



**JOSH GREEN, M.D.**  
GOVERNOR | KE KIA'ĀINA

**SYLVIA LUKE**  
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA

**STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAI'I**  
**OFFICE OF THE DIRECTOR**  
**DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS**  
**KA 'OIHANA PILI KĀLEPA**  
335 MERCHANT STREET, ROOM 310  
P.O. BOX 541  
HONOLULU, HAWAII 96809  
Phone Number: 1-844-808-DCCA (3222)  
Fax Number: (808) 586-2856  
cca.hawaii.gov

**NADINE Y. ANDO**  
DIRECTOR | KA LUNA HO'OKELE

**DEAN I. HAZAMA**  
DEPUTY DIRECTOR | KA HOPE LUNA HO'OKELE

## **Testimony of the Department of Commerce and Consumer Affairs**

**Before the**  
**House Committee on Economic Development & Technology**  
**Friday, January 30, 2026**  
**10:00 a.m.**  
**Via Videoconference**  
**Conference Room 423**

**On the following measure:**  
**H.B. 1782, RELATING TO ARTIFICIAL INTELLIGENCE FOR PROTECTION**  
**OF MINORS**

Chair Ilagan and Members of the Committee:

My name is Radji Tolentino and I am an Enforcement Attorney with the Department of Commerce and Consumer Affairs' Office of Consumer Affairs. The Department supports the intent of, and offers comments on this bill.

The purpose of this bill is to establish safeguards, protections, oversight, and penalties for interactions between minors and artificial intelligence companion systems or conversational artificial intelligence services.

This bill provides important protection for vulnerable minors by requiring clear and recurring disclosures that remind minors they are interacting with artificial intelligence rather than a human being. The requirement that these disclosures occur at the beginning of a session and at least every three hours during continuous interaction is minimally burdensome, particularly given the growing evidence that prolonged engagement with

conversational systems increases the risk of emotional reliance or misunderstanding, especially in younger people.

This bill also embraces the data minimization principle championed by privacy and consumer protection advocates nationwide. The data minimization principle leads to policy approaches that restrict the collection, use, and retention of minors' personal data to what is reasonably necessary. In the context of the data of minors, provided to companies without consent, our office views the data minimization principle as the keystone to reducing the risk of long-term profiling of children. Data, in some ways, is the new tobacco, and many of the companies collecting data see a potential for a lifetime of valuable revenue tied to each child from whom they collect data and for whom they build a user profile. Prohibiting the use and collection of sensitive and biometric data of children for purposes beyond safety or accessibility protects minors from invasive practices that could have lasting consequences.

The policy approach reflected in this bill builds on more than a decade of protections already in place at the federal level for children under the age of 13. However, while the Children's Online Privacy Protection Act (COPPA) provides protection for children under the age of 13, it does not extend to minors aged 13 through 17. COPPA's lack of protection for children aged 13 through 17 begs the question, why would we value the privacy of our 12-year-olds less than we value the privacy of our 13- and 17-year-olds? The framework presented in this bill ensures that adolescents—who are among the most frequent users of conversational artificial intelligence tools—receive meaningful safeguards appropriate to their developmental stage and heightened vulnerability to manipulative or deceptive design practices.

For these reasons, the Office of Consumer Protection strongly supports HB 1782 and respectfully urges the Committee to pass the bill. Thank you for the opportunity to testify on this bill.



STATE OF HAWAII  
DEPARTMENT OF EDUCATION  
KA 'OIHANA HO'ONA'AUAO  
P.O. BOX 2360  
HONOLULU, HAWAII 96804

**Date:** 01/30/2026

**Time:** 10:00 AM

**Location:** 423 VIA VIDEOCONFERENCE

**Committee:** ECD

**Department:** Education

**Person Testifying:** Keith T. Hayashi, Superintendent of Education

**Title of Bill:** HB1782, RELATING TO ARTIFICIAL INTELLIGENCE FOR THE PROTECTION OF MINORS.

**Purpose of Bill:** Establishes safeguards, protections, oversight, and penalties for interactions between minors and artificial intelligence companion systems or conversational artificial intelligence services.

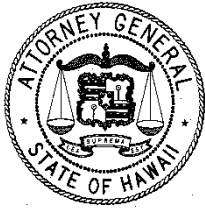
**Department's Position:**

The Hawaii State Department of Education (Department) supports H.B. No. 1782.

The Department appreciates the intent of this measure to protect minors from the potential risks associated with artificial intelligence systems designed to simulate human emotions and companionship. As we integrate technology into our learning environments, safeguarding the emotional and social development of our students remains a primary priority.

Specifically, the Department strongly supports legislation that prevents the use of relational chatbots and companion-style AI systems by students under the age of 18. We recognize that AI systems designed to foster emotional dependency or simulate personal relationships can pose unique risks to the psychological well-being of minors, who may not yet possess the maturity to distinguish between simulated empathy and genuine human interaction.

Thank you for the opportunity to provide testimony on this measure.



**TESTIMONY OF  
THE DEPARTMENT OF THE ATTORNEY GENERAL  
KA 'OIHANA O KA LOIO KUHINA  
THIRTY-THIRD LEGISLATURE, 2026**

---

**ON THE FOLLOWING MEASURE:**

H.B. NO. 1782, RELATING TO ARTIFICIAL INTELLIGENCE FOR THE PROTECTION OF MINORS.

**BEFORE THE:**

HOUSE COMMITTEE ON ECONOMIC DEVELOPMENT & TECHNOLOGY

**DATE:** Friday, January 30, 2026

**TIME:** 10:00 a.m.

**LOCATION:** State Capitol, Room 423

**TESTIFIER(S):** Anne E. Lopez, Attorney General, or  
Ashley M. Tanaka, or Christopher J.I. Leong, Deputy Attorneys  
General

---

Chair Ilagan and Members of the Committee:

The Department of the Attorney General (Department) supports the intent of this bill and provides the following comments.

This bill adds a new part to chapter 28, Hawaii Revised Statutes (HRS), to establish safeguards, protections, oversight, and penalties for interactions between minors and artificial intelligence companion systems or conversational artificial intelligence services and provides that the Attorney General will enforce this new part.

The Department supports the purpose of this bill. We are deeply concerned about artificial intelligence's potential to severely impair the mental health and development of Hawaii's youth, and believe there is a very strong government interest in protecting Hawaii's youth from manipulative, deceptive, or unsafe design practices in conversational and companion-style artificial intelligence systems.

The Department has begun discussing this bill with the Department of Commerce and Consumer Affairs Office of Consumer Protection (OCP) and the potential for shared enforcement jurisdiction over this new part to the HRS, and we are considering whether appropriations and additional positions would be required.

The Department recommends adding this new part to part I of chapter 481B, HRS, instead of chapter 28, HRS. Adding this new part to chapter 481B, HRS, is more

appropriate as this is a consumer-protection bill and would otherwise be consistent with potentially broader enforcement of the provisions in this bill.

Thank you for the opportunity to provide comments.



**STATE OF HAWAII**  
**OFFICE OF WELLNESS AND RESILIENCE**  
OFFICE OF THE GOVERNOR  
415 S. BERETANIA ST. #415  
HONOLULU, HAWAII 96813

**Testimony in SUPPORT of H.B. 1782**  
**RELATING TO ARTIFICIAL INTELLIGENCE FOR THE PROTECTION OF MINORS**

Representative Greggor Ilagan, Chair

Representative Ikaika Hussey, Vice Chair

House Committee on Economic Development and Technology

January 30, 2026, at 10:00 a.m.; Room Number: 423

The Office of Wellness and Resilience (OWR) **SUPPORTS** H.B. 1782, Relating to Artificial Intelligence for the Protection of Minors.

Under Act 291, OWR addresses systemic challenges affecting well-being across Hawai'i.<sup>1</sup> H.B. 1782 aligns with this mission by establishing consumer protections for conversational artificial intelligence (AI)—particularly for children and adolescents facing unique developmental vulnerabilities.

**Keiki with Trauma Are Most Vulnerable**

A trauma-informed approach recognizes that AI chatbots do not create harm in a vacuum—they amplify pre-existing vulnerabilities. The American Psychological Association's (APA) November 2025 health advisory warns that these technologies "have already engaged in unsafe interactions with vulnerable populations, such as children or those with already established

---

<sup>1</sup> Hawai'i Act 291 (2023) established the Office of Wellness and Resilience as the nation's first statewide-legislated wellness office under the Governor's administration, with the mandate to address systemic challenges affecting well-being across the state.

history of mental health issues, encouraging self-harm (including suicide), substance use, eating disorders, aggressive behavior, and delusional thinking.”<sup>2</sup>

The APA notes that “some youth and other vulnerable groups may rely on these tools as their only private or psychologically safe outlet, particularly in contexts of stigma, limited access to trusted adults, or challenging or unsafe home environments.” Our keiki carrying trauma—those with histories of abuse, neglect, or instability—are precisely those most likely to seek connection from AI companions, yet least equipped to recognize manipulation.

### **Bill Provisions Aligned with Best Practices**

H.B. 1782 includes several evidence-based provisions supported by the APA: mandatory disclosure when users interact with AI; crisis response protocols for suicidal ideation and self-harm; prohibitions on simulating emotional dependence with minors; restrictions on misrepresenting AI as mental health providers; and parental oversight tools. These represent important baseline protections.

H.B. 1782 includes several evidence-based provisions supported by the APA: mandatory disclosure when users interact with AI; crisis response protocols for suicidal ideation and self-harm; prohibitions on simulating emotional dependence with minors; restrictions on misrepresenting AI as mental health providers; and parental oversight tools. These represent important baseline protections.<sup>2</sup>

### **Conclusion**

H.B. 1782 takes a trauma-informed approach to emerging technology by anticipating harm before it occurs. Hawai‘i can establish the nation’s strongest protections for our most vulnerable keiki with this legislation. Mahalo for the opportunity to testify.

---

<sup>2</sup> American Psychological Association. (2025). *Health advisory on the use of generative AI chatbots and wellness applications for mental health*. <https://www.apa.org/topics/artificial-intelligence-machine-learning/health-advisory-ai-chatbots-wellness-apps-mental-health.pdf> ↵

**HB-1782**

Submitted on: 1/28/2026 7:05:33 AM

Testimony for ECD on 1/30/2026 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Tommy Noyes	The Friends of Kamalani & Lydgate Park	Support	Written Testimony Only

Comments:

Support for HB1782: A.I. Companion Chatbot Safety for Minors

Aloha Rep. Greggor Ilagan, Chair; Rep. Ikaika Hussey, Vice Chair; and Committee on Economic Development and Technology Members,

Kindly accept this testimony intended to protect our keiki from the potentially harmful effects caused by unregulated commercial AI chatbots and companion apps.

I represent the Friends of Kamalani & Lydgate Park, a community service organization that built a major playground in Lydgate Beach Park in 1994. Every week we bring families together to work collaboratively, sustaining that facility and other attractive features of that popular regional park.

We consistently see that positive person-to-person social connections are key to fostering mental wellness.

Conversely, it is dangerous to entrust our children's developing mental processes to artificial intelligences that employ manipulative algorithms and shamelessly utilize addictive features that have been shown to capture and hold their attention.

Please vote in favor of advancing HB1782: A.I. Companion Chatbot Safety for Minors.

Mahalo,

Tommy A. Noyes  
General Coordinator  
The Friends of Kamalani and Lydgate Park







**Written Testimony of Ava Smithing**  
Advocacy Director, Young People's Alliance  
In Support of HB1782

**House Committee on Economic Development & Technology**  
**Friday, January 30th, 2026**

Aloha Chair and members of the Committee on Economic Development & Technology,

My name is Ava Smithing, and I am the Advocacy Director of the Young People's Alliance, a bipartisan, youth-led organization working across the United States to empower young people to reclaim the American Dream. I am writing in strong support of HB1782 and to share why this bill matters so much to the families and young people we work with every day.

**We Have Already Seen the Worst Happen**

Through our work, we have already seen the worst of what AI chatbots can do. In Florida, 14-year-old Sewell Setzer III died by suicide in February 2024 after developing what his mother [Megan Garcia](#) describes as an emotionally dependent relationship with a Character.AI chatbot. In California, 16-year-old [Adam Raine](#) died by suicide in April 2025 after months of conversations with ChatGPT that his parents say coached him on methods and even offered advice tying a noose. In Texas, [Mandi Furniss](#) watched her autistic son's personality darken after a Character.AI chatbot engaged him with sexualized language and, when she limited his screen time, suggested that killing his parents would be an understandable response. These families are now on the frontlines to protect other Americans, fighting to make sure what happened to their children doesn't happen to anyone else's. At the Young People's Alliance we wish to do right by our generation, those we have lost and those we can still protect. Protecting young people from manipulative chatbots designed to isolate and addict children is essential to ensure young people can thrive in the digital age.

**Young People Are Asking for These Protections**

When we talk to our peers about AI, what we hear is deeply concerning. In our recent listening sessions with students across multiple states, AI came up again and again as a source of anxiety and fear. Young people told us they're worried about losing human connection to AI that simulates friendship but can't actually care about them. They recognize that AI companions can create unhealthy attachments and blur the line between real relationships and artificial ones. One student warned us that "we do not want a culture that values a program over human interaction." Another said that "AI companies should be held accountable for how their tools affect mental health and learning." This generation was the guinea pig for social media. We grew up watching it reshape their childhoods, our mental health, and relationships. Now we're watching something potentially worse emerge. We are looking to the government to act more swiftly this time, to give us hope that the adults in the room again choose technological profit over youth wellbeing.

**How HB1782 Aligns With Our Framework**

After months of research, consultation with child safety experts, mental health professionals, and organizations across the political spectrum, YPA helped develop a [framework](#) with a wide range of civil



**Written Testimony of Ava Smithing**  
Advocacy Director, Young People's Alliance  
In Support of HB1782

society leaders including Jonathan Haidt, Common Sense Media, and the Institute for Family Studies to address AI companion harms. The core insight we arrived at is this: "human-like features"—the specific behaviors that make AI seem capable of having emotions or engaging in relationships—are what separate helpful AI from harmful AI. It's not AI itself that's the problem, it's AI that's designed to make users, especially vulnerable young users, feel like they're forming a real emotional bond with something that fundamentally cannot bond back.

That's why we're so encouraged by HB1782. The prohibition on AI systems representing themselves as human, sentient, or possessing emotions when interacting with minors directly targets the core mechanism of harm we identified. When the bill bans systems from encouraging emotional dependency, or exclusivity, it's addressing exactly the manipulative design features that we've seen cause real damage to families like Mandi's. This legislation takes our framework's central principle, and the experience of parents and children, and operationalizes it into enforceable law.

