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February 20, 2026

The Honorable Robert F. Kennedy, Jr.
Secretary
U.S. Department of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

Comments Submitted Electronically

RE: Request for Information, Adoption of Artificial Intelligence re Clinical Care

Dear Secretary Kennedy:

The Pennsylvania Medical Society (PAMED) appreciates the opportunity to comment on the Request for Information Regarding Accelerating the Adoption and Use of Artificial Intelligence (AI) as Part of Clinical Care. As Pennsylvania's largest physician advocacy organization, PAMED boasts a membership of more than 13,000 physicians. PAMED advances physician leadership and advocates for the ethical practice of medicine, quality patient care, and the public's health. As the voice of Pennsylvania physicians, PAMED offers these comments to highlight three aspects of AI adoption of particular importance to physicians and patients.

Preservation of the physician-patient relationship

The primacy of the physician-patient relationship must be maintained as AI is introduced and integrated into the process of delivering patient care. PAMED recognizes that, as a tool, AI possesses potential to optimize health care delivery in America. However, it is crucial to continue to recognize AI as a tool and not an autonomous mechanism that can attempt to provide care on its own, or under the supervision of a non-

physician or corporate entity. The physician-led clinical care team must oversee and direct the use of AI to bolster, not diminish, the quality of care provided.

The failure to utilize AI in this responsible, supporting, role can pose substantial risks to patients and the health care system, in general. Physicians, and the teams they lead, employ uniquely human attributes such as compassion and empathy in treating patients and making decisions in furtherance of that treatment. These attributes are used along with the intelligence, acumen, training and experience the treatment team brings to the table. In contrast, AI is mostly algorithm based, featuring mathematics at its core. While attempts continue to be made to “humanize” AI, compassion and empathy, to name two of many, are uniquely human traits that AI cannot replicate.

As important as technical and academic knowledge are to the delivery of medical care, these uniquely human characteristics that physicians have integrated into care over the centuries are uniquely important. To attempt to utilize AI to provide care directly is inherently a disservice to the patient. Use in such a manner would run counter to the intent of employing AI in health care in the first place.

Concerns regarding AI trustworthiness

Accuracy and reliability of AI are two additional concerns. Current AI applications cannot be trusted to provide unbiased and patient-specific information that can be relied on in the delivery of care. Recent media reports include many instances where, when consulted, AI provided inaccurate and/or incomplete information both inside and outside the health care realm. While such inaccuracies may prove to be an inconvenience or pose a mild annoyance in many settings, it can be dangerous or deadly in the health care arena. Maintaining AI as a tool in the physician’s armamentarium will be essential in helping to ensure that AI contributes to, instead of detracts from, human-centered care.

Concerns regarding data privacy and security

Data privacy and security constitute other areas of concern related to the employment of AI in health care. Protected Health Information is extremely sensitive information. Failing to properly safeguard such information can cause significant harm. The combination of sensitive data, rapid technological advancement and the continuing threat posed by cybercriminals creates a high-risk environment for the protection of sensitive data. Patient safety, in this instance related to the protection of health data, cannot be compromised for the sake of expediency. The potential negative consequences are too great.

Opportunities for use of AI in Medical Practice

AI programs have the potential to enhance a physician-led team’s ability to analyze data, optimize work flows, respond to patient needs quicker, improve communication, and much more. Utilized judiciously, we see AI as a method to reduce clinician burnout and strengthen the patient-physician relationship.

Pennsylvania’s physicians recognize the significant potential benefits offered by the responsible use of AI as yet another tool the clinician can employ. Sufficient time to allow for the application of thorough and thoughtful consideration is essential to ensure that the risks highlighted above, and other risks, are properly identified and addressed prior to the employment of AI. The stakes are too high to pursue any course of action other than one that employs rigorous testing, verification and controls prior to the introduction and use of AI in clinical care.

PAMED appreciates the opportunity to provide input on the Request for Information on the Adoption and Use of AI in Clinical Care. If you have any questions or follow up, please call (800)228-7823 and ask for PAMED leadership or email president@pamedsoc.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'Arvind R. Cavale', written in a cursive style.

Arvind R. Cavale, MD

President of the Pennsylvania Medical Society