



The Hospital + Healthsystem
Association of Pennsylvania

May 5, 2026

Members of the House Communications and Technology Committee:

On behalf of more than 235 member hospitals and health systems, The Hospital and Healthsystem Association of Pennsylvania (HAP) writes in opposition to House Bill 1925 (Venkat).

House Bill 1925 represents a well-intended piece of legislation, seeking to increase patient awareness of the use of artificial intelligence (AI) across the health care industry. However, the proposal falls short in accurately reflecting the current and anticipated use and growth of AI in health care—as well as other businesses and industries across the commonwealth and all states—creating onerous, fixed requirements on health care facilities without clear patient benefit.

While amendment language reflects meaningful changes, including the removal problematic definitions, a streamlined annual attestation, and a reduction in aggregate civil penalties, and while these changes move in the right direction, additional revisions are necessary. Significant concerns remain unresolved in the proposal:

- **Disclosure:** Given AI's expanding role across the care continuum, the bill's broad disclosure requirements will impose heavy administrative burdens with frequent notices that are unlikely to meaningfully inform and may confuse patients.
- **Responsible Use:** The bill does not recognize FDA-approved AI tools or treat HIPAA compliance as satisfying applicable requirements, thus creating duplication with federal law.
- **Oversight and Third-Party Vendors:** Hospitals would be inappropriately held accountable—and likely subject to penalties—for third-party vendor AI tools without a workable framework for what that oversight requires.
- **Enforcement and Penalties:** The tiered penalty factors do not align cleanly with the per-violation amounts, and exposure under the Unfair Trade Practices and Consumer Protection Law is difficult to reconcile with the good-faith and plan-of-correction provisions also in this section.

Pennsylvania hospitals remain committed to the responsible and transparent use of AI. However, this bill imposes layered administrative burdens and significant penalty



exposure without a workable compliance framework—at a time when hospitals are calling for regulatory simplification and financial relief.

HAP appreciates the engagement of Chairmen Ciresi and Ortity, committee staff, and the prime sponsor of the legislation and looks forward to continuing to work toward language that more accurately reflects how AI is used in health care today and how it will continue to evolve, but respectfully urges members of the committee to **vote no on House Bill 1925**.

Sincerely,

A handwritten signature in black ink that reads 'Arielle Chortanoff'.

Arielle Chortanoff
Vice President, State Advocacy