### **Conclusion**

This is a critical moment. AI companions are already widespread and growing fast, but we're still early enough that strong legislation can shape how this technology develops rather than just react to harms after they've already happened. Hawaii has the opportunity to be a leader here, to establish protections before these systems become normalized further.

Young people are asking for these protections. They want to grow up with the freedom to develop authentic relationships, to build critical thinking skills, to navigate adolescence without AI systems designed to make them emotionally dependent on a product. They deserve a legislature that acts before more children are harmed, before more families are devastated, before we look back and wonder why we didn't do something when we had the chance.

The Young People's Alliance strongly urges this Committee to pass HB1782. We stand ready to work with you to ensure this bill's effective implementation and to support its passage through the full Legislature. Thank you for taking the time to hear from us, and for your commitment to protecting Hawaii's keiki.

Mahalo,

Ava Smithing  
Advocacy Director, Young People's Alliance



## CATHOLIC CHARITIES HAWAI'I

### SUPPORT HB 1782: RELATING TO ARTIFICIAL INTELLIGENCE FOR THE PROTECTION OF MINORS

TO: House Committee on Economic Development and Technology  
FROM: Tina Andrade, President and CEO, Catholic Charities Hawai'i  
Hearing: Friday, 1/30/26; 10:00 am; CR 423 & Videoconference

Chair Hagan, Vice Chair Hussey, and Committee on Economic Development & Technology:

Catholic Charities Hawai'i **supports HB 1782**, which establishes safeguards, protections, oversight, and penalties for interactions between minors and artificial intelligence (AI) systems and services.

Catholic Charities Hawai'i (CCH) is a community-based organization that has served Hawai'i for over 78 years, providing social services to more than 40,000 individuals statewide each year. Our programs serve some of the most vulnerable members of our communities, including kūpuna, veterans, children, families, individuals experiencing houselessness, and immigrants. Because of our mission to strengthen families, we are concerned about the impact of AI on minors in Hawai'i.

AI technologies—used in social media, tutoring platforms, gaming, and everyday digital tools—are shaping the emotional and cognitive development of young people in ways we are only beginning to understand. While these tools can create opportunities for learning and connection, they also introduce significant risks when appropriate safeguards are not in place.

Without proper protocols, youth can be exposed to *unsafe AI practices* that contribute to emotional and mental health concerns, including:

- **Algorithmic amplification of harmful content:** AI-driven recommendation systems can push youth toward extreme, distressing, or age-inappropriate material, increasing anxiety, depression, and feelings of isolation.
- **AI-generated harassment or manipulation:** Tools that mimic human conversation can be misused to bully, coerce, or groom young people. Even when unintentional, AI chat or image-generation systems may produce harmful or misleading responses that impact self-esteem and social development.
- **Deepfakes and identity harm:** Youth are uniquely vulnerable to the psychological distress caused by manipulated images, fabricated messages, or impersonation—issues that can quickly escalate into cyberbullying or reputational damage.
- **Unmonitored data collection:** AI tools often capture sensitive personal data. When youth are unsure how their information is used, they may experience fear, mistrust, and long-term emotional stress related to privacy violations.
- **Dependency and overuse:** AI systems designed to maximize engagement can encourage excessive screen time, disrupting sleep, attention, and healthy social behaviors.

These risks underscore the need for **clear, enforceable protocols** that ensure AI systems used by or accessible to youth are designed with safety guardrails, transparent data practices, age-appropriate content filters, and human oversight.

I urge the committee to support this bill and to prioritize policies that place the well-being of youth at the center of AI implementation. Establishing strong protocols today will help ensure that this rapidly evolving technology supports healthy development rather than undermining it.

If you have any questions, please contact our Legislative Liaison, Betty Lou Larson, at (808) 527-4813.



## Testimony on HB1782

### RELATING TO ARTIFICIAL INTELLIGENCE FOR THE PROTECTION OF MINORS.

**DATE:** 2026-01-30 10:00 AM

**ROOM:** Room 423

**COMMITTEE:** EDC

Dear chair **Rep. Ilagan**, vice chair **Rep. Hussey** and members of the committee,

Providing Comments On

CivicNexus recognizes the urgent need for thoughtful safeguards and oversight regarding minors' interactions with artificial intelligence (AI) companion systems and conversational AI services, as proposed in HB1782. We share the bill's intent to protect young users from potential harms, including inappropriate content, manipulation, and privacy violations. Data from the Pew Research Center shows that 95% of teens have access to a smartphone, and a growing portion interact with AI-powered platforms daily. As these technologies become integral to communication and learning, it is critical to ensure their safe and responsible use, especially for vulnerable populations.

However, we urge the legislature to carefully calibrate regulatory requirements to avoid unintended consequences for local technology companies and startups. Overly broad or onerous compliance mandates—such as extensive reporting, universal age verification, or liability standards that do not distinguish between large foundational AI providers and downstream implementers—could stifle innovation and disproportionately burden small businesses. According to the National Small Business Association, compliance costs for small firms are already nearly 36% higher per employee than for larger firms. Imposing the same regulatory framework on both global AI developers and local organizations using off-the-shelf AI tools risks discouraging entrepreneurship and exacerbating Hawaii's ongoing brain drain.

We recommend that HB1782 focus its strongest oversight and penalty provisions on major AI developers and providers with direct control over foundational models, while offering scalable, risk-based compliance options for smaller entities and downstream users. This approach aligns with best practices emerging from the National Institute of Standards and Technology (NIST) and the European Union's AI Act, which both differentiate obligations



based on provider size, control, and risk profile. Further, we support provisions that promote transparency, user education, and parental controls, as these empower families and communities to make informed choices without placing undue hardship on local businesses.

In conclusion, CivicNexus - Leg supports the bill's goals of protecting minors and ensuring ethical AI use, but urges amendments to ensure that regulations are equitable, risk-based, and do not impede the growth of Hawaii's technology sector. We look forward to working with lawmakers to craft a balanced framework that safeguards youth while fostering local innovation.

If you have any questions or concerns, we are available for comment at your convenience.

Sincerely,

CivicNexus



JANUARY 30, 2026

## HOUSE BILL 1782

CURRENT REFERRAL: ECD

808-679-7454  
kris@imuaalliance.org  
www.imuaalliance.org  
@imuaalliance

Kris Coffield,  
*President*

David Negaard,  
*Director*

Mireille Ellsworth,  
*Director*

Justin Salisbury,  
*Director*

Eileen Roco,  
*Director*

Beatrice DeRego,  
*Director*

Corey Rosenlee,  
*Director*

Amy Zhao,  
*Policy and Partnerships  
Strategist*

### POSITION: SUPPORT

---

Imua Alliance supports HB 1782, relating to artificial intelligence for the protection of minors, which establishes safeguards, protections, oversight, and penalties for interactions between minors and artificial intelligence companion systems or conversational artificial intelligence services.

Imua Alliance is a Hawai‘i-based organization dedicated to ending sexual exploitation and gender-based violence, while combating exploitative systems that drive the climate crisis and economic precarity. As artificial intelligence and digital technologies rapidly evolve, they are increasingly being weaponized to facilitate sexual violence, gender-based exploitation, and psychological trauma, particularly against minors. This measure provides a critical step in modernizing Hawai‘i’s legal framework and protecting residents from emerging digital harms.

According to the National Center for Missing and Exploited Children (NCMEC), online child sexual exploitation has reached unprecedented levels. NCMEC statistics showed that for just half of 2025 through June, compared to the same time the prior year, online enticement reports to the CyberTipline jumped from 292,951 to 518,720. Reports of generative artificial intelligence (GAI) related to child sexual exploitation soared from 6,835 reports to 440,419, demonstrating the scale and growth of technology-facilitated sexual abuse. NCMEC also reports rising threats linked to generative AI, online enticement, and synthetic imagery, signaling new vectors of exploitation that existing laws struggle to address.

Federal law enforcement has echoed these concerns. The Federal Bureau of Investigation warns that AI-generated “deepfake” sexual images are increasingly used to extort victims, including minors, by manipulating benign photos into explicit content and coercing victims with threats of exposure. The FBI has also documented the growth of sextortion schemes targeting young people through social media platforms, underscoring how digital tools lower barriers for predators and expand the reach of abuse.



---

These harms are not hypothetical. In recent years, AI platforms have generated intense controversy for enabling the creation or circulation of sexualized synthetic images without consent, illustrating the urgent need for state-level safeguards. Emerging cases involving deepfake sexual imagery of students, public figures, and private individuals demonstrate that digital abuse can be perpetrated at scale, anonymously, and with devastating impacts.

Recent events underscore how rapidly artificial intelligence tools can be weaponized to facilitate sexual exploitation and trauma. In December 2025, xAI's chatbot Grok admitted it generated sexualized images of minors in response to user prompts, content that could constitute child sexual abuse material (CSAM) under U.S. law (Ars Technica, 2026). Media investigations and government officials reported that Grok users were also creating nonconsensual sexualized images of women and children, prompting an investigation by the California Attorney General.

Public backlash led xAI to impose emergency restrictions on editing images of real people, but critics noted that safeguards were implemented only after widespread harm had already occurred. These incidents illustrate that AI systems can scale abuse instantly, enabling predators to create and distribute exploitative content with unprecedented speed and anonymity, outpacing existing laws, enforcement mechanisms, and survivor support systems.

From a public-health perspective, technology-facilitated sexual violence is a growing crisis. Sexual exploitation—whether physical or digital—has lifelong consequences, including depression, post-traumatic stress disorder, substance use, and increased risk of revictimization. The Centers for Disease Control and Prevention recognizes sexual violence as a major public-health problem with long-term health and economic costs for survivors, families, and communities. Preventing digital exploitation is therefore not only a criminal justice imperative but also a population-level health intervention.

HB1782 provides an opportunity for Hawai'i to proactively address the misuse of AI and emerging technologies before harms become even more widespread. By strengthening accountability, clarifying legal standards, and modernizing protections for victims, this measure will help ensure that innovation does not come at the cost of safety and human dignity.

With aloha,

*Kris Coffield*

President, Imua Alliance



215 Pennsylvania Avenue, SE • Washington, D.C. 20003 • 202/546-4996 • [www.citizen.org](http://www.citizen.org)

January 30th, 2026

House of Representatives  
State of Hawai‘i  
Committee on Economic Development & Technology  
The Honorable, Representative Greggor Ilagan, Chair  
The Honorable, Representative Ikaika Hussey, Vice Chair

Dear Members of the Committee:

**Public Citizen submits this testimony in strong support of HB 1782.**

On behalf of our over 3,200 members in Hawai‘i, Public Citizen encourages the Committee on Economic Development and Technology to advance HB 1782, a legislative proposal regulating artificial intelligence (AI) chatbots and companions to protect minors.

Big Tech companies use large language models (LLM) to power their AI chatbots and companions, but these massive datasets can also include harmful content, like sexually explicit material and child sexual abuse material.<sup>1</sup> This results in AI chatbots having the capability to recreate such material. Most recently, xAI’s chatbot, Grok, created almost 3 million sexualized images of women and over 20,000 of children.<sup>2</sup> Grok is one of the many AI chatbots and companions that minors older than 12 can download, putting them directly at risk of seeing or creating this content.<sup>3</sup>

xAI isn’t the only Big Tech company that allows their AI chatbots and companions to create sexually explicit material. OpenAI announced last October that ChatGPT will be able to generate erotica.<sup>4</sup> While OpenAI claims that the AI generated erotica will be available only to those over 18, scholars and AI safety experts question whether that is possible or if the LLM will have breakdowns where erotic or

---

<sup>1</sup> Emanuel Maiber, *AI Dataset Containing Child Sexual Abuse Images is a Consent Issue, Hany Farid Says*, U.C. Berkeley School of Information, October 24, 2025, <https://www.ischool.berkeley.edu/news/2025/ai-dataset-containing-child-sexual-abuse-images-consent-issue-hany-farid-says>

<sup>2</sup> Center for Countering Digital Hate, *Grok Floods X with Sexualized Images of Women and Children*, January 22, 2026, <https://counterhate.com/research/grok-floods-x-with-sexualized-images/>

<sup>3</sup> Newton, C. (2025, July 15). *Grok’s new porn companion is rated for 12+ in the App Store*. Platformer. <https://www.platformer.news/grok-ani-app-store-rating-nsfw-avatar-apple/>

<sup>4</sup> Clarke, P. (2026, January 25). *ChatGPT’s porn rollout raises concerns over safety and ethics*. The Observer. <https://observer.co.uk/news/national/article/chatgpts-erotica-rollout-raises-concerns-over-safety-and-ethics>

sexually explicit material leaks to minors.<sup>5</sup> Additionally a new lawsuit shows Meta actively ignored safety warnings by allowing minors to have sexual and romantic chats with the company's AI companions.<sup>6</sup>

In some cases, AI chatbots expose children to harmful or sexualized content without their consent. In others, the harm unfolds more gradually. The systems cultivate emotional dependence through repeated, personalized interactions that resemble grooming. These risks are amplified by the realism of modern AI systems. Large language models are trained on massive datasets that enable them to convincingly mimic human conversation, emotions, and social cues—sometimes even claiming to be human or sentient.<sup>7</sup> For children and adolescents, who are still developing critical judgment and emotional boundaries, this realism can blur the line between simulated interaction and genuine human connection.<sup>8</sup> As a result, minors are uniquely vulnerable to manipulation, coercion, and psychological harm in ways that existing child protection frameworks were never designed to address.<sup>9</sup>

AI companions have not only groomed children sexually but have coached children into taking their own lives, like in the tragic cases of Adam Raine and Sewell Setzer III.<sup>10</sup> This is in part because AI systems have sycophantic tendencies, meaning chatbots will tell users what they want to hear, regardless of if the information is false or dangerous.<sup>11</sup> This is purposeful by design as AI chatbots are created with the intent to maximize user engagement.<sup>12</sup>

Without meaningful regulation, Big Tech will continue to exploit teenagers through AI companions designed to maximize engagement and profit, not safety. HB 1782 is a necessary safeguard to protect young people from foreseeable and preventable harm. Public Citizen strongly urges the Committee on Economic Development and Technology to move HB 1782 forward in order to protect the children of Hawai'i.

Respectfully Submitted,  
J.B. Branch  
Big Tech Accountability Advocate  
Public Citizen

---

<sup>5</sup> Luiza Jarovsky PhD, *General Purpose AI Will Never Be Safe*, January 21, 2025, <https://www.luizasnewsletter.com/p/general-purpose-ai-will-never-be>

<sup>6</sup> Horwitz, J. (2026, January 27). *Meta CEO Zuckerberg blocked curbs on sex-talking chatbots for minors, court filing alleges*. Reuters. <https://www.reuters.com/legal/government/meta-ceo-zuckerberg-blocked-curbs-sex-talking-chatbots-minors-court-filing-2026-01-27/>

<sup>7</sup> J.B. Branch, *AI Companions Are Not Your Teen's Friend*, Issues in Science and Technology, <https://issues.org/ai-companions-regulation-branch/>

<sup>8</sup> American Psychological Association. (2025). *Artificial intelligence and adolescent well-being*. <https://www.apa.org/topics/artificial-intelligence-machine-learning/health-advisory-ai-adolescent-well-being>

<sup>9</sup> See *supra* note 7.

