January 25, 2024

House Committee on Innovation, Internet, and Technology
Rhode Island State House
82 Smith Street
Providence, RI 02903

**Re: H 7158 – AN ACT RELATING TO STATE AFFAIRS AND GOVERNMENT – ARTIFICIAL INTELLIGENCE ACCOUNTABILITY ACT**

Dear Chair Baginski,

Thank you and the House Committee on Innovation, Internet, and Technology for providing the Division of Enterprise Technology Strategy and Services (ETSS) the opportunity to submit comments on H 7158, Artificial Intelligence Accountability Act.

As the pre-eminent emerging technology, Artificial Intelligence (A.I.) adoption requires the highest level of scrutiny and oversight to ensure that all identified risks associated with any state or constituent sensitive data informing A.I. algorithms are properly mitigated.

ETSS is fully committed to the adoption of emerging technologies that will support efficient and effective government operations in a secure, scalable, sustainable, and ethical manner. In fact, ETSS is currently in the process of evaluating how best to utilize resources to address the emerging concerns of A.I.

ETSS agrees that standard procedures and policies are necessary to guide adoption and implementation of A.I., including:
- data readiness and data security activities,
- the creation of ethical A.I. practices and policies,
- a cross-government, higher education, and private sector collaboration to the identify A.I. adoption opportunities within Rhode Island state government, provided that these opportunities inform ethical decision-making and potentially automate redundant, time-consuming tasks for the state workforce.

However, while ETSS prepares to address challenges posed by A.I.'s adoption, including providing implementation frameworks, policies and procedures, and tools for state agencies, it is concerned that a thorough and successful evaluation of unlawful discrimination and impacts in systems using A.I. cannot be completed solely by ETSS. The federal government, through President Biden's Executive Order on Safe, Secure, and Trustworthy Development and Use of Artificial Intelligence, recently instructed all federal entities to address discriminatory effects in

programs that they operate. As proposed, this bill diverges from the approach set out on the federal level.

Separately, ETSS respectfully requests that the Committee consider amending the annual report contemplated within H 7158 such that the proposed A.I. reporting be included as a section of the existing annual ETSS report currently required by R.I.G.L. § 42-11-2.6.

ETSS continues to explore this topic as well as many other emerging technology opportunities. Our commitment to the modernization of our business operating environment through adoption of modern technologies will continue to be executed in a governed and deliberate manner. As always, I thank you for your partnership and consideration of this letter.

Sincerely,

**Brian Tardiff** Digitally signed by Brian Tardiff
Date: 2024.01.25 13:51:56 -05'00'

Brian Tardiff
State Chief Digital Officer and Chief Information Officer

cc: The Honorable Representative John Lombardi
    The Honorable Members of the House Committee on Innovation, Internet & Technology
    Dawn Huntley, Committee Clerk
    Nicole McCarty, Chief Legal Counsel, House Speaker's Office