

SENATE PRIVACY, DIGITAL TECHNOLOGIES, AND CONSUMER PROTECTION COMMITTEE  
Senator Christopher Cabaldon, Chair  
2025-2026 Regular Session

AB 2656 (Petrie-Norris)  
Version: April 14, 2026  
Hearing Date: June 29, 2026  
Fiscal: Yes  
Urgency: No  
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**SUBJECT**

Public employees: notice: artificial intelligence performing service within scope of work

**DIGEST**

This bill requires certain public employers to provide a recognized employee organization no less than 45 days' written notice before taking an action to develop, purchase, implement, or utilize any generative AI (GenAI) to perform a service that is within the scope of work of the job classification represented by the recognized employee organization.

**EXECUTIVE SUMMARY**

GenAI is rapidly transforming the modern workplace, with employers across industries deploying these tools to streamline operations, automate repetitive tasks, boost productivity, and reduce costs. From drafting communications and summarizing reports to analyzing data and handling client inquiries, GenAI is taking on work that was once exclusively human. However, this technological shift has sparked significant concern among workers who fear that these systems are quietly encroaching on their core responsibilities, blurring the line between augmentation and replacement. Employees often feel blindsided when AI tools are introduced without warning, leading to anxiety, distrust, and a sense that their expertise is being devalued. This has prompted a call for increased transparency and open communication, clearly explaining to employees what the technology will do, how it will affect their roles, and what safeguards are in place to protect their positions.

This bill requires public employers to provide such notice before developing or deploying GenAI in the workplace. The bill is sponsored by the Peace Officers Research Association of California. It is opposed by certain public employers, including the City of Orinda. This bill passed out of the Senate Labor, Public Employment, and Retirement Committee on a vote of 5-0.

**PROPOSED CHANGES TO THE LAW**

Existing law:

- 1) Defines “artificial intelligence” to mean an engineered or machine-based system that varies in its level of autonomy and that can, for explicit or implicit objectives, infer from the input it receives how to generate outputs that can influence physical or virtual environments. (Gov. Code. § 11549.64(a).)
- 2) Defines “GenAI” or “generative artificial intelligence” to mean an artificial intelligence system that can generate derived synthetic content, including text, images, video, and audio that emulates the structure and characteristics of the system’s training data. (Gov. Code. § 11549.64(b).)
- 3) Requires the California Department of Technology (CDT) to update the report ordered by Executive Order No. N-12-23, as needed, to respond to significant developments in GenAI deployment and shall, as appropriate, consult with academia, industry experts, and organizations that represent state exclusive employee representatives. (Gov. Code. § 11549.65(a).)
- 4) Requires the Office of Emergency Services to, as appropriate, perform a risk analysis of potential threats posed by GenAI to California’s critical infrastructure, including risks that could lead to mass casualty.
  - a) Requires the analysis to be provided to the Governor, and to include recommendations reflecting changes to AI technology, its applications, and risk management, such as further private actions, administrative actions, and collaboration with the Legislature to protect against potential threats and vulnerabilities.
  - b) Requires a high-level summary of the analysis be submitted to the Legislature annually. (Gov. Code. § 11549.65(b).)
- 5) Requires any state agency or department to consider procurement and enterprise use opportunities in which GenAI can improve the efficiency, effectiveness, accessibility, and equity of government operations consistent with relevant policies for public sector GenAI procurement. (Gov. Code. § 11549.65(c).)
- 6) Requires legal counsel for any state agency or department to consider any potential impact of GenAI on regulatory issues under the respective agency’s or department’s authority and requires the legal counsel recommend necessary updates, if appropriate, as a result of this evolving technology. (Gov. Code. § 11549.65(d).)

This bill requires certain public employers to provide a recognized employee organization 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.

## COMMENTS

### 1. A framework for California: GenAI uses, risks, and benefits

Seeking to establish a framework for California, Governor Gavin Newsom issued Executive Order N-12-23 in September 2023 “to study the development, use, and risks of artificial intelligence (AI) technology throughout the state and to develop a deliberate and responsible process for evaluation and deployment of AI within state government.”<sup>1</sup>

The executive order includes the following provisions:

- **Risk-Analysis Report:** Directs state agencies and departments to perform a joint risk-analysis of potential threats to and vulnerabilities of California’s critical energy infrastructure by the use of GenAI.
- **Procurement Blueprint:** To support a safe, ethical, and responsible innovation ecosystem inside state government, agencies will issue general guidelines for public sector procurement, uses, and required training for application of GenAI – building on the White House’s Blueprint for an AI Bill of Rights and the National Institute for Science and Technology’s AI Risk Management Framework. State agencies and departments will consider procurement and enterprise use opportunities where GenAI can improve the efficiency, effectiveness, accessibility, and equity of government operations.
- **Beneficial Uses of GenAI Report:** Direct state agencies and departments to develop a report examining the most significant and beneficial uses of GenAI in the state. The report will also explain the potential harms and risks for communities, government, and state government workers.
- **Deployment and Analysis Framework:** Develop guidelines for agencies and departments to analyze the impact that adopting GenAI tools may have on vulnerable communities. The state will establish the infrastructure needed to

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<sup>1</sup> Press Release, *Governor Newsom Signs Executive Order to Prepare California for the Progress of Artificial Intelligence* (September 6, 2023) Office of Governor Gavin Newsom, <https://www.gov.ca.gov/2023/09/06/governor-newsom-signs-executive-order-to-prepare-california-for-the-progress-of-artificial-intelligence/>. All internet citations are current as of June 14, 2026.

conduct pilots of GenAI projects, including CDT approved environments or “sandboxes” to test such projects.

