



# RHODE ISLAND MEDICAL SOCIETY

Chair Victoria Gu  
Senate Artificial Intelligence and Emerging Technologies Committee  
Rhode Island Senate  
Rhode Island State House  
82 Smith Street  
Providence, RI 02903

Support – S 2010

March 24, 2026

Dear Chair and Members of the Committee:

On behalf of the Rhode Island Medical Society (RIMS), I am writing in support of S2010, which seeks to establish transparency and accountability in the use of artificial intelligence (AI) by health insurers in managing coverage and claims.

As AI becomes more integrated into healthcare delivery and insurance processes, it is essential that its use is guided by clear standards that prioritize patient care and maintain appropriate clinical oversight.

RIMS supports several key elements of this legislation.

First, the bill's transparency requirements will provide important insight into how AI is being used in coverage determinations, including the role these systems play in approving or denying care, the data used to inform decisions, and performance metrics such as denial and appeal rates. This information will be critical to understanding the real-world impact of these tools. Second, the requirement that any non-administrative adverse benefit determination involving medical necessity be reviewed and approved by a provider with the same license status as the ordering clinician is a vital safeguard. Decisions involving medical judgment should remain grounded in clinical expertise, not solely automated processes.

We would also note an important dynamic in the current system: a relatively small percentage of denied claims or prior authorization requests are ever appealed, yet a substantial majority of those appeals are ultimately overturned. This suggests that many denials are never revisited, even when the underlying care may be appropriate. As artificial intelligence is increasingly used in coverage determinations, it will be important to ensure that its use does not contribute to an increase in denials that may go unchallenged, potentially creating unintended barriers to medically necessary care.

As these technologies continue to evolve, it will also be important to ensure that their use does not introduce additional administrative complexity or delays in care. Physicians and patients are already navigating significant challenges related to prior authorization and coverage decisions. AI should be used to improve efficiency and access—not create new barriers.

RIMS appreciates the intent of this legislation and views it as an important step toward ensuring that emerging technologies are implemented in a way that is transparent, accountable, and aligned with patient-centered care.

Thank you for your consideration.

Sincerely,

Nadine Himelfarb, MD  
President