



April 1, 2026

Senate Finance Committee
Attn: Tammy Kraft
3 East Miller Senate Office Building
Annapolis, Maryland 21401

Re: HB 883 - "Consumer Protection - Artificial Intelligence - Behavioral Health Care Prohibitions" (Oppose)

Dear Chair Beidle, Vice Chair Hayes, and Members of the Senate Finance Committee:

On behalf of the Computer & Communications Industry Association (CCIA), I write to respectfully oppose HB 883 in advance of the Committee hearing on April 1, 2026. CCIA is an international, not-for-profit trade association representing a broad cross-section of communications and technology firms.¹ Proposed regulations on the intrastate provision of digital services therefore can have a significant, nationwide impact on CCIA members.

We share the bill's underlying goal of protecting Marylanders who seek behavioral health support through emerging technologies. However, as drafted, HB 883 extends well beyond that objective and would regulate a broad array of general-purpose AI tools that are not designed to provide mental health services.

HB 883 regulates tools far beyond behavioral health contexts.

The bill's requirements are not limited to AI systems intended to deliver behavioral health support. Instead, its scope is broad enough to encompass general-purpose chat assistants, voice-activated devices, and productivity applications that millions of Marylanders use for routine, everyday tasks. This is especially concerning given that the bill contains a civil penalty capped at \$1,000,000 per violation.

By applying uniform disclosure and safety protocol mandates to all covered AI systems, regardless of their function or purpose, the bill blurs the line between a specialized mental health chatbot and a digital assistant used to check the weather or draft an email. For example, would this apply to customer service chatbots that answer support questions, productivity tools that use conversation interfaces, or even wellness applications that respond to user prompts about goals or progress? Precise narrowing is required to focus the regulation solely on the intended targets. That lack of distinction creates compliance obligations disconnected from actual risk.

¹ For more than 50 years, CCIA has promoted open markets, open systems, and open networks. CCIA members employ more than 1.6 million workers, invest more than \$100 billion in research and development, and contribute trillions of dollars in productivity to the global economy. A list of CCIA members is available at <https://www.ccianet.org/members>.



Mandated disclosures for every interaction undermine usability.

HB 883 would require disclosures at the outset of each use of an AI system. For conversational and voice-first services, that means a repetitive and intrusive warning before routine interactions, even when there is no behavioral health component to the exchange. These products are designed to be seamless and intuitive. Requiring repeated disclaimers unrelated to the task at hand would degrade user experience without delivering meaningful additional protection, particularly where the product does not claim to provide clinical care in the first place.

HB 883 risks creating a fractured regulatory environment, and requires a more thoughtful approach.

The bill would also contribute to a growing panoply of state artificial intelligence laws that impose inconsistent and potentially conflicting obligations on interstate digital services. Artificial intelligence systems are developed, trained, and deployed on a national and global scale. Prescriptive state-level mandates risk becoming outdated quickly, complicating compliance, and discouraging investment in jurisdictions that adopt rigid or punitive frameworks. Maryland has long benefited from policies that promote innovation and technological growth. A fragmented regulatory approach threatens that position by making it more difficult for companies to deploy new services and features in the state.

Other states have taken a narrower and more tailored approach by focusing regulatory obligations on AI systems specifically developed, marketed, or held out as providing behavioral health services. For example, Utah’s HB 452 concentrates on systems intended to provide mental health-related support, while avoiding sweeping mandates on general-purpose technologies.² We respectfully encourage the sponsor and the Committee to review models such as Utah’s HB 452 and to refine HB 883 so that it addresses genuine behavioral health AI applications without capturing everyday tools Marylanders use for communication, productivity, and convenience.

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Maryland can and should protect vulnerable individuals who turn to AI for mental health support. A targeted framework that focuses on systems designed for that purpose, will better achieve that goal while preserving access to widely used, non-clinical technologies.

We stand ready to work with you to develop amendments that meaningfully advance consumer protection without unintended consequences for innovation and access.

Sincerely,

Megan Stokes
State Policy Director
Computer & Communications Industry Association

² H.B. 452, Artificial Intelligence Amendments, 66th Leg., 2025 Gen. Sess. (Utah 2025), <https://le.utah.gov/~2025/bills/static/HB0452.html>.