

20 Lewis St.
Providence, RI 02906
March 24, 2026

Senate Committee on Artificial Intelligence and Emerging Technologies
Rhode Island State House
82 Smith St
Providence, RI 02903

Dear Chairwoman Gu and Members of the Committee:

I am writing to oppose S2197, the bill on artificial intelligence use in mental health care. I am a member of Rhode Islanders for Personal Privacy.

I would prefer stricter regulation of AI use in mental health than this bill provides. Mental health care is a very intimate topic that involves huge consequences, and AI is a technology in its infancy that gets many things wrong.

Most seriously, the bill contemplates using AI for preparing therapy notes and maintaining client records, without any privacy requirements on how the AI could use that highly personal information or other information derived from it. For example, instead of

Although the bill includes a consent requirement, that does not need to be opt-in consent; patients could be deemed to be consenting by default simply because they left the default options unchanged. There should always be consent required for AI but it should be opt-in consent.

On page 4, line 8-17 (section 40.1-5.5-3 (a)), the legal wording is wrongly phrased and will not have the intended effect. For example, it would allow AI use for supplementary support even without the patient's consent if the AI system is not an AI companion and doesn't simulate anything emotional. A parent can consent on a patient's behalf even if the patient is a competent adult.

Sincerely, Randall Rose