



February 27, 2026

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Delegate Kriselda Valderrama, Chair  
Delegate Lorig Charkoudian, Vice-Chair  
House Economic Matters Committee  
230 Taylor House Office Building  
231 Taylor House Office Building  
Annapolis, Maryland 21401

**RE: HB 952 Consumer Protection – Companion Chatbots – Regulation**

**Position: OPPOSE**

Dear Chair Valderrama, Vice Chair Charkoudian, and Members of the Committee:

The Maryland Psychological Association, (MPA), which represents over 1,000 doctoral level psychologists in the state, asks the House Economic Matters Committee to **provide an UNFAVORABLE report on HB 952.**

The Maryland Psychological Association respectfully opposes **House Bill 952**, which seeks to regulate “companion chatbots” by imposing broad consumer protection requirements and operational mandates. While the bill is well-intentioned in its effort to reduce risks related to self-harm and protect minors, the proposed framework is overly expansive, technologically impractical, and likely to produce unintended consequences that may limit access to beneficial digital mental health tools. The bill defines companion chatbots broadly as artificial intelligence systems capable of meeting users’ social needs and sustaining relationships across interactions, thereby capturing a wide range of emerging digital supports and therapeutic technologies without sufficient distinction between clinical, educational, and general consumer applications.

HB 952 also requires operators to implement protocols preventing chatbots from presenting content related to self-harm when users express such thoughts and to use “evidence-based methods” to detect suicidal ideation, while imposing enforcement penalties under the Maryland Consumer Protection Act. However, accurately identifying and responding to complex mental health expressions through automated systems remains an evolving scientific challenge. While mandating undefined “evidence-based” detection methods and strict intervention protocols seems protective, these terms are undefined and there is simply no “evidence-based” detection method currently available.

Finally, the bill’s regulatory structure may duplicate or conflict with existing professional, clinical, and federal oversight frameworks while placing responsibility for mental health risk assessment on technology providers rather than qualified health professionals. By imposing rigid operational requirements and annual reporting mandates, the legislation risks appearing to ensure safety through some required paper-based compliance despite the fact that there are no meaningful user safety outcomes.

For these, and many other reasons, the Maryland Psychological Association respectfully urges the Committee to provide an **Unfavorable Report on House Bill 952**. If we can provide any additional information or be of any assistance, please do not hesitate to contact the Chair of MPA’s Legislative Committee, Dr. Stephanie Olarte, at [mpalegislativcommittee@gmail.com](mailto:mpalegislativcommittee@gmail.com).

Respectfully submitted,

*Stephanie Wolf, JD, Ph.D.*  
Stephanie Wolf, JD, Ph.D.  
President

*Stephanie Olarte, Ph.D.*  
Stephanie Olarte, Ph.D.  
Chair, MPA Legislative Committee

cc: Barbara Brocato & Dan Shattuck, MPA Government Affairs