

# Responsible Use of AI in Maryland Public Benefits Programs

Policy Position Paper | MRAC Responsible AI Policy Series

MARYLAND RESPONSIBLE AI COUNCIL • Public Sector Applications and Government Services Committee

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## 1. Policy One-Pager

Policy one-pager | Accompanies the full position paper | October 2026

Accompanies the full MRAC Issue Brief, “Responsible Use of AI in Maryland Public Benefits Programs,” August 2026.

**The Issue** Maryland agencies are exploring AI in public benefits administration [6]. Residents need accurate service and meaningful human review. Adoption should be governed by demonstrated outcomes and safeguards, not vendor promises.

**Why It Matters Now** Purchases and workflow choices can become difficult to reverse. Maryland can build accountability into implementation through its existing AI governance framework [1,2].

### What Maryland Should Weigh

| Key Risks                                                                                                                                                                                                                | Key Opportunities                                                                                                                                                                                                   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"><li>• Incorrect or unequal outcomes for residents.</li><li>• Exposure or inappropriate reuse of personal data.</li><li>• Loss of staff expertise, displacement, and burnout.</li></ul> | <ul style="list-style-type: none"><li>• Better service and less administrative rework.</li><li>• More accessible and multilingual support.</li><li>• Workforce skills and Maryland research partnerships.</li></ul> |

**What the Evidence Shows** A Colorado randomized sandbox study found no overall quality or efficiency gain, despite favorable staff ratings and possible consistency benefits [3]. Georgetown’s policy-to-code experiments still required external knowledge and human oversight [4].

Neither study establishes statewide savings or performance in Maryland. Benefits depend on the task, integration, and evaluation.

### MRAC’s Recommendations

1. Strengthen evaluation and cost effectiveness metrics: measure results.
2. Require independent assessment of AI systems: test vendor claims.
3. Make privacy protections explicit: control access, reuse, and deletion.
4. Guarantee transparency and a right to human review: enable escalation.
5. Require equitable performance across groups: test outcomes.
6. Provide workforce training and support: prepare staff.
7. Ensure responsible delegation and human authority: assign accountability.
8. Build Maryland AI expertise: develop partnerships.
9. Support interoperability and system coordination: protect shared data.

**The Ask** The General Assembly and benefits agencies, working with DoIT, should implement these safeguards through existing law and Maryland’s Responsible AI Policy, without creating a parallel governance structure [1,2].

## 2. Background and Context

The source brief draws on 2026 interviews with officials from two Maryland agencies involved in benefits programs. They described bounded uses such as document processing, communication, and workflow support, with eligibility and adjudication remaining under human authority [6]. These accounts describe the agencies consulted; they are not a statewide inventory or independent verification of each deployment.

The Supplemental Nutrition Assistance Program (SNAP), Unemployment Insurance (UI), and Medicaid illustrate the stakes of benefits administration. Extracting fields from a document differs from generating an answer about eligibility or recommending a case outcome. A useful tool in one task cannot be assumed safe in another. Maryland's Responsible AI Policy and DoIT guidance, drawing on the Governor's responsible-AI executive order, provide the existing governance context [1,2].

## 3. Risks and Opportunities

### 3.1 Risks

1. Incorrect or unequal service. Unsupported answers and poorly tested decision support could delay assistance or produce uneven outcomes; the research warrants task-specific testing rather than broad efficacy claims [3,4].
2. Privacy loss. Sensitive applicant data can be exposed or reused beyond its purpose unless agency and vendor controls are enforceable. This is a risk identified in the committee's analysis [6].
3. Workforce harm. MRAC identifies loss of adjudication expertise, displacement, burnout, and change overload as risks, even where agency officials emphasized productivity and support. These are concerns to monitor, not measured Maryland impacts [6].

### 3.2 Opportunities

1. Better operations. Carefully evaluated assistance may reduce repetitive work or improve consistency; net gains must be demonstrated in the actual workflow [3].
2. Better access. MRAC sees potential for multilingual and accessible communication, provided agencies test accuracy and usability for the affected populations [6].
3. Stronger capacity. Training, internships, and research partnerships can develop State employee expertise and Maryland institutional capacity [6].

## 4. Policy Considerations and Implications for Maryland

For Labor and other benefits agencies, a tool should have an accountable business owner, a defined purpose, and a route for correcting errors. Procurement must specify evaluation access, data handling, and change notification. DoIT's intake process can connect these controls to the State's existing risk governance; agency program obligations and applicable federal requirements continue to govern benefits decisions [1,2].

## 5. Sources and Methods

The August issue brief used structured interviews with officials from two State agencies during 2026, a literature and risk-catalog review, and MRAC's legislative analysis [6]. Interview reporting removes personal identifiers; this revision identifies no individual interviewee. The source brief included MIT's AI Risk Repository as a risk-organizing resource [5]. This version checks the Colorado evaluation, Georgetown experiments, and Maryland governance sources [1–4]; it adds no interviews. Interview accounts, empirical findings, and MRAC proposals are distinguished throughout.

## 6. MRAC Policy Position

MRAC supports bounded, evaluated uses of AI that improve benefits administration while preserving human authority and practical access to services. Four principles guide this position: evidence before scale, privacy and equitable access, accountable human review, and workforce support. State governance should strengthen existing agency responsibilities rather than create a separate AI benefits bureaucracy [6].

