

Bryson F. Popham, P.A.

Bryson F. Popham, Esq.

191 Main Street
Suite 310
Annapolis, MD 21401
www.papalaw.com

410-268-6871 (Telephone)
443-458-0444 (Facsimile)

February 25, 2021

The Honorable Paul G. Pinsky, Chair
Senate Education, Health, and Environmental Affairs Committee
2 West, Miller Senate Office Building
Annapolis, Maryland 21401

RE: Senate Bill 873 - Department of Information Technology - State and Local Government Employees and Contractors - Cybersecurity Training - FWA

Dear Chairman Pinsky, Senator Jackson and Members of the Committee,

On behalf of my client, T. Rowe Price Group, Inc., I am writing to express our support for Senate Bill 873, with amendments. T. Rowe Price is a global financial services company headquartered in Baltimore, Maryland, with an additional campus in Owings Mills Maryland.

The legislation requires the Department of Information Technology, in coordination with the Maryland Cybersecurity Council, to develop criteria for, and to certify, cybersecurity training programs for use across state and local government in Maryland. Personnel in state and local government with access to government computer systems or databases would be required to complete an approved training program annually. The certification requirements under Senate Bill 873 include certification of training programs to be used by personnel of private businesses that contract with government agencies, where the contractor has access to the computer systems or databases of a government unit. Furthermore, Senate Bill 873 requires the Department of Information Technology to approve at least one certified program for outside contractors. We note that, among other things, the bill requires that the Department shall certify at least 20 cybersecurity training programs for use by governmental employees and update the certification list annually.

T. Rowe Price has a long history of protecting confidential information on behalf of its customers and others. For many years, there has been an annual requirement for its personnel to have at least one (and depending on an employee's area, more than one) cybersecurity training. Training programs are sometimes developed internally, and other times may rely on a vendor-supplied module with minimal customization. They are evaluated and refreshed as needed to keep up with the developing threat landscape. T. Rowe Price believes that Maryland law should permit contractors to utilize their own training programs that are designed to be consistent with the goals stated in the bill for the Department to use in assessing cybersecurity training programs (e.g., inclusion of activities, case studies, hypothetical situation, and other methods that focus on forming information security habits, detecting and reporting security threats, etc.).

It is our understanding that the Department will not take a position on the bill, and they suggested that we approach Senator Jackson or Delegate Krimm with our request.

Accordingly, T. Rowe Price respectfully requests an opportunity to work with Senator Jackson and Committee Counsel on amendment language that would permit a contractor to use its own training program under certain circumstances. Those circumstances would include a requirement that the contractor's training program is consistent with the criteria

stated in the bill for cybersecurity training programs. If the contractor's training program fails to meet those criteria, the Department could simply require the contractor to use a training program on the Department's approved list.

The Committee may wish to add other conditions, such as an additional requirement that a contractor relying on its own training program must provide a copy of the program to either the Department or the particular government agency involved. We respectfully submit that this is a common sense approach that will streamline the training process without sacrificing quality in the established standards.

Thank you for your consideration of this request.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Bryson Popham".

Bryson Popham, Esq.

cc: The Honorable Michael A. Jackson - michael.jackson@senate.state.md.us
The Honorable Carol L. Krimm - Carol.Krimm@house.state.md.us