoconference

In Consideration of
HOUSE BILL 131
RELATING TO RESEARCH

House Bill 131 creates a section under Chapter 92F, Hawaii Revised Statutes (HRS), that “notwithstanding 92F-13,” allows for the disclosure of government records to a researcher for research purposes. **The Department of Land and Natural Resources (Department) offers the following comments.**

HRS §92F-13 allows for exceptions to the general rule that government records should be open and available to the public. There are only five situations in which an agency may decide not to release documents, all which DLNR finds to be reasonable:

- 1) If disclosure would be an unwarranted invasion of personal privacy.
- 2) If the record pertains to a judicial or quasi-judicial action to which the State or a county is a party, but only to the extent that the records are not discoverable.
- 3) Release of the record would frustrate legitimate government functions.
- 4) Records that are protected under state or federal law.
- 5) Draft legislative records.

The inclusion of “notwithstanding” language in House Bill 131 could undermine these existing exceptions, effectively making all records open to public access, including those requested by researchers. If the intention is to facilitate access to records for research purposes, this bill may not be necessary, as current law already balances public access with privacy and operational concerns.

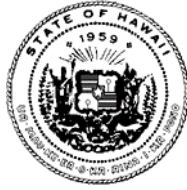
If this bill moves forward, DLNR is concerned that it will increase requests for information,

require staff to ensure that the requestor meets the definition of a researcher, require additional time to review documents and should we deny the request, cause additional challenges.

To address these concerns, the Department recommends that any implementation of this measure include funding for at least one additional full-time position (1 FTE) for each affected department to manage these responsibilities. Further, the definition of “researcher” should be limited to persons affiliated with an educational or research institute, museums or non-profit institutions.

Mahalo for the opportunity to provide comments on House Bill 131.

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



RYAN I. YAMANE
DIRECTOR
KA LUNA HO'OKELE

JOSEPH CAMPOS II
DEPUTY DIRECTOR
KA HOPE LUNA HO'OKELE

STATE OF HAWAII
KA MOKU'ĀINA O HAWAI'I
DEPARTMENT OF HUMAN SERVICES
KA 'OIHANA MĀLAMA LAWELAWE KANAKA
Office of the Director
P. O. Box 339
Honolulu, Hawaii 96809-0339

TRISTA SPEER
DEPUTY DIRECTOR
KA HOPE LUNA HO'OKELE

January 27, 2025

TO: The Honorable Representative David A. Tarnas, Chair
House Committee on Judiciary & Hawaiian Affairs

FROM: Ryan I. Yamane, Director

SUBJECT: **HB 131 – RELATING TO RESEARCH.**

Hearing: January 28, 2025, 2:00 p.m.
Conference Room 325 & Videoconference, State Capitol

DEPARTMENT'S POSITION: The Department of Human Services (DHS) provides comments and requests clarification. DHS agrees with the Department of Land and Natural Resources' testimony and concerns.

PURPOSE: Allows agencies to disclose government records to researchers for certain research purposes.

DHS appreciates that the proposal does not mandate agencies to disclose government records to researchers for certain purposes. The current law allows DHS to provide information to requesters who identify themselves as researchers. The proposed new section in Section 1 does not provide DHS with any additional authority to disclose additional information that otherwise would fall under the exceptions to disclosure per section 92F-13, Hawaii Revised Statutes (HRS). DHS remains bound by state and federal law regarding records that can be released, to whom, and in what circumstances. Amongst others, section 346-10, HRS, lays out the state law regarding the release of applicant and recipient information.

The new definitions in Section 2 are ambiguous, and it is unclear what "non-commercial" includes or whether it is in the public interest. It is also unclear as to how "non-commercial" will be

determined or the duration that the research remains “non-commercial.” Additionally, whether intended or not intended to result in reidentifying individuals, the permissible uses and safeguards that lay out duties and responsibilities when sharing information that could result in reidentifying individuals are still required. Computing power has changed significantly where algorithms can match information, resulting in reidentification; safeguards and responsibilities would need to be negotiated and enforceable.

DHS requests clarification on whether the requester will be required to attest to the “non-commercial purpose” of the research and clearly articulate the purpose of the research. Understanding the research purpose or question would help determine if the information requested would assist with the research.

