



M. Teresa Paiva Weed  
President

February 15, 2024

The Honorable Jacquelyn M. Baginski  
House Committee on Innovation, Internet and Technology  
Rhode Island State House  
82 Smith Street  
Providence, Rhode Island 02903

Re: H.7521

Dear Chair Baginski:

The Hospital Association of Rhode Island (HARI) and its members appreciate the opportunity to comment on H. 7521, an act that creates requirements for the developers or deployers of artificial intelligence and allows civil action against these developers or deployers by the attorney general and local solicitors.

While HARI acknowledges the importance of regulating AI and recognizes the need for federal and state oversight, we believe that the current language of the bill raises certain issues that warrant further consideration.

Upon our initial review, we have identified areas of concern, specifically related to the definitions within the bill. Individually, certain definitions could be interpreted in a manner that inadvertently implicates the use of electronic health records (EHRs). The potential ramifications of this interpretation could subject a hospital's systems to the bill's enforcement mechanisms, even though it may not be the explicit intent of the legislation. In addition, collectively these definitions may inadvertently categorize hospitals as developers, a classification that does not align with the primary functions and purposes of healthcare institutions.

Our hospitals are committed to the responsible and ethical use of AI in healthcare and look forward to the opportunity to work collaboratively with you on this legislation to ensure that intended and unintended implications can be addressed.

Thank you for your consideration on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Lisa P. Tomasso", is written over a light blue horizontal line.

Lisa P. Tomasso  
Senior Vice President