- **State Employee Training:** To support California’s state government workforce and prepare for the next generation of skills needed to thrive in the GenAI economy, agencies will provide trainings for state government workers to use state-approved GenAI to achieve equitable outcomes, and will establish criteria to evaluate the impact of GenAI to the state government workforce.
- **Legislative Engagement:** Engage with legislative partners and key stakeholders, including academic institutions, in a formal process to develop policy recommendations for responsible use of AI, including any guidelines, criteria, reports, and/or training.
- **Evaluate Impacts of AI on an Ongoing Basis:** Periodically evaluate for potential impact of GenAI on regulatory issues under the respective agency, department, or board’s authority and recommend necessary updates as a result of this evolving technology.

In the wake of the EO, SB 896 (Dodd, Ch. 928, Stats. 2024) established the Generative Artificial Intelligence Accountability Act, which codified most of the key provisions of the EO. SB 896 required that the Office of Emergency Services perform a risk analysis of potential threats to California’s critical infrastructure posed by GenAI, to be updated as needed to address significant developments. The bill required state agencies and departments to consider procurement and enterprise use opportunities in which GenAI can improve the efficiency, effectiveness, accessibility, and equity of government operations consistent with relevant policies for public sector GenAI procurement.

The EO called for a report to the Governor examining the most significant, potentially beneficial use cases for deployment of GenAI tools by the State. It went on:

The report shall also explain the potential risks to individuals, communities, and government and state government workers, with a focus on high-risk use cases, such as where GenAI is used to make a consequential decision affecting access to essential goods and services. Additionally, the report shall include but not be limited to: risks stemming from bad actors and insufficiently guarded governmental systems, unintended or emergent effects, and potential risks toward democratic and legal processes, public health and safety, and the economy. The report shall be regularly assessed for any significant developments or necessary updates and as appropriate, be done in consultation with civil society, academia, industry experts, and the state government workforce or organizations that represent state government employees.

SB 896 requires CDT to update the report as called for in the EO. SB 896 also established disclosure requirements for state agencies and departments that use GenAI to communicate directly with a person regarding government services and benefits.

2. Ensuring transparency when GenAI is introduced in the workplace

The United States Department of Labor, under President Biden and the leadership of Secretary Julie Su, issued principles and best practices for developers and employers with respect to AI and worker well-being. Relevant here is the focus on transparency:

**Ensuring Transparency In AI Use: Employers should be transparent with workers and job seekers about the AI systems that are being used in the workplace.**

Today, many workers are recognizing and responding to the need for greater transparency over the implementation of AI and automated systems in the workplace. Some unions are securing collective bargaining provisions that give workers a right to advanced notice of the use of new technology in the workplace. This notice may include receiving information about an AI system, how it will be used, and how it will impact workers; it may also include obtaining informed consent from workers before deploying AI systems. Employers that provide greater disclosure and transparency about how workers will interact with AI and automated systems will foster greater trust and job security, prepare workers to effectively use AI, and open channels for workers to provide input to improve the technology or correct errors.<sup>2</sup>

The best practice laid out by the report that is most relevant here asserts:

Employers should provide workers and their representatives advance notice and appropriate disclosure if they intend to use worker-impacting AI. This disclosure should include an explanation of the purpose of the AI system; how job seekers or workers will engage with the worker-impacting AI system; and how the AI systems will be used to monitor workers, direct work, or inform significant employment decisions.

In line with these best practices, this bill requires specified public employers to provide a recognized employee organization no less than 45 days' written notice before taking an action to develop, purchase, implement, or utilize any GenAI to perform a service that is within the scope of work of the job classification represented by the recognized employee organization.

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<sup>2</sup> *Artificial Intelligence And Worker Well-being: Principles And Best Practices For Developers And Employers* (October 16, 2024) U.S. Department of Labor, [https://data.aclum.org/wp-content/uploads/2025/01/DOL\\_www\\_dol\\_gov\\_general\\_AI-Principles.pdf](https://data.aclum.org/wp-content/uploads/2025/01/DOL_www_dol_gov_general_AI-Principles.pdf).

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. As cities, counties, and state agencies increasingly deploy AI tools in the workplace, employees deserve clear, advance notice when these technologies are being used and how they may impact their duties, evaluations, and decision-making processes. While emerging technologies can be valuable tools, they must be implemented thoughtfully, transparently, and with appropriate safeguards.

