



To: House Committee on Innovation, Internet and Technology  
From: Care New England  
Date: February 15, 2024  
Subject: **Concerns for HB 7521**

Dear Chair Baginski and members of the Committee,

**Care New England (CNE) has concerns with HB 7521.** CNE would like to thank Chair Baginski for looking to address this emerging issue and we ask that the committee work with CNE, the Hospital Association of Rhode Island, and our health system partners in seeking solutions to this developing subject.

CNE Health System is a trusted, integrated health care organization that fuels the latest advances in medical research, attracts the nation's top specialty-trained doctors, hones renowned services and innovative programs, and engages in the important discussions people need to have about their health. CNE is helping to transform the future of health care, providing a leading voice in the ongoing effort to ensure the health of the individuals and communities we serve.

AI-driven software products that make predictions, recommendations, or classifications that inform decision-making in healthcare are in their nascency across the industry. Similarly, health systems are in the early stages of identifying the challenges and key considerations to take into account when evaluating and deploying commercially available AI-based tools. While CNE is actively establishing expectations for third-party AI developers to prioritize and make transparent ethical and responsible AI that facilitates the delivery of high-quality care, industry best practices for the procurement, integration, and lifecycle management of AI tools have yet to be standardized.

CNE is concerned that HB 7521 misunderstands the state of the industry with respect to assessing and addressing risks in AI models and the oversight capabilities and responsibilities between deployers and developers of AI-enabled tools. The bill places a disproportionate responsibility on deployers (which could include non-profit health care organizations without the resources to operationalize the bill's expectations) versus AI tool developers that hold primary decision-making authority and control over the design, training, testing, and configurability of automated decision tools.

HB 7521 could be improved by refocusing its impact assessment and risk management requirements to apply to AI system developers that are better positioned to assess and mitigate risks of unfairness, bias, and other harms at the AI design-stage.



(401) 227-3669



4 Richmond Square  
Providence, RI 02906



[www.carenewengland.org](http://www.carenewengland.org)



**CNE urges you to not pass HB 7521.** We are appreciative of the opportunity to provide testimony and if you have any questions, please feel free to reach out to Robert Dulski, Director of Government Affairs, [RDulski@CareNE.org](mailto:RDulski@CareNE.org). Thank you.

Sincerely,

A handwritten signature in black ink that reads "Robert Dulski".

Robert Dulski  
Director of Government Affairs  
Care New England



(401) 227-3669



4 Richmond Square  
Providence, RI 02906



[www.carenewengland.org](http://www.carenewengland.org)