



February 23, 2026

Dr. Thomas Keane

Assistant Secretary for Technology Policy/Office of the National Coordinator for Health Information Technology
ATTN: Request for Information: HHS Health Sector AI RFI
Mary E. Switzer Building, Mail Stop: 7033A
330 C Street SW
Washington, DC 20201

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

Re: Request for Information: Accelerating the Adoption and Use of Artificial Intelligence as Part of Clinical Care (RIN 0955-AA13)

Dear Dr. Keane:

The WellLink Health Alliance appreciates the opportunity to provide comments to the Assistant Secretary for Technology Policy and the Office of the National Coordinator for Health Information Technology regarding the Request for Information on artificial intelligence (AI) adoption in clinical care.

AI is rapidly moving from concept to operational reality in healthcare. Providers, health systems and community partners are already evaluating and deploying AI-enabled tools to support clinical decision-making, improve operational efficiency and expand access to care. Federal policy must now evolve just as quickly to ensure that innovation can move forward while protecting patients and strengthening trust in the healthcare system.

WellLink encourages the U.S. Department of Health and Human Services to adopt a clear, coordinated federal framework that accelerates responsible adoption of AI while addressing regulatory fragmentation, cybersecurity risks, workforce readiness and data interoperability.

Establish a Coordinated Federal Approach to AI in Healthcare

Fragmented regulatory expectations across federal agencies and states risk slowing innovation and increasing compliance burdens for healthcare providers. WellLink urges HHS to adopt a coordinated strategy that aligns policies across agencies and programs affecting AI in healthcare.

Clear federal direction will help providers, technology developers and patients understand expectations around privacy, governance and responsible deployment. Without greater coordination, organizations may delay adoption of beneficial technologies due to uncertainty about regulatory obligations.

Strengthen Cybersecurity and Risk Guidance

Healthcare organizations continue to face persistent and sophisticated cyber threats. The introduction of AI-enabled technologies increases the need for clear expectations around cybersecurity, vendor transparency and system resilience.

WellLink encourages federal agencies to provide practical guidance and technical assistance to help healthcare organizations evaluate AI vendors, understand cybersecurity risks and incorporate strong protections into procurement and implementation processes. Federal coordination across agencies responsible for health, cybersecurity and critical infrastructure will be essential.



Reduce Payment and Regulatory Barriers to Innovation

Many AI-enabled clinical tools lack clear or sustainable reimbursement pathways, which limits adoption even when technologies demonstrate value. Providers operating under tight financial constraints often cannot invest in promising innovations without a viable payment model.

WellLink urges HHS to work closely with the Centers for Medicare & Medicaid Services to reduce regulatory barriers and explore pathways that support the responsible adoption of digital health and AI-enabled tools. Incorporating real-world evidence and performance-based outcomes into future payment models could help accelerate innovation while ensuring accountability.

Promote Meaningful Transparency for AI Tools

Trust will determine whether AI succeeds in healthcare. Clinicians and healthcare organizations must understand how technologies perform, when they should be used and where limitations exist.

WellLink supports federal efforts to encourage transparency but recommends a practical approach focused on meaningful performance information rather than static disclosures that may quickly become outdated. Information about accuracy, reliability, known risks and appropriate clinical use cases will better support informed decision-making by providers and healthcare organizations.

Advance Interoperable Data and AI-Ready Infrastructure

The effectiveness of AI depends on reliable, interoperable data. Inconsistent data standards, fragmented systems and limited interoperability across healthcare supply chains and care settings continue to limit the potential of advanced analytics and AI.

Federal leadership can play a critical role in encouraging widely adopted, standards-based data systems that enable healthcare organizations to safely deploy AI technologies, improve supply chain resilience and strengthen patient safety.

Ensure Rural and Resource-Limited Providers Are Not Left Behind

Rural hospitals, community providers and smaller health systems face unique financial, workforce and technology challenges. AI policies and programs must be aligned across federal initiatives, so these providers are not forced to navigate conflicting expectations or duplicative requirements.

Thoughtful alignment will help ensure that federal investments in healthcare innovation translate into improved access to care and long-term sustainability for underserved communities.

Conclusion

Artificial intelligence presents a significant opportunity to improve healthcare delivery, reduce administrative burden and support clinicians. Achieving these benefits will require a federal policy framework that is coordinated, transparent and supportive of responsible innovation.

WellLink appreciates the opportunity to provide input and looks forward to continued engagement as federal agencies shape the future of AI in healthcare.

Sincerely,

Daniel Lettenberger Klein
Executive Director
WellLink Health Alliance