Requiring advance notice is a straightforward, commonsense step that promotes accountability without slowing innovation. It ensures that employees can adapt to new systems, raise concerns where appropriate, and maintain the professional judgment that is critical in high-stakes public safety environments.

### 3. Stakeholder positions

The Peace Officers Research Association of California, the sponsor of the bill, writes:

AB 2656 ensures that public employee organizations receive advance notice of the proposed use of Generative Artificial Intelligence (GenAI) and are provided a meaningful opportunity to engage with public agencies prior to its implementation. This bill establishes a reasonable and necessary framework to ensure that the introduction of new technologies enhances, rather than undermines, the work of public employees.

GenAI is rapidly transforming workplaces across the public sector, including law enforcement. While this technology has the potential to improve efficiency and support public safety operations, it also raises important concerns related to job displacement, working conditions, and the use of automated systems that may lack transparency or accountability. Decisions about the development and implementation of GenAI are often made without sufficient input from the employees most directly impacted.

Public safety professionals bring valuable, real-world experience and insight that can help ensure these tools are implemented effectively and responsibly. Providing advance notice and an opportunity to engage allows employee organizations to identify potential risks, improve outcomes, and help integrate new technologies in a way that supports both public safety and workforce stability.

AB 2656 strikes an appropriate balance by fostering collaboration between public employers and employee organizations, while ensuring that decisions impacting wages, hours, and working conditions are not made unilaterally. By requiring advance notice, the bill promotes transparency, accountability, and thoughtful implementation of emerging technologies.

The El Dorado Irrigation District writes in opposition:

AB 2656 would add Section 3558.10 to the Government Code to require a public employer to provide a recognized employee organization at least 45 days' written notice before taking an action to develop, purchase, implement, or utilize generative artificial intelligence to perform a service that is within the scope of work of the job classification represented by that recognized employee organization.

Although the legislation would only require notification, the purpose for the notice is unclear. The legislation is also unclear as it relates to the term "service" regarding whether a service would come within the scope of a job classification. The bill would erode an employer's ability to make unencumbered business decisions that fall within traditional management authority. Decisions related to methods, technology, organizational structure, and workforce composition are fundamental to effective operations, and additional constraints like the notification requirement proposed by this legislation could hinder that flexibility.

To address concerns about the breadth of the requirement, the author has agreed to amendments that narrow the trigger for the relevant notice:

### **Amendment**

3558.10. (a) For purposes of this section, "generative artificial intelligence" and "artificial intelligence" have the same meanings as those terms are defined in Section 11549.64.

(b) A public employer identified in subdivision (a) of Section 3555.5 shall provide a recognized employee organization no less than 45 days' written notice before taking an action to develop, purchase, or require the use of ~~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.

### **SUPPORT**

Peace Officers Research Association of California (sponsor)  
SEIU California

### **OPPOSITION**

Association of California School Administrators  
California Association of Recreation & Park Districts  
California Special Districts Association  
California State Association of Counties (CSAC)  
City of Orinda  
El Dorado Irrigation District  
League of California Cities  
Public Risk Innovation, Solutions, and Management (PRISM)  
Rural County Representatives of California (RCRC)  
Shasta County Board of Supervisors  
Urban Counties of California (UCC)

### **RELATED LEGISLATION**

SB 947 (McNerney, 2026) regulates the use of automated decision systems (ADS) in the employment context, prohibiting certain uses and limiting the purposes for which ADS can be used. Certain disclosures are required when ADS are primarily relied upon to make a disciplinary, termination, or deactivation decision. SB 947 is currently in the Assembly Privacy and Consumer Protection Committee.

SB 951 (Reyes, 2026) establishes the California Worker Technological Displacement Act to, among other things, require employers to provide a 60-day advanced written notice before any technological displacement affecting a specified number of its workforce; prohibit employers from discharging an affected worker without reasonable and substantiated cause during this 60-day period; grant impacted workers the right of first bid on other positions with the employer; and prescribe penalties and specified remedies for violations. SB 951 is currently in the Assembly Privacy and Consumer Protection Committee.

AB 1898 (Shultz, 2026) requires employers to give workers at least 90 days' advance written notice before deploying any "workplace AI tool," defined to include both ADS and AI-based surveillance technologies. Employers must provide workers a notice that, among other disclosures, lists the tools used by the employers, each tool's purpose, the data it collects, the employment decisions it may affect, and any quotas the tool sets or enforces. Enforcement falls to the Labor Commissioner, public prosecutors, and workers themselves, with civil penalties of up to \$500 per violation. AB 1898 was held in the Assembly Appropriations Committee.

**PRIOR VOTES:**

Assembly Floor (Ayes 72, Noes 2)

Assembly Appropriations Committee (Ayes 14, Noes 0)

Assembly Public Employment and Retirement Committee (Ayes 7, Noes 0)

Assembly Privacy and Consumer Protection Committee (Ayes 14, Noes 1)

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