We are also concerned that these proposed changes will increase the number of requests for information. Information requests have increased dramatically since the COVID-19 pandemic and Maui Wildfires without any additional resources or tools to assist the department with its review and response. Specifically, there were:

- an 89% increase in UIPA requests between 2019 and 2020;
- a 77% increase in UIPA requests between 2020 and 2021;
- a 43% increase in UIPA requests between 2021 and 2022; and
- a 30% increase in UIPA requests between 2022 and 2023.

Lastly, if the measure proceeds, DHS is interested in a requirement that any resulting research based on government records be made available to the releasing department to inform our services or program efficiencies or be released for the public’s general edification.

Thank you for the opportunity to provide comments on this measure.



UNIVERSITY OF HAWAII SYSTEM
‘ŌNAEHANA KULANUI O HAWAII

Legislative Testimony
Hō‘ike Mana‘o I Mua O Ka ‘Aha‘ōlelo

Testimony Presented Before the
Senate Committee on Judiciary & Hawaiian Affairs
January 28, 2025, at 2:00 p.m.

By
Carrie K. S. Okinaga
Vice President for Legal Affairs and University General Counsel
and
Kalbert K. Young
Vice President for Budget and Finance/Chief Financial Officer
University of Hawai‘i System

HB 131 – RELATING TO RESEARCH

Chair Tarnas, Vice Chair Poepoe, and Members of the Committee:

The University of Hawai‘i (University) respectfully submits testimony in opposition to HB 131 as presently drafted. This bill creates another exception to the privacy protections and protections of government’s ability to function provided under HRS § 92F-13 (Government records; exceptions to general rule).¹ While government transparency is clearly an important goal, concern for privacy protections and government operations and efficiency warrant careful consideration before advancing this measure.

HB 131 provides definitions of “research” and “researcher” that are so overly broad and subject to abuse by “researchers” that the “exception” it provides could swallow the whole of HRS 92F-13, which protects everything from personal privacy interests, to drafts maintained by agencies the disclosure of which would frustrate legitimate government function, to the draft working documents of legislative committees. The

¹ HRS §92F-13, provides as follows:

Government records; exceptions to general rule. This part shall not require disclosure of:

- (1) Government records which, if disclosed, would constitute a clearly unwarranted invasion of personal privacy;
- (2) Government records pertaining to the prosecution or defense of any judicial or quasi-judicial action to which the State or any county is or may be a party, to the extent that such records would not be discoverable;
- (3) Government records that, by their nature, must be confidential in order for the government to avoid the frustration of a legitimate government function;
- (4) Government records which, pursuant to state or federal law including an order of any state or federal court, are protected from disclosure; and
- (5) Inchoate and draft working papers of legislative committees including budget worksheets and unfiled committee reports; work product; records or transcripts of an investigating committee of the legislature which are closed by rules adopted pursuant to section 21-4 and the personal files of members of the legislature.

choice to characterize requestors of information as “researchers” tries to pretend that such requests are to meet some specialized purpose other than to request 92F public records. The bill should more adequately define what is “non-commercial” use or objective so that government agencies can validate the applicability of the requestor(s). The bill, which broadly defines “researcher” to include entities such as “news media, nonprofit organization[s], or other similar organization[s],” is silent as to who pays the costs for compiling and anonymizing the data, and does not provide any protections against abuse of such “research” requests. HRS Chapter 92F currently provides for a balancing of legitimate government functions and privacy interests, and in the name of “research,” HB 131 would severely compromise this balance.

Specifically with respect to privacy and government operations concerns, while the bill defines “research purpose” as involving aggregate or anonymous information, this presumes the government agencies will be required to redact protected information, since no government agencies could turn over sensitive or identifiable data to an outside entity, including news media, and “trust” that that entity will redact and /or anonymize sensitive data in compliance with applicable State and federal laws pertaining to sensitive records. As just one example, existing federal laws, such as the Family Educational Rights and Privacy Act (FERPA) and the Health Insurance Portability and Accountability Act (HIPAA), impose strict safeguards for the handling and reporting of sensitive data. The University has established robust policies and procedures to govern the use of institutional data for research, consistent with State and federal laws. The University designed these policies to protect privacy and ensure compliance with legal standards.

Please note that even the ability of State agencies to research the records of other State agencies is restricted, requiring the requesting agency to honor the “same restrictions on disclosure of the records as the originating agency.” HRS Section 92F-19(b). HB 131 imposes no such obligations on the purported “researcher.”

