



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

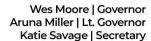
POSITION: Letter of Information

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 Al and consumer protection. While the bill takes an important step toward addressing Al 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 Al disclosures (e.g., data usage, decision-making transparency, bias mitigation)
 - b. Whether this pertains to commercial Al applications, government Al use, or both.





c. Whether these disclosures align with existing or proposed federal Al 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 DolT's role and the bill's implementation.

Best,

Melissa Leaman
Acting Secretary
Department of Information Technology