

## **HB0956 - Senate\_FAV\_MTC\_Consumer Protection - Work**

Uploaded by: Drew Vetter

Position: FAV



Senate Finance Committee

March 20, 2025

House Bill 956 – *Consumer Protection – Workgroup on Artificial Intelligence Implementation*

**POSITION: SUPPORT**

The Maryland Tech Council (MTC), with over 800 members, is the State's largest association of technology companies. Our vision is to propel Maryland to be the country's number one innovation economy for life sciences and technology. MTC brings the State's life sciences and technology communities into a united organization that empowers members to achieve their goals through advocacy, networking, and education. On behalf of MTC, we submit this letter of support for House Bill 956.

This bill establishes a Workgroup on Artificial Intelligence (AI) Implementation to monitor issues and make recommendations related to AI, including (1) the regulation of AI used in decisions that significantly impact the livelihood and life opportunities of individuals in the State; (2) deployer and developer obligations related to labor and employment and the protection of individuals privacy rights; (3) the protection of consumer rights; (4) current private sector use of AI; (5) general AI disclosures for all consumers; and (6) enforcement authority for the Office of the Attorney General's Consumer Protection Division. By July 1, 2026, and each year thereafter, the workgroup must report its findings and recommendations to specified committees of the General Assembly.

The topic of how the State should regulate AI is a complicated new area of the law that requires a careful balance of safety, transparency, and consumer protection with the reality that AI is enmeshed with our daily lives. MTC also believes that we must regulate AI in a manner that keeps Maryland economically competitive and welcoming of tech innovation. We applaud the sponsor's approach to tackling those issues through the creation of a Workgroup composed of lawmakers and subject matter experts to examine all the complicated factors that must be considered. We are particularly appreciative that the proposed Workgroup includes four representatives from the MTC and additional representatives from the e-commerce and biotechnology industries. We look forward to participating in the Workgroup discussions and contributing to recommendations for the sensible regulation of AI. We request a **favorable** report on House Bill 956.

**For more information call:**

Andrew G. Vetter

J. Steven Wise

Danna L. Kauffman

Christine K. Krone

410-244-7000

## **HB 956– Consumer Protection - Workgroup on Artific**

Uploaded by: Hannah Allen

Position: FAV



## House Bill 956

**Date: March 20, 2025**  
**Committee: Senate Finance**  
**Position: Favorable**

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Founded in 1968, the Maryland Chamber of Commerce is the leading voice for business in Maryland. We are a statewide coalition of more than 7,000 members and federated partners working to develop and promote strong public policy that ensures sustained economic health and growth for Maryland businesses, employees, and families.

House Bill 956 establishes the Workgroup on Artificial Intelligence (AI) Implementation and requires the workgroup to establish recommendations regarding the regulation of AI used in decisions that significantly impact the livelihood and life opportunities of individuals in the State. Additionally, HB 956 requires the workgroup to make recommendations regarding deployer and developer obligations related to labor and employment, protection of individual privacy rights, protection of consumer rights, and current private sector use of AI.

AI is a new and evolving industry that has the potential to benefit all Marylanders. As such, the Maryland Chamber supports studying AI implementation and regulation before broad policies are established that could deter AI investment and creation in Maryland. For this reason, the Maryland Chamber of Commerce respectfully requests a **favorable report** on **HB 956**.

## **HB 956 - Consumer Protection - Workgroup on Artifi**

Uploaded by: Donna Edwards

Position: FWA



# MARYLAND STATE & D.C. AFL-CIO

AFFILIATED WITH NATIONAL AFL-CIO

7 School Street • Annapolis, Maryland 21401-2096

Balto. (410) 269-1940 • Fax (410) 280-2956

*President*

**Donna S. Edwards**

*Secretary-Treasurer*

**Gerald W. Jackson**

## **HB 956 - Consumer Protection - Workgroup on Artificial Intelligence Implementation Senate Finance Committee March 20, 2025**

### **SUPPORT with AMENDMENTS**

**Donna S. Edwards**

**President**

**Maryland State and DC AFL-CIO**

Madame Chair and members of the Committee, thank you for the opportunity to submit testimony in support of HB 956 if all of our amendments are accepted. My name is Donna S. Edwards, and I am the President of the Maryland State and District of Columbia AFL-CIO. On behalf of Maryland's 300,000 union members, I offer the following comments.