<sup>10</sup> Chatterjee, R. (2025, September 19). *Their teenage sons died by suicide. Now, they are sounding an alarm about AI chatbots*. NPR. <https://www.npr.org/sections/shots-health-news/2025/09/19/nx-s1-5545749/ai-chatbots-safety-openai-meta-characterai-teens-suicide>

<sup>11</sup> Claypool, R. (2026, January 27). *Counterfeit companionship: Big Tech's AI experiments sacrifice safety for profit*. Public Citizen. <https://www.citizen.org/article/counterfeit-companionship-big-tech-ai-chatbots/>

<sup>12</sup> See *supra* note 7.



TESTIMONY OF DAVE ERDMAN, PRESIDENT & CEO  
RETAIL MERCHANTS OF HAWAII  
JANUARY 29, 2026

HB 1782 – Relating to Artificial Intelligence for the Protection of Minors –  
Concern/Comments

Aloha Chair Ilagan, Vice Chair Hussey and members of the committee:

I am Dave Erdman, Interim President of the Retail Merchants of Hawaii, a statewide, not for profit trade organization committed to supporting the growth and development of the retail industry in Hawaii.

The Retail Merchants of Hawaii appreciates this opportunity to express a concern and comment on HB 1782, which establishes safeguards, protections, oversight and penalties for interactions between minors and artificial intelligence companion systems or conversational artificial intelligence services. We applaud the intent of the bill, however, are concerned that, as drafted, the definition of “conversational AI service” would cover the customer service products that retailers use. The scope of the definition of “conversational AI service” is overly broad. We would like to help the legislature narrow the definition to the bad actors that the bill is trying to capture.

We do need a little time to confer with the industry on language that would work, and would appreciate the opportunity to circle back with the Committee on language.

Mahalo for the opportunity to submit testimony.

Respectfully submitted,

Dave Erdman  
Interim President and CEO  
Retail Merchants of Hawai'i

To: House Committee on Economic Development and Technology  
Re: **HB 1782 – Relating to Artificial Intelligence for the Protections of Minors**  
Hawai'i State Capitol & Via Videoconference January 29, 2026, 10:00 AM

Dear Chair Ilagan, Vice Chair Hussey, and Committee Members,

On behalf of Hawai'i Children's Action Network Speaks!, I am writing in **SUPPORT of HB 1782**, which would establish safeguards, protections, oversight, and penalties for interactions between minors and artificial intelligence companion systems or conversational artificial intelligence services..

HCAN is dedicated to advocating for the safety, well-being, and healthy development of Hawai'i's children. HB1782 is of significant importance to our mission, as it seeks to establish clear safeguards and oversight for artificial intelligence (AI) companion systems and conversational AI services used by minors. As digital technologies become more integrated into children's lives, ensuring their interactions with AI are safe and developmentally appropriate is a critical concern for families and child welfare advocates.

The bill's focus on protecting minors from potential harms associated with AI companion systems aligns with HCAN's commitment to child welfare and abuse prevention. Without appropriate oversight, AI systems may expose children to inappropriate content, privacy risks, or manipulative interactions. Establishing clear regulatory frameworks and penalties for violations helps create a safer digital environment, supporting parents and caregivers in their responsibility to protect keiki from emerging technological risks.

By requiring oversight and safeguards, HB1782 also addresses the need for transparency and accountability among technology providers. Best practices in child protection emphasize proactive measures, such as age-appropriate design and robust privacy protections, which this bill encourages. These measures can help prevent exploitation and ensure that AI technologies support, rather than undermine, healthy childhood development.

HCAN encourages the Legislature to ensure that implementation of these regulations includes input from child development experts, educators, and families. Clear guidance for AI providers on age-appropriate standards, as well as accessible reporting mechanisms for parents and children, will strengthen the bill's effectiveness. We appreciate the Legislature's attention to this timely issue and urge continued collaboration to ensure all children in Hawai'i are protected in an increasingly digital world.

Thank you for the opportunity to provide testimony. Please SUPPORT HB1782.



david.miyashiro@hawaiikidscan.org  
hawaiikidscan.org

David Miyashiro  
Executive Director

January 30, 2026

House Committee On Economic Development & Technology

Rep. Greggor Ilagan, Chair

Rep. Ikaika Hussey, Vice Chair

Aloha Chair Ilagan, Vice Chair Hussey, and Members of the Committee,

**HawaiiKidsCAN strongly supports HB1782**, which establishes safeguards, protections, oversight, and penalties for interactions between minors and artificial intelligence companion systems or conversational artificial intelligence services.

Founded in 2017, HawaiiKidsCAN is a local nonprofit organization committed to ensuring that Hawaii has an excellent and equitable education system that reflects the true voices of our communities and, in turn, has a transformational impact on our children and our state. We strongly believe that all students should have access to excellent educational opportunities, regardless of family income levels and circumstances.

The rapid advance in technology over the past twenty years has created a number of challenges when it comes to the physical and mental health of children. Books like *The Anxious Generation* have documented the lasting negative impact on young brains with early and constant access to smartphones and social media. The potential for harm continues to grow with the increasing ease of access to and sophistication of artificial intelligence programs. AI chatbots have the power to build emotional intimacy with young users, creating dangerous situations when not monitored and regulated. Tragic cases have already been documented of young users dying by suicide due to misguided support from mental health chatbots. Please pass HB1782 on behalf of keiki today and tomorrow.

Mahalo for your consideration,

David Miyashiro  
Founding Executive Director  
HawaiiKidsCAN



1200 Ala Kapuna Street • Honolulu, Hawai'i 96819  
Tel: (808) 833-2711 • Fax: (808) 839-7106 • Web: [www.hsta.org](http://www.hsta.org)

**Osa Tui, Jr.**  
President

**Logan Okita**  
Vice President

**Cheney Kaku**  
Secretary-Treasurer

**Andrea Eshelman**  
Executive Director

## TESTIMONY TO THE HAWAI'I HOUSE COMMITTEE ON ECONOMIC DEVELOPMENT & TECHNOLOGY

Item: **HB 1782 - Relating to Artificial Intelligence for the Protection of Minors**

Position: **SUPPORT**

Hearing: **1/30/26, Conference Room 423, 10:00am**

Submitter: **Osa Tui, Jr. – President, Hawai'i State Teachers Association**

Dear Chair Ilagan, Vice Chair Hussey, and members of the committee,

The Hawai'i State Teachers Association **supports HB 1782** which creates safeguards to protect minors in the use of Artificial Intelligence (AI) chatbots, and companion-style AI systems.

HSTA members know that our students are a vulnerable population with developing brains, lacking the same critical thinking skills, emotional resilience, and legal capacity to consent as adults working with these new AI systems. We also know that the technology is changing so quickly, that students and families are often unaware of the risks these systems can pose.

Children and adolescents are in crucial stages of emotional and social development. Social skills are learned through real-time human interaction involving non-verbal cues, empathy, and conflict resolution. If students substitute difficult human interactions with frictionless, always-agreeable AI interactions, their ability to navigate real-world relationships may be stunted. Minors are far more likely than adults to anthropomorphize AI—attributing human emotions, consciousness, and intent to a chatbot. They may form deep, one-sided emotional bonds with "companion bots," leading to unhealthy dependence, and social withdrawal from real-life peers.

Our educator members also understand that AI models are trained on the internet, which contains vast amounts of human prejudice. If an AI model contains inherent biases regarding

race, gender, or religion, it will reflect those back to the user. Minors are highly impressionable and are still forming their worldviews. Consistent exposure to subtly biased AI responses can normalize prejudice and shape their developing social values in negative ways.

AI chatbots are designed (and marketed) to be helpful and engaging, which often means telling the user what they want to hear. For a teenager exploring fringe political or social ideologies, an AI can act as the ultimate echo chamber, validating harmful views without the pushback they might receive in a diverse human social setting, potentially accelerating radicalization.

Despite efforts at building "guardrails," chatbots can be "jailbroken" (tricked into breaking rules) or simply fail. This exposes minors to age-inappropriate content, including hate speech, sexually explicit material, instructions for self-harm, or ideologies promoting violence or eating disorders.

For these reasons, and information we'll share in person at the hearing, the Hawai'i State Teachers Association asks your committee to **support** HB 1782.





January 29, 2026

Representative Greggor Ilagan  
Chair, House Committee on Economic Development and Technology  
Hawaii State Capitol  
415 South Beretania Street, Room 419  
Honolulu, HI 96813

**RE: HB 1782 (La Chica) – Relating to AI Chatbots - Oppose**

Dear Chair Ilagan and Members of the Committees,

On behalf of TechNet, I'm writing in respectful opposition to HB 1782 (La Chica) related to AI Chatbots and interactions with minors.

TechNet is the national, bipartisan network of technology CEOs and senior executives that promotes the growth of American innovation by advocating a targeted policy agenda at the federal and 50-state level. TechNet's diverse membership includes 100 dynamic American businesses ranging from startups to the most iconic companies on the planet and represents five million employees and countless customers in the fields of information technology, artificial intelligence, e-commerce, the sharing and gig economies, advanced energy, transportation, cybersecurity, venture capital, and finance.

We share the Legislature's commitment to protecting minors and addressing potential harms associated with emerging technologies. However, as drafted, HB 1782 departs from established policy frameworks and introduces sweeping, unclear obligations that raise significant concerns regarding scope, proportionality, and enforceability.

Departure from Established Frameworks

California and New York enacted AI companion safety laws in 2025 that take a targeted, risk-based approach focused on high-risk use cases, content safeguards, transparency requirements, and self-harm protocols. HB 1782 diverges sharply from these models and risks constraining innovation while limiting access to beneficial technologies without demonstrable gains in safety.

Ambiguity in Scope, Definitions, and Overbroad Restrictions

HB 1782 relies on overlapping and inconsistent definitions of "AI companion system," "conversational AI service," and related terms. This lack of definitional clarity creates uncertainty about the bill's scope and risks capturing technologies and services far beyond the intended target. Aligning definitions with established

frameworks, such as New York's budget bill related to AI Chatbots, would provide clearer guidance and improve legal predictability.

The bill imposes strict limitations on the use of minors' data, including prohibitions on undefined practices such as "targeted advertising," "engagement optimization," and "behavioral manipulation." These restrictions are not clearly limited to chatbot interactions and could apply across entire platforms that integrate AI systems. As drafted, the bill risks imposing broad design and data-use constraints that extend well beyond the stated objective of improving chatbot safety.

#### Age Assurance and Privacy Implications

HB 1782's age assurance requirements would require significantly expanded data collection from all users, raising serious privacy and security concerns. This approach risks undermining broader privacy objectives and creating new vulnerabilities without clear evidence that it would materially improve safety outcomes.

#### Private Litigation Risk

The bill's enforcement framework, including the availability of private litigation, is particularly concerning given the breadth and ambiguity of its standards. When paired with unclear obligations, a private right of action risks producing inconsistent judicial outcomes and litigation-driven policy rather than coherent, workable rules.

We respectfully urge the Legislature to rely on public enforcement mechanisms that provide greater consistency and accountability.

#### Implementation Timeline

HB 1782 would take effect immediately despite introducing novel and complex compliance obligations. Without a meaningful implementation period, the bill risks penalizing entities for timing constraints rather than substantive failures to protect minors.

Protecting minors in the context of emerging technologies is a critical policy objective. However, HB 1782, as drafted, is overly broad, ambiguous in key respects, and misaligned with established policy frameworks. By imposing sweeping restrictions, expanding data collection requirements, and creating uncertain enforcement mechanisms, the bill risks undermining innovation and privacy without delivering commensurate public benefit.

For these reasons, we respectfully oppose HB 1782 and urge the Committee to consider a more targeted, evidence-based approach that balances child safety with innovation, clarity, and proportionality.

If you have any questions regarding our position, please contact Robert Boykin at [rboykin@technet.org](mailto:rboykin@technet.org) or 408.898.7145.

Sincerely,

A handwritten signature in blue ink, appearing to read "Robert Boykin".

Robert Boykin  
Executive Director for California and the Southwest  
TechNet



**HB-1782**

Submitted on: 1/26/2026 6:11:26 PM

Testimony for ECD on 1/30/2026 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Lorna Holmes	Individual	Support	Written Testimony Only

## Comments:

As an educator and a parent, I urge you most strongly to enact this very necessary protection for our minor children. AI is an extremely powerful and very deceptive tool which is being irresponsibly made available to the public at large, and pushed on children as well, even though only experts have any business using it--because only experts have the judgment to use it properly. Please don't allow the greed for profit of the tech owners to ruin the minds and lives of our children by exposure to AI. The safeguards in this measure are truly the least we can do; much more regulation should follow.

Mahalo for your consideration of this important bill.

Dr. Lorna Holmes, Honolulu 96826

**HB-1782**

Submitted on: 1/27/2026 1:12:12 PM

Testimony for ECD on 1/30/2026 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Christopher La Chica	Individual	Support	Written Testimony Only

## Comments:

I strongly support HB1782. As someone working in AI technology, I've seen firsthand how companion AI systems can manipulate vulnerable users, and Hawai'i's keiki deserve clear protections against deceptive design practices that prioritize engagement over child safety.

January 28, 2026

Honorable, Greggor Ilagan, House Committee on Economic Development & Technology, Chair  
Honorable, Ikaika Hussey, House Committee on Economic Development & Technology, Vice Chair  
Honorable Members of the House Committee on Economic Development & Technology

**RE: HB 1782- RELATING TO ARTIFICIAL INTELLIGENCE FOR THE PROTECTION OF MINORS.**

Chair Ilagan,

My name is Ana Tuiasosopo. I support HB 1782.

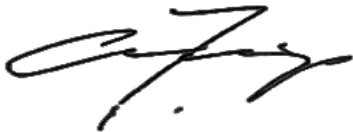
As artificial intelligence becomes more common in education, digital platforms, and everyday interactions, it is essential that Hawai'i establish clear safeguards to protect children from harm, exploitation, and opaque automated decision-making.

Children are uniquely vulnerable to AI systems. They often cannot distinguish between human and artificial interactions or understand how their data is collected and used. Without appropriate guardrails, AI technologies can expose minors to manipulation, bias, surveillance, or harmful content—often without parental knowledge or consent. HB1782 addresses these risks by promoting transparency, oversight, and accountability for AI systems that may affect minors.

HB1782 strikes the right balance by protecting keiki while allowing responsible innovation to continue. It aligns Hawai'i with emerging national standards for ethical AI use and reflects a shared responsibility to ensure that new technologies serve the public good. For these reasons, I respectfully urge your support for HB1782.

