



June 9, 2026

The Honorable Marc Berman
Chair, Assembly Business and Professions Committee
1020 N Street, Room 379
Sacramento, CA 95814

RE: SB 903 (Padilla) – Oppose Unless Amended

Dear Assemblymember Berman,

On behalf of the California Medical Association (CMA) and the California Hospital Association (CHA), we are respectfully opposed unless amended to SB 903 (Padilla), regarding mental health professionals and artificial intelligence (AI) in health care. We appreciate the recent amendments which reflect a strong collaboration between the author, sponsors and our organizations. We have a couple of remaining concerns that we are working through with the author and sponsors.

Artificial intelligence has the potential to improve nearly every aspect of health care, including quality, patient experience, and affordability. At the same time, the health care field faces unique considerations when using AI. Health care leaders and policymakers must understand and balance the potential benefits and risks to ensure that AI is used safely, effectively, and equitably. We welcome that conversation — and we share the Legislature’s commitment to getting it right.

Our organizations recognize the growing role of AI in improving diagnostics, workflow efficiency, and patient engagement. When thoughtfully implemented, AI enhances and does not replace clinical decision making.

Specifically, we are still working through some concerns with section 4989.84 of this bill. We believe this subdivision is intended to prohibit psychotherapy delivered by AI. However, that practice is already prohibited under existing licensure and scope of practice laws. These laws prohibit the provision or advertisement of a professional service that is subject to licensure and regulated by the healing arts division of the Business and Professions Code by anyone who is not appropriately licensed to provide that service. This provision is likely duplicative of existing Business and Professions Code sections and could create unintended consequences with existing licensure laws. In recent amendments we proposed striking various provisions in this section to address our concerns. As currently drafted, the language would restrict AI screening and scheduling tools that help direct patients to the right care at the right time. These tools support,

rather than replace, the judgment of a licensed provider, and the bill should be clarified to reflect that distinction. We will continue to work through these amendments with the author and sponsors.

We appreciate the recent amendments that focus on providing tighter language regarding which clinicians are captured in this bill, removed or revised multiple definitions listed in the bill, and provided explicit language that will allow for research and development of AI tools in the mental health space.

Artificial intelligence is not an aspiration in health care. Rather, it is simply a reality that is saving lives in California today. We have a shared obligation and commitment to ensure that these tools are developed and deployed responsibly, equitably, and transparently.

For these reasons, our organizations are respectfully opposed unless amended to SB 903. Thank you for your consideration of our concerns.

cc: The Honorable Stephen Padilla
The Honorable Members of the Assembly Business and Professions Committee