HB 956 purports to establish a workgroup on artificial intelligence (AI) implementation. We appreciate the commitment to study the potential benefits and risks of using AI. However, several important stakeholders are missing, including voices from labor and representatives from key industries that AI is heavily used in. As stated, the focus of the workgroup is monitoring and recommending AI use in decision making impacting the livelihood of individuals in the state and employer and developer obligations to labor and employment. It is imperative to include representatives from labor on the workgroup.

We strongly believe the quality of the conversation and decisions are significantly enhanced when we include the voices of those who will be directly impacted by the workgroup's recommendations.

To address this absence, we propose the following amendments:

On pg. 2, after (4), insert:

**“(5) THE STATE CHIEF INFORMATION SECURITY OFFICER OR HIS  
OR HER DESIGNEE”**

On pg. 2, after line 12, insert:

**“(II) THREE REPRESENTATIVES FROM THE CYBERSECURITY INDUSTRY;”**

On pg. 2, after line 14, insert:

**“(III) THREE REPRESENTATIVES FROM THE RETAIL INDUSTRY”**

On pg. 2, after (III), insert:

**“(IV) THREE REPRESENTATIVES FROM THE MANUFACTURING INDUSTRY”**

On pg. 2, under (VI), insert:

**“(6) THREE REPRESENTATIVES APPOINTED BY THE MARYLAND STATE AND DISTRICT OF COLUMBIA AFL-CIO”**

On pg. 3, strike lines 3-4 and replace with:

**“THE WORKGROUP SHALL REVIEW AND ANALYZE LEGISLATION CONSIDERED DURING THE 2022, 2023, 2024, AND 2025 LEGISLATIVE SESSIONS AND MAKE RECOMMENDATIONS RELATED TO ARTIFICIAL INTELLIGENCE INCLUDING:”**

On pg. 3, line 10, add “ and worker” after “consumer” to read:

**“PROTECTION OF CONSUMER AND WORKER RIGHTS”**

On pg. 3, line 16, replace “JULY 1, 2026” with “DECEMBER 30, 2025”

# **HB0956 - MBA - FWA - FIN - GR25.pdf**

Uploaded by: Evan Richards

Position: FWA



**HB 956 - Consumer Protection - Workgroup on Artificial Intelligence Implementation**

**Committee:** Senate Finance Committee

**Date:** March 20, 2025

**Position:** Favorable with Amendments

The Maryland Bankers Association (MBA) **SUPPORTS HB 956 WITH AMENDMENTS** that add representatives of Maryland's financial services industry to the Workgroup on Artificial Intelligence Implementation. The Workgroup will be tasked with making recommendations on the regulation of artificial intelligence and its impact on the livelihood and life opportunities of Marylanders.

Banks operating in Maryland have utilized artificial intelligence for years and continue to do so in a safe and responsible manner. Banks use artificial intelligence for fraud detection and prevention, lending processes, customer service, marketing, and back-office purposes. The utilization of artificial intelligence for these purposes decreases costs and increases productivity in the financial services industry, which in turn expands access to financial services for Marylanders.

As the Workgroup considers how artificial intelligence should be regulated across the State, MBA hopes that the concerns of the financial services will be considered before any recommendations are made to the General Assembly. Accordingly, MBA urges issuance of a **FAVORABLE** report on HB 956 **WITH AMENDMENTS**.

*The Maryland Bankers Association (MBA) represents FDIC-insured community, regional, and national banks, employing thousands of Marylanders and holding more than \$194 billion in deposits in almost 1,200 branches across our State. The Maryland banking industry serves customers across the State and provides an array of financial services including residential mortgage lending, business banking, estates and trust services, consumer banking, and more.*

## **Coalition Letter -- HB956 .docx.pdf**

Uploaded by: Grace Gedye

Position: FWA



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March 20, 2025

Honorable Senators  
Senate Finance Committee  
Miller Senate Office Building  
11 Bladen St, Annapolis, MD 21401

