



February 16, 2026

Health Coverage, Insurance, and Financial Service Committee  
Maine State Legislature  
Augusta, ME 04333

**RE: Teladoc Health’s Comments on LD 2082**

Dear Committee Members,

Thank you for the opportunity to engage with your committee on this important piece of legislation and we appreciate Representative Kuhn’s leadership on this issue. Ensuring that patients are protected from the unlicensed practice of therapy – whether by a human or by an artificial intelligence system – is of utmost importance. Indeed, this legislation is incredibly timely as news stories across the country are highlighting the risks associated with people relying on chatbots for their complex mental health needs. Teladoc Health firmly believes that all therapy services should be delivered, directed, and overseen by a licensed professional. To that end, please see our comments below.

**Teladoc Health Background**

By way of background, Teladoc Health is the global leader in virtual care. We are delivering and orchestrating care – including mental and behavioral health services – across patients and transforming virtual care into a catalyst for how better health happens. Through our relationships with health plans, employers, providers, health systems and consumers, we are enabling more access, driving better outcomes, extending provider capacity and lowering costs. Teladoc Health is also the parent company of BetterHelp – the world’s largest online therapy service. BetterHelp has a network of over 30,000 licensed professionals who have completed millions of sessions across the country since our inception in 2013.

**Teladoc Health Policy Principles**

In writing these comments, it is our hope that the legislation will strike the appropriate balance between protecting patients from untested, unlicensed “therapy” chatbots while avoiding the creation of arbitrary barriers to AI utilizations that are complementary to licensed health care providers’ practices.

Teladoc Health firmly believes that mental health therapy is most effective when it is delivered by a trained licensed professional. We believe that a licensed, human provider should always be the one ultimately responsible for the delivery of therapy. We also believe that licensed providers should be able to harness AI to deliver better care for their patients should the patient consent to the use and should the provider believe that such use will benefit the patient.

At Teladoc Health, artificial intelligence never diagnoses, treats, or makes clinical decisions for patients. Most importantly, AI never replaces nor substitutes for a provider's education, experience, and expertise.

We've developed and deployed AI features that personalize and enhance the patient's experience while simultaneously empowering our providers. This includes tools such as AI notetaking, personalizing patient intake for improved therapist selection, and providing additional support tools that help our clinicians organize important details from sessions. Our AI technologies are thoughtfully designed, rigorously tested, and always created with the goal of putting patients' health first while enhancing the capabilities of our network of credentialed therapists.

We've implemented significant safety features, including ensuring that no therapy session data is shared with external models and is not used to train those models; hosting all of our systems on our dedicated cloud infrastructure so patient data stays secure within a controlled environment; and having a team of clinical and legal experts continuously review and monitor the effectiveness and accuracy of our models. These are foundational elements to any responsible AI utilization.

Moreover, we are transparent about the use of these AI tools with patients and we do not deploy any AI systems in the clinical environment without obtaining informed consent from the patient.

## **LD 2082**

Teladoc Health is generally supportive of LD 2082. Indeed, we wholeheartedly agree with the legislation's intent to prohibit artificial intelligence systems from independently providing mental or behavioral health services while preserving appropriate use of artificial intelligence as an assistive tool by licensed professionals under direct supervision. To achieve these ends, we believe that the amendments below will strengthen the bill while ensuring that AI can be harnessed in a responsible and safe way.

1. The definition of "therapy or psychotherapy services" may be too broad when stating that it includes anything that may "improve an individual's mental health." There are many things that may "improve" a person's mental health that are not clinically delivered therapy services. We would suggest striking the "improve" language throughout the legislation.
2. Under the "Prohibition of Use" section, we believe that it would be appropriate to add the following language: "*B. Directly interact with clients in any form of therapeutic communication unless the licensee has directed the patient to use the artificial intelligence system and the licensee maintains oversight of the artificial intelligence system.*"

- This additional clarifying language makes it clear that a licensee may use appropriate artificial intelligence tools in their practice so long as they remain ultimately in control of the patient's care.

With these changes, the legislation will strengthen protections for patients while ensuring unintended barriers do not restrict a provider's ability to utilize the full suite of tools available.

Thank you again for this opportunity to comment on this important legislation. Please do not hesitate to contact me should you have any questions about the issues we have raised or about the use of artificial intelligence in mental health care in general.

Respectfully,

A handwritten signature in black ink, appearing to read 'Wm. Mercer May', with a long horizontal flourish extending to the right.

Wm. Mercer May, Esq.  
Director of State Government Relations  
Teladoc Health