September 3, 2025

Congressman Morgan Griffith
Chairman
House Committee on Energy & Commerce
Subcommittee on Health
2125 Rayburn House Office Building
Washington, DC 20515

Congresswoman Diana DeGette
Ranking Member
House Committee on Energy & Commerce
Subcommittee on Health
2323 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Griffith and Ranking Member Griffith:

Thank you for holding the hearing *Examining Opportunities to Advance American Health Care through the Use of Artificial Intelligence Technologies* to highlight the great promise of artificial intelligence (AI) to improve the health care system. Consumer Technology Association (CTA) members are developing cutting-edge AI tools to improve health access and outcomes, and to lower costs.

As North America's largest technology trade association, CTA is the tech sector. Our members are the world's leading innovators – from startups to global brands helping support more than 18 million American jobs. CTA owns and produces CES® – the most powerful tech event in the world. CTA is the trade association representing more than 1200 companies in the U.S. technology industry. Eighty percent of CTA companies are small businesses and startups; others are among the world's best-known brands. We provide members with policy advocacy, market research, technical education and standards development.

CTA's Health Division advances consumer-based, technology-enabled health solutions to improve health outcomes and reduce overall health care costs. The Division includes telehealth providers, personal health wearable companies, digital health technology companies, healthcare payers, health systems, and biopharmaceutical innovators. Our members use technology to improve nutrition, fitness, mental health, lifestyle management, care access, care coordination, and more – and they are poised to lead the next wave of American innovation with cutting-edge health technology.

AI Holds Great Promise in Health Care

Like many other industries, the U.S. health care system is struggling with increased staffing and infrastructure costs, worker burnout and shortages, and increased demand. CTA believes technology, including AI, can help address these issues, including:

- Workforce Issues – The Health Resources and Services Administration (HRSA) estimates that there will be a shortage of more than 68,000 primary care physicians and the Association of American Medical Colleges (AAMC) estimates a shortage of up to 86,000 physicians overall by 2036. We face a similar crisis in nursing. In October 2022, the Bureau of Labor Statistics projected that more than 275,000 additional nurses are needed from 2020 to 2030. There are

Consumer Technology Association®
Producer of CES®

almost daily reports of the staggering number of registered nurses leaving or intending to leave the profession, due to post-pandemic stress, burnout and retirements. In a March 2023 response to the Senate Health, Education, Labor, and Pensions (HELP) Committee, CTA highlighted the potential of digital health, including AI, to address health care workforce shortage issues. CTA believes that AI is showing promise in reducing provider burden and burnout. Not only are advances in AI revolutionizing the way we detect and treat diseases, but it can also streamline administrative tasks such as scheduling and clinical documentation requirements.[1,2] AI can help health care workers treat patients more efficiently and effectively and address main drivers of worker burnout.

- Patient Engagement – AI tools can translate jargon-heavy medical information to meet patients where they are by generating visit summaries and recommendations. It might also help facilitate patient interventions, ensuring patients follow-up with referrals or treatment plans, or by helping healthcare organizations identify and engage patients who could benefit from a specific intervention the most. Always on, always available AI can help create a world of healthcare abundance, where every individual benefits from early detection, early intervention and personalized attention.

- Improving transparency and decision-making – AI may be able to consolidate and generate insights from data, which can then be used to empower consumers and healthcare organizations to make informed decisions. For example, AI tools can be used to help payer organizations to validate their provider directory data – a process that has long been manual and difficult to manage. AI tools can also be used to detect patterns in pricing or claims data, identifying areas to improve contract negotiations or flag potential instances of fraud, waste and abuse.

- Accelerate innovation – AI can accelerate the development of new treatments or diagnoses, by being used in drug discovery and diagnostic products. As we shift to more personalized medicine and treatments, AI will be crucial to helping identify patient subpopulations and ensure clinical trials are representative of the population for which the treatments are developed.

The Role of Industry Standards

With more than 70 committees, subcommittees and working groups and roughly 1100 participants, the CTA Technology and Standards program, touching all aspects of the consumer technology industry, maintains an unmatched reputation as a credible and flexible standards-making body accredited by the American National Standards Institute (ANSI). CTA has more than 30 completed health technology standards focusing on remote patient monitoring, mobile health, AI in health care, and over-the-counter hearing aids, digital therapeutics and mental health, among others.

CTA is helping advance the use of AI and ML in health care by driving industry consensus. To date, CTA's Artificial Intelligence Committee has already developed a number of health AI standards, including:

- Definitions/Characteristics of Artificial Intelligence in Health Care (ANSI/CTA-2089.1)
- The Use of Artificial Intelligence in Health Care: Trustworthiness (ANSI/CTA-2090)

---

[1] Hazarika, I. (2020). Artificial intelligence: opportunities and implications for the health workforce. *International health*, *12*(4), 241-245.

[2] https://www.fiercehealthcare.com/ai-and-machine-learning/finding-right-candidates-keeping-them-ai-aiding-healthcare-industry-meets

- [The Use of Artificial Intelligence in Health Care: Managing, Characterizing, and Safeguarding Data (ANSI/CTA-2107-A)](#)

CTA continues to focus on developing additional industry standards to advance the adoption of health AI, to include current work underway on verification and validation for pre-market and operations and monitoring for post-market application for predictive health AI.

As Congress considers the growth of the use of AI in health care and implications, consensus-based industry standards can play an important role for both FDA and non-FDA regulated health care AI-enabled devices and applications. CTA believes a risk-based approach to regulating AI in health care balances the huge benefits of innovation with appropriate patient safety protections. Standards can work in tandem with federal regulations and can be nimbler and more reactive to changes in the market, while underpinned by baseline federal consumer protections and rules. For non-FDA regulated AI-enabled health care devices and applications, which are generally low risk, standards can be important in driving industry best practices and ensuring quality and effective products. In considering federal regulation of AI, we urge Congress to recognize the important role of consensus-based industry standards.

Medicare Reimbursement

In their Calendar Year 2026 Medicare Physician Fee Schedule proposed rule, the Centers for Medicare & Medicaid Services (CMS) acknowledges that their current Practice Expense (PE) methodology does not accurately account for innovative health software technologies like AI, despite the Food & Drug Administration (FDA) having approved more than 1200 AI-enabled medical devices.[3] While CTA supports CMS updating PE methodology to better account for Software as a Medical Device (SaMD)/Software as a Service (SaaS), in order to fully realize the potential of AI in health care, CMS must move away from time-based reimbursement codes that incentivize inefficient clinician workflows.

Congressional Digital Health Caucus

In 2024, CTA helped launch the Congressional Digital Health Caucus, co-chaired by Representatives Troy Balderson (R-OH) and Robin Kelly (D-IL), with the goal of fostering dialogue and collaboration among government, the private sector, and health care experts to shape policies that integrate digital health technologies into the health care system. In the 119th session, the Caucus will continue to serve as a convener on issues of importance to the digital health industry and policymakers.

Conclusion

CTA appreciates the opportunity to highlight the potential of health AI for the hearing *Examining Opportunities to Advance American Health Care through the Use of Artificial Intelligence Technologies*. We look forward to continuing to work with you to advance policies that fully harness AI's benefits in health care.

Sincerely,

René Quashie   Catherine Pugh
Vice President, Digital Health   Director, Digital Health
Consumer Technology Association   Consumer Technology Association

---

[3] https://www.fda.gov/medical-devices/software-medical-device-samd/artificial-intelligence-enabled-medical-devices