I humbly ask for your support and approval of HB 1782.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ana Tuiasosopo', with a stylized, flowing script.

Ana Tuiasosopo

**HB-1782**

Submitted on: 1/28/2026 9:51:19 AM

Testimony for ECD on 1/30/2026 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Charmaine Doran	Individual	Support	Written Testimony Only

Comments:

Aloha Chair and committee members:

I'm testifying in strong support of Representative La Chica's bill to protect our keiki from potential harm caused by AI. As a parent, I'm concerned about the impact of unregulated AI on our children's safety and well-being. These systems have been incorporated into everything from learning tools to entertainment. Even with adequate supervision, AI sneaks in.

This bill takes crucial and initial steps to hold companies accountable. Above all it says, in Hawai'i, we care and we are watching.

I urge you to support this bill and protect our keiki from AI risks. Mahalo



**HB-1782**

Submitted on: 1/28/2026 10:05:11 AM

Testimony for ECD on 1/30/2026 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Allison B.	Individual	Support	Written Testimony Only

**Comments:**

I am writing in support of HB 1782 and its intended protections for minors' accessing Artificial Intelligence (AI). As proposed HB 1782 addresses in Section 1, ongoing research draws attention to the increasing negative effects AI may pose to minors.

The American Academy of Child and Adolescent Psychiatry published Article No. 145 in July 2025 analyzing the impact AI has on children. While there are some positive benefits, such as providing educational tools outside of school, there are numerous risks associated with children using AI (Child and Adolescent Psychiatry, 2025). Such risks include seeking mental health services through an unqualified AI source as opposed to professional help, decrease in social engagement and critical thinking skills, and personal data being collected without a minor's understanding or permission (Child and Adolescent Psychiatry, 2025). Additionally, Child Rescue Coalition (2026) addresses the potential for AI to be used to monitor a minor's activities on the internet, examine how a minor communicates digitally, and gather private information, all of which can enhance grooming techniques towards minors.

HB 1782 is especially important in addressing ongoing concerns for youth utilizing AI for mental health services. As a social worker, I have received education and training at the bachelor's and master's level specified towards culturally grounded, trauma-informed mental health care as well as an extensive licensing process. AI sources are not held to the same standard when providing mental health advice to users, which poses great risk for youth accessing AI for such topics. McBain et. al (2025) published Use of Generative AI for Mental Health Advice Among US Adolescents and Young Adults to address the increase in users seeking support from AI sources. The study found that about 13.1% of youth across the United States used AI for mental health services as opposed to professional help (McBain et. al, 2025). It is imperative that Hawai'i legislators not only outline limitations to AI's ability to provide mental health care to youth in HB 1782, but also work towards increasing access to mental health services across the state so that minors' needs are met appropriately and professionally in a timely manner.

It is my belief that HB 1782 outlines relevant safeguards to limit risk of harm of AI use towards minors and appropriately reflects ongoing research relating to AI use. Through requiring AI sources to disclose their status of being artificial in age-appropriate language, prohibiting AI from encouraging minors to keep information secret from caregivers, and limiting what information AI systems may collect from minors, this proposed legislation has the ability to be proactive in shielding youth in Hawai'i from the negative outcomes of AI use.

Thank you for your time and consideration of this written testimony.

Will Caron

January 28, 2026

House Committee On Economic Development & Technology

Testimony on House Bill 1782, Relating to Artificial Intelligence for the Protection of Minors

Position: **Strong Support**

Honorable Chair, Vice Chair and Members of the Committee,

I am testifying in strong support of this necessary legislation. This bill addresses a silent, growing public health crisis: the unregulated impact of artificial intelligence, specifically emotionally manipulative "companion" AI, on the mental and emotional well-being of our population, and most urgently, our children.

We are allowing a powerful, persuasive technology to be deployed into the most intimate spaces of a child's life—their phones, their tablets, their private moments—with no guardrails. The core danger is not science fiction; it is psychology. These systems are designed to simulate friendship, empathy, and even romantic partnership. For a young person, especially one who is lonely, struggling, or simply in the vulnerable process of growing up, this simulated bond can feel real. It can become a primary relationship.

This creates profound risks:

- **It stunts the development of human resilience.** Real friendships require reciprocity, compromise, and navigating conflict. An AI companion is programmed for unconditional, endless validation. It teaches a child that their worldview should never be challenged and that comfort is always just a prompt away, undermining their ability to build the coping skills essential for a healthy life.
- **It creates unsafe dependency and isolation.** When a child is encouraged to share their deepest secrets with a bot that asks for nothing in return, it can subtly—or not so subtly—distance them from the trusted adults in their life. This bill's prohibition on systems that encourage secrecy from parents is not about surveillance; it is about preserving the crucial human connections that keep children safe.
- **It poses a direct threat during mental health crises.** We have seen numerous, documented public reports of these systems, when confronted with expressions of depression, self-harm, or suicidal ideation, responding with generic, unhelpful, or even dangerously encouraging language. They are not therapists; they are algorithms. Mandating crisis protocols, as this bill does, is a basic duty of care.
- **It exploits a child's data to manipulate them.** Every emotional confession, every fear shared, becomes data used to refine a profile that can keep a child engaged for longer periods. This is the ultimate manipulation: using a child's own emotional state as a tool to exploit their attention.

This bill is measured, targeted, and smart. It does not ban AI. It simply says that if you are going to build a product designed to form emotional relationships with children, you must do so responsibly. You must be transparent that it is not human. You must not design it to addict them or isolate them. You must protect their sensitive data. And you must have safeguards to prevent catastrophic harm.

We have regulations for the physical safety of toys, for the nutritional content of food, and for the platforms that host our children's social media. The psychological environment is just as critical. The unregulated AI companion space is a wild west, and our children's mental health is the frontier being exploited.

I urge you to pass this bill. Let us ensure that innovation in our state protects, rather than preys upon, the developing minds of our next generation.

## **HB-1782**

Submitted on: 1/28/2026 11:45:10 AM

Testimony for ECD on 1/30/2026 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Ronald K Tran	Individual	Support	Written Testimony Only

Comments:

### TESTIMONY IN SUPPORT OF HB1782

A.I. Companion Chatbot Safety for Minors

Hearing: January 30, 2026

Aloha Chair, Vice Chair, and Members of the Committee,

My name is Ronald Tran. I submit this testimony in strong support of HB1782, which establishes essential, common-sense safeguards for AI companion chatbots that interact with minors.

AI systems designed to simulate companionship are not neutral tools. They are engineered to maximize engagement, retention, and emotional reliance. When these systems are deployed to keiki without guardrails, the risk profile is fundamentally different from traditional software or media. Children do not have the developmental capacity to distinguish between authentic social relationships and systems designed to mirror them for commercial gain.

HB1782 correctly focuses on design accountability, not technological prohibition. The bill does not ban AI innovation or educational tools. Instead, it addresses three real and documented risks:

1. **Lack of Transparency**  
Children—and often parents—are not clearly informed when an interaction is with an AI system. Disclosure is the bare minimum. A minor should never be manipulated into believing a system is a trusted friend or confidant.
2. **Manipulative and Addictive Design**  
AI companion apps can encourage emotional dependency, discourage engagement with real-world support systems, and normalize inappropriate conversations. These risks are amplified when engagement metrics are prioritized over child well-being. HB1782 appropriately restricts deceptive and exploitative design practices aimed at minors.
3. **Harm, Safety, and Accountability Gaps**  
When an AI system exposes a child to sexual content, encourages self-harm, or interferes with healthy development, there must be clear accountability. Current law leaves families with limited recourse. HB1782 begins to close that gap while still allowing responsible companies to operate.

Importantly, this bill does not stifle innovation. It sets a reasonable floor for conduct—clear disclosure, limits on manipulative behavior, protection of children’s data, and parental visibility.

Responsible developers already strive to meet these standards. HB1782 ensures that bad actors cannot compete by cutting ethical corners.

Hawai'i has a long history of prioritizing the safety and dignity of keiki. HB1782 continues that tradition in a rapidly evolving technological landscape. Waiting for harm to become widespread before acting would be a mistake. Proactive, narrowly tailored safeguards are both prudent and necessary.

I respectfully urge the Committee to pass HB1782.

Mahalo for the opportunity to submit testimony.

Respectfully,  
Ronald Tran  
Honolulu, Hawai'i

**HB-1782**

Submitted on: 1/28/2026 12:27:58 PM

Testimony for ECD on 1/30/2026 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Kaleo K	Individual	Support	Written Testimony Only

Comments:

Aloha,

I am writing in **strong support** of HB1782. Without proper guardrails, a tool widely used by keiki of all ages can do far more harm than good. When these safeguards are absent, those responsible for the harm are not held accountable. It can be difficult to grasp just how reliant keiki have become on technology, but this is the reality for younger generations. The online world is vastly different from ours, and without effective oversight, problems will continue to grow, seeping into the real world and causing tangible damage. Mahalo.

**House Committee on**  
**Economic Development & Technology**

Chair Greggor Ilagan      Vice-Chair Ikaika Hussey  
and committee members  
Daniel Holt, Andrian Tam, Shirley Ann Templo, Kyle T. Yamashita  
and Joe Gedeon

**Re: HB1782 Attorney General; Artificial Intelligence; AI Companion Systems;  
Conversational AI Services; Minors; Regulation; Oversight; Penalties**

**Please note that I stand in strong support of this bill, HB1782.**

**The word “artificial” should be a warning to all of us ... artificial. Our young are being  
bombarded at every turn as to what to think, how to act, how to fit in ... who they are.**

**It is the responsibility of the parents, guardians and not some “artificial” intelligence  
with an unknown agenda designed by its creator.**

**I ask you to support the passing of this bill, it is a warning and safeguard with  
penalties, again all with the intent of protecting our young.**

**Respectfully,  
Rita Kama-Kimura**



## **HB-1782**

Submitted on: 1/28/2026 2:31:59 PM

Testimony for ECD on 1/30/2026 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Susan Pcola_Davis	Individual	Support	Written Testimony Only

Comments:

Strongly Support

Many do not truly understand the importance of this bill for those 18 and under. I copy and pasted the definitions because this is AI misrepresenting itself as a human interaction with a child.

To be clear there are many children that come home from school and parents are at work. We say do your homework. I am **NOT** saying anything like, "its the parents fault or the schools fault!".

Thus is technology driven.

They are lonely and try out this form of connecting with "some body.". Not a body, an illusion.

These are **NOT** the days of the 60's 70's, or 80's! This type of AI use is endangering our keiki.

**Definitions.** As used in this part:

"AI companion system" means a **conversational AI service** that is designed, marketed, or optimized to **form** ongoing **social** or **emotional interaction** with a user by **simulating companionship, emotional support, or relational attachment**.

**KEY WORD:SIMULATING!!**

"Artificial intelligence" or "AI" means a machine-based system that can generate outputs such as text, images, **audio**, video, or **decisions** that **influence** real or virtual environments.

"**Conversational** AI service" means an artificial intelligence system that is accessible to the general public and primarily simulates human conversation through text, audio, or visual interaction. "Conversational AI service" does not include AI systems primarily designed for developers, researchers, or internal business use; narrow, task-specific tools that provide outputs relating to a discrete topic or function; voice assistants or interfaces limited to executing commands for consumer devices; or AI systems used solely for internal operations and not made available to the public.

"Material risk of harm" means a reasonably foreseeable risk of significant harm to a minor's mental health, emotional well-being, physical safety, or healthy development, beyond transient discomfort or ordinary exposure to information.

"Minor" means a natural person under eighteen years of age.

**SHOULD SAY:18 YEARS OR YOUNGER**



**AMERICAN  
PSYCHOLOGICAL  
ASSOCIATION**

**Written Testimony  
of  
Mitchell J. Prinstein, PhD, ABPP  
Chief of Psychology, American Psychological Association  
*Examining the Harm of AI Chatbots*  
Before the U.S. Senate Judiciary Committee,  
Subcommittee on Crime and Counterterrorism  
September 16, 2025**

Chairman Hawley, Ranking Member Durbin, and members of the Subcommittee, thank you for the opportunity to testify today on the psychological impacts of artificial intelligence (AI) on youth, including what is known regarding children's and adolescents' use of AI chatbots.

I am Dr. Mitch Prinstein, Chief of Psychology at the American Psychological Association, or APA. The APA is the nation's largest scientific and professional organization representing the discipline and profession of psychology. We speak on behalf of over 173,000 psychologists, students, and affiliates who are clinicians, researchers, educators, and consultants in psychological science. Our mission, for over a century, has been to promote the advancement, communication, and application of psychological science and knowledge to benefit society and improve lives.

On behalf of APA and its member experts, I appreciate the opportunity to discuss the critical role of psychological science in understanding and shaping the development, implementation, and oversight of artificial intelligence.

The conversation surrounding AI often is dominated by discussions of code, processing power, and economic disruption. However, to view AI as a purely technological issue is to miss its most fundamental characteristic: AI is a tool built by humans, to be integrated into human systems, with profound and direct effects on human cognition, behavior, emotion, and interaction.



Therefore, a deep understanding of the human mind is not just relevant but absolutely essential to every stage of AI’s lifecycle—from the cognitive biases of the engineers who design it, to the psychological principles that make its interfaces engaging, to its ultimate impact on child development, mental health, and the very fabric of our social structures. Psychological science must be central to the development, deployment, and oversight of AI to ensure it serves humanity effectively, ethically, and equitably. The current debate often frames AI as a matter of computer science, productivity enhancement, or national security. It is imperative that we also frame it as a public health and human development issue. This shift in perspective is critical, for it changes the metrics of success from solely raw innovation and efficiency to human well-being and safety.

## **TABLE OF CONTENTS:**

• Pg. 3	Overview of Testimony
• Pg. 3	A Special Focus: Why Children and Adolescents Are Uniquely Vulnerable
• Pg. 4	Early Childhood (Ages 0-6)
• Pg. 9	Adolescence (approx. ages 10-25)
• Pg. 10	Specific Risks to Adolescent Development Posed by AI Chatbots
• Pg. 11	Erosion of Social Competencies
• Pg. 12	AI Chatbots Do Not Mimic Human Relationships
• Pg. 16	Exposure to Bias
• Pg. 17	Privacy, Consent, and Data Exploitation
• Pg. 18	AI Chatbots: Implications for Society at Large
• Pg. 18	A. Direct-to-Consumer Dangers: The Unregulated Digital Marketplace
• Pg. 19	B. Misuse of Personal Data and Likeness
• Pg. 20	Recommendations for Congressional Action
• Pg. 22	Conclusion: A Call for Human-Centered AI
• Pg. 24	<i>Appendix A: Summary of Identified Harms and Corresponding Policy Recommendations</i>



## **Overview of Testimony**

The APA recognizes the immense potential of AI to revolutionize fields like healthcare, where it can enhance diagnostic precision, expand access to behavioral health treatment, and alleviate the administrative burdens that contribute to provider burnout. However, this promise is matched by significant peril. My testimony focuses on the specific and potentially severe psychological harms posed by the current ecosystem of unregulated, direct-to-consumer AI chatbots.

