February 27, 2025

Kirk Dohne, JD
National Coordination Office (NCO)
Networking and Information Technology Research and Development (NITRD)
National Science Foundation (NSF)
2415 Eisenhower Avenue
Alexandria, VA 22314

Dear Acting Director Dohne,

On behalf of the American Health Information Management Association (AHIMA) and its members, we are writing in response to the Networking and Information Technology Research and Development (NITRD) Request for Information (RFI) on the Development of an Artificial Intelligence (AI) Action Plan published in the February 6, 2025 *Federal Register* (2025-02305).

AHIMA is a global nonprofit association of health information (HI) professionals. AHIMA represents professionals who work with health data for more than one billion patient visits each year. The AHIMA mission of empowering people to impact health drives our members and credentialed HI professionals to ensure that health information is accurate, complete, and available to patients and clinicians. Our leaders work at the intersection of healthcare, technology, and business, and are found in data integrity and information privacy job functions worldwide.

The HI profession is energized by the innovations and opportunities AI can bring to healthcare. Through proper implementation, the use of AI can assist HI professionals in completing burdensome tasks – such as claims processing – allowing them to focus on more advanced work within their field. A robust policy plan will need to be implemented if the American healthcare system is to take full advantage of everything AI has to offer. Such a plan must provide the AI sector with guardrails to focus their efforts to ensure products brought to market and implemented are actively improving the quality of healthcare provided and/or assist with improving health outcomes.

AHIMA recommends any plan related to the regulation and implementation of AI should:
- Ensure robust regulatory guidelines centered on fairness, accuracy, security, and transparency are developed for both clinical and non-clinical AI;
- Structure regulatory frameworks with sufficient flexibility to allow for continued AI development and innovation;
- Focus on the intended use and desired outcome of the AI when determining the efficacy of the technology;
- Prioritize end-users' input – including HI professionals – throughout the development and real-world testing of AI technology;

1

- Develop an updated set of privacy and security policies to better encapsulate new challenges and needs posed by the use of AI in healthcare settings; and
- Maintain a focus on reducing unintended outputs and unplanned biases within AI models to ensure outputs remain stable and can be utilized across multiple settings with limited maintenance.

AHIMA believes the above recommendations will create an environment of trusted AI use and implementation allowing those who interact with healthcare to have confidence in the technology itself. A number of challenges exist in the use of AI today and the existing policy framework surrounding its implementation. As an action plan on how to tackle AI on a broad scale is developed, we encourage NITRD to address both the recommendations above and the need for those in healthcare to have an avenue to engage in the development of standards and best practices for AI. Maintaining strong private-public sector partnerships relating to the development and use of AI can ensure the desired policy outcomes are realized.

To date, challenges in healthcare technology have continued regardless of the modality of technology used. It is important that these challenges are accounted for in the development and implementation of AI to maximize its potential as an asset in healthcare. Today, while many agencies within the Executive Branch lack the statutory authority to regulate AI the proposed policy actions above can begin to be implemented while Congress works to create an AI statutory framework. As NITRD works to create an AI strategic plan, AHIMA and its membership stand ready to assist in creating a trusted AI regulatory framework.

The advent of AI will assist the HI profession by alleviating staff burnout, reducing administrative burden, and improving compliance activities. While the implementation of AI is not without challenges, AHIMA believes a regulatory plan that utilizes commonsense policy guardrails can ensure that AI becomes another piece of trusted, safe healthcare technology. We look forward to continued collaboration in the development of this action plan. If you have any questions related to our letter or would like to discuss opportunities for the HI profession to be involved in the development of AI policy moving forward, please contact AHIMA Senior Director of Regulatory and International Affairs, Andrew Tomlinson, at andrew.tomlinson@ahima.org.

Sincerely,

Lauren Riplinger, JD
Chief Public Policy and Impact Officer