HEALTH **INNOVATION**
ALLIANCE

March 13, 2025

Mr. Kirk Dohne, Acting Director
National Coordination Office
Networking and Information Technology Research and Development Program
National Science Foundation
2415 Eisenhower Avenue
Alexandria, VA 22314

RE: AI Action Plan

Submitted electronically via regulations.gov

Dear Mr. Dohne:

The Health Innovation Alliance (HIA) is pleased to submit comments to the *Request for Information (RFI) on the Development of an Artificial Intelligence (AI) Action Plan*. HIA encourages the Trump administration to accelerate the use of AI in health care with federal resources and incentives and to take a commonsense regulatory approach using existing authorities that balances safety and effectiveness while allowing for continued innovation and efficiency.

HIA is a diverse coalition of patient advocates, healthcare providers, consumer organizations, employers, technology companies, and payers working together to improve health care through the commonsense use of data and technology. Founded in 2007, HIA has been a stalwart supporter of health information technology and interoperability, having worked on key legislation ranging from the HITECH Act to the 21st Century Cures Act.

We are excited about the impact AI is having on the health community and its potential to address many of health care's most challenging problems, particularly for administrative burden, provider burnout, and provider shortages. For too long, the health care industry has faced increasingly complex regulations and compliance burdens due to an expanding and seemingly endless government bureaucracy. The Trump administration is uniquely situated to recast federal health technology policy and reorient to market-driven, practical approaches rather than a top-down, government-led system. The development of an AI Action Plan is a perfect place to start. HIA looks forward to working with the Office of Science and Technology Policy and the National Science Foundation to craft a national AI plan that fosters innovation and drives American excellence in AI.

Health care is a hyperregulated industry, and numerous existing authorities are already governing the use of AI in health care. The Biden administration began this expansion by creating the Assistant Secretary for Technology Policy (ASTP) which issued AI policies that conflicted with existing ones at the Food and Drug Administration (FDA). In particular, several requirements on AI from ASTP take a "function-based" approach, where any technology that possesses machine learning or AI functionality is subject to increased regulatory requirements. In contrast, the FDA has taken a risk-based approach to regulating medical products for decades. HIA believes this is the correct approach to AI and urges the Trump administration to use existing authorities at HHS, particularly the FDA, to streamline regulatory processes where possible to encourage the proliferation of AI technology.

In 2024, HIA convened stakeholders across the health care industry and developed principles for regulating AI in health care. Our response to this RFI includes these principles to help guide the Trump administration's AI Action Plan for artificial intelligence in health care. We have also included our recent report cataloging various use cases for AI across health care. The volume of current and potential uses of AI in health care – and the different forms these AI tools take given the dynamic circumstances of each health care encounter or transaction – underscores the need to view health care AI with a risk-based lens and an adaptive regulatory model. There is no way to regulate AI in a one-size-fits-all approach, and we encourage the Trump administration to be flexible as we learn the true utility and limitations of AI tools.

Finally, we encourage the Trump administration to invest in AI across the health care industry. Without support from the government, we run the risk of only the largest or wealthiest health care organizations adopting AI tools. Artificial intelligence should be available throughout, including in less resourced areas like rural and behavioral health care. Since health care currently constitutes one-third of non-defense spending, HIA believes the investment can come from one-third of non-defense AI spending.

We thank OSTP and the National Science Foundation for the opportunity to respond to this RFI, and we look forward to working with you to achieve American AI dominance and excellence in health care.

Sincerely,

Brett Meeks
Executive Director

CC:
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