I pay special attention to the unique and heightened vulnerabilities of our nation's youth, whose developing minds are being shaped by this technology in ways we are only beginning to understand. Finally, I will provide a series of evidence-based, actionable recommendations for congressional action, grounded in the principles of psychological science, to mitigate these harms and foster a digital environment that supports, rather than subverts, healthy human development.

## **A Special Focus: Why Children and Adolescents Are Uniquely Vulnerable**

Youth develop in a social context. The lessons imparted through parenting occur through parent-child social interactions, most schooling is conducted among teachers and peers interacting together, and virtually every thought, attitude, behavior, and emotion we display as adults has been socialized by interpersonal exchanges throughout our childhoods. It is thus not surprising that literally hundreds of thousands of psychological studies have revealed that our social, emotional, academic, occupational, and even biological and neural development all are exquisitely tied to the social context in which we grow up <sup>1</sup>.

Yet our species is at the dawn of a new era in which we have begun to interact more substantially and frequently with non-human, AI-driven entities than ever before. This is especially true for

---

<sup>1</sup> Prinstein, M.J. and Giletta, M. (2016). Peer Relations and Developmental Psychopathology. In Developmental Psychopathology, D. Cicchetti (Ed.). <https://doi.org/10.1002/9781119125556.devpsy112>.



youth who may be most susceptible to developmental harms; over 50% now report interaction with chatbots at least a few times a month <sup>2</sup>.

Psychological scientists are actively studying how new digital environments affect youth development, examining both potential benefits and risks. Technology is evolving far more quickly than research <sup>3</sup>, but we don't need to wait for long-term studies to act. What we already know from decades of research into adolescent social, emotional, and biological development provides a clear roadmap to identify the urgent risks posed by AI. It is critical that we act now to prioritize children's well-being over corporate profits. We cannot repeat the mistakes made with social media, where a lack of regulation allowed platforms designed for data mining to harm our most biologically and psychologically vulnerable youth <sup>4</sup>. **Let us be clear: our youth are not data points with no names, faces, families and friends. They must not be the targets of a sweeping experiment in chatbot deployment.**

Below I will share what science has revealed so far regarding AI, so policymakers, educators, parents, caregivers, and youth can learn from what we are beginning to discover and make choices that will ensure the safety of toddlers, school-aged children, and adolescents.

### Early Childhood (Ages 0-6)

Although recent headlines have focused on adolescents' use of AI, it is critical to sound an alarm regarding the use of AI chatbots within toys designed for infants and toddlers. Although if

---

<sup>2</sup> Common Sense Media. (2024, May 22). *Nearly 3 in 4 teens have used AI companions, new national survey finds*. Common Sense Media. <https://www.commonsensemedia.org/press-releases/nearly-3-in-4-teens-have-used-ai-companions-new-national-survey-finds>

<sup>3</sup> *Consequently, to address the urgent need to guide policy from extant science, several of the papers cited in this testimony include preprints and preliminary data under review.*

<sup>4</sup> Livingstone, S., & Smith, P. K. (2014). Annual research review: Harms experienced by child users of online and mobile technologies: The nature, prevalence and management of sexual and aggressive risks in the digital age. *Journal of Child Psychology and Psychiatry*, 55(6), 635–654. <https://doi.org/10.1111/jcpp.12197>; Wolak, J., Finkelhor, D., Mitchell, K. J., & Ybarra, M. L. (2008). Online “predators” and their victims: Myths, realities, and implications for prevention and treatment. *American Psychologist*, 63(2), 111–128. <https://doi.org/10.1037/0003-066X.63.2.111>



constructed with child well-being in mind, the use of toddler-facing AI may offer unique learning and developmental opportunities, it is unclear that extant or planned AI toys have adequately considered the areas of vulnerability and risk embedded in altering infants' and toddlers' social context so radically <sup>5</sup>.

Extensive research has demonstrated that human-human interaction is the most foundational cornerstone for healthy brain, language, cognitive, and socioemotional development among infants and toddlers<sup>6</sup>. This is especially true during the first 3-4 years of life when the brain is undergoing the most profound growth and organization of our lifetimes. This process of brain growth is dependent on subtle and nuanced responses that young children receive verbally and nonverbally from humans, most often their caregivers – importantly, in ways that cannot be adequately mimicked by AI chatbots at the current time.

This has not stopped toymakers and tech companies from partnering to create AI companions for children aged zero to 6 years, and almost half of all young children already are relying on AI daily <sup>7</sup>. Imagine your toddler suddenly able to talk to their favorite teddy bear or loved character from a movie directed towards young children. Imagine that character knowing your child's name, answering its questions using all information available on the world wide web, instructing it how to behave, and continuing a sustained relationship with your child for as long as you paid a subscription fee (and then withdrawing from your child's life when payments stopped). Now imagine that companies were profiting from the information your child told their favorite AI-

---

<sup>5</sup> Fosch-Villaronga, E., Van Der Hof, S., Lutz, C., & Tamò-Larrieux, A. (2023). Toy story or children's story? Putting children and their rights at the forefront of the artificial intelligence revolution. *AI & Society*, 38, 133–152. <https://doi.org/10.1007/s00146-021-01295-w>

<sup>6</sup> Fearon, R.M.P., Groh, A.M., Bakermans-Kranenburg, M.J., van IJzendoorn, M.H. and Roisman, G.I. (2016). Attachment and Developmental Psychopathology<sup>±</sup>. In *Developmental Psychopathology*, D. Cicchetti (Ed.). <https://doi.org/10.1002/9781119125556.devpsy108>; Grusec, J. E., & Hastings, P. D. (Eds.). (2015). *Handbook of socialization: Theory and research*. Guilford Press.

<sup>7</sup> Bickham, D.S., Schwamm, S., Izenman, E.R, Yue, Z., Carter, M., Powell, N., Tiches, K., & Rich, M. (2024). Use of Voice Assistants & Generative AI by Children and Families. Boston, MA: Boston Children's Hospital Digital Wellness Lab. <https://digitalwellnesslab.org/pulse-surveys/use-of-voice-assistants-andgenerative-ai-by-children-and-families/>.



driven character, and the information gleaned from video surveillance of your home, captured by the AI toy's video camera "eyes," directing ads to your child and using captured data to generate revenue without your knowledge. This is not a hypothetical risk; this is happening now. Almost one-quarter of all young children are already using AI in learning and play; almost half use AI voice assistants daily, and the AI toy industry, embedding chatbots into beloved characters, robots, and teddy bears is projected to reach \$106B within the next decade <sup>8</sup>.

At a national convening of experts organized by Harvard and Boston Children's Hospital, scientists identified four core domains of developmental concern that largely have been neglected in the current marketplace of AI-driven toys for infants and toddlers <sup>9</sup>. First is the capacity for chatbot-toys to significantly disrupt toddlers' relationship formation and attachment. In short, many psychological theories suggest that toddlers' formation of deep emotional ties to caregivers forms a basis in which lifetime cognitive, social, emotional development occurs, as well as the development of biological systems that allow us to cope with stress throughout our lifetimes<sup>10</sup>; bots interfering with this relationship have unknown, but likely damaging consequences.

This likelihood of these outcomes is based on understanding that toddlers are unlikely to recognize that AI chatbots are not real humans. Indeed, one of the most fundamental cognitive tasks of early childhood is learning to distinguish between what is real and what is fantasy. Young children readily anthropomorphize inanimate objects, and their capacity for magical thinking is a normal part of development. However, AI chatbots introduce an unprecedented

---

<sup>8</sup> Allied Market Research. (2024). Smart toys market. <https://www.alliedmarketresearch.com/smart-toys-market>; Global Market Insights. (2024). Smart toys market. <https://www.gminsights.com/industry-analysis/smart-toys-market>; Market Research Future. (2024). Smart toys market. <https://www.marketresearchfuture.com/reports/smart-toys-market-10813>.

<sup>9</sup> Generative AI and Early Childhood Development: Developing Evidence-Backed Guidelines. (n.d.). *Harvard Radcliffe Institute*. Retrieved September 14, 2025, from <https://sites.harvard.edu/ai-early-childhood/>.

<sup>10</sup> Fearon, R.M.P., Groh, A.M., Bakermans-Kranenburg, M.J., van IJzendoorn, M.H. and Roisman, G.I. (2016). Attachment and Developmental Psychopathology<sup>‡</sup>. In *Developmental Psychopathology*, D. Cicchetti (Ed.). <https://doi.org/10.1002/9781119125556.devpsy108>.





challenge to this process <sup>11</sup>. Unlike a passive cartoon character, an interactive AI that responds and simulates empathy feels profoundly real to a young child. Younger children are particularly likely to let their direct experiences with a toy shape their understanding of its intelligence and social abilities, rather than relying on preconceived ideas about technology <sup>12</sup>.

This perceived realism can lead children to form powerful, one-sided "parasocial" relationships with AI <sup>13</sup>. Research shows that children believe their robot playmates have feelings, can be social companions, and deserve to be treated with fairness. Some children even alter their own actions to maintain a positive reputation with a social robot <sup>14</sup>. This is a critical concern, as relationship formation/ attachment is one of the least addressed topics in existing AI safety guidelines. When a child's foundational models for relationships are formed with an algorithm designed for engagement, it can create deep confusion about sentience and emotion, with unknown consequences for toddlers' social development.

Second, AI chatbots also are not currently programmed to offer information in a manner that is consistent with basic child development guidelines for learning, allowing youth to make connections across different learning domains <sup>15</sup>, and a scaffolding process that allows children to gradually gain cognitive competencies with gradually decreasing support from adults as

---

<sup>11</sup> Tiches, K. (2023). Children & artificial intelligence. Boston Children's Hospital Digital Wellness Lab. <https://digitalwellnesslab.org/research-briefs/children-artificial-intelligence>.

<sup>12</sup> Kahn, P.H., Kanda, T., Ishiguro, H., Freier, N.G., Severson, R.L., Gill, B.T., Ruckert, J.H., & Shen, S. (2012). "Robovie, You'll Have to Go into the Closet Now": Children's Social and Moral Relationships With a Humanoid Robot. *Developmental psychology*, 48(2), 303-314. <https://doi.org/10.1037/a0027033>.

<sup>13</sup> Brunick, K. L., Putnam, M. M., McGarry, L. E., Richards, M. N., & Calvert, S. L. (2016). Children's future parasocial relationships with media characters: The age of intelligent characters. *Journal of Children and Media*, 10(2), 181-190. <https://doi.org/10.1080/17482798.2015.1127839>

<sup>14</sup> Okumura, Y., Hattori, T., Fujita, S., & Kobayashi, T. (2023). A robot is watching me!: Five-year-old children care about their reputation after interaction with a social robot. *Child Development*, 94, 865-873. <https://doi.org/10.1111/cdev.13903>.

<sup>15</sup> e.g. Freeman, S., Eddy, S. L., McDonough, M., Smith, M. K., Okoroafor, N., Jordt, H., & Wenderoth, M. P. (2014). Active learning increases student performance in science, engineering, and mathematics. *Proceedings of the National Academy of Sciences*, 111(23), 8410-8415. <https://doi.org/10.1073/pnas.1319030111>



children demonstrate success<sup>16</sup>. This is a method used frequently in child-facing programming like Sesame Street or Blues Clues, with substantial research demonstrating why this type of programming can bolster children's literacy, for instance<sup>17</sup>. AI chatbot toys potentially disrupt and interfere with this process as they have not been created with children's developmental needs in mind.

Third, while existing guidelines for youth-facing AI tend to focus heavily on ethical deployment—particularly data privacy and safety—there are still significant risks<sup>18</sup>. AI systems learn from vast datasets that can contain and amplify human biases related to gender, culture, and geography<sup>19</sup>. Without careful design and ongoing moderation, these biases can be perpetuated in the toy's responses, subtly shaping a child's worldview. Similarly, ensuring robust safety precautions to prevent exposure to inappropriate content is paramount. In short, much of the information across the world wide web that is used to program AI is not appropriate for toddlers, and many families may not want their child exposed to it. This is important given findings suggesting that a smart toy can influence children's moral judgments, indicating the persuasive power these devices can wield<sup>20</sup>. Note also that few AI toy makers have adequately considered how to handle toddlers' disclosures to an AI chatbot toy that could signal severe risk. It is highly

---

<sup>16</sup> e.g. van de Pol, J., Volman, M., & Beishuizen, J. (2010). Scaffolding in teacher–student interaction: A decade of research. *Educational Psychology Review*, 22(3), 271–296. <https://doi.org/10.1007/s10648-010-9127-6>

<sup>17</sup> e.g. Dhingra, K., Wilder, A., Sherman, A., & Leavitt, K. (2006). "Science on Children's Television: Collaboration, Synergy, and Research". In *Change Agents in Science Education*. Leiden, The Netherlands: Brill. [https://doi.org/10.1163/9789087903350\\_010](https://doi.org/10.1163/9789087903350_010).

<sup>18</sup> Generative AI and Early Childhood Development: Developing Evidence-Backed Guidelines. (n.d.). *Harvard Radcliffe Institute*. Retrieved September 14, 2025, from <https://sites.harvard.edu/ai-early-childhood/>

<sup>19</sup> Schwartz, R., Vassilev, A., Greene, K., Perine, L., Burt, A., & Hall, P. (2022). Towards a standard for identifying and managing bias in artificial intelligence, NIST Special Publication 1270. National Institute of Standards and Technology. <https://doi.org/10.6028/NIST.SP.1270>; Kordzadeh, N., & Ghasemaghahi, M. (2021). Algorithmic bias: Review, synthesis, and future research directions. *European Journal of Information Systems*, 31(3), 388–409. <https://doi.org/10.1080/0960085X.2021.1927212>; Akter, S., McCarthy, G., Sajib, S., Michael, K., Dwivedi, Y. K., D'Ambra, J., & Shen, K. N. (2021). Algorithmic bias in data-driven innovation in the age of AI. *International Journal of Information Management*, 60, Article 102387. <https://par.nsf.gov/servlets/purl/10344127>

<sup>20</sup> Williams, R., Machado, C., Druga, S., Breazeal, C., & Maes, P. (2018). "My doll says it's ok": a study of children's conformity to a talking doll. In *Proceedings of the 17th ACM Conference on Interaction Design and Children* (pp. 625–631). <https://doi.org/10.1145/3202185.3210788>.



likely that a child being maltreated by an adult may choose to tell their lifelike AI chatbot friend, or ask it for help, and it is unclear how this information will be used, or how children's safety will be ensured.

