



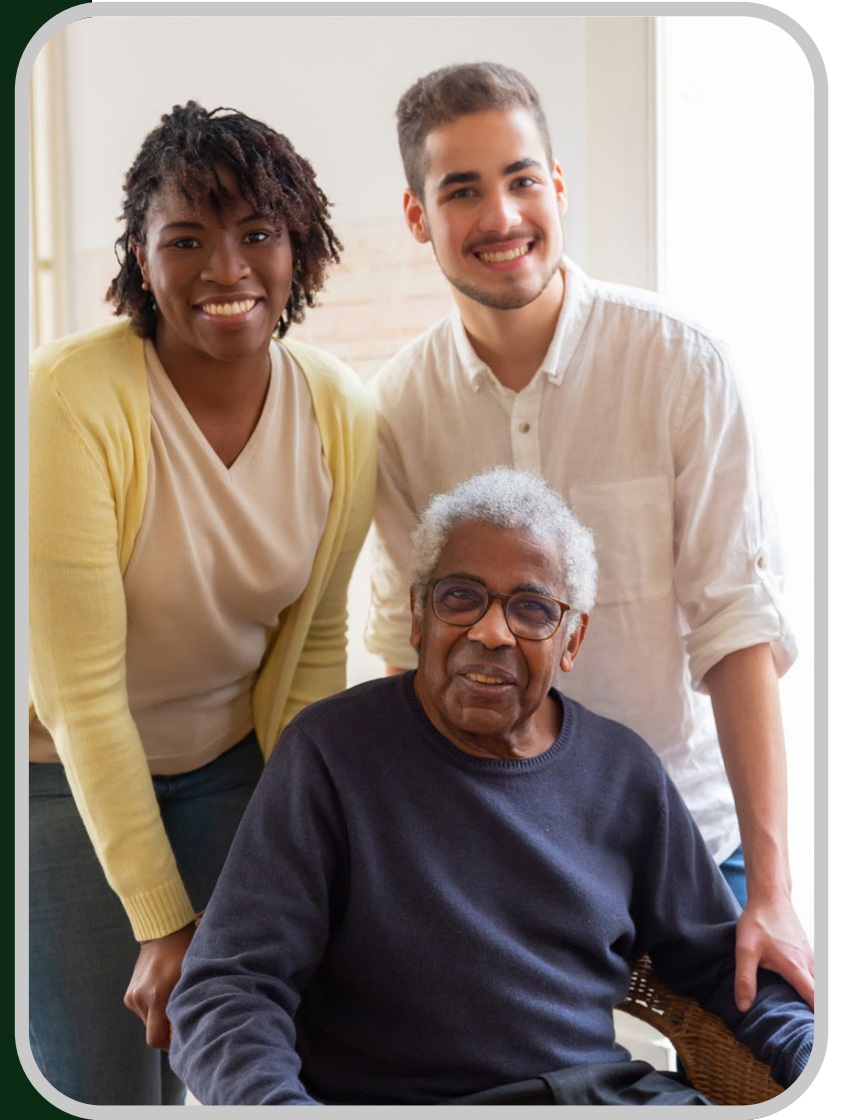
Special Needs — — Plan Alliance

Technical Assistance Center Office Hours March 2026

AI and Data Advisory Group

Agenda

- Introductions
- AI and Advisory Group Presentation
 - AI
 - Data Privacy
 - Current Regulations, Models and Guidance
- Open Discussion
- Takeaways
- Wrap Up and Next Steps



