

Date of Hearing: May 6, 2026

ASSEMBLY COMMITTEE ON APPROPRIATIONS

Buffy Wicks, Chair

AB 2656 (Petrie-Norris) – As Amended April 14, 2026

Policy Committee:	Privacy and Consumer Protection	Vote:	14 - 1
	Public Employment and Retirement		7 - 0

Urgency: No State Mandated Local Program: No Reimbursable: Yes

SUMMARY:

This bill requires a public employer covered under the Public Employee Communications Chapter (Government Code Section 3555.5(a)) to provide a recognized employee organization with no less than 45 days’ written notice before taking an action to develop, purchase, implement, or utilize any generative artificial intelligence to perform a service that is within the scope of work of the job classification represented by the recognized employee organization.

FISCAL EFFECT:

- 1) Costs of an unknown, but potentially significant amount, in excess of \$150,000, across local agencies (nearly 4,000 cities, counties, and special districts) to plan and provide the required notice. If the Commission on State Mandates determines this bill’s requirements to be a reimbursable state mandate, the state would need to reimburse these costs to local agencies (General Fund).
- 2) Costs of an unknown, but potentially significant amount, in excess of \$150,000, to the state as an employer to implement this bill’s notice requirements (General Fund, special fund). The magnitude of costs depends on the prevalence of workplace AI tools across the state.

The Legislative Analyst’s Office recently warned of General Fund structural deficits of around \$35 billion per year in the 2027-28 fiscal year and ongoing.

COMMENTS:

- 1) **Purpose.** According to the author:

This measure ensures that public employees are not left in the dark as artificial intelligence becomes more integrated into government operations. [...] Requiring advance notice is a straightforward, commonsense step that promotes accountability without slowing innovation.

- 2) **Background.** Public employers in California are subject to a layered set of advance-notice and meet-and-confer obligations to recognized employee organizations regarding changes affecting represented employees. The Meyers-Milias-Brown Act and the other public employment relations statutes incorporated by reference in this bill require meet-and-confer in good faith on wages, hours, and other terms and conditions of employment. Recent

legislation, AB 339 (Ortega), Chapter 687, Statutes of 2025, added specific advance-notice requirements that operate independently of meet-and-confer obligations.

This bill requires public employers covered by the major California public employment relations statutes to provide 45 days' written notice to recognized employee organizations before developing, purchasing, implementing, or utilizing generative AI to perform a service within the scope of work of represented job classifications. The bill operates independently of existing meet-and-confer obligations and does not limit or prohibit a public employer from taking action on generative AI. The Privacy and Consumer Protection Committee analysis notes that "scope of work" remains undefined in the bill.

- 3) **Support and Opposition.** The sponsor of this bill, the Peace Officers Research Association of California, writes that decisions about generative AI development and implementation are often made without sufficient input from the employees most directly impacted. A coalition including the California State Association of Counties, Urban Counties of California, Rural County Representatives of California, and the California Special Districts Association writes that local agencies are already subject to the Meyers-Milias-Brown Act's (MMBA) meet-and-confer requirements and to AB 339's contracting notice requirements, that AB 339 has been "incredibly burdensome" to implement and required significant time, legal resources, and training, and that the bill would represent another state mandate for which the state may be obligated to provide reimbursement. The coalition further writes that off-the-shelf software with embedded generative AI features (such as Zoom and Teams notetaking tools, ChatGPT, and Microsoft Copilot) is now ubiquitous in the modern office environment and that the bill is overbroad and unnecessary.
- 4) **Related Legislation.** AB 339 (Ortega), Chapter 687, Statutes of 2025, established the 45-day contracting notice requirement under the MMBA.

AB 1898 (Schultz), of this legislative session, would require employers — including public employers — to provide 90 days' written notice to workers and exclusive bargaining representatives before deploying workplace AI tools used to assist in employment-related decisions or workplace surveillance, and is pending in this committee.

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