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Monika P. Zuluaga

April 15, 2026

The Honorable Arthur Corvese  
House Committee on Labor  
State House  
Providence, RI 02903

Dear Chairman Corvese and Members of the Committee,

The Northern RI Chamber of Commerce (NRICC) represents businesses in the communities of Burrillville, Central Falls, Cumberland, Foster, Glocester, Johnston, Lincoln, North Providence, North Smithfield, Pawtucket, Scituate, Smithfield and Woonsocket. I write to express the Chamber's opposition to H.7767, An Act Relating to Labor and Labor Relations – Artificial Intelligence Use and Fair Employment Practices.

H.7767 creates a statutory framework to broadly address and regulate the use of artificial intelligence in the workplace. The legislation: (1) Sets rules for "inputs and outputs" generated by AI when used to make certain decisions about workers, (2) Addresses the collection of data through electronic monitoring and time-tracking tools by banning such use unless the collection purpose meets specific needs set in the legislation and (3) Covers "work process information" related to an individual's productivity.

This legislation would create significant operational and legal challenges for businesses by narrowly restricting when and how electronic monitoring can be used. By limiting monitoring to vaguely defined "legitimate purposes" and requiring it to be "narrowly tailored" and "minimally invasive," the bill introduces uncertainty that could expose employers to increased litigation risk and compliance costs, as businesses may struggle to determine what qualifies under these subjective standards. Additionally, the outright prohibition of widely emerging technologies such as facial recognition and emotion or gait analysis removes potentially valuable tools that can enhance workplace security, prevent theft, improve safety, and streamline operations. These restrictions could put Rhode Island businesses at a competitive disadvantage compared to those in other states that are able to leverage modern technologies more effectively, while also increasing administrative burdens and limiting an employer's ability to protect their workforce, customers, and assets.

The requirement in H.7767 that employers obtain an independent audit before deploying certain monitoring or AI tools—and then share the results with employees—would impose significant cost and administrative burdens,



particularly on small and mid-sized businesses. Independent audits assessing bias, privacy, and legal compliance are often expensive, require specialized expertise, and may need to be repeated as technologies evolve, creating ongoing financial obligations. The mandate to distribute audit findings to employees also raises concerns about misinterpretation of complex technical reports and could expose proprietary or sensitive operational details. For smaller organizations with limited staff and resources, these requirements could be especially difficult to manage, effectively creating a barrier to adopting modern technologies.

**The Chamber appreciates how quickly technology is changing the workplace and urges the committee to complete a comprehensive study with experts from the field and members of the business community, both large and small, in order to gain a full perspective of the numerous issues in this matter.**

Respectfully,

A handwritten signature in blue ink that reads "Monika Zuluaga".

Monika P. Zuluaga  
President & CEO