The Hospital + Healthsystem Association of Pennsylvania

Statement of

The Hospital and Healthsystem Association of Pennsylvania

for the

House Committee on Technology and Communications

December 15, 2025

Testimony Regarding Pennsylvania House Bill 1925
Regulation of the Use of Artificial Intelligence in Health Care

Good afternoon, Chairman Ciresi, Chairman Ortitay, and esteemed members of the House Communications and Technology Committee. HAP appreciates the committee's invitation to submit testimony and discuss the implications of House Bill 1925 for the future of care in our commonwealth.

Hospitals are making significant investments in technology and staff training to realize the potential of artificial intelligence (AI). The full benefits and efficiencies derived from the use of AI across the health care system are not yet known, but the positive impact on operations and patient care is quickly becoming clearer. From enhanced communication and coordination, and predictive analytics that can identify patients at risk for a variety of conditions and diseases, to AI-driven tools that assist in diagnostics and treatment, the opportunities are vast.

While full of positive potential, HAP recognizes that AI poses new questions and concerns about its future impact on patients, staff, and the delivery of health care. HAP encourages this committee to take a thoughtful approach to consideration of HB 1925 that allows hospitals to adopt and grow AI technologies while ensuring patient safety, data security, and transparency, and applauds this committee for dedicating time to gathering stakeholders and receiving feedback on the legislation.

Maintaining a Unified Framework Across Industries

Applications of AI are not limited to hospitals or to the health care industry. The use of AI technology spans across multiple sectors, and it is crucial that any legislative framework reflects this reality. A fragmented approach to AI regulation, particularly one

that is specific to hospitals or other health care organizations, would add unnecessary burdens on these entities and create separate standards for the use of AI than what would be imposed on other industries. Maintaining space for hospitals to evolve as new technology emerges must be an essential component of any new legislative requirements.

Definitions

HAP is concerned about definitions unique to health care entities included in HB 1925. For example, any term that outlines what constitutes AI should be consistent with an existing framework—to the extent a standard is already in place at the federal or state level—to minimize the burdens of compliance and capturing only those AI tools and technologies that are impacting clinical decision-making or patient care. As written, the bill risks incorporating outliers or technologies that are not yet widely used or have limited applications in Pennsylvania's health care landscape. Clear definitions are essential to avoid confusion, maintain consistency, and control for risks while supporting beneficial uses of the technology.

Patient Disclosure and Communications

This bill requires that patients be informed when clinical decisions or similar tasks are influenced by AI systems. HAP is supportive of transparency as a tool for increased information to assist patient decision-making; however, requirements regarding when and how frequently disclosure is necessary should be clearly defined and distinguished between instances where AI plays a primary role in decision-making—as opposed to cases where AI tools are used to assist providers in their clinical judgments. The bill should ensure that disclosures are meaningful and provide patients with accurate information about how AI is being used in their care.

Reporting and Data Protection

HB 1925 proposes that hospitals report certain proprietary and confidential information about their AI systems to the Department of Health. HAP is concerned about an added mandated reporting requirement, and equally, the storage of vast amount of digital data and protection of sensitive information. Hospitals invest significant resources into the development and deployment of AI technologies, and the information associated with these systems is often proprietary and uses highly personal patient data. HAP urges members of this committee to consider language be included in HB 1925 to ensure that

proprietary and confidential information is safeguarded, and that reporting requirements include only the "minimum necessary" information to balance both volume and security concerns.

Penalties and Enforcement

HAP also has concerns about the bill's provisions related to penalties and enforcement. Specifically, prior to monetary penalties, the bill lacks notice requirements and safe harbor protections for hospitals and health care providers. These safeguards are critical to ensure that hospitals are not penalized for unintentional errors or misinterpretations related to the use of AI systems. Hospitals must have clarity on what constitutes compliance, and the legislative framework must allow for corrections without the imposition of harsh penalties that could discourage innovation and hinder the adoption of beneficial technologies.

Conclusion

HAP recognizes the immense interest in AI and how the technology is likely to shape how providers deliver services and how patients receive treatment in years to come. HAP appreciates the opportunity to provide comment to the House Communications and Technology Committee on HB 1925, and recognizes the sponsor of the bill, Representative Venkat, for his desire to build a framework around the use of this complex and rapidly developing technology. While HAP is unable to support HB 1925 as currently written, we are eager to be part of the continuing dialogue to ensure that legislation provides hospitals with the flexibility to embrace AI technologies while ensuring that patient safety, data privacy, and transparency are prioritized. The future of health care is intertwined with the responsible use of AI, and we look forward to collaborating on solutions that foster innovation while protecting both patients and providers.