



**AMERICAN
PSYCHOLOGICAL
ASSOCIATION**

Acting Chairman Peter A. Feldman
Consumer Product Safety Commission

Commissioner Douglas Dziak
Consumer Product Safety Commission

Subject: Urgent Request for Investigation into Unreasonable Risk of Injury Posed by Generative Artificial Intelligence Chatbots as Consumer Products

Dear Acting Chairman Feldman and Commissioner Dziak,

On behalf of the American Psychological Association (APA), the leading scientific and professional organization representing psychology in the United States, I am writing to offer our scientific expertise as the Consumer Product Safety Commission (CPSC) considers the rapidly evolving landscape of generative artificial intelligence (AI) chatbots. These technologies hold potential for innovation, but as consumer products, their design and implementation raise important safety questions, particularly regarding their psychological impact on the public and vulnerable populations such as children and adolescents.

Psychological science demonstrates that the way humans interact with technology is deeply influenced by product design. When AI products are designed to simulate human connection and offer guidance on personal matters, they become a unique category of consumer product that warrants careful evaluation of safety. We believe an examination of these products is crucial to ensure they are developed and marketed responsibly, maximizing their benefits while minimizing potential harms.

From a scientific and consumer safety perspective, we have identified several key areas that merit review to ensure these products do not pose an unreasonable risk of psychological harm:

1. **Misrepresentation of AI as Licensed Professionals:** Many of these products are designed to mimic or explicitly claim the identity of a licensed mental health professional, sometimes even generating fraudulent credentials. This practice is concerning because it can prevent individuals with serious mental health needs from seeking evidence-based care from a qualified human provider, and it creates a false sense of security in the AI's unregulated and unpredictable guidance.
2. **Erosion of Trust and Privacy:** These products often simulate a confidential therapeutic environment, with some claiming interactions are protected by law (e.g., HIPAA). However,

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their terms of service frequently permit broad use of sensitive user data. This mismatch between the user's experience and the product's actual function can erode trust, not only in the technology itself but also in the legitimate mental health system, potentially discouraging individuals from seeking help when needed.

3. **Inadequate Safety Guardrails and Warnings:** Documented instances show these AI chatbots can encourage harmful behaviors, including self-harm. From a product safety standpoint, the user warnings—if present at all—are often insufficient, failing to provide the clear, conspicuous, and persistent information necessary for consumers to understand the product's risks.

These risks are particularly acute for adolescents. The APA's recently issued [*Health Advisory on AI and Adolescent Well-being*](#) highlights that young people's developing brains, ongoing identity formation, and heightened need for social connection make them uniquely vulnerable. Product designs that foster unhealthy parasocial relationships can interfere with the development of healthy human relationships and expose youth to inappropriate or biased information at a critical developmental stage. When a vulnerable teen seeking help is instead met with an unregulated product that may offer harmful advice, the risk of tragic outcomes increases.

The Consumer Product Safety Act empowers the CPSC to protect the public "against unreasonable risks of injury associated with consumer products." The psychological, emotional, and consequential physical harms potentially caused by these AI chatbots fall squarely within this mandate.

Given these considerations, the American Psychological Association believes it is within the CPSC's mandate to examine this category of consumer products. We stand ready to assist the Commission and recommend that any safety review or development of standards for these products include the following:

- **Standards to prevent the misrepresentation** of AI as licensed professionals.
- Requirements for **robust and persistent warnings** about the product's limitations and risks, including an advisory that the product may not be appropriate for children under a specified age.
- Systems to **prevent the generation of harmful content** and to limit engagement with inaccurate information.
- **Clear guidelines** for the protection of personal information, with a strong emphasis on adolescent data privacy.
- Guidelines concerning advertising to young people.
- Requirements for **specific audit and disclosure mechanisms**, such as reporting on the detection of suicidal ideation.
- Measures to **minimize addictive features and manipulative design**.



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- Guidelines for systems to be designed with **consideration for adolescents' competencies and vulnerabilities**, encouraging uses that promote healthy development and boundaries.
- Provisions to help **ensure the accuracy of health information** provided by AI chatbots.
- **Strong enforcement provisions and whistleblower protections.**

The responsible development of AI technology is critical for public well-being. By ensuring these powerful consumer products are designed with safety and psychological science in mind, we can help realize their benefits while mitigating their risks. The APA is prepared to serve as a resource to the Commission, providing scientific expertise on the psychological impacts of these technologies.

Sincerely,

A handwritten signature in black ink, appearing to read 'Arthur C. Evans Jr.'.

Arthur C. Evans Jr., Ph.D.
Chief Executive Officer
American Psychological Association