Cornerstone Behavioral Healthcare
AI Use Policy

Purpose: This policy explains how Artificial Intelligence (AI) tools may be used for work purposes. Failure to follow this policy may result in disciplinary action.

AI is a Support Tool and Can be Used Only to:

- Help draft documents
- Improve wording and clarity
- Generate ideas or suggestions
- Summarize information
- Support general research
- Assist providers in chart entries if the software is HIPAA compliant and has approval from the CEO or designