ORGANIZATIONAL PROCEDURE

PROCEDURE # 3.7A		EFFECTIVE DATE	REVISED DATE
TITLE:	**APPROVAL OF ARTIFICIAL INTELLIGENCE TOOLS**	**3/26/2025**	**11/21/2025**
<u>ATTACHMENT TO</u>		REVIEW DATES	
POLICY #: 3.7 POLICY TITLE: ARTIFICIAL INTELLIGENCE CHAPTER: INFORMATION MANAGEMENT			

I. PURPOSE

To establish consistent process for the evaluation and approval of AI Tools and their acceptable/approved use cases, and to establish a framework for staff training and for AI Tool use monitoring and oversight.

LRE staff are not permitted to use any AI tool on LRE-owned IT equipment, or for LRE business purposes on a non-LRE device, unless the AI tool, and its intended Use Case, has been evaluated by the LRE AI Committee, approved by the LRE CIO, and staff member(s) have received supervisor approval.

Staff must be trained for use of AI tools and specific Use Case prior to using any AI tool.

II. PROCEDURES

A. To request evaluation/approval of a new AI Tool / Use Case combination:
1. Complete an **LRE Artificial Intelligence (AI) Request Form**.
2. Email the completed form to your direct supervisor and copy helpdesk@lsre.org. **NOTE**: Do not fill out the "IT Review" section or fields below as those areas are reserved for use by the IT department and the LRE AI Committee.

B. Evaluation:
1. **Initial Evaluation:** LRE IT Department will coordinate with the direct supervisor and then conduct an AI Tool/Use Case initial evaluation if warranted.
2. **AI Committee Initial Review:** The results of the initial evaluation will be reviewed by the LRE AI Committee which will determine whether a full evaluation and potential approval should be pursued, and if so which additional involved parties should be assigned (Compliance Officer, Privacy Officer, Chief Executive Officer, LRE Legal, others as needed).
3. **Full Evaluation:** If the LRE AI Committee advises that a full evaluation should occur, LRE CIO will coordinate the efforts of all involved parties to complete a full evaluation of the proposed AI Tool / Use Case.

4. **AI Committee Final Review (establish final evaluation status)**: When completed, the full evaluation will be brought to the LRE AI Committee for final review.
   a. If the LRE AI Committee approves the AI Tool / Use Case, staff training materials will be developed, and staff trainings planned as appropriate.
   b. LRE CIO will notify all affected LRE personnel and their department leaders of its availability for use
      i. Affected LRE staff will receive further coaching and training from their direct supervisor to clarify expectations regarding appropriate and inappropriate use of the tool for the designated Use Case.
      ii. The new AI Tool / Use Case combination will be available for use following completion of staff training
5. **Final Approval/Denial Status:**
   a. Upon approval of the tool by the LRE AI Committee, the Final Status document (contained within the original request form) must be completed and signed by all required parties.
   b. The final status will be documented in this procedure in section F (Approved/Denied Grid) below.

C. **Staff Training:**
   1. LRE staff training will be conducted for all staff who will be using the new AI Tool / Use Case combination. Staff training will be documented, and will require staff and trainer signatures. Copies will be provided to the LRE Human Resources department.
   2. New LRE staff will receive basic AI awareness training as part of new employee onboarding. If the job role is impacted by existing approved AI Tool / Use Case combinations, they will receive additional training/guidance from their direct supervisor.
   3. Existing LRE staff will receive basic AI awareness training (at minimum annually) as part of mandatory staff trainings.
   4. When existing approved AI Tools "drift" (experience updates to their functionality that could adversely impact data security or threaten information authenticity), additional staff training may be required.
   5. When existing approved AI Tools "drift", it is possible that an AI Tool / Use Case may need to be removed from use at LRE (especially if the changes result in threats to data security).

D. Monitoring the usage of approved AI Tools / Use Cases:
   1. Given that software tools may evolve rapidly and unexpectedly—for example, following new releases or updates to iOS or Android operating systems—the LRE IT team, in collaboration with direct supervisors and LRE department leads, will routinely monitor AI tool usage and periodically review usage patterns in order to:

a. Ensure that AI Tool "drift", via software updates, has not occurred in a way that may potentially cause undue risk to LRE's data security or information authenticity;
b. Ensure that staff are not using AI Tools for unapproved Use Cases;
c. Verify that staff are not exposing PHI or confidential information to AI Tools which have not been approved for that type of content;
d. Verify that staff are using required citations and disclosures, when needed, for work products that were created using Generative AI;
e. Confirm that staff are appropriately verifying the accuracy and authenticity of information obtained through the use of Generative AI prior to the use or publication of that information in an LRE work product;
f. Identify potential need for additional staff training, either at the individual or department level or at the organization level, as warranted.

E. AI Questions and Compliance concerns:
AI Tools can pose significant added risk to data security and information authenticity. **Keeping PHI, LRE confidential information, and copyrighted materials safe and secure is everyone's responsibility.** All staff must be ready and willing to ask questions, and to report concerns.

1) **If not sure, ASK!** If a staff member has questions about how to use an AI Tool effectively, about whether the information to be exposed to an AI Tool matches an approved Use Case, or if uncertain how to authenticate results created by generative AI, staff should contact their supervisor, the IT helpdesk, or the LRE CIO.
2) As with potential HIPAA violations, if staff observe or hears something that makes them believe that AI is being used inappropriately at LRE, they are obligated to share that concern with their supervisor or the LRE Compliance Officer.

F. Approved/Denied Grid: AI Tools / Use Case combinations:

AI TOOL	USE CASE	STATUS	DEPT*	ADMIN PURPOSE	CLINICAL PURPOSE	USE WITH PHI	USE WITH LRE CONFIDENTIAL INFORMATION
APPROVED TOOLS							
Microsoft CoPilot (licensed within LRE M365 tenant) Agents	All enabled and deployed features.	**Approved**	All depts	Yes	Yes	Yes	Yes

AI TOOL	USE CASE	STATUS	DEPT*	ADMIN PURPOSE	CLINICAL PURPOSE	USE WITH PHI	USE WITH LRE CONFIDENTIAL INFORMATION
				DENIED TOOLS			
Microsoft CoPilot (**unlicensed version**)	No uses of the un-licensed version are permitted.	**Denied**	NA	No	No	No	No
Microsoft CoPilot (licensed within LRE M365 tenant) - **Agents**	Third party agents, custom agents and some MS Agents are prohibited and thus have been disabled.	**Denied**	All depts	No	No	No	No
ChatGPT	Create summary of client progress note	**Denied**	Clin	No	No	No	No

DEPT* = Departments with involved staff: **Qual** – Quality Team, **Fin** – Finance Team, **Csv** – Customer Services, **Clin**: Medical Directors and Care Coordinators, **Adm**: CEO and Administrative Assistants, **Comp**: Compliance, **IT** – IT Team, **Ops** – Operations Team members not previously represented, **Oth**: Other.

III.   CHANGE LOG

Date of Change	Description of Change	Responsible Party
3/25/2025	NEW Procedure	CIO
11/21/2025	Within item F: Added use case determinations for Microsoft CoPilot.	CIO