



September 22, 2023

Senator Bill Cassidy, MD  
Ranking Member  
Senate Committee on Health, Education, Labor, & Pensions  
428 Senate Dirksen Office Building  
Washington, DC 20510

**Re: ATA Action Comments on the Senate Committee on Health, Education, Labor, & Pensions  
Request for Information**

On behalf of ATA Action, the American Telemedicine Association's trade organization focused on advocacy, thank you for the opportunity to comment on the Senate Committee on Health, Education, Labor, & Pensions' (HELP) request for information to safely enhance the use of artificial intelligence (AI). We appreciate your commitment to ensuring health care is delivered in an efficient and safe manner as well as driving innovation.

For many years, healthcare providers and patients have utilized technology for assistance in health care delivery. AI is now at the forefront of this effort. AI is used in telehealth modalities such as Tele-ICU, remote patient monitoring, chatbots, and medical imaging analysis. It has many uses such as creating alerts for disease progression, identifying potential drug interactions and allergies, patient engagement, data visualization, and creating personalized treatment plans.

Utilizing AI in healthcare – including telehealth – can improve quality and service capability at every stage of the care journey. ATA Action supports efforts to ensure trustworthy AI development, integration, and utilization. AI use should maximize potential benefits as a meaningful tool for patients and providers and keep them at the center of healthcare decision-making. ATA Action also supports policies, practices, and regulatory frameworks that enhance patient and provider trust, safety, and efficacy of AI adoption as a tool in healthcare, including in telehealth.

*Prevention of Bias*

As mentioned in the document, *Exploring Congress' Framework for the Future of AI*, bias in AI utilization is a concern. Safeguards to mitigate against bias are essential. AI solutions that support clinical care should provide clear and publicly available evidence that algorithms and correlations drawn in output from AI are as free from bias as possible. Like broader telehealth, utilization of AI should seek to eliminate – and not further – healthcare disparities brought on by bias and institutional racism that has plagued traditional healthcare. Policy should promote transparent exposure of bias found within AI systems, alongside allowance for actions to address uncovered bias and strive to reduce bias in the future.

*Patient Protections*

Transparency and explainability are related to bias as well as trust, ethics, patient protections, and effective outcomes. Disclosures should allow patients, providers, regulators, and the general public to understand where and how data is being processed, used, shared, and stored and how algorithms are developed to ensure AI outputs are secure, trustworthy, clinically appropriate, and reliable.

Privacy is an important component of patient protections. Privacy, as it relates to the utilization of AI, should mirror privacy policies and practices across the healthcare system. More on ATA Action's Health Data Privacy Principles for Telehealth can be found [here](#).

### *Workforce*

Labor and the workforce is mentioned in the document. AI adoption has the potential to address critical worker shortages across the healthcare ecosystem and enhance the ability of providers to work at the top of their licenses. To harness AI's full potential, priority must be placed on education for both current and upcoming healthcare professionals on the importance of AI integration and best practice utilization. Systems should guide those whose roles may shift due to AI, ensuring they transition into vital roles that bolster workforce's strength and capacity. Along with AI integration, emphasis on AI in cloud training and workforce development programs is crucial to support the smooth implementation of AI in healthcare. Furthermore, it is essential that healthcare workers and providers are actively involved in the AI adoption decision-making process. Their firsthand experience and insights will ensure that technology is integrated in ways that genuinely complement patient care and enhance their professional practices.

ATA Action recommends policy makers consider policies that can streamline and expand the use of AI with clear guardrails and accountability. AI has the capability to reduce healthcare costs, improve patient care, and reduce the impacts of workforce shortages.

Again, we applaud the Senate Committee on HELP for soliciting feedback from stakeholders on this matter and appreciate its work to ensure the effective and safe use of AI. Thank you for your consideration of this information.

Kind regards,

A handwritten signature in black ink, appearing to read "Kyle Zebley". The signature is fluid and cursive, with a large initial "K" and a long, sweeping tail.

Kyle Zebley  
Executive Director  
ATA Action