**Re: H.B. 956 - Necessary and Commonsense Amendment Request**

Dear Honorable Senators of the Finance Committee,

Thank you for your attention to the urgent issue of AI regulation this session. While the undersigned groups appreciate the intent of H.B. 956, it is critical that consumer protection and civil rights advocates, labor leaders, independent academics and ethicists, and representatives from state agencies that regulate industries where AI has a massive consumer impact are included in conversations about how Maryland should approach regulating AI. As currently written, the workgroup is made up almost entirely of industry and business representatives. Because it lacks civil society and expert academic voices, the working group outlined in this bill would be **unable to do critical analysis of the needs of Marylanders, and we fear there would be an insurmountable bias toward regulation that benefits companies instead of protecting Marylanders.**

The use of AI impacts Marylanders throughout their daily lives, and the makeup of the workgroup must reflect that. Workgroup and task force bills on AI throughout the country, including New York, Vermont, Connecticut, Colorado, and more,<sup>1</sup> recognize this need for balanced stakeholder involvement by including ACLU, AFL-CIO, academic, and other public interest representatives explicitly in their workgroups. Adding representatives from labor, civil rights, consumer protection, and privacy organizations will ensure there are voices focused on protecting Marylanders' rights involved in important discussions about the future of AI in the state.

Specifically, we offer the following recommendations for makeup of the workgroup:

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<sup>1</sup> H.B. 24-1468, 2024 Gen. Assemb., Reg. Sess. (Colo. 2024); H. 378, 2017-2018 Gen. Assemb., Reg. Sess. (Vt. 2018); S.B. 2, 2025 Gen. Assemb., Reg. Sess. (Conn. pending bill), [https://www.cga.ct.gov/asp/CGABillStatus/cgabillstatus.asp?selBillType=Bill&bill\\_num=SB2](https://www.cga.ct.gov/asp/CGABillStatus/cgabillstatus.asp?selBillType=Bill&bill_num=SB2); *Members*, NYC Automated Decision Systems Task Force (2018), <https://www.nyc.gov/site/adstaskforce/members/members.page>.

- **Recommendation 1:** Reduce the number of representatives from each category listed in (B)(5) of the bill by one representative, **and** add an equal number of public interest representatives, including:
  - Two representatives from non-profit organizations focusing on data privacy;
  - Two representatives from labor unions operating in the state;
  - Two representatives from non-profit organizations focusing on civil rights and liberties;
  - Two representatives from non-profit organizations focused on consumer protection;
  - Two members of academic faculty from the state that are experts in the development, operation of, and social implications of data science, artificial intelligence, or machine learning, to be appointed by the governor; and
  - Two academic or government technologists that specialize in and are able to interpret source code, consider technological development workflows, and consult regarding validation, to be appointed by the governor.
- **Recommendation 2:** Alternatively, if the Legislature prefers the size of the working group to remain closer to what was originally drafted, the number of representatives from each of these categories and the categories currently set out in the bill can be further scaled down, as long as the number of representatives from public interest groups remains equal to the number of representatives from industry-associated entities and organizations.

Thank you for your time and attention to this important issue. If you have any questions when working to integrate these recommendations or have any questions, don't hesitate to reach out to us at [williams@epic.org](mailto:williams@epic.org) and [bwinters@consumerfed.org](mailto:bwinters@consumerfed.org).

Sincerely,

Center for Democracy & Technology  
Consumer Federation of America  
Consumer Reports  
Electronic Privacy Information Center (EPIC)

## **HB 956 (Senate) CPD Letter in Support with Amendme**

Uploaded by: Hanna Abrams

Position: FWA

**CAROLYN A. QUATTROCKI**  
*Chief Deputy Attorney General*

**LEONARD J. HOWIE III**  
*Deputy Attorney General*

**CARRIE J. WILLIAMS**  
*Deputy Attorney General*

**SHARON S. MERRIWEATHER**  
*Deputy Attorney General*

**ZENITA WICKHAM HURLEY**  
*Chief, Equity, Policy, and Engagement*



**STATE OF MARYLAND**  
**OFFICE OF THE ATTORNEY GENERAL**  
**CONSUMER PROTECTION DIVISION**

**ANTHONY G. BROWN**  
*Attorney General*

**WILLIAM D. GRUHN**  
*Division Chief*

**PHILIP ZIPERMAN**  
*Deputy Division Chief*

**PETER V. BERNS**  
*General Counsel*

**CHRISTIAN E. BARRERA**  
*Chief Operating Officer*

**HANNA ABRAMS**  
*Assistant Attorney General*

March 20, 2025

TO: The Honorable Pamela Beidle, Chair  
Finance Committee

FROM: Hanna Abrams, Assistant Attorney General

RE: House Bill 956– Consumer Protection – Workgroup on Artificial  
Intelligence Implementation (SUPPORT WITH AMENDMENT)

