



Wes Moore | Governor  
Aruna Miller | Lt. Governor  
Katie Savage | Secretary

**TO:** House Economic Matters Committee  
**FROM:** Department of Information Technology  
**RE:** House Bill 956- Consumer Protection - Workgroup on Artificial Intelligence Implementation  
**DATE:** February 18, 2025  
**POSITION:** Letter of Information

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The Honorable Delegate C. T. Wilson  
House Economic Matters Committee  
230 Taylor House Office Building  
Annapolis, Maryland 21401

Dear Chairman Wilson,

The Department of Information Technology (DoIT) appreciates the intent behind House Bill 956 - Consumer Protection - Workgroup on Artificial Intelligence Implementation, which seeks to establish a Workgroup on Artificial Intelligence Implementation to monitor and make recommendations regarding AI and consumer protection. While the bill takes an important step toward addressing AI governance, **DoIT would like to provide the following considerations regarding its implementation:**

1. If the referred "Department" responsible for staffing the workgroup is intended to be DoIT, we do not have the necessary resources or remit to support this function effectively. Given our current marginal resourcing, we suggest identifying a more appropriate entity with expertise and capacity to facilitate the workgroup's objectives.
2. The workgroup is currently composed of government and industry representatives, which provides valuable perspectives on consumer protection. However, expert civil society organizations specializing in AI and consumer rights should also be included. These groups often hold different viewpoints, ensuring that the workgroup's recommendations consider a broader range of perspectives, including potential opposing equities in AI regulation.
3. The bill references "general AI disclosures for all consumers" as an area for the workgroup's recommendations, but it is unclear what specific disclosures are being referred to. Additional clarity is needed regarding;
  - a. The scope of AI disclosures (e.g., data usage, decision-making transparency, bias mitigation)
  - b. Whether this pertains to commercial AI applications, government AI use, or both.



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- c. Whether these disclosures align with existing or proposed federal AI transparency initiatives.

DoIT appreciates the efforts to strengthen AI oversight and consumer protection in Maryland. However, we recommend; clarifying the entity responsible for staffing the workgroup if DoIT is not the appropriate agency, expanding representation to include civil society groups with expertise in AI ethics and consumer protection, and clarifying the intent of general AI disclosures for consumers to ensure effective policy recommendations.

We look forward to further discussions and remain available for any questions regarding DoIT's role and the bill's implementation.

Best,

Melissa Leaman  
Acting Secretary  
Department of Information Technology