In addition, and given the above presumption that it will be government agencies which will need to do the necessary aggregation and anonymization, HB 131 appears to require compilations be done by the government agencies, in direct conflict with HRS Section 92F-11(c) which plainly states that “an agency shall not be required to prepare a compilation or summary of its records.” HB 131’s provisions as written will conflict with these established frameworks, creating operational uncertainty and exposing the University and other State agencies to legal challenge.

While the University recognizes the value of research in advancing public knowledge and informing policy, HB 131 raises significant operational and privacy concerns that require further examination. The absence of clear definitions of “research” and “research purposes”, the lack of safeguards that comply with federal and State laws, the inability to reconcile HB 131 with the legal framework set forth in HRS Chapter 92F, and the substantial operational challenges associated with implementing the bill underscore the need for caution.

Thank you for the opportunity to provide testimony.

JOSH GREEN, M.D.
GOVERNOR OF HAWAII
KE KIA'ĀINA O KA MOKU'ĀINA 'O HAWAII



KENNETH S. FINK, M.D., M.G.A., M.P.H.
DIRECTOR OF HEALTH
KA LUNA HO'ŌKELE

**STATE OF HAWAII
DEPARTMENT OF HEALTH**

P. O. Box 3378
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**Testimony COMMENTING on HB131
RELATING TO RESEARCH.**

**REP. DAVID TARNAS, CHAIR
HOUSE COMMITTEE ON JUDICIARY AND HAWAIIAN AFFAIRS**

Hearing Date: January 28, 2025

Room Number: 325

1 **Fiscal Implications:** N/A.

2 **Department Testimony:** The Department of Health (DOH) supports HB131 with amendments
3 to strengthen privacy, protect personally identifiable information, and ensure best practices.

4 Page 1, Lines 4 – 5

5 DOH recommends striking “Notwithstanding section 92F-13” over concerns that it may diminish
6 standards governing the restriction of certain types of data, such as personally identifiable
7 information. The exceptions are in statute to protect privacy and should not be optional for the
8 disclosure of records even for purposes of research.

9 DOH strongly recommends amendments that disclosing government agencies must publish and
10 follow policies and procedures for the appropriate disclosure of data to ensure that reviews of
11 requests and releases of data are consistent and standardized to assure protection and fairness.

12 Thank you for the opportunity to testify.

13 **Proposed Amendments:**

14 SECTION 1. Chapter 92F, Hawaii Revised Statutes, is
15 amended by adding a new section to be appropriately designated
16 and to read as follows:

1 "§92F-_____ Disclosure of research records. An agency may
2 disclose government records to a researcher for a research
3 purpose, subject to the agency's standardized processes for de-
4 identification and applicable best practices, including but not
5 limited to best practices for statistical sampling,
6 epidemiology, data governance, and information security."



House Committee on Judiciary & Hawaiian Affairs

Tuesday, January 28, 2025 2 p.m. Hearing in Conference Room 325 on
HB 131, Relating to Research

TESTIMONY

Douglas Meller, Legislative Committee, League of Women Voters of Hawaii

Chair Tarnas, Vice Chair Poepoe, and Committee Members:

The League of Women Voters of Hawaii supports HB 131. We suggest asking the Legislative Reference Bureau to identify any statutes other than Section 92F(13) which impede disclosure of government records for research purposes.

Thank you for the opportunity to submit testimony.



House Committee on Judiciary & Hawaiian Affairs
Honorable David A. Tarnas, Chair
Honorable Mahina Poepoe, Vice Chair

RE: Testimony in Support of H.B. 131, Relating to Research
Hearing: January 28, 2025 at 2:00 p.m.

Dear Chair and Members of the Committee:

My name is Ben Creps. I am a staff attorney at the Public First Law Center, a nonprofit organization that promotes government transparency.

Thank you for the opportunity to submit testimony **in strong support** of H.B. 131. This measure amends chapter 92F to clarify the Office of Information Practices' (OIP) authority to create rules for disclosure of records for research purposes.

