



May 28, 2026

The Honorable Dan Hutchison
Chair, Assembly Regulated Professions Committee
New Jersey General Assembly
Trenton, New Jersey 08625

RE: ATA ACTION COMMENTS ON A 4731

Dear Chair Hutchison and member of the Assembly Regulated Professions Committee,

On behalf of ATA Action, I am writing to share our perspective on Assembly Bill 4731, which would direct the Director of the Division of Consumer Affairs to establish a model policy for licensee use of generative artificial intelligence (AI) and require each professional and occupational board to adopt that policy within prescribed timeframes. ATA Action does not oppose the goal of this legislation – providing regulatory clarity for licensed professionals on the appropriate use of AI is a worthy objective – and we appreciate the Legislature’s attention to this issue. We write to encourage the Committee to consider two important process concerns as the bill advances.

ATA Action is the affiliated policy and legislative advocacy arm of the American Telemedicine Association. ATA Action is the leading advocacy organization dedicated to advancing policy and accelerating the adoption of technology-enabled healthcare. Working collaboratively with federal and state legislators and policymakers, our organization drives industry momentum by influencing legislative and regulatory developments in telehealth, virtual care, remote patient monitoring, artificial intelligence in health, health data privacy, private sector healthcare investment, and more. We represent a diverse membership – including hospital systems, technology companies, professional associations, direct-to-consumer digital health providers, payers, pharmaceutical manufacturers, digital therapeutics developers, and remote monitoring organizations.

The Rulemaking Timeframes May Not Allow for Adequate Stakeholder Input

A 4731 requires the Director to adopt a model AI policy within six months of enactment, and each professional and occupational board to adopt profession-specific rules within nine months or at the next regularly scheduled board meeting thereafter. While we appreciate that the bill has already been amended to extend the original deadlines, we remain concerned that the prescribed timeframes may not allow sufficient opportunity for the kind of meaningful stakeholder engagement that rules of this complexity and consequence warrant.

AI in professional practice is a rapidly evolving area. Guidance that is developed hastily, without adequate input from the licensed professionals who will be subject to it, the patients and consumers they serve and the technology developers building these tools, risks producing rules that are either too restrictive to permit beneficial innovation or too permissive to provide meaningful patient protection. The Administrative Procedure Act’s standard notice-and-comment process exists precisely to guard against this risk. We note that A 4731 expressly overrides those requirements for the initial rulemaking, which makes the adequacy of any informal stakeholder process all the more important.

We urge the Committee to consider the importance of a robust, inclusive stakeholder process in developing these rules, including outreach to licensed professionals, patient advocacy organizations,

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health technology developers and telehealth providers. While, the one-year sunset on the expedited rules provides a natural opportunity to revisit and refine the framework through the standard process; we encourage the Legislature to signal that the interim rules should be treated as a starting point for that broader conversation, not a permanent endpoint.

AI Policy Should Be Grounded in Principles That Protect Both Patients and Innovation

As artificial intelligence 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 stage 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 Policy Principles](#) (updated in 2025) 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 stand ready to engage constructively with the Legislature, Director, the Division of Consumer Affairs and the relevant professional boards as this rulemaking process unfolds. If you have any questions or would like to discuss further, please contact me at hyoung@ataaction.org.

Kind regards,

A handwritten signature in black ink that reads "Hunter Young". The signature is written in a cursive, flowing style.

Hunter Young
Head of State Government Relations
ATA Action