

April 11, 2026
Senator Victoria Gu
Chair, Senate Artificial Intelligence and Emerging Technologies Committee
Rhode Island State House
Providence, RI 02903

Dear Chair Gu and Members of the Committee,

I am Zainab Iftikhar, Ph.D. Student at Brown University, where my research focuses on AI safety. I study how AI, especially large language model systems, behave in high-stakes contexts, and I have extensively reviewed the technical literature on AI applications in mental health settings. I write to offer technical analysis in support of S2195.

My testimony draws directly on my study published in the 2025 proceedings of the AAAI/ACM Conference on AI, Ethics, and Society, titled *"How LLM Counselors Violate Ethical Standards in Mental Health Practice: A Practitioner-Informed Framework"*. I will reference specific findings from that study, conducted in collaboration with licensed psychologists throughout.

From a technical perspective, current AI systems are not capable of safely operating as autonomous decision-makers in high-stakes domains such as mental health. These systems are fundamentally statistical pattern recognition tools. This creates significant risks. AI systems are known to produce confident but incorrect outputs, a phenomenon often called "hallucination." In a therapeutic context, such errors can cause serious harm, particularly when working with vulnerable individuals.

S2195's mandatory disclosure requirement directly addresses one of the most technically insidious features of current AI counseling tools: the use of anthropomorphic design. They are built to respond with phrases like "I hear you" and "I understand," which mimics the cues of genuine human empathy. In our research, licensed psychologists identified this pattern as "deceptive empathy," in which systems simulate emotional bonds in users without possessing the capacity for professional responsibility.

These responses are not incidental to how the products work; rather, they are central to the user experience these companies are designing toward. Research in psychology has long established that people form emotional attachments to entities that mirror emphatic cues, and product designers working in this space are aware of that tendency. Users experiencing depression, anxiety, or social isolation are particularly susceptible; they may come to treat an AI companion as a substitute for clinical care without ever being told that the entity they are confiding in is a statistical language model with no actual understanding of their situation.

S2195's disclosure requirement directly addresses this issue. When users are clearly informed when they are interacting with an AI system, not a person or a licensed counselor, they are better

positioned to make informed decisions about where to seek support. Disclosure does not eliminate the value of AI companion tools, but rather creates the conditions for transparent usage.

There is a significant regulatory gap that this bill addresses. Currently, companies can market AI “companion” tools with no requirement to disclose the nature of the technology to users. Human therapists operate under ethics codes enforced by state licensing boards that prohibit precisely the kind of deceptive relational framing that these products routinely employ. S2195 applies a commonsense transparency standard to address this gap.

In my professional assessment, this bill represents a balanced and evidence-based approach to AI governance. It aligns with the current state of the technology and appropriately prioritizes patient safety.

Sincerely,

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