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The Consumer Protection Division of the Office of the Attorney General supports House Bill 956 (“HB 956”), sponsored by Delegate C.T. Wilson, with a technical amendment. House Bill 956 establishes a workgroup for the purpose of making recommendations regarding artificial intelligence regulation and consumer protection.

Artificial intelligence offers the possibility of revolutionizing countless fields and streamlining processes, but as President Biden’s Executive Order noted, the “irresponsible use [of AI] could exacerbate societal harms such as fraud, discrimination, bias, and disinformation.”<sup>1</sup> House Bill 956 will allow constituents from government, industry, and community to work together to develop recommendations that permit the responsible development and deployment of artificial intelligence while at the same time protecting consumers from potential harms.

We support HB 956 with a non-substantive amendment. Section 3.5-807(f)(6) refers to the “Office of Consumer Protection.” The agency within the Office of the Attorney General that is charged with enforcing the Consumer Protection Act is the “Division of Consumer Protection.” Commercial Law Article, § 13-201.

Accordingly, we urge the Finance Committee to issue a favorable report on HB 956 with the amendment discussed.

cc: Members, Finance Committee  
The Honorable C.T. Wilson

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<sup>1</sup> Exec. Order NO 14,110, 88 Fed. Reg. 75191 (October 30, 2023), <https://www.federalregister.gov/documents/2023/11/01/2023-24283/safe-secure-and-trustworthy-developmentand-use-of-artificial-intelligence>.

# **CA-2025-HB956-TESTIMONY-FWA-SENATE VERS..docx.pdf**

Uploaded by: John Fiastro

Position: FWA

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**HB 956 - Consumer Protection – Workgroup on Artificial Intelligence Implementation**  
**Senate Finance Committee**  
**March 18, 2025**  
**Favorable**

Good afternoon, Chair Beidle and members of the Senate Finance Committee. My name is Tasha Cornish, and I am the Executive Director of the Cybersecurity Association, Inc. (CA), a statewide, nonprofit 501(c)(6) organization dedicated to the growth and success of Maryland's cybersecurity industry. Established in 2015, CA represents over 600 businesses, ranging from Fortune 500 companies to independent operators, collectively employing nearly 100,000 Marylanders.

Thank you for the opportunity to provide testimony on **House Bill 956 – Consumer Protection – Workgroup on Artificial Intelligence Implementation**. This bill seeks to establish a workgroup to monitor and make recommendations regarding various issues related to artificial intelligence (AI) and consumer protection. The Cybersecurity Association, Inc. **supports HB 956 with an amendment** to ensure that Maryland's cybersecurity industry is represented in this important discussion.

**Recommended Amendment: Add the Cybersecurity Association, Inc. to the Workgroup**

- **Current Proposal:** The workgroup is composed of representatives from the Maryland Technology Council, e-commerce, biotechnology, real estate, health care, and education sectors, as well as government officials.
- **Concern:** AI-related cybersecurity risks are a **critical** aspect of AI regulation and consumer protection, yet **cybersecurity representation is missing** from the workgroup.
- **Recommended Change:** Amend **Section 3.5-807(B)** to **add 3 representatives from the Cybersecurity Association, Inc.** to ensure cybersecurity considerations are fully addressed in AI policy discussions.

**Rationale for the Amendment**

**1. AI and Cybersecurity Are Inextricably Linked**

- AI-powered attacks are increasing in frequency and sophistication, with cybercriminals using AI for automated phishing, deepfake fraud, and AI-powered malware.
- AI governance must account for these cybersecurity threats to protect Maryland's businesses, government, and consumers.