SNP Alliance Antitrust & Compliance

- I. These policies and procedures apply to all membership, board, committee and other meetings of the SNP Alliance.
- II. No discussion is permitted of any elements of member's operations which might influence competitiveness and viability such as but not limited to:
 - Cost of operations, supplies, labor or services;
 - Contracts with states and the federal government, Model of Care, Benefits design, health care providers, and other contractors associated with plan operations;
 - Business operations and strategy to include but not limited to Model of Care, Benefits Design, Quality Metrics, Measurement and Performance, Reimbursement Levels; and
 - Profit margins.
- III. It is the SNP Alliance's policy that all meetings during which discussion can border on an area of antitrust sensitivity, the member representative or SNP Alliance staff request that the discussion be stopped and ask that the request be made a part of the minutes of the meeting being attended. If others continue such discussion, the member representative should excuse himself from the meeting and request that the minutes show that s/he left the meeting at that point and why s/he left. SNP Alliance staff also will end the meeting. Any such instances shall be reported immediately to the Chair and SNP Alliance executive leadership.
- VI. It is the SNP Alliance's policy that these Antitrust Compliance Policies be reviewed and acknowledged at all meetings of the SNP Alliance membership.

AI Advisory Group—Today's Learning Objectives

New Advisory Group that will be part of Leadership in Policy Work Group.

The overarching goals of the Advisory Group are to:

- Understand more about what SNPs and MA are doing now
- Articulate best practice standards for plan and what should we develop as member TA
- Advocate for and with our members:
 - Current Hill Legislation
 - CMS Efforts

SNP Alliance AI Strategic Goal: Drive Best Practice in Specialty Managed Care for Complex Populations

Objective -- Work to ensure individuals with significant, complex needs have the knowledge, access, and choice to select services that address their unique care needs

Strategy	Timeframe	Tactics
2026 and Annual: Develop and maintain linkage to AI expertise	Quarters 2 – 3	<ul style="list-style-type: none">• Work with CMS on AI and Data Privacy solutions to aid beneficiaries with choice and education Identify CMS and Hill priorities with IT and AI and develop SNP Alliance plan – proactive and solutions oriented• Identify member experts in IT and AI through Leadership in Policy Work Group to provide guidance to Leadership in Policy on needs – policy, technical support, education. To include point in time meetings – 2-3 over year• Identify and leverage partnerships for technical support to include working with Business Partners with such expertise• Launch advocacy and technical support

What is AI?

There is no single, universally agreed definition of AI, nor indeed of 'intelligence

AI describes a set of advanced technologies that enable machines to carry out highly complex tasks effectively – tasks that would require intelligence if a person were to perform them. - *The Academic Health Science Network*

A machine doing something that usually requires a human brain. -*Me, explaining it to my mother*

What is AI?

Machine Learning

- Focused on data and analytics
- Allows computers to “learn” by recognizing patterns and then make predictions

Natural Language Processors (NLPs)

- Focused on communications
- Allows computers to understand and respond to text and voice data

Generative AI

- Focused on creating new content
- Large Language Models (LLMs), GPT-5, which are known for their ability to generate human-like text

Current Trends in AI

Use Cases

Everyday life

Healthcare

Where is it being used in organizations?

Controversies

Big Tech (Google, Amazon, Facebook, Twitter, etc.)

Facial recognition, hiring practices, social and credit scoring, weapons, deepfakes, etc.

Healthcare

AI in Healthcare

1357

AI Med Devices

FDA has reviewed 1000+
AI devices for
commercialization

1039

In Radiology

Radiology is a data-
driven specialty, ripe for
AI application

1

From Healthcare Orgs

Only 1 Healthcare org has
assumed role of legal
manufacturer

Regulation of AI

Digital Health Technologies (DHTs)