The Legislature recognized in 1989 that disclosing government records for research purposes serves an important public purpose, and delegated rule making authority to OIP for such disclosures. *E.g.*, H. Stand. Comm. Rep. No. 1288 (bill "instructs [OIP] to adopt rules pertaining to the disclosure of records for research purposes."); Test. of the State Attorney General on S.B. 1799 (Feb. 21, 1989) at 7 ("the bill adds specific authority for [OIP] to adopt rules setting forth uniform standards for disclosure of records for research purposes in order that legitimate research is not jeopardized by the new laws."); Sess. Laws of Haw. Act 192 (1989) at 370 (authorizing OIP to adopt rules governing the disclosure of records for research purposes); *accord* HRS § 92F-42(15) (same).

OIP, however, has not adopted rules governing disclosure of records for research purposes. Our understanding is that OIP views the language of section 92F-42(15) as insufficient to authorize it to create rules for disclosure of records to researchers beyond the level of access available to the general public. That limited access denies the public benefit the Legislature intended to create decades ago by affording researchers *greater* access to government records than the general public.

Government agencies often have massive amounts of data but do not always have sufficient expertise or resources to use that data. Researchers in the public and private sector often have the expertise or resources, but lack sufficient access to the government's data to draw meaningful conclusions.



House Committee on Judiciary & Hawaiian Affairs
January 28, 2025
Page 2

This bill seeks to bridge that gap and clarifies the original intent of section 92F-42(15). It is the first step in a long road toward allowing for more consistent access to government data for researchers. This, in turn, will promote government improvement through data-driven decision-making.

Thank you again for the opportunity to testify in support of H.B. 131.

Jan. 28, 2025, 2:00 p.m.
Hawaii State Capitol
Conference Room 325 and Videoconference

To: House Committee on Judiciary & Hawaiian Affairs
Rep. David A. Tarnas, Chair
Rep. Mahina Poepoe, Vice-Chair

From: Grassroot Institute of Hawaii
Ted Kefalas, Director of Strategic Campaigns

RE: TESTIMONY IN SUPPORT OF HB131 — RELATING TO RESEARCH

Aloha Chair Tarnas, Vice-Chair Poepoe and other members of the Committee,

The Grassroot Institute of Hawaii would like to offer its comments in **support** of [HB131](#), which would allow the state Office of Information Practices to develop more effective rules governing the disclosure of government records for research purposes.

This bill is a much-needed amendment to existing open-records law that would allow a more uniform approach to the disclosure of records for research purposes.

The state Uniform Information Practices Act allows for the expanded disclosure of information for research purposes, but the OIP has indicated that it requires explicit statutory authority to make those rules. This means that research-based organizations are unable to make full use of the data held by government agencies.

As an educational research organization and public watchdog group, the Grassroot Institute of Hawaii often uses open-records requests in its analysis of government policy. Our UIPA requests run the gamut, from requests for records of budget and financial documents to requests for details of the plans for the Honolulu rail project.

We have found that government agencies have access to large amounts of data that could be used in the development of studies that would inform local policymaking. However, without full access to that data,

researchers are limited in their ability to carry out such studies. Meanwhile, government agencies with access to this data might lack the resources, interest or mandate to make full use of it for research purposes.

Allowing researchers greater access to government data would be a win-win for policymakers, creating more avenues for useful, data-driven projects at little cost to taxpayers.

It is important to emphasize that the expanded disclosure envisioned by this bill would apply to only those who fit the definition of a “researcher,” and that “research purpose” is also narrowly defined.

Moreover, the OIP will certainly refine the rules of disclosure for research, adding necessary provisions for confidentiality, security and related matters. This should address any remaining concerns about the effect of expanded disclosure for researchers.

Thank you for the opportunity to testify.

Ted Kefalas
Director of Strategic Campaigns
Grassroot Institute of Hawaii



January 27th, 2025

House Committee on Judiciary & Hawaiian Affairs

Hearing Time: Tuesday, January 28th 2025, 2:00 PM

Location: State Capitol

Re: House Bill 131 Relating to Research

Aloha e Chair Tarnas, Vice Chair Poepoe, and members of the Committee:

We are writing **in strong support of** House Bill 131 Relating to Research.

This bill will amend the statute to allow the Office of Information Practices (OIP) to create rules. If OIP issued rules, researchers would be able to establish a process for requesting records from government agencies for research purposes.

Our close partnerships and engagements across multiple state agencies revealed that agencies hold a lot of data but are short staffed, forcing the front line workers and administrators to prioritize day to day operations. This limits the time and resources agencies can dedicate to analyze that information. With the establishment of OIP rules, researchers and state agencies can more effectively partner to analyze this data to draw meaningful conclusions.

