



July 16, 2009

The Honorable Tom Harman
California State Senate
State Capitol, Room 3070
Sacramento, CA 95814

RE: SB 202 – **OPPOSE**

Dear Senator Harman:

The Department of Consumer Affairs (Department) must respectfully take a position of **OPPOSE** on your bill, **SB 202**, which would require private investigators, as a condition of license renewal, to complete 12 hours of continuing education in privacy rights, professional ethics, recent legal developments, and other subjects related to the profession.

The Department believes that this bill is unsubstantiated, overly punitive, and would significantly increase the workload of the Bureau, taking away from enforcement activities that could better benefit consumers. There is no demonstrated need for the continuing education that would be required by this bill. Mandated continuing education programs always impose a burden on working Californians; without a demonstrated threat to the public health, safety, or welfare, this burden is unreasonable. Further, this bill structures the continuing education provider approval process in a way that effectively requires the Bureau to license these educational providers, which could significantly add to the Bureau's existing workload.

Should you have any questions regarding our position, please contact me at 574-7800.

Sincerely,

A handwritten signature in blue ink that reads "Brian Warren".

Brian Warren
Deputy Director
Division of Legislative and Regulatory Review

cc: Michael Pro시오, Legislative Secretary, Office of the Governor
Laura Zuniga, Acting Deputy Secretary, Legislation, State and Consumer
Services Agency