



HOWARD COUNTY DEPARTMENT OF COMMUNITY RESOURCES AND SERVICES

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Delegate C.T. Wilson, Chair
Delegate Brian M. Crosby, Vice Chair
House Economic Matters Committee
House Office Building, Room 231
Annapolis, Maryland 21401

RE: HB603: Consumer Protection – Online Products and Services – Data of Children (Maryland Kids Code)

Chair Wilson, Vice Chair Crosby, and Members of the House Economic Matters Committee:

The Howard County Department of Community Resources and Services (DCRS) provides vital human services through its nine offices and ten boards and commissions, including the Office of Consumer Protection (OCP) and the Office of the Local Children's Board (OLCB), Office of Children & Families (OCF) and the Office of Human Trafficking Prevention (OHTP).

The OCP helps to protect Howard County consumers and tenants by mediating disputes, taking enforcement action or providing tips on how to stay safe online, avoid scams or make smart purchasing decisions. The OLCB, Howard County's Local Management Board, and is committed to creating a Howard County where all children and youth have equitable access to education, health care, basic needs and enrichment. The OCF promotes the well-being of children birth to five years old by providing a wide array of services and resources to promote healthy development, school readiness and strengthen families. Finally, the OHTP works across multiple disciplines, and focuses on local system improvements, responsibly raising awareness of trafficking and developing new rights-based outreach and survivor-centered initiatives. OCP, OLCB, OCF and OHTP regularly provide outreach and education opportunities to parents, grandparents, and caregivers regarding the importance of online safety for children.

One relevant collaboration between OCP, OLCB and OCF, with guidance from OHTP, is Your CyberFeet, a program in conjunction with the Howard County Public School System and BrightMinds Foundation which seeks to teach, at grade level from Pre-K through 12th grade, concepts surrounding digital footprints, their imprints, and impacts on the future where data is gathered at an undisclosed rate and stored forever. The program will feature The Howards, a multigenerational and multicultural avatar family which will be the mechanism and conduit of the core messaging from "sharenting" to basic concepts of digital footprints, to the impact of the imprints on college acceptance, security clearances, and risks of bullying and human trafficking.

DCRS, and the OCP, OLCB, OCF and OHTP, file this comment in support of HB603 which seeks to bring common sense and pragmatic approaches to the collection and sale of data involving children. Requiring an assessment of the data collected, the manner of collection, the age of the targets of collection and the impact of

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the collection, will likely be an eye-opening endeavor for the Covered Entities. Moreover, the requirement that Covered Entities not process or use personal information of children without deliberate thought to the best interest of the child allows educational platforms to continue to provide services to the public. Finally, avoiding “dark patterns” is in line with the Federal Trade Commission’s efforts in connection with common consumer transactions.

In our frequently ever-changing online world, we must remain constant in ensuring the protection and safety of children. We know that children and teens can be explicitly vulnerable to misleading advertisements and other misinformation, and we should not allow adults the avenue to directly target minors when they are online. Even in the online world, children should be able to navigate that space in safe and secure way.

For these reasons, DCRS by and through its Office of Consumer Protection, Office of the Local Children’s Board, Office of Children & Families, and Office of Human Trafficking Prevention, supports this bill.

Sincerely,



Jacqueline Scott, Director

Cc: The Honorable Dr. Calvin Ball III, County Executive
Erin Bonzon, Administrator OCF
Kim Eisenreich, Administrator OLCB
Ashton Petta, Manager OHTP
Tracy Rezvani, Administrator OCP
Maureen Evans Arthurs, Director of Government Affairs & Strategic Partnerships