Hawai'i Data Collaborative (HDC) firmly believes that data informs our understanding of what's happening, why it's happening, and what we can do about it. Data helps identify opportunities, guide decisions, and create systems of accountability so we, as a community, can achieve better outcomes for all. Because HDC's focus is to improve the household need space, we partner with government, philanthropy, and community based organizations (CBO) to improve the data ecosystem in Hawai'i.

We support this measure.

Please support House Bill 131. Thank you for your time and consideration.

Respectfully submitted,

Thomas Lee

Thomas Lee, PhD, MPH

Director of Government Partnerships

Hawai'i Data Collaborative

HB-131

Submitted on: 1/24/2025 11:55:42 AM

Testimony for JHA on 1/28/2025 2:00:00 PM

Submitted By	Organization	Testifier Position	Testify
Nicholas Chagnon	Individual	Support	Written Testimony Only

Comments:

To the esteemed members of the committee,

My name is Nick Chagnon and I'm a criminologist at UH West Oahu. I am writing in support of HB 131 because of how it will facilitate research like my own. My research focuses on policing and public safety, and often necessitates access to official records that are not publicly available. Studying issues of policing and public safety here in Hawaii often requires an examination of records such as arrest records, use of force reports, 911 call data, etc. These records often contain identifying and confidential information that means they cannot be automatically made available to the public. Information requests often require that agencies such as the Honolulu Police Department redact sensitive information. That process can be time consuming, labor intensive, and expensive. It's made more so without clear rules and standards governing access to such information. This bill would mitigate these problems in my opinion, by creating rules for research requests that could streamline the process of data acquisition.

I thank you for your time and consideration and hope you will support the passage of this bill.

Mahalo nui,

Nicholas J. Chagnon, PhD

**Testimony to the Thirty-Third Legislature, 2025 Regular Session
House Committee on Judiciary & Hawaiian Affairs**

Colin D. Moore

House Bill No. 131: Relating to Research

Position: STRONG SUPPORT

Aloha Chair Tarnas, Vice Chair Poepoe, and Members of the Committee:

I am Colin Moore, a political scientist and professor at the University of Hawai‘i at Mānoa. I regularly conduct research that relies on public data to inform policy and decision-making in Hawai‘i. I am submitting this testimony as a private citizen.

I strongly support HB 131, which allows agencies to disclose government records to researchers for certain research purposes under well-defined conditions. This bill promotes evidence-based research while ensuring the privacy of individuals remains safeguarded.

There are three principal reasons why I support this bill:

1. Supports Public Interest Research:

- By enabling researchers to access anonymized and aggregate government records, this bill enhances the ability to study pressing issues, such as housing, healthcare, and education, which are critical for policymaking in Hawai‘i.

2. Encourages Collaboration and Innovation:

- The proposed definitions of “research purpose” and “researcher” create a framework that encourages partnerships between government agencies, universities, nonprofits, and other organizations.
- This will enable innovative, interdisciplinary research that addresses Hawai‘i’s unique challenges.

3. Strengthens Accountability and Oversight:

- The bill entrusts the Office of Information Practices (OIP) with the authority to adopt rules and provide oversight for the disclosure process.
- This ensures that the use of government records for research remains transparent, ethical, and aligned with public interest.

This bill strikes an important balance between advancing research and protecting individual privacy. It empowers researchers to contribute to evidence-based policy solutions that improve the lives of Hawai‘i residents.

For these reasons, I urge you to support HB 131. This bill is a valuable investment in the research capacity of our state and its ability to address complex policy challenges.

Mahalo for the opportunity to provide testimony.

HB-131

Submitted on: 1/27/2025 9:42:32 AM

Testimony for JHA on 1/28/2025 2:00:00 PM

Submitted By	Organization	Testifier Position	Testify
Marion K A Kapuniai	Individual	Oppose	Written Testimony Only

Comments:

A 'OLE !!!!!!! HB 131

It is my constitutional right to (1) be invited to participate in research and (2) my ineliable right to approve my consent to participate in any research or like project!!!!

A few people deliberating on and voting on a this law, seeking the Governor's signature for an ACT, infringes upon the right to privacy of every peron in this State of Hawaii.

Thank you, Marion K A Kapuniai