## 7. Recommendations and Legislative Guidance

**1. Strengthen evaluation and cost effectiveness metrics.** Agencies should establish a baseline and measure accuracy, processing time, rework, cost per resolved request, escalation, and resident experience before scaling a tool. Report results by relevant demographic, language, disability, and geographic groups where lawful and statistically meaningful. Procurement milestones and legislative reporting requirements should use these measures; the Colorado study illustrates why favorable impressions alone cannot establish net benefit [3].

**2. Require independent assessment of AI systems.** Agencies should obtain evaluation by a qualified unit, university, or third party independent of the vendor's product claims. Contracts should provide access to test materials, relevant logs, and version-change information, subject to privacy and security controls. The evidence from Colorado and Georgetown supports contextual testing with domain expertise, not reliance solely on demonstrations or resident complaints [3,4].

**3. Make privacy protections explicit.** Agencies should specify storage, access permissions, permitted uses, retention, deletion, and incident responsibilities in procurement and program procedures. Contracts should prohibit secondary use or vendor training on applicant data unless separately authorized through applicable legal and governance processes. These controls respond to the committee's privacy concerns and should operate through existing State review mechanisms [1,2,6].

**4. Guarantee transparency and a right to human review.** Agencies should tell residents when AI materially affects an interaction and explain how to reach a trained person, correct information, or challenge an adverse result. Provide an alternative to direct AI interaction where practical; backend processing may instead require meaningful escalation and review. Put these procedures in program rules, service standards, and vendor obligations, reflecting the original brief's distinction between useful transparency and impractical blanket opt-out [6].

**5. Require equitable performance across groups.** Agencies should test accuracy and usability for affected populations before deployment and monitor outcomes after material changes. Procurement acceptance criteria and recurring reviews should include language access, disability accessibility, digital-literacy barriers, and disparities in errors or escalation. Set corrective-action or suspension triggers when a tool fails the agreed criteria; this operationalizes the committee's equity recommendation without assuming that parity is automatic [6].

## 7. Recommendations and Legislative Guidance continued

**6. Provide workforce training and support.** Agencies should budget for role-specific training, staff consultation, and time to evaluate and challenge AI output. Implementation plans should monitor workload, rework, expertise retention, and displacement risks alongside productivity. These requirements translate the source brief's workforce concerns into program management and procurement deliverables [6].

**7. Ensure responsible delegation and human authority.** Agencies should name the official accountable for benefits decisions and define which tasks AI may support. Case procedures should require trained human review where outputs affect substantive determinations, with recorded reasons and escalation paths. The Colorado and Georgetown findings support caution about substituting generated output for domain judgment [3,4]; MRAC's position is to retain final benefits determinations under human authority [6].

**8. Build Maryland AI expertise.** Agencies should include opportunities for Maryland educational and research institutions to contribute independent evaluation, workforce learning, and appropriately supervised internships. Use lawful research agreements and procurement pathways with confidentiality and conflict-of-interest controls. This captures the source brief's capacity-building opportunity without assuming that a local partnership alone guarantees effectiveness [6].

**9. Support interoperability and system coordination.** Agencies should specify documented interfaces, data definitions, and authorized information flows when integrating AI into benefits systems. Interagency agreements and contracts should limit sharing to permitted purposes, preserve access controls, and prevent avoidable duplication. The committee recommends coordination as an operational opportunity, not unrestricted pooling of resident data [6].

## 8. The Ask

MRAC asks the General Assembly to incorporate these safeguards into relevant benefits legislation and oversight, and asks benefits agencies to implement them with DoIT through Maryland's existing Responsible AI Policy and guidance. Agencies should identify accountable owners, evaluation measures, and review procedures before expansion. MRAC does not propose a new governance structure; it seeks evidence, enforceable safeguards, and practical agency capacity within the current framework [1,2,6].

## 9. References

- [1] Maryland Department of Information Technology. The State of Maryland's Responsible AI Policy. Version 1.0, May 23, 2025. <https://doit.maryland.gov/policies/ai/Pages/maryland-responsible-ai-policy.aspx>
- [2] Maryland Department of Information Technology. Responsible AI Policy Implementation Guidance. Version 1.0, May 2025. <https://doit.maryland.gov/policies/ai/Pages/maryland-responsible-ai-policy-implementation-guidance.aspx>
- [3] Martin, O., Magesh, V., Surani, F., Rodolfa, K., Ho, D. E., and Perez, A. Evaluating Generative AI in Benefits Administration: A Demonstration Project. Symposium on Computer Science and Law, 2026. <https://reglab.stanford.edu/publications/evaluating-generative-ai-in-benefits-administration-a-demonstration-project/>
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- [5] Massachusetts Institute of Technology. AI Risk Repository. Risk-organizing resource cited in MRAC's August 2026 issue brief. <https://airisk.mit.edu/>
- [6] Maryland Responsible AI Council, Public Sector Committee. MRAC Issue Brief and Recommendations: Responsible Use of AI in Maryland Public Benefits Programs. August 2026. [https://docs.google.com/document/d/1Yj\\_WzCQWAgeoxaqqrvQp-AbI3-UEt6hzMxOUkuyJxJA/edit](https://docs.google.com/document/d/1Yj_WzCQWAgeoxaqqrvQp-AbI3-UEt6hzMxOUkuyJxJA/edit)

## Appendix A. Contributors and Document Control

**Authoring committee:** Public Sector Applications and Government Services Committee

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**Minority or dissenting views:** None recorded in the source documents.

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