Medical Devices

Class I

Class II

Class III



FDA Regulations, Oversight, and Enforcement Apply

Non-Medical Devices

Administrative

Electronic Health Record

General Wellness

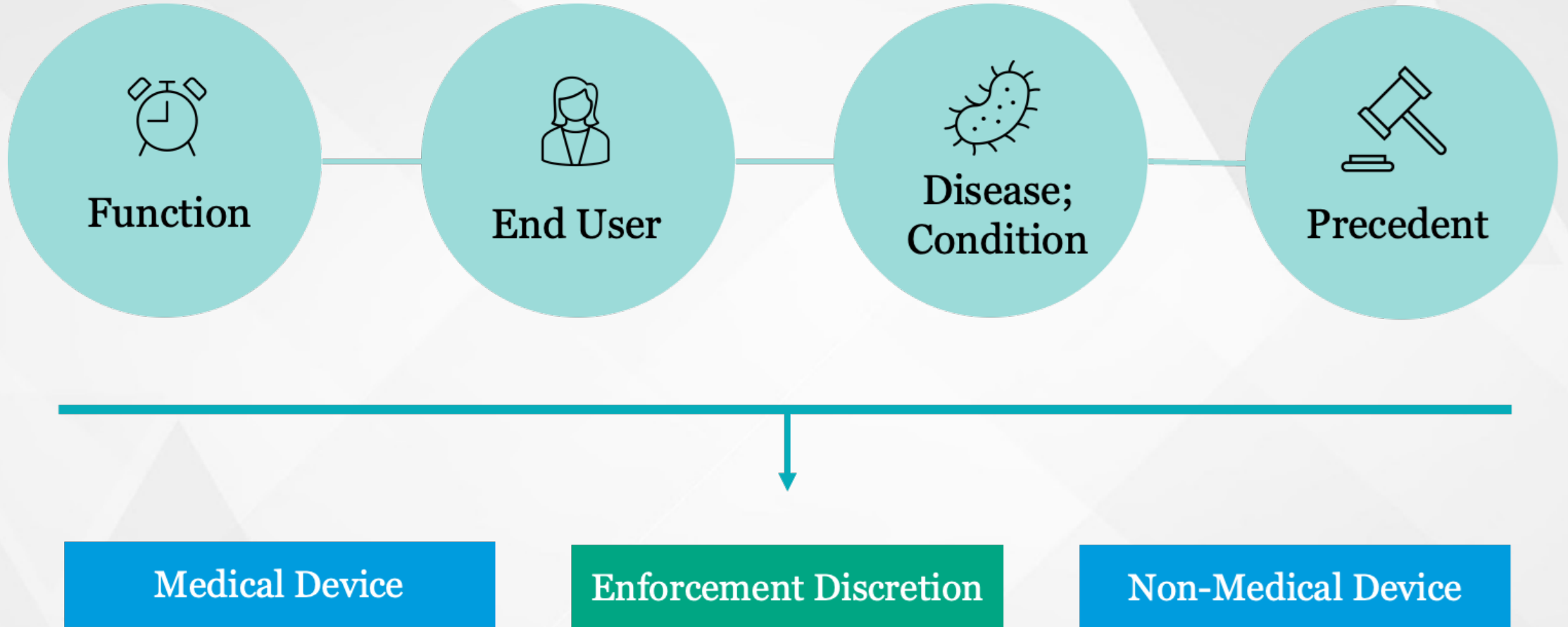
Medical Device Data Systems

Clinical Decision Support




FDA Regulations, Oversight, and Enforcement DO NOT Apply

Regulation of AI



US Regulations on AI

Regulations and Guidance	Voluntary Guidelines
Section 5 of the Federal Trade Commission Act Fair Credit Reporting Act Equal Credit Opportunity Act	AI Bill of Rights (White House Office of Science and Technology Policy)
38 states enacted or adopted roughly 100 AI measures in 2025 (e.g., algorithmic decision rules, AI governance, consent/ownership clarifications) https://www.ncsl.org/technology-and-communication/legislation-related-to-artificial-intelligence	National Institute of Standards and Technology (NIST) AI Risk Management Framework (AI RMF 1.0 + Generative AI Profile)
American Data Privacy and Protection Act (not passed) HHS AI Strategy (AI Governance & Risk Management - 1 st pillar of 5); HHS AI Use Case Inventory	FDA AI/ML-enabled medical devices list, guiding principles, etc.
- Executive Order (followed by evolving executive actions in 2025 aimed at preempting state AI laws and creating federal alignment standards) - December 2025 - OMB Guidance (OMB Memo M-24-10, 2024) — federal risk management practices for agency AI use)	National Security Commission on Artificial Intelligence released 2021 final report to Congress
DOJ guidance from 2/14/24 -longer criminal sentences involving use of AI -Justice AI – determine how DOJ can deploy AI in safe and ethical manner in work	Government Accountability Office AI accountability framework
FTC guidance: - Protections to Combat AI Impersonation of Individuals - AI Companies: Uphold Your Privacy and Confidentiality Commitments - AI (and other) Companies: Quietly Changing Your Terms of Service Could Be Unfair or Deceptive	 <p>Special Needs Plan Alliance</p>

