

PROCEDURE # 3.7A	EFFECTIVE DATE	REVISED DATE
TITLE: APPROVAL OF ARTIFICIAL INTELLIGENCE TOOLS	3/26/2025	
ATTACHMENT TO	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.

II. PROCEDURES

No LRE staff may use any AI Tool on LRE owned IT equipment, nor may they use it for LRE business purposes on a non-LRE device, unless that AI Tool and the intended Use Case has first been evaluated by the LRE AI Committee, has been approved by the LRE CIO, and the staff member must also have supervisor approval and specific training for the AI Tool / Use Case combination prior to use.

LRE staff will know if a specific AI Tool / Use Case combination has been approved for their use by the following methods:

1. The LRE CIO will send out a notification to all impacted LRE staff and their department leads when a new AI Tool / Use Case combination has been approved for their use.
2. Impacted LRE staff will also receive additional coaching/training from their direct supervisor to set expectations for how the tool should (and should not) be used for the specified Use Case.
3. All approved (or denied) AI Tools / Use Cases will be documented in this procedure in section E (Approved/Denied Grid) below.

A. To request evaluation/approval of a new AI Tool / Use Case combination:

1. **Request:** Fill out an **LRE Artificial Intelligence (AI) Request Form**. Email the completed form to your direct supervisor and copy helpdesk@lsre.org. NOTE: Do not fill out the "IT Review" section or anything below that – those areas are reserved for use by the IT department and the LRE AI Committee.

B. Evaluation Process

1. **Initial Evaluation:** The LRE IT Department will coordinate with the direct supervisor and will 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, the 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. If the LRE AI Committee approves the AI Tool / Use Case, then staff training materials will be developed, and staff trainings will be planned as appropriate.
5. **Staff Training:** If approved by the LRE AI Committee and if all required signatories to the final status have signed the final status document (contained within the original request form), then LRE staff training will be conducted for impacted staff who will be using the new AI Tool / Use Case combination. Staff trainings will be documented, will require staff signature as well as trainer signature, and copies will be provided to the LRE Human Resources department.
6. **Final Approval/Denial Status:** The final status will be documented in this procedure in section E (Approved/Denied Grid) below. If approved the new AI Tool / Use Case combination will be available for use following staff training and emailed notification of approval from the LRE CIO.

C. AI Training:

1. 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.
2. Existing LRE staff will receive basic AI awareness training (at minimum annually) as part of mandatory staff trainings.
3. 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.
4. When existing approved AI Tools “drift”, it is also 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: Since software tools change over time (sometimes rapidly and unexpectedly, as with a new release/update of an iOS or Android operating system), the LRE IT team in collaboration with direct supervisors and

LRE department leads will work together to routinely monitor AI Tool use and periodically review usage patterns to:

- 1) 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.
- 2) Ensure that staff are not using AI Tools for unapproved Use Cases.
- 3) Verify that staff are not exposing PHI or confidential information to AI Tools which have not been approved for that type of content.
- 4) Verify that staff are using required citations and disclosures, when needed, for work products that were created using Generative AI.
- 5) 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.
- 6) 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.** We all need to be ready and willing to ask questions, and to report concerns.

- 1) **If you’re not sure, ASK!** If you have questions about how to use an AI Tool effectively, about whether the information you want to expose to an AI Tool matches an approved Use Case, or if you are not sure how to authenticate results created by generative AI, ask your supervisor, the IT helpdesk, or the LRE CIO.
- 2) **As with potential HIPAA violations, if you see or hear something that makes you think that AI is being used inappropriately at LRE, you are obligated to share that concern with your 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
ChatGPT4	Create summary of client progress note	Denied	Clin	No	No	No	No

Fake Tool 1	Reword a template document to grade level 6.9 or below.	Approved	Csv, Ops	Yes	Yes	No	No
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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