**2. Ensuring a Balanced Approach to AI Regulation**

- The workgroup's responsibilities include monitoring private sector AI use, privacy protections, and consumer rights—all areas that directly intersect with cybersecurity.
- Including cybersecurity expertise will ensure practical, enforceable recommendations that enhance security without stifling innovation.

**3. Protecting Maryland's Economy from AI-Driven Cyber Threats**

- Including cybersecurity industry representation in AI policymaking helps protect state infrastructure, businesses, and residents from evolving threats.

## **Conclusion**

By incorporating this amendment, HB 956 will strengthen Maryland's AI regulatory framework by ensuring cybersecurity risks are fully addressed. This will help safeguard consumers, businesses, and state agencies as AI technologies continue to evolve.

Thank you for your time and consideration. I urge a favorable report on HB 956 with the proposed amendment.

Sincerely,  
Tasha Cornish  
Executive Director  
Cybersecurity Association, Inc.

**HB956 AI WorkGroup EconAction FWA Sen. FIN.docx.p**

Uploaded by: Marceline White

Position: FWA



## Testimony to the Senate Finance Committee

### HB956 Consumer Protection – Workgroup on Artificial Intelligence Implementation

Position: FWA

March 20, 2025

The Honorable Pam Beidle, Chair  
Senate Finance Committee  
3 East, Miller Office Building  
Annapolis, Maryland 21401  
cc: Members, Senate Finance

Chair Beidle and members of the committee:

Economic Action, formerly the Maryland Consumer Rights Coalition) is a statewide coalition of individuals and organizations that advances economic rights and equity for Maryland families through research, education, direct service, and advocacy. Our 12,500 supporters include consumer advocates, practitioners, and low-income and working families throughout Maryland. Our direct service programs assist clients in every county in Maryland.

We agree with the goals of HB956 which is to create a workgroup on Artificial Intelligence Implementation. AI offers both promise and peril for a variety of sectors including education, housing, employment, financial products and services, the arts and more.

There are opportunities to save time and labor on rote tasks as well as concerns about unintended consequences of AI, data privacy, and more. Economic Action Maryland Fund describes some of the many factors to consider in our [Digital Equity and Justice in Maryland: Challenges and Opportunities](#).

Expanding the proposed Work Group to include a broader range of advocates and experts to contribute to the discussion is an opportunity to ensure that stakeholders represent a variety of perspectives and experiences. Workgroup and task force bills on AI throughout the country, including New York, Vermont, Connecticut, Colorado, and more,<sup>1</sup> recognize this need for balanced stakeholder involvement by including ACLU, AFL-CIO, academic, and other public interest representatives explicitly in their workgroups. Adding representatives from labor, civil rights, consumer protection, and privacy organizations will ensure there are voices focused on

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<sup>1</sup> H.B. 24-1468, 2024 Gen. Assemb., Reg. Sess. (Colo. 2024); H. 378, 2017-2018 Gen. Assemb., Reg. Sess. (Vt. 2018); S.B. 2, 2025 Gen. Assemb., Reg. Sess. (Conn. pending bill), [https://www.cga.ct.gov/asp/CGABillStatus/cgabillstatus.asp?selBillType=Bill&bill\\_num=SB2](https://www.cga.ct.gov/asp/CGABillStatus/cgabillstatus.asp?selBillType=Bill&bill_num=SB2); *Members*, NYC Automated Decision Systems Task Force (2018), <https://www.nyc.gov/site/adstaskforce/members/members.page>.

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Tax ID 52-2266235

Economic Action Maryland Fund is a 501(c)(3) nonprofit organization and your contributions are tax deductible to the extent allowed by law.



protecting Marylanders' rights involved in important discussions about the future of AI in the state.

To achieve this goal, we recommend the following amendment:

Under (5) THE FOLLOWING MEMBERS, APPOINTED BY THE GOVERNOR: 9 (I) FOUR REPRESENTATIVES FROM THE MARYLAND 10 TECHNOLOGY COUNCIL; 11 (II) THREE REPRESENTATIVES FROM THE E-COMMERCE 12 INDUSTRY; 13 (III) THREE REPRESENTATIVES FROM THE BIOTECHNOLOGY 14 INDUSTRY; 15 (IV) THREE REPRESENTATIVES FROM THE REAL ESTATE 16 COMMUNITY; 17 (V) THREE REPRESENTATIVES FROM THE HEALTH CARE 18 SECTOR; AND 19 (VI) THREE REPRESENTATIVES FROM THE EDUCATION SECTOR.