Global Regulations on AI

Regulations

An estimated 72 countries currently have formal AI policies, strategies, or governance frameworks (legal, regulatory, or policy instruments)

EU AI Act — the world's first comprehensive horizontal AI law, providing a risk-based framework for AI systems across the bloc; entered into force in 2024 and will become effective in phases beginning in 2026

- China - algorithms, generative AI, and ethical reviews of science and technology activities
- Canada (establishing requirements for many high-impact AI systems, including risk management and transparency),
- Japan (first comprehensive national AI law in Asia),
- Brazil (progressing, signaling a comprehensive domestic AI regulatory framework)

Trends/ Notes

UN Resolutions on AI — more than 120 UN Member States supported a non-binding draft resolution promoting safe, secure, and trustworthy AI aligned with human rights, data protection, and risk monitoring.

AI Action Summit Declaration (2025) saw 58 countries commit to shared principles for ethical, inclusive, and sustainable AI, underscoring global cooperation on governance norms.

Increasing convergence around risk-based governance and transparency-enhancing requirements for high-impact AI systems.

Emergence of cross-border regulatory cooperation forums and standard-setting (OECD, UNESCO, GPAI, UN entities).

Expansion of national regulatory enforcement regimes and sector-specific AI compliance duties in healthcare, finance, employment, and public safety.

Current Models and Guidance on AI and Data Privacy

CMS AI Guidance

[Artificial Intelligence at CMS](#)

[CMS AI Playbook](#)

[Guidance for Responsible Use of Artificial Intelligence \(AI\) at CMS | CMS Information Security and Privacy Program](#)

CMMI WISeR Model

[WISeR \(Wasteful and Inappropriate Service Reduction\) Model | CMS](#)

HHS AI Guidance

[HHS Artificial Intelligence Strategy & Implementation | HHS.gov](#)

Open Discussion

Takeaways

- AI is everywhere; it has the potential to do great good but could also do potential harm to society at mass scale
- Regulations are coming, but slowly - the time to start implementing oversight is now
- There are frameworks emerging that recommend paths to ethical use of AI
- 5-Phase approach to implementing an oversight program
- Multi-disciplinary expertise must be leveraged
- Benefits to establishing an AI oversight program now:
 - Build trust with all stakeholders
 - More effective operations and talent attraction/retention
 - Competitive advantages
 - Links to Environmental, Social, Governance (ESG)
 - Better prepared for regulatory demands
 - Better sleep



Image source:

<https://www.forbes.com/sites/forbesbusinesscouncil/2022/05/16/why-is-solving-for-trust-in-ai-so-challenging/?sh=f00d2d66f483>

Meeting Wrap Up and Next Steps

Action Steps from Meeting

- Subject Matter?
- Contact Follow Up?
- Hill, CMS or CMMI Information Gathering?
- Materials to be Prepared before the Next Meeting?
 - Members Who Would Like to be Engaged?
- Any Other Guidance or Requests?

Technical Assistance (TA) Center

- New email address:
TACenter@snpalliance.org
- New Materials are Added on a Rolling Basis and End of Each Quarter
- TA Materials Include:
 - Educational Briefs and Short Pre-Recorded Webinars
 - Guidance Documents with Concrete Action Steps
 - Short Analyses of Policy with Recommended SNP Positioning

TA Material Requests from Today?



THANK YOU
