March 14, 2025

AI Action Plan
Attn: Faisal D'Souza
National Coordination Office
2415 Eisenhower Avenue
Alexandria, VA 22314

RE: Response to Request for Information on the Development of an Artificial Intelligence Action Plan

Dear Mr. D'Souza,

The American Society of Echocardiography (ASE) appreciates the opportunity to provide input on the development of an Artificial Intelligence (AI) Action Plan. ASE is the Society for Cardiovascular Ultrasound Professionals™. As the largest global organization for cardiovascular ultrasound imaging serving physicians, sonographers, nurses, veterinarians, and scientists, ASE is the leader and advocate, setting practice standards and guidelines for the field. Since 1975, the Society has been committed to advancing cardiovascular ultrasound to improve lives. In this capacity as the voice for cardiovascular ultrasound professionals and patients, ASE is committed to advancing the integration of AI into echocardiography to enhance workflow efficiency, improve disease detection, and optimize patient outcomes. AI has the potential to revolutionize healthcare by increasing cost-effectiveness, reducing disparities in care, and supporting clinicians in delivering high-quality cardiovascular imaging. However, for AI to reach its full potential without unintended consequences, its development and implementation must be guided by clear policies that foster innovation while ensuring patient safety, appropriate clinical oversight, and access to care.

Utilizing Common Terminology to Advance AI in Healthcare

The lack of standardized definitions for AI in healthcare presents a significant challenge to innovation, regulation, and reimbursement. ASE supports the establishment of clear distinctions between assistive, augmentative, and autonomous AI applications to ensure appropriate payment methodologies and regulatory oversight. Without such clarity, AI's role in healthcare may be misunderstood, leading to inconsistent coverage policies, misaligned payment structures, and barriers to adoption. ASE endorses the American Medical Association (AMA) Current Procedural Terminology (CPT®) Editorial Panel's Appendix S: AI taxonomy for medical services and procedures, which provides a structured approach to classifying AI technologies. Implementing a standardized framework will promote transparency, facilitate accurate reimbursement, and help both patients and clinicians understand the scope and limitations of AI applications in medicine.

Ensuring a Rigorous AI Development and Approval Process

AI in healthcare must undergo a rigorous, FDA-authorized validation process to ensure that it meets the highest standards of quality, safety, and effectiveness. As AI increasingly influences patient care, the methods used to collect, analyze, and apply data must be transparent and comprehensive, reflecting

the patient populations AI is meant to serve. Bias in AI algorithms remains a critical concern, as inadequate representation in training data can lead to disparities in diagnostic accuracy and treatment recommendations. ASE urges policymakers to prioritize variety in AI dataset development and to establish regulatory safeguards that require continuous monitoring and refinement of AI systems to prevent unintended biases.

Recognizing the Essential Role of Clinicians in AI-Driven Care

AI should be seen as a tool to assist and enhance, rather than replace, the expertise of trained healthcare professionals. Current payment structures are not well-suited to AI's evolving role, as they often assume AI reduces the workload of clinicians when, in reality, AI may introduce new responsibilities related to interpretation, oversight, and patient communication. ASE emphasizes the need for differentiated payment models that account for the varying levels of clinician involvement across AI applications, from assistive to autonomous. AI cannot independently replace the clinical judgment, experience, and patient-centered decision-making that echocardiographers and other specialists provide. Policies that fail to recognize this risk undervaluing the expertise of healthcare providers and may lead to unintended consequences in patient care.

Addressing Liability Concerns to Encourage AI Adoption

While AI has the potential to enhance patient outcomes, liability concerns remain a major barrier to widespread adoption. Clinicians are often hesitant to rely on AI recommendations due to the risk of algorithm inaccuracies leading to patient harm and potential malpractice claims. To encourage responsible AI integration, liability should be equitably distributed across the healthcare ecosystem, ensuring that frontline clinicians are not disproportionately burdened with legal risk. Policies should support shared accountability among AI developers, healthcare institutions, and regulatory agencies to foster confidence in AI-driven medical decision-making. By creating a balanced liability framework, Congress can enable clinicians to use AI as a trusted resource without fear of undue legal repercussions.

Conclusion and Recommendations

ASE strongly supports the integration of AI into echocardiography and broader cardiovascular imaging to improve diagnostic accuracy, efficiency, and access to care. However, to fully realize AI's benefits while safeguarding patient safety and provider integrity, we recommend that the Trump Administration:

1. Standardize AI Terminology – Implement clear classifications for assistive, augmentative, and autonomous AI applications to guide appropriate payment models and regulatory oversight.
2. Strengthen AI Development Standards – Require transparent, FDA-authorized validation processes that ensure AI algorithms are unbiased and clinically reliable.
3. Recognize the Role of Clinicians – Design payment structures that reflect the ongoing necessity of clinician oversight and expertise in AI-driven care.
4. Address Liability Concerns – Establish a fair liability framework that distributes risk across AI developers, healthcare providers, and institutions, preventing undue burden on clinicians.

ASE appreciates the opportunity to contribute to the development of the AI Action Plan and looks forward to working with the Administration to ensure AI-driven advancements support innovation while maintaining high standards for patient care and clinical integrity. If you have any questions, please contact Katherine Stark, ASE Director of Advocacy, at kstark@asecho.org. This document is approved for public dissemination. The document contains no business-proprietary or confidential

information. Document contents may be reused by the government in developing the AI Action Plan and associated documents without attribution.

Sincerely,

Theodore Abraham, MD, FASE
ASE President