ADD) **LINE 20 THREE REPRESENTATIVES FROM MARYLAND CONSUMER PROTECTION AND ECONOMIC RIGHTS ORGANIZATIONS**  
**LINE 21 THREE REPRESENTATIVES FROM MARYLAND CIVIL AND LABOR RIGHTS ORGANIZATIONS**  
**LINE 22 THREE REPRESENTATIVES FROM MARYLAND COMMUNITY DEVELOPMENT ORGANIZATIONS**

We are happy to work with the sponsor to discuss these amendments and urge the committee to adopt these critical amendments to HB956.

Best,

Marceline White  
Executive Director

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info@econaction.org · www.econaction.org  
Tax ID 52-2266235

Economic Action Maryland Fund is a 501(c)(3) nonprofit organization and your contributions are tax deductible to the extent allowed by law.

## **Coalition Letter -- HB956 -1.pdf**

Uploaded by: Kara Williams

Position: UNF



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March 20, 2025

Honorable Senators  
Senate Finance Committee  
Miller Senate Office Building  
11 Bladen St, Annapolis, MD 21401

**Re: H.B. 956 — Necessary and Commonsense Amendment Request**

Dear Honorable Senators of the Finance Committee,

Thank you for your attention to the urgent issue of AI regulation this session. While the undersigned groups appreciate the intent of H.B. 956, it is critical that consumer protection and civil rights advocates, labor leaders, independent academics and ethicists, and representatives from state agencies that regulate industries where AI has a massive consumer impact are included in conversations about how Maryland should approach regulating AI. As currently written, the workgroup is made up almost entirely of industry and business representatives. Because it lacks civil society and expert academic voices, the working group outlined in this bill would be **unable to do critical analysis of the needs of Marylanders, and we fear there would be an insurmountable bias toward regulation that benefits companies instead of protecting Marylanders.**

The use of AI impacts Marylanders throughout their daily lives, and the makeup of the workgroup must reflect that. Workgroup and task force bills on AI throughout the country, including New York, Vermont, Connecticut, Colorado, and more,<sup>1</sup> recognize this need for balanced stakeholder involvement by including ACLU, AFL-CIO, academic, and other public interest representatives explicitly in their workgroups. Adding representatives from labor, civil rights, consumer protection, and privacy organizations will ensure there are voices focused on

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protecting Marylanders' rights involved in important discussions about the future of AI in the state.

Specifically, we offer the following recommendations for makeup of the workgroup:

- **Recommendation 1:** Reduce the number of representatives from each category listed in (B)(5) of the bill by one representative, **and** add an equal number of public interest representatives, including:
  - Two representatives from non-profit organizations focusing on data privacy;
  - Two representatives from labor unions operating in the state;
  - Two representatives from non-profit organizations focusing on civil rights and liberties;
  - Two representatives from non-profit organizations focused on consumer protection;
  - Two members of academic faculty from the state that are experts in the development, operation of, and social implications of data science, artificial intelligence, or machine learning, to be appointed by the governor; and
  - Two academic or government technologists that specialize in and are able to interpret source code, consider technological development workflows, and consult regarding validation, to be appointed by the governor.
- **Recommendation 2:** Alternatively, if the Legislature prefers the size of the working group to remain closer to what was originally drafted, the number of representatives from each of these categories and the categories currently set out in the bill can be further scaled down, as long as the number of representatives from public interest groups remains equal to the number of representatives from industry-associated entities and organizations.

Thank you for your time and attention to this important issue. If you have any questions when working to integrate these recommendations, don't hesitate to reach out to us at [williams@epic.org](mailto:williams@epic.org) and [bwinters@consumerfed.org](mailto:bwinters@consumerfed.org).

Sincerely,

Center for Democracy & Technology  
Consumer Federation of America  
Consumer Reports  
Electronic Privacy Information Center (EPIC)  
Fight for the Future

# **House Bill 956- DoIT Written Testimony.docx (1).pd**

Uploaded by: Sara Elalamy

Position: INFO



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.



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

- 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