



Department of Health
Three Capitol Hill
Providence, RI 02908-5097

TTY: 771
www.health.ri.gov

March 24, 2026

The Honorable Victoria Gu, Chair
Senate Committee on Artificial Intelligence & Emerging Technologies
State House
82 Smith St.
Providence, RI 02903

RE: S 2197 – An Act Relating to Behavioral Healthcare, Developmental Disabilities and Hospitals – Oversight of Artificial Intelligence Technology in Mental Health Care Act

Dear Chair Gu:

Please accept this letter regarding S 2197, legislation that would establish regulations regarding the use of artificial intelligence in mental healthcare treatments. Although the Rhode Island Department of Health (RIDOH) applauds the intent of the legislation, please know that RIDOH is currently reviewing this proposal and is seeking input from the Rhode Island Department of Behavioral Healthcare, Developmental Disabilities and Hospitals (BHDDH), which has the statutory authority over the [Rhode Island Mental Health Law](#) referenced in the proposed legislation and over behavioral healthcare, including the program areas of integrated mental health services and substance abuse treatment and prevention services ([RIGL 40.1-1-4](#)). As the State's Single State Agency (SSA) for mental health and substance use disorders, BHDDH has authority to oversee mental health and substance use disorder prevention, treatment, and recovery services. RIDOH is supportive of the letter submitted by BHDDH to the Committee on the proposed legislation.

RIDOH is also seeking input from the associated RIDOH healthcare professional licensing boards to carefully analyze the impact the proposed legislation would have on licensure and disciplinary processes. It is important to note that, from a regulatory perspective, RIDOH does not license all the healthcare professional types included in S 2197. The bill authorizes RIDOH to promulgate rules and regulations to carry out the intent of the Act, but amends Title 40.1 of the General Laws entitled *Behavioral Healthcare, Developmental Disabilities, and Hospitals* for which RIDOH has no authority. It is also noted that S 2197 does not include physicians in its definition of "licensed professional" even though physicians provide mental health services.

RIDOH looks forward to working with the Committee, BHDDH, and our professional boards to achieve the goals of the legislation by learning more about this bill's intent and requirements, as well as the potential benefits to both regulated professionals and patients/clients throughout Rhode Island.

Thank you for the opportunity to comment on this legislation.

Sincerely,

A handwritten signature in black ink that reads "Jerome M. Larkin". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Jerome M. Larkin, MD
Director

CC: The Honorable Members of the Senate Committee on Artificial Intelligence & Emerging Technologies
The Honorable Lori Urso
Kristen Silvia, Director of Legislation and Deputy Chief of Staff
Patricia Resende, Director of Senate Policy