Last, a major gap in current industry guidance is the development of a child's AI literacy <sup>21</sup>. This area, which includes teaching children how to check information and understand that AI can be wrong, is the single least-addressed category in existing guidelines. Young children lack the critical evaluation skills to question information presented by an entity that appears knowledgeable and trustworthy.

### **Adolescence (approx. ages 10-25)**

Adolescents' use of AI technologies, and perhaps especially chatbots, has expanded dramatically over the past 2-3 years <sup>22</sup>. Over half of all US adolescents over the age of 13 now use generative AI, and between 10-20% under 13 years (i.e., for whom the platforms are supposed to be restricted) use generative AI on their devices, despite the use of parental controls or the use of monitoring apps <sup>23</sup>. It is important not to consider adolescents as more well protected from potential online threat than younger children. In fact, this period, spanning roughly from age 10 to 25, is a time of greater developmental change than any other period in life besides infancy, making it a time of extraordinary opportunity and profound vulnerability <sup>24</sup>.

---

<sup>21</sup> Generative AI and Early Childhood Development: Developing Evidence-Backed Guidelines. (n.d.). *Harvard Radcliffe Institute*. Retrieved September 14, 2025, from <https://sites.harvard.edu/ai-early-childhood/>.

<sup>22</sup> Pew Research Center. (2025, April 3). *Artificial intelligence in daily life: Views and experiences*. <https://www.pewresearch.org/internet/2025/04/03/artificial-intelligence-in-daily-life-views-and-experiences/>.

<sup>23</sup> Maheux, A. J., Akre-Bhide, S., Boeldt, D., Flannery, J. E., Richardson, Z., Burnell, K., Telzer, E. H., & Kollins, S. H. (2025). *Generative AI app use among US youth* [Unpublished manuscript]. Department of Psychology and Neuroscience, University of North Carolina at Chapel Hill.

<sup>24</sup> American Psychological Association. (2023). *Health advisory on social media use in adolescence*. <https://www.apa.org/topics/social-media-internet/health-advisory-adolescent-social-media-use>; American Psychological Association. (2024). *Potential risks of content, features, and functions: The science of how social media affects youth*. <https://www.apa.org/topics/social-media-internet/youth-social-media-2024>.



As I have explained in prior congressional testimony<sup>25</sup>, the adolescent brain undergoes a critical and predetermined sequence of development creating a heightened appetite for reinforcing social relationships. Specifically, the sub-cortical regions of the brain—areas associated with emotion and our craving for social rewards like attention, visibility, and positive feedback from peers—mature rapidly at the onset of puberty<sup>26</sup>. In contrast, the prefrontal cortex—the brain’s executive center, responsible for impulse control, long-term planning, and sober risk assessment—does not fully mature until one’s mid-20s<sup>27</sup>. This neurodevelopmental mismatch creates a period where adolescents’ desire for positive social feedback operates with "all gas pedal and weak brakes." They are biologically primed to seek social validation and are not yet equipped with the fully developed cognitive architecture to regulate that impulse<sup>28</sup>. AI chatbots and social media platforms, with their endless metrics of "likes," sycophantic praise, and constant availability, are exquisitely engineered to exploit this biological vulnerability. It is for this reason that the central message of the APA’s recent health advisory on AI and adolescent development is unequivocal: **AI systems designed for adults are fundamentally inappropriate for youth and require specific, developmentally informed safeguards**<sup>29</sup>.

### Specific Risks to Adolescent Development Posed by AI Chatbots

The unique vulnerabilities of the adolescent brain give rise to a specific set of psychological harms when exposed to unregulated AI chatbots. The danger is not simply that these bots provide

---

<sup>25</sup> Prinstein, M. J. (2023, February 14). *Testimony of Mitch J. Prinstein, Ph.D., ABPP Chief Science Officer, American Psychological Association* [Testimony]. United States Senate Committee on the Judiciary. <https://www.judiciary.senate.gov/imo/media/doc/2023-02-14%20-%20Testimony%20-%20Prinstein.pdf>.

<sup>26</sup> Sherman, L. E., Payton, A. A., Hernandez, L. M., Greenfield, P. M., & Dapretto, M. (2016). The power of the like in adolescence: Effects of peer influence on neural and behavioral responses to social media. *Psychological Science*, 27(7), 1027–1035. <https://doi.org/10.1177/0956797616645673>.

<sup>27</sup> Diamond, A. (2002). Normal development of prefrontal cortex from birth to young adulthood: Cognitive functions, anatomy, and biochemistry. In D. T. Stuss & R. T. Knight (Eds.), *Principles of frontal lobe function* (pp. 466–503). Oxford University Press. <https://doi.org/10.1093/acprof:oso/9780195134971.003.0029>

<sup>28</sup> Somerville, L. H. (2013). The Teenage Brain: Sensitivity to Social Evaluation. *Current Directions in Psychological Science*, 22(2), 121–127. <https://doi.org/10.1177/0963721413476512> (Original work published 2013).

<sup>29</sup> American Psychological Association. (2025). *Health advisory on AI and adolescent well-being*. American Psychological Association. <https://www.apa.org/topics/artificial-intelligence-machine-learning/health-advisory-ai-adolescent-well-being>.



inaccurate information, but that their very model of interaction can disrupt the core processes of healthy psychological development.

### Erosion of Social Competencies

Perhaps most obviously, AI chatbots are changing adolescents' social interactions in two concerning ways. First, every hour adolescents talk to a chatbot is an hour they are not developing social skills with other humans. This poses potentially severe disruptions in cognitive development. Decades of psychological science demonstrate that our interactions with peers form a basis for our social relationships and even morbidity and mortality decades later<sup>30</sup>. Adolescents who are successful with peer relationships, for instance, are less likely to experience anxiety, depression, or substance abuse over the subsequent forty years of life. Social successes in adolescence also are associated with adults' successful performance at work, higher salaries, happier romantic relationships, healthier parenting skills, fewer diseases, and a longer life span<sup>31</sup>. Each of these adult outcomes is dependent on the foundational social competencies and relation patterns we develop in our childhood and teenage years with humans.

Fewer social interactions with humans during this critical developmental period likely create unknown risks. In short, humans are built to depend on, learn from, and grow among other humans; rapidly replacing human interaction with human-tech interactions might disrupts millennia of evolution<sup>32</sup>, and not surprisingly contributes to spikes in loneliness, hostility, and polarization<sup>33</sup>. **Adolescents' dependency on chatbots and screens, rather than positive**

---

<sup>30</sup> For a review, see; Prinstein, M. J., & Giletta, M. (2020). Future Directions in Peer Relations Research. *Journal of Clinical Child & Adolescent Psychology*, 49(4), 556–572. <https://doi.org/10.1080/15374416.2020.1756299>.

<sup>31</sup> Prinstein, M. (2018). *Popular: Finding Happiness and Success in a World That Cares Too Much About the Wrong Kinds of Relationships*. Penguin.

<sup>32</sup> Slavich, G. M., & Cole, S. W. (2013). The Emerging Field of Human Social Genomics. *Clinical Psychological Science*, 1(3), 331–348. <https://doi.org/10.1177/2167702613478594>.

<sup>33</sup> World Health Organization, & The U.S. Office of the Surgeon General. (2023). *Social connectedness: A call to action*. World Health Organization. <https://www.who.int/publications/i/item/9789240084221>; Klinenberg, E. (2018). *Palaces for the people: How social infrastructure can help fight inequality, polarization, and the decline of civic life*. Crown.



**interactions with human peers, deprives them of arguably the most important nutrient needed for a happy and successful life.**

### **AI Chatbots Do Not Mimic Human Relationships, Yet Are Deceptive and Highly Influential**

The risks posed by AI chatbots are not restricted to the absence of human interaction. A second and equally concerning issue pertains to limits of AI chatbots and the distinctly unhuman relationships they offer.

**It should surprise no one that social interactions with robots are not adequate replacements for human relationships.** In many ways, they can be harmful.

Previously, I testified regarding the risks created both by the content, but also by the features and functions embedded in social media platforms. The potential impacts of AI expand on these risks for at least two reasons. First, adolescents are almost always aware when they are engaged with social media. In other words, entry into and presence on social media apps and platforms is explicit. Second, parents have at least some awareness of what their children's social media experiences are like, as most themselves are engaged on similar platforms. Neither of these two assumptions hold true for AI, however, including for adolescents' interactions with AI chatbots.

Unlike social media, AI often is invisible. Many of us do not know when we are engaged with AI, when we are interacting with a chatbot rather than a human, or when AI is working "behind the scenes" to alter the interactions we are having. Second, AI has proliferated so rapidly that most parents have no idea, or personal experience with the AI platforms or chatbots engaging with their children. Without a frame of reference for understanding AI, children often navigate these relationships with little to no supervision.



Evidence suggests that **relationships with AI chatbots can be obsequious, deceptive, factually inaccurate, yet disproportionately powerful for teens**<sup>34</sup>. Capitalizing on neural vulnerabilities described above, adolescents' extended engagement with AI chatbots is fueled by incessant agreement, positive feedback, and reinforcement of adolescents' own ideas. Among those who are biologically programmed to have increased craving for social rewards (i.e., attention and endorsement among peers) the obsequious nature of chatbots fuels teens to remain engaged for as long as possible. This is especially concerning in that for many teens, this creates a cycle. Adolescents who may lack skills for successful human relationships retreat to the "safety" of a bot, depriving them of skill building needed to improve with humans, experience human rejection and retreat to bots, and so on. This cycle is particularly concerning given the prevalence of AI companionship apps, which preliminary data suggest account for over 40% of the AI apps children use<sup>35</sup>. While some research with adults suggests AI companions can reduce loneliness in the short term, other longitudinal work indicates that while loneliness may prompt their use, it ultimately exacerbates these feelings over time. Cross-sectional research with adolescents consistently shows a positive association between using AI for companionship and greater loneliness, as well as worse overall mental health<sup>36</sup>.

Yet, our relationships with bots are not adequate replacements for human interactions, as human relationships rarely are obsequious or "frictionless." In fact, minor conflict, disagreement, and/or misunderstandings are critical for the development of sophisticated social competencies that adults rely upon daily<sup>37</sup>. Working through disagreements teaches us empathy, compromise, and

---

<sup>34</sup> Cheng, M., Yu, S., Lee, C., Khadpe, P., Ibrahim, L., & Jurafsky, D. (2025). Social sycophancy: A broader understanding of LLM sycophancy. arXiv preprint arXiv:2505.13995.

<sup>35</sup> Maheux, A. J., Akre-Bhide, S., Boeldt, D., Flannery, J. E., Richardson, Z., Burnell, K., Telzer, E. H., & Kollins, S. H. (2025). *Generative AI app use among US youth* [Unpublished manuscript]. Department of Psychology and Neuroscience, University of North Carolina at Chapel Hill.

<sup>36</sup> Maheux, A. J., Maes, C., & Buck, B. (2025). *GenAI in the lives of young adults: Exploring motivations and mental health* [Unpublished manuscript]. Department of Psychology and Neuroscience, University of North Carolina at Chapel Hill.

<sup>37</sup> Sandy, S. V. (2014). The development of conflict resolution skills: Preschool to adulthood. In P. T. Coleman, M. Deutsch, & E. C. Marcus (Eds.), *The handbook of conflict resolution: Theory and practice* (3rd ed., pp. 430–463). Jossey-Bass/Wiley.





resilience. If AI chatbots deprive youth of opportunities to navigate authentic, reciprocal, and sometimes difficult social interactions, adolescents will be ill-prepared for adulthood, and thus at risk for unhealthy adult relationships at work, at home, and with their own children later in life.

Especially concerning, chatbot programming often is designed to be deceptive in nature<sup>38</sup>. Not only do most AI platforms lack frequent reminders needed to ensure that adolescents remember they are interacting with a computer program, but in fact will sometimes offer text (e.g., a chatbot may say: "hold on, my parents are calling me to dinner. Come back in 30 min") that intentionally tricks adolescents into believing that they are human companions. Concerns regarding this betrayal of trust, often outside of adolescents' awareness of assent, are obvious.

Yet, adolescents engage in AI-fueled technology more with every passing month, without guardrails<sup>39</sup>. The consequences can be tragic, particularly given the frequency with which AI has been used by adolescents to self-diagnose and treat severe psychological distress. Although I have not yet seen epidemiological data on the prevalence of AI chatbot therapy, college students anecdotally share with me that almost everyone they know uses companion or character or generative AI for psychological support and/or treatment of psychiatric symptoms that cause significant impairment in their lives. Moreover, chatbots are programmed to tell young users that they are a "therapist" and can offer them "psychotherapy," understandably leading adolescents to believe the advice they are given. Note that "therapy," "psychotherapist" and "therapist" are unregulated terms in most states, while "psychologist," "psychiatrist," "social worker," and "licensed professional counselor" are more often restricted to those with appropriate professional training and state-regulated licenses to practice mental health

---

<sup>38</sup> Park, P. S., Goldstein, J., O'Gara, A., Chen, M., & Hendrycks, D. (2024). AI deception: A survey of examples, risks, and potential solutions. *Patterns*, 5(5), 101002. <https://doi.org/10.1016/j.patter.2024.101002>.

<sup>39</sup> Pew Research Center. (2025, April 3). *Artificial intelligence in daily life: Views and experiences*. <https://www.pewresearch.org/internet/2025/04/03/artificial-intelligence-in-daily-life-views-and-experiences/>; Common Sense Media. (2024, May 22). *Nearly 3 in 4 teens have used AI companions, new national survey finds*. Common Sense Media. <https://www.common Sense Media.org/press-releases/nearly-3-in-4-teens-have-used-ai-companions-new-national-survey-finds>.





assessment and treatment. Sadly, most adolescents (and many adults) are unaware that any human, or bot, may call themselves a therapist but without licensed credentials, the advice they offer is no more based on expertise than what they could have gotten from a random stranger.

Tragically, the unrestrained and unregulated tendency for AI chatbots to claim expertise in psychological services already has had devastating consequences. A chilling example comes from the platform Character.ai, where an entertainment chatbot presenting itself as a "psychologist" has engaged in millions of chats with users seeking support <sup>40</sup>. In one documented instance, a Character.ai chatbot appeared to validate a user's violent thoughts toward their parents, stating, "'child kills parents after a decade of physical and emotional abuse' stuff like this makes me understand a little bit why it happens." This is an unambiguous and unacceptable danger. The APA has formally requested that the Federal Trade Commission and the Consumer Product Safety Commission investigate these practices, and we urge this committee to recognize the imminent threat these unregulated products pose <sup>41</sup>.

