February 18, 2026

Jim O'Neill
Deputy Secretary
US Department of Health and Human Services
200 Independence Avenue SW
Washington, DC 20201

Dr. Thomas Keane
Assistant Secretary and National Coordinator
Assistant Secretary for Technology Policy / Office of the National Coordinator for Health Information Technology
330 C Street NW
Floor 7, Mary E. Switzer Building
Washington, DC 20201

Submitted electronically to http://www.regulations.gov

RE: HHS Health Sector AI RFI

Dear Deputy Secretary O'Neill and Assistant Secretary Keane:

On behalf of the American Health Information Management Association (AHIMA) and its members, we are writing in response to the *Request for Information: Accelerating the Adoption and Use of Artificial Intelligence as Part of Clinical Care*.

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.

As HHS continues to enact President Trump's vision for the utilization of AI in healthcare it is crucial for all sectors of healthcare to be included at the table. It will take a whole of healthcare approach to ensure the full potential of AI is unlocked in a safe and meaningful way. HHS' AI Strategy lays the foundation for an approach encompassing key stakeholders and AHIMA applauds those efforts while urging HHS to maintain that expansive vision throughout implementation.

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 that builds on this strategy will need to be implemented if the American healthcare system is to take advantage of everything AI has to offer. Such a plan must provide the necessary guardrails to ensure AI tools brought to market and implemented are improving the quality of healthcare provided and/or assist with improving health outcomes.

AHIMA provides the following policy recommendations to strengthen AI's use in healthcare:

- 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;
- Develop an updated set of privacy and security policies to 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. We encourage HHS 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.

AHIMA encourages HHS to focus continued AI activities on the above recommendation in concert with the goals outlined within the five pillars of the HHS AI Strategic Plan, especially when looking at ways to bring AI into the clinical sphere. It is crucial for HHS to use the pillars as a starting point for all guided regulatory actions related to AI, but flexibility is also needed for the department to adjust based on the practical realities of AI implementation and use. Healthcare AI development and use is in a nascent stage and a nimble regulatory posture will be necessary to ensure regulatory goals are met. As HHS encounters changes in the operational and regulatory landscape related to AI, the department should continue to lean on its private sector parties to ensure the regulatory strategy remains viable.

To date, challenges in healthcare technology have perpetuated regardless of the modality of technology used. It is important that these challenges are accounted for in all regulatory activities. As HHS continues to develop its AI regulatory strategy, AHIMA and its members stand ready to assist.

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 common sense policy guardrails can ensure that AI becomes another piece of trusted, safe healthcare technology. We look forward to continued collaboration in the development of the Department's AI strategy. 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