

February 23, 2026

The Honorable Robert F. Kennedy, Jr.
U.S. Secretary of Health and Human Services
Department of Health and Human Services
200 Independence Ave. Southwest
Washington, District of Columbia 20201

The Honorable Thomas Keane, M.D.
Assistant Secretary for Technology Policy
National Coordinator for Health Information
Technology
Department of Health and Human Services
330 C Street Southwest, 7th Floor
Washington, District of Columbia 20024

Dear Secretary Kennedy and Assistant Secretary Keane:

We represent a diverse coalition of stakeholders that span the healthcare and technology sectors, all of whom support the necessary expanded use of digital and connected health technologies. A growing evidence base continues to demonstrate that the responsible use of safe and effective digital health solutions produces better patient outcomes, reduces costs, augments population health management, and improves the healthcare workforce experience.¹ Digital health tools, increasingly powered by artificial intelligence (AI), leverage patient-generated health data (PGHD) and include cloud-enabled solutions, to reduce administrative burden, support medical and clinical decision-making, and chronic and acute care management. The use of these tools is also vital in supporting unserved and underserved populations' access to prevention, diagnosis, and treatment for both acute and chronic conditions.

Leveraging the tremendous potential of AI is critical to accomplishing the Administration's goals of empowering the American people with personalized solutions; equipping healthcare providers with better and timely data about the patients they serve and improving health outcomes; and shifting the paradigm for health care to a system that fosters prevention, wellness, and chronic disease management. Many AI use cases, ranging from solving administrative/backend efficiencies to supportive clinical decisions, have already demonstrated their capacity to advance the Quadruple Aim.

We are encouraged to see the Department of Health and Human Services (HHS) continue to investigate these goals, most recently with its request for information regarding accelerating the adoption of artificial intelligence as part of clinical care.² HHS is well-positioned to leverage its existing authority to ensure that its policies propel the American healthcare system forward through its safe, effective, and responsible uptake of AI. We encourage you to set policy aligned with the following principles:

- **A Shared Responsibility for Quality and Efficacy:** Across HHS, adopt a risk-based approach to healthcare AI that tailors risk mitigation to the potential harms of intended and expected uses. Responsibility for managing risks should be appropriately shared among developers, vendors, and providers based on their knowledge of, and ability to address, those risks in alignment with leading standards such as ISO/IEC 42001.³ HHS should prevent the improper or unfair shifting of

¹ Bodenheimer, T., & Sinsky, C. (2014). "From Triple to Quadruple Aim: Care of the Patient Requires Care of the Provider." *Annals of Family Medicine*, 12(6), 573-576.

² <https://www.federalregister.gov/documents/2025/12/23/2025-23641/request-for-information-accelerating-the-adoption-and-use-of-artificial-intelligence-as-part-of>

³ <https://www.iso.org/standard/42001>

liability to those who rely on AI technologies in good faith to care for patients so as to encourage innovation and adoption without introducing new risks for critical health AI value chains.

- **Transparency and Explainability:** In alignment with existing standards and best practices for making appropriate information public, provide clear, risk-based communications that inform all healthcare stakeholders about relevant data requirements, intended uses, limitations, target populations, bias mitigation, and applications of AI tools. These communications should disclose sufficient detail to help providers assess when a tool is appropriate for individual patients, clarify whether the tool augments or automates clinical workflows, and specify compliance with all applicable legal and regulatory requirements. Transparency is a prerequisite for AI adoption.
- **Access and Affordability:** Prioritize measures that will ensure digital health technologies and AI systems in health care are accessible and affordable across research, health administration and operations, population health, practice delivery improvement, and direct clinical care. Payment and incentive policies must be in place to invest in building health AI infrastructure; preparing personnel and training; and appropriately incenting the responsible uptake and consistent use of AI tools demonstrated to advance the Quadruple Aim. Notably, CMS should modernize the way AI software is categorized and supported, including AI enabled non-medical device technologies, and provide support in Medicare for AI tools to improve Medicare beneficiaries' experience and care (as well as working with states to achieve a harmonized expansion of similar support for AI in Medicaid). Further, CMS should make overdue modernizations to key disease prevention programs (e.g., diabetes prevention) and support preventative healthcare by fully leveraging digital health technologies tools, such as patient-facing wearables and AI-enabled services. AI can play a central role in the transition to value-based care by providing essential population health tools and providing enhanced scalability and patient support.
- **Interoperability:** Ease data access and improve interoperability, while protecting data privacy and security, to foster cooperation, trust, and openness among patients, providers, health AI technology developers, and researchers. A truly interoperable healthcare system is one that enables and engages patients across multiple privacy-preserving platforms using open APIs, enabling the secure integration of patient-generated health data into electronic health records. Interoperability rules under the 21st Century Cures Act should enable clinicians' access to medical records and patients to get their data and provide it to other organizations, including for research. The success of AI tools for precision medicine, population health, and clinical decision support, all of which are key tools in addressing chronic diseases, depends on accessible and interoperable data.
- **Ethics:** Given the longstanding, deeply rooted, and well-developed body of medical and biomedical ethics, it will be critical to preserve existing and emerging ethical norms developed by providers and healthcare professional organizations for broader adherence by technologists, innovators, computer scientists, and those who use such systems. From design, development, implementation, and to use, healthcare AI tools should reflect the practical, ethical, and operational realities of patient care.
- **Workforce:** The United States faces a stark, and growing, healthcare workforce shortage. Successful creation and deployment of AI-enabled technologies which help care providers streamline tasks and meet the needs of their patients will be an essential part of addressing this shortage. Policies should support user education and workforce development through AI upskilling and strengthen the clinician-patient relationship.
- **Education:** Support educational efforts to increase AI literacy in healthcare, highlight successful AI applications, and promote stakeholder engagement to keep policies responsive to new opportunities and challenges. Education should be developed by healthcare professional organizations in partnership with AI developers. Educating the public about how AI is used in

their care increases transparency, fosters trust, and enables patients to make informed decisions about their health.

- **Collaboration:** We strongly encourage you to leverage the public-private partnership framework to collaborate with providers, patients, industry, research institutions, and government agencies to advance the above and to more broadly drive safe and effective innovation in healthcare AI.

We appreciate your consideration of our input at this critical time for the American healthcare system and the countless Americans that depend on it. We stand ready to assist you further in any way that we can.

Sincerely,

Alliance Tele-Med, LLC

EmPowerYu

American Health Information Management Association (AHIMA)

Epic Reach, LLC

American Osteopathic Association

Howie Robotics

Avella Physical Therapy Group

Life365, Inc.

Axeleos, Inc., Makers of Sentraeus360

MiCare Path

College of Healthcare Information Management Executives (CHIME)

Nova Insights Corp

Connected Health Initiative

Oncoustics

Dogtown Media

Rimidi

UnaliWear, Inc.

CC: Dr. Mehmet Oz, Administrator, Centers for Medicare & Medicaid Services
Dr. Marty Makary, Commissioner of Food and Drugs, U.S. Food and Drug Administration
Dr. Jay Bhattacharya, Director, National Institutes of Health
Paula M. Stannard, Director, Office for Civil Rights
Christi Grimm, Inspector General, Office of Inspector General
Amy Gleason, Administrator, United States DOGE Service