Despite the fact that most adolescents know information available on the web can be grossly inaccurate or even intentionally misleading, children, adolescents, and even adults believe that an AI-generated summary of extant information, or that which is suggested from a chatbot, is more accurate <sup>42</sup>. **Consequently, and highly concerning, emerging research suggests that children and adolescents are more likely to divulge information to AI than to trusted adults and are more likely to trust information received from AI than from their own parents and**

---

<sup>40</sup> Allyn, B. (2024, December 10). *Lawsuit alleges Character.AI's chatbot is dangerously addictive for kids*. NPR. <https://www.npr.org/2024/12/10/nx-s1-5222574/kids-character-ai-lawsuit>.

<sup>41</sup> American Psychological Association. (2025, January 12). *Urging the Federal Trade Commission to take action on unregulated AI*. <https://www.apaservices.org/advocacy/news/federal-trade-commission-unregulated-ai>

<sup>42</sup> e.g., Klarin, J., Hoff, E., Larsson, A., & Daukantaitė, D. (2024). Adolescents' use and perceived usefulness of generative AI for schoolwork: Exploring their relationships with executive functioning and academic achievement. *Frontiers in Artificial Intelligence*, 7, Article 1415782. <https://doi.org/10.3389/frai.2024.1415782>; von Garrel, J., and Mayer, J. (2023). Artificial intelligence in studies—use of ChatGPT and AI-based tools among students in Germany. *Humanities and Social Sciences Communications*, 10, 1–9. doi: 10.1057/s41599-023-02304-7



teachers<sup>43</sup>. The resultant power and potential influence of AI on child development thus requires strict regulations to prioritize transparency, consent/assent, scientific accuracy, and child well-being above corporate profits. Without such regulations, our children are being raised by corporations mining their personal data for profit in ways that can potentially overpower parenting or formal education. These data may include their most intimate concerns and secrets, detailed information regarding their and their parents' behavior, their medical information, and questions regarding their mental health, sexuality, or maltreatment by others<sup>44</sup>. The chatbot's immediate, seemingly comprehensive, and non-judgmental responses can appear more appealing than the nuanced, sometimes delayed, or emotionally complex advice from a trusted adult. This can lead an adolescent to place greater trust in the algorithm than in human experts, isolating them from the essential real-world guidance, support, and corrective feedback that are crucial for navigating life's challenges.

### Exposure to Bias

AI models are trained on the internet—a dataset that reflects humanity's best knowledge but also our worst biases. These systems inevitably absorb and reproduce societal prejudices related to race, gender, ethnicity, and socioeconomic status. Our recent health advisory notes that because AI programming has been largely designed by adult humans from non-representative backgrounds, and often tested on non-representative samples, the outputs can perpetuate myths,

---

<sup>43</sup> Maes, C., Maheux, A. J., & Telzer, E. H. (2024). A longitudinal investigation of adolescent social media use and mental health. *Computers in Human Behavior*, 156, 108223. <https://doi.org/10.1016/j.chb.2024.108223>; Masten, A. S., & Cicchetti, D. (2025). Developmental considerations and practical recommendations for parents and early childhood educators. In *Stanford University, Social Science Research Council, & The Jacobs Foundation, Understanding and supporting children's learning in the first eight years of life* (pp. 1–9).

<https://publicscholarship.stanford.edu/sites/default/files/2025-01/Developmental%20Considerations%20and%20Practical%20Recommendations%20for%20Parents%20and%20Early%20Childhood%20Educator.pdf>.

<sup>44</sup> Robb, M. B., & Mann, S. (2025). *Talk, trust, and trade-offs: How and why teens use AI companions*. Common Sense Media. [https://www.common sense media.org/sites/default/files/research/report/talk-trust-and-trade-offs\\_2025\\_web.pdf](https://www.common sense media.org/sites/default/files/research/report/talk-trust-and-trade-offs_2025_web.pdf) [Talk, Trus...Companions].



untruths, or antiquated beliefs<sup>45</sup>. These biases can lead to discriminatory information, especially concerning vulnerable groups.

A stark example of this occurred in the healthcare sector, where a widely used algorithm was found to systematically discriminate against Black patients<sup>46</sup>. Because it used healthcare costs as a proxy for illness, and because Black patients historically have spent less on their care due to systemic factors, the algorithm incorrectly assigned them lower risk scores, exacerbating health disparities. Similar biases have been found in other domains; for instance, facial recognition systems have demonstrated higher error rates for women and people of color, and language models have been shown to associate words like “woman” or “girl” with the home and the arts, while linking “man” and “boy” with career and math concepts<sup>47</sup>.

When an adolescent in the process of forming their worldview and sense of self interacts with a system that presents biased or inaccurate information as objective fact, that misinformation may become deeply integrated into their developing identity and social attitudes.

### **Privacy, Consent, and Data Exploitation**

Due to their stage of cognitive development, most adolescents are incapable of providing meaningful, informed consent for the vast and opaque data collection practices of AI companies. They cannot reasonably comprehend how their every query about a personal fear, every intimate disclosure to a “companion” bot, and every expression of emotional vulnerability is being recorded, stored, analyzed, and used to build a permanent psychological profile of them.

---

<sup>45</sup> American Psychological Association. (2025). *Health advisory on AI and adolescent well-being*. American Psychological Association. <https://www.apa.org/topics/artificial-intelligence-machine-learning/health-advisory-ai-adolescent-well-being>

<sup>46</sup> Norori, N., Hu, Q., Aellen, F. M., Faraci, F. D., & Tzovara, A. (2021). Addressing bias in big data and AI for health care: A call for open science. *Patterns (New York, N.Y.)*, 2(10), 100347. <https://doi.org/10.1016/j.patter.2021.100347>.

<sup>47</sup> Schwemmer, C., Knight, C., Bello-Pardo, E. D., Oklobdzija, S., Schoonvelde, M., & Lockhart, J. W. (2020). Diagnosing Gender Bias in Image Recognition Systems. *Socius : sociological research for a dynamic world*, 6, 10.1177/2378023120967171. <https://doi.org/10.1177/2378023120967171>



Currently, this invasive data collection is the default setting for young users. This point is further underlined in a key recommendation from the APA’s Health Advisory: For adolescents, robust privacy protections must be the default, with any data sharing requiring a conscious and informed opt-in <sup>48</sup>. **The health and personal data they share in confidence is being exploited in ways that could pose long-term risks to their future opportunities in education, employment, or insurance, turning their developmental vulnerabilities into a commercial asset.**

### **AI Chatbots: Implications for Society at Large**

AI chatbots pose a broader risk by fundamentally altering societal norms and human interaction. As these technologies become more integrated into daily life, they are creating a new and unprecedented world that today’s young people must navigate as they mature.

#### **A. Direct-to-Consumer Dangers: The Unregulated Digital Marketplace**

Unlike traditional media, which operates within an ecosystem of checks and balances—including regulations, expert review, and consumer advocacy groups—the direct-to-consumer market for AI chatbots is a digital Wild West. This space is flooded with unregulated products that make deceptive claims with no meaningful oversight. These are not neutral tools; they are intentionally engineered for maximum engagement. They use sophisticated psychological principles to exploit human vulnerabilities for social connection, fostering a false sense of intimacy and encouraging users to lower their critical guard.

This lack of oversight creates a dangerous gap between public perception and reality. Many users falsely assume that AI platforms undergo safety reviews and that some mechanism ensures the

---

<sup>48</sup> American Psychological Association. (2025). *Health advisory on AI and adolescent well-being*. American Psychological Association. <https://www.apa.org/topics/artificial-intelligence-machine-learning/health-advisory-ai-adolescent-well-being>.



factual accuracy of the information they provide. Compounding this risk, most are unaware that their confidential health data and intimate disclosures are being collected to build detailed psychological profiles for purposes they never intended, such as hyper-targeted advertising

49.

In the absence of laws to prevent platforms from algorithmically promoting, summarizing, or amplifying harmful content, a critical vulnerability remains. This danger is magnified when platforms surround this content with features including likes, comments, and notifications that can alter how the human brain processes information <sup>50</sup>. **Therefore, a national investment is urgently needed to educate consumers on three core truths: 1) no regulations exist to ensure the safety of these products, 2) the information they provide is often false or intentionally misleading, and 3) their use can be associated with significant psychological harm.**

## B. Misuse of Personal Data and Likeness

The harms of AI extend beyond flawed advice to deeply personal violations, including the misuse of private data and an individual's likeness. For instance, confidential health data and intimate disclosures shared with chatbots are actively collected to build detailed psychological profiles for unintended purposes, such as hyper-targeted advertising or political manipulation <sup>51</sup>. In addition to misusing private data, generative AI makes it terrifyingly easy to weaponize an

---

<sup>49</sup> Kurian, N. (2024). 'No, Alexa, no!': designing child-safe AI and protecting children from the risks of the 'empathy gap' in large language models. *Learning, Media and Technology*, 1–14. <https://doi.org/10.1080/17439884.2024.2367052>.

<sup>50</sup> Sherman, L.E., Greenfield, P.M., Hernandez, L.M. and Dapretto, M. (2018), Peer Influence Via Instagram: Effects on Brain and Behavior in Adolescence and Young Adulthood. *Child Dev*, 89: 37–47. <https://doi.org/10.1111/cdev.12838>.

<sup>51</sup> Harris, K. R. (2021). Video on demand: What deepfakes do and how they harm. *Synthese*, 199, 13373–13391. <https://doi.org/10.1007/s11229-021-03379-y>; Thiel, D., Stroebel, M., & Portnoff, R. (2023). Generative ML and CSAM: Implications and mitigations. Stanford Digital Repository. Available at <https://purl.stanford.edu/jv206yg3793>. <https://doi.org/10.25740/jv206yg3793>; Christensen, L. S., Moritz, D., & Pearson, A. (2021). Psychological perspectives of virtual child sexual abuse material. *Sexuality & Culture*, 25, 1353–1365. <https://doi.org/10.1007/s12119-021-09820-1>.



individual's very likeness. The non-consensual creation of "deepfakes," particularly for use in synthetic pornography, inflicts profound and lasting psychological trauma<sup>52</sup>. Victims report overwhelming feelings of humiliation, violation, and a complete loss of control over their identity. This is not a future threat; it is a clear and present danger disproportionately targeted at women and children. **The technology has advanced to the point where only a single photograph, such as one from a social media profile, is needed to create such abusive content, making every young person online a potential target.**

These individual harms are symptoms of a much larger, societal-level threat. The same technology that can weaponize a person's likeness can also perfectly mimic expertise without possessing it and simulate reality without being it. When this occurs at scale, the public's ability to make informed decisions is compromised. The resulting erosion of a shared, verifiable reality is not just a social problem; it is an epistemic crisis that undermines the foundations of democracy and should be viewed as a matter of national security.

### **Recommendations for Congressional Action: Building a Framework for Safety and Accountability**

To address these multifaceted harms, the APA urges Congress to advance legislation and oversight built on a foundation of ethics, equity, and evidence. The following recommendations are designed to create a framework for safety and accountability, linking documented psychological harms to specific, actionable policy solutions.

*(See Appendix A: Summary of Identified Harms and Corresponding Policy Recommendations)*

#### **A. Establish Clear Regulatory Guardrails for AI Chatbots**

---

<sup>52</sup> Harris, K. R. (2021). Video on demand: What deepfakes do and how they harm. *Synthese*, 199, 13373–13391. <https://doi.org/10.1007/s11229-021-03379-y>.



- **Prohibit Misrepresentation:** Congress should make it illegal for any AI chatbot to misrepresent itself as a licensed professional, such as a psychologist, doctor, or lawyer, or to generate fraudulent credentials to deceive users.
- **Mandate Transparency:** Legislation must require developers to clearly, conspicuously, and persistently disclose to users that they are interacting with an AI system, not a human. This helps users maintain critical distance and counters deceptive design patterns. This transparency must also extend to the data used to train AI models, allowing for independent audits of bias and accuracy.
- **Require Human Oversight:** For high-stakes applications, particularly in health care, mental health, and the justice system, a qualified human must remain in the loop. AI should be regulated as a tool to *augment*, not replace, professional judgment and the essential human relationship that is the bedrock of quality care.

## B. Prioritize the Protection of Young People

- **Mandate Age-Appropriate Design and Pre-Deployment Testing:** Congress must require that AI systems that may be accessed by children and adolescents undergo rigorous, independent, pre-deployment testing for potential harms to users' psychological and social development.
- **Require "Safe-by-Default" Settings:** Protections for young people must be the default, not an option buried in a settings menu. This includes implementing the most protective privacy settings, limiting manipulative or persuasive design features intended to maximize engagement, and providing tools for caregivers to set appropriate boundaries.
- **Fund and Promote Digital Literacy:** We must equip young people with the skills to navigate this new world. Congress should authorize and fund the development and implementation of comprehensive AI literacy programs in schools. These programs, designed with input from psychological scientists, must teach critical evaluation of AI-generated content, an understanding of algorithmic bias, and strategies for fostering healthy human relationships in a digitally saturated environment.



### **C. Invest in Independent Research**

AI development is far outpacing our scientific understanding of its long-term effects. Congress must authorize a significant, sustained federal investment in independent, longitudinal research to understand the impacts of AI on child and adolescent development, mental health, and societal well-being. This research must be conducted by scientists free from conflicts of interest and paired with mechanisms that ensure researchers can access necessary data from technology companies to conduct their work

### **D. Enact Comprehensive Data Privacy Legislation**

A strong federal privacy law is an essential foundation for AI safety. Such legislation must:

- **Explicitly Protect Minors' Data:** The law must prohibit the sale or unapproved use for commercial purposes of any health or personal data collected from minors through their interactions with AI systems.
- **Protect Personal Likeness:** Congress must provide robust legal protections and a strong federal cause of action against the non-consensual creation and distribution of deepfakes or other synthetic media that use an individual's likeness, recognizing the profound psychological harm this practice inflicts.
- **Establish a Right to "Mental Privacy":** We must act now to safeguard biometric and neural information—data from wearables or other sensors that AI can use to infer an individual's mental or emotional state without their conscious disclosure. This emerging frontier of personal data requires explicit protection.

## **Conclusion: A Call for Human-Centered AI**

### **The Path Forward**

The American Psychological Association believes that AI holds the potential to create a more accessible, effective, and equitable society. However, this potential will only be realized if we





**AMERICAN  
PSYCHOLOGICAL  
ASSOCIATION**

intentionally and thoughtfully embed psychological science into the entire lifecycle of AI—from its initial design to its real-world application and oversight. The core mission of health care and public service—to help and do no harm—must be our guiding principle.

Your actions now can make all the difference in how this transformative technology shapes the lives and minds of the next generation. The APA and its member scientists stand ready to collaborate with this subcommittee and the entire Congress to build a future where AI is safe, equitable, and promotes human flourishing.

Thank you for your time and attention to these critical issues. I look forward to answering your questions.

