



July 23, 2025

Farren Fuquea  
Attorney General  
150 S Main Street  
Providence, RI 02903  
[ffuquea@riag.ri.gov](mailto:ffuquea@riag.ri.gov)

**RE: ATA ACTION COMMENTS ON 110-RICR-40-00-5**

Dear Attorney General Fuquea,

On behalf of ATA Action, I am writing to provide comments for your consideration as you evaluate additional regulation regarding the use of artificial intelligence (AI), specifically in healthcare.

ATA Action, the American Telemedicine Association's affiliated trade association focused on advocacy, advances policy to ensure all individuals have permanent access to telehealth services across the care continuum. ATA Action supports the enactment of state and federal telehealth policies to secure telehealth access for all Americans, including those in rural and underserved communities. ATA Action recognizes that telehealth and virtual care have the potential to truly transform the health care delivery system – by improving patient outcomes, enhancing safety and effectiveness of care, addressing health disparities, and reducing costs – if only allowed to flourish.

As artificial intelligence (AI) has continued to become more refined, healthcare entities have begun to utilize this technology in many aspects of care delivery due to its potential to improve quality and service capacity at every state of the care journey. AI-powered technologies are being deployed to analyze data quickly and accurately to assist providers in making better informed decisions and identifying diseases earlier. AI is also helping healthcare entities streamline administrative tasks--such as improving patient scheduling or medication refill requests--which frees up more time for patient care. Accordingly, legislators and regulators have begun to consider the proper guardrails for the use of AI in healthcare, allowing for increased innovation and efficiency while ensuring patient care is not compromised. With this in mind, in 2023 the ATA adopted [AI Principles](#) to help guide policies that enhance patient and provider trust, safety, and efficacy of AI adoption as a tool in healthcare, including in telehealth. We are currently in the process of updating these principles and would be happy to share the updated version with your office when it is finalized. Should you determine future regulations are necessary in this space our organization encourages you to take the ATA AI principles linked above into account.

Furthermore, as you and your office consider potential further regulation regarding AI in healthcare, we encourage you to take existing authorities and safeguards into account. For example, our organization represents Digital Therapeutics, which are clinically validated and FDA regulated Software as a Medical Device products that incorporate artificial intelligence and other technologies into treatments delivered to patients through phones, tablets, computers, and VR headsets. We encourage you not to promulgate regulations which would restrict the deployment of beneficial AI tools and technologies that have been (or seek to be) specifically cleared by the FDA and other regulatory bodies.

**ATA ACTION**

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Thank you for the opportunity to comment and for your consideration of these important issues. As your office considers the implications of AI regulations on healthcare entities we are happy to serve as a resource. If you have any questions or would like to further discuss ATA Action's perspective on this critical issue, please contact me at [kzebley@ataaction.org](mailto:kzebley@ataaction.org).

Kind regards,

A handwritten signature in black ink, appearing to read 'Kyle Zebley', is written over a light gray rectangular background.

Kyle Zebley  
Executive Director  
ATA Action