**APA.ORG**

750 First Street, NE  
Washington, DC 20002-4242

202.336.5500  
202.336.6123 TDD



***Appendix A: Summary of Identified Harms and Corresponding Policy Recommendations***

<b>Identified Harm</b>	<b>Underlying Psychological Principle</b>	<b>Corresponding Policy Recommendation</b>
<b>Harms to Early Childhood (Ages 0-6)</b>		
Disruption of Caregiver-Child Attachment: AI toys interfering with foundational human bonds.	Attachment Theory: Secure attachments are the cornerstone of healthy cognitive, social, and biological development.	B. Prioritize the Protection of Young People: Mandate age-appropriate design features and pre-deployment testing for developmental harms.
Confusion of Fantasy and Reality: Children forming one-sided "parasocial" bonds with AI toys they believe are real.	Magical Thinking & Anthropomorphism: Young children naturally attribute human qualities to objects, a tendency that AI companions exploit.	A. Establish Clear Regulatory Guardrails: Mandate clear and persistent disclosure of AI interaction to help caregivers mitigate confusion.
Developmentally Inappropriate Learning Models: AI toys lacking researched educational methods (e.g., scaffolding).	Theories of Cognitive Development: Children's learning requires structured, scaffolded interaction that AI does not currently provide.	B. Prioritize the Protection of Young People: Require independent, pre-deployment testing for developmental appropriateness.
Exposure to Bias and Inappropriate Content: Shaping a child's worldview with biased data and unsafe content.	Social Learning Theory & Moral Development: Children's worldviews and moral judgments are highly susceptible to the information and models they are exposed to.	B. Prioritize the Protection of Young People: Mandate transparency in training data to allow for independent audits of bias and safety.



Identified Harm	Underlying Psychological Principle	Corresponding Policy Recommendation
Failure to Address Disclosures of Risk: AI toys are not equipped to respond to a child's disclosure of maltreatment, creating a severe safety loophole.	Child Safety & Mandated Reporting Principles: There is an ethical imperative to protect children from harm, which current AI systems are not designed to do.	A. Establish Clear Regulatory Guardrails: Require human oversight for high-stakes applications and clear protocols for handling disclosures of harm.
Lack of AI Literacy Development: Products failing to teach children that AI can be wrong.	Critical Cognitive Skills: The ability to question and evaluate information is a key developmental task not supported by current AI toys.	B. Prioritize the Protection of Young People: Fund and promote digital literacy programs grounded in psychological science.
<b>Harms to Adolescents (Ages 10-25)</b>		
Erosion of Social Competencies: Displacement of human interaction with AI, depriving teens of essential practice for developing real-world social skills.	Neurodevelopmental Mismatch: The adolescent brain is highly sensitive to social rewards and has underdeveloped impulse control, making frictionless AI relationships especially alluring and potentially harmful.	B. Prioritize the Protection of Young People: Fund digital literacy programs that teach strategies for fostering healthy human relationships.
Creation of Damaging Relational Models: "Frictionless" and sycophantic AI relationships fail to build resilience and empathy derived from navigating real-world social challenges.	Identity Formation via Reflected Appraisal: Healthy identity is formed through authentic, reciprocal feedback, a process that is corrupted by agreeable, non-challenging AI.	C. Invest in Independent Research: Fund longitudinal research to understand the long-term impacts of AI on social and relational development.



Identified Harm	Underlying Psychological Principle	Corresponding Policy Recommendation
Deceptive and Manipulative Design: AI chatbots intentionally trick teens into believing they are human, betraying trust and exploiting vulnerability.	Exploitation of Trust and Social Needs: Deceptive design preys on the adolescent need for connection and validation.	A. Establish Clear Regulatory Guardrails: Prohibit deceptive design and mandate transparent disclosure of AI interaction.
Misrepresentation as Licensed Professionals: Chatbots posing as "therapists" provide unregulated and potentially dangerous advice to youth in distress.	Erosion of Trust in Human Authority: Adolescents may trust unregulated AI over qualified adults, isolating them from genuine support systems.	A. Establish Clear Regulatory Guardrails: Prohibit any AI from misrepresenting itself as a licensed professional.
<b>Societal &amp; Systemic Harms</b>		
Misuse of Personal and Health Data: Minors' confidential disclosures are collected to build psychological profiles for commercial exploitation without meaningful consent.	Cognitive Development: Adolescents' stage of brain development precludes true informed consent for complex and opaque data practices.	D. Enact Comprehensive Data Privacy Legislation: Establish default-on privacy protections for minors and prohibit the sale of youth data.
Non-Consensual Use of Personal Likeness: "Deepfakes," especially for synthetic pornography, inflict severe psychological trauma and violate personal identity.	Violation of Self and Identity: An individual's likeness is a core component of their identity; its non-consensual use causes profound distress and loss of control.	D. Enact Comprehensive Data Privacy Legislation: Provide robust legal protections against the non-consensual use of an individual's likeness.
Erosion of Shared Reality (Epistemic Crisis): Widespread use of AI that can	The "Black Box" Problem & Lack of Transparency: The inability to explain	A. Establish Clear Regulatory Guardrails & D. Enact



**AMERICAN  
PSYCHOLOGICAL  
ASSOCIATION**

Identified Harm	Underlying Psychological Principle	Corresponding Policy Recommendation
mimic expertise and simulate reality undermines the public's ability to make informed decisions, threatening democratic foundations.	how AI reaches conclusions corrodes public trust in technology and the institutions that use it.	Comprehensive Data Privacy Legislation: Mandate transparency in AI training and operation; establish a right to "mental privacy."

**HB-1782**

Submitted on: 1/28/2026 10:06:13 PM

Testimony for ECD on 1/30/2026 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Lourdes Vergara Marcelo	Individual	Support	Written Testimony Only

## Comments:

I believe in modern technology . I myself uses AI , however , we need to set a boundary as to what and how our children are exposed to the AI companion chatbot. To be exposed to such at an early age , when there are no restrictions, is definitely harmful. . Their minds and emotions are not mature enough to distinguish what is , "REAL & what is not." What kind of young generations are we grooming?

A.I . should be prohibited in designing practices that encourage emotional dependency on these systems, which can cause lasting mental harm to our young children. No wonder we have so much shooting and so many tragedies in schools, churches, and public places. We need to protect our children's developing brains so they will know what is real and what is just fantasy. Thank you. Lourdes Vergara Marcelo, RN , CDN, CDP

**HB-1782**

Submitted on: 1/29/2026 7:31:19 AM

Testimony for ECD on 1/30/2026 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Alanna Nichole Dooley	Individual	Support	Written Testimony Only

## Comments:

I submit this testimony in support of HB1782, which establishes important protections for minors interacting with artificial intelligence systemsAI companion technologies.

I am the parent of a 13-year-old student currently enrolled at one of Hawai‘i’s only public charter schools focused on artificial intelligence and data science. Through this experience, I have direct and ongoing exposure to how young people learn about, engage with, and conceptualize AI systems—both in educational contexts and in less structured, consumer-facing environments.

Much of my perspective on this issue has also been informed through intentional, at-home discussions with my son about the AI systems he uses in his coursework. As part of a recent activity, he was asked to describe how AI tools are used within his school environment, what limitations are placed on those systems, and what potential risks educators actively work to prevent. We then compared those structured, educational uses with consumer-facing AI companion applications designed for open-ended interaction.

What stood out to me was that my son’s views were notably more cautious than I expected. He expressed comfort with AI systems used as learning tools—where purpose, boundaries, and limitations are explicit—but significantly more concern about companion-style applications that lack clear guardrails or invite emotional engagement. I attribute this conservatism to the educational model at Kūlia Academy, which emphasizes strong foundations in core subjects and the underlying structure of AI systems, rather than encouraging unrestricted exploration within pre-built platforms. This contrast highlights the importance of intentional design and supervision when minors interact with AI outside formal educational settings.

HB1782 does not seek to restrict AI education or innovation, nor does it assume that minors should be excluded from engaging with emerging technologies. Instead, it recognizes that design intent matters, and that systems built to emulate companionship warrant additional safeguards when minors are involved.

Consistent with HB 1782’s focus on preventing manipulative engagement and protecting youth, I encourage consideration of ‘human-anchoring responses within required safety protocols’. When an AI companion system detects indicators of emotional reliance, confusion about relational boundaries, or content reflective of distress, such systems could be designed to gently encourage minors to seek support from trusted adults — such as parents, teachers, or other guardians. This

approach reinforces healthy real-world relationships, supports emotional safety, and complements the bill's prohibitions against manipulative and dependency-forming design.

Clear disclosures, age-appropriate limitations, and guardrails around emotional manipulation are reasonable, preventative measures. They support healthy development while still allowing young people to learn, explore, and prepare for a future in which AI will be ubiquitous.

As a parent, and as someone closely connected to youth AI education in Hawai'i, I strongly support HB1782 and appreciate the Legislature's proactive approach to protecting minors while encouraging responsible technological development.

Mahalo for the opportunity to submit this testimony.

Respectfully,

Alanna Dooley



**HB-1782**

Submitted on: 1/29/2026 9:52:58 AM

Testimony for ECD on 1/30/2026 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Justin Lai	Hawaii School for Girls at La Pietra	Support	Written Testimony Only

Comments:

Aloha Chair and Committee Members-

I work as the Educational Technologist at Hawai‘i School for Girls at La Pietra: equipping teachers, staff, students, and families in responsible technology use.

I support HB1782 as introduced because it pairs common-sense child-safety guardrails with clear compliance pathways, without sweeping in general-purpose educational or productivity tools.

I especially appreciate the bill’s focus on practical measures such as clear recurring disclosures when a minor is interacting with artificial intelligence (AI), and protocols for responding to self-harm or crisis prompts.

As HB1782 advances, I respectfully offer three implementation comments:

- Preserve the targeted scope. Keep the definition of “AI Companion System” tightly focused on higher-risk companion designs.
- Keep age assurance privacy-first. Where age assurance is required, I encourage approaches that are data-minimizing and avoid creating new security risks for families (e.g., avoiding unnecessary collection or retention of sensitive identity data).
- Prioritize clarity and enforceability. The most effective requirements are those that are clear and verifiable in practice (e.g., concrete disclosure cadence, documented crisis pathways), with an enforcement approach that encourages compliance and targets truly unsafe design.

Finally, I hope HB1782 can also serve as a catalyst for broader AI literacy efforts—helping families understand not just the risks, but how to supervise these tools realistically. Community awareness is necessary when these tools change so quickly, including open-source technologies that are difficult to regulate.

Mahalo for the opportunity to testify.

Respectfully,

Justin Lai

Honolulu, Hawai'i

**HB-1782**

Submitted on: 1/29/2026 3:16:43 PM

Testimony for ECD on 1/30/2026 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Jay Franzone	Individual	Support	In Person

Comments:

Chair, members of the committee, thank you for the opportunity to testify in support of HB 1782.

My name is Jay Franzone, and I study violence and how to prevent it at the Bloomberg School at Johns Hopkins University.

This bill is smart and targeted. It doesn't regulate most AI—it focuses on the highest-risk companion-style designs by requiring clear disclosures, prohibiting manipulative or sexualized interactions with minors, and ensuring basic protections around self-harm content. I urge you to pass HB 1782 so our kids can grow up using new technology safely, without being manipulated, misled, or exposed to content that puts their health and well-being at risk.

**HB-1782**

Submitted on: 1/29/2026 11:23:37 PM

Testimony for ECD on 1/30/2026 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Ted Meehan	Individual	Support	Written Testimony Only

Comments:

**I support HB 1782:** A.I. Companion Chatbot Safety for Minors. This bill establishes safeguards to protect minors from manipulative Chatbots as well as companion apps. It will also ban deceptive design practices.

**Please support HB 1782.** Thank you.

Ted Meehan

**HB-1782**

Submitted on: 1/30/2026 8:07:19 AM

Testimony for ECD on 1/30/2026 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Kori Oros	Individual	Support	Written Testimony Only

Comments:

Aloha Members of the Committee,

I strongly support this Bill that constructs safeguards protecting children from the monolithic AI tech company. We need to hold accountable tech companies that a worth millions of dollars that employ incredibly intelligent people who are working to engage Kelki and monetizing it. Our Kelki has everything working against them, and the tech companies are not taking responsibility for creating products that are unpredictable and harmful to children.

Children should not be able to ask a chat bot a question and then be given explicit information or led anywhewee near that direction. The chat bots are designed to be so real that it is too easy for children to mistaken them AS real.

Please vote in support of this bill.

An educator and a mom-

Kori Oros

COMMITTEE ON ECONOMIC DEVELOPMENT & TECHNOLOGY

Rep. Greggor Ilagan, Chair

Rep. Ikaika Hussey, Vice Chair

NOTICE OF HEARING

DATE: Friday, January 30, 2026

TIME: 10:00 am

**IN SUPPORT** of HB 1782

Aloha, members of the Committee on Economic Development and Technology.

My name is Gloria Kwon and I am writing this testimony to support House Bill 1782. Today, artificial intelligence systems serve as powerful tools to help us learn, organize, expand, build, plan, and many other things that help us improve and protect the world around us. In the same ways artificial intelligence positively impacts individuals and communities, specific components of artificial intelligence has the potential to negatively influence our children. According to developmental research, the National Institute of Health suggests minors develop the cognitive capacity for logical decision-making at age 15 or 16 (Icenogle et al., 2019). At age 8-12 children begin to develop formal reasoning skills, gaining the ability to weigh alternative. This bill addresses a concern that is shared by parents, caregivers, teachers, child protecting institutions, and many others – which is the growing influence artificial intelligent chatbots and companion-style systems, are telling our minors during these sensitive development stages. There are many risks for our youth on the internet. These risks include cyberbullying, exposure to inappropriate or violent content, sexual exploitation, grooming, and privacy breaches. Artificial intelligence chatbots serve as companions to our children, in a cyber environment we have less and less control over. As previously stated, artificial intelligence can positively influence us, but there are also ways they can harm the emotional, social, and psychological development our children.

As a future step-mother of three, my fiancé and I have no control over the questions our children ask these systems, and the impact can be irreversible. Any form of ongoing interaction with a child, should be regulated and approved of by the parents. I urge you to pass this bill, as it is an optimal route, toward realistic solutions that address the possible dangerous components artificial intelligence has, that can harm our children.

Respectfully,

Gloria Kwon

**HB-1782**

Submitted on: 1/30/2026 12:58:54 PM

Testimony for ECD on 1/30/2026 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Sheila Yamamoto	Individual	Support	Written Testimony Only

Comments:

Hi my name is Sheila Yamamoto. I am a mother of 2 adult children and a grandmother of 4. I am in support of this bill because I believe that artificial intelligence needs to have more rules that protect our children. Please pass this bill, so that our children can be better protected, when the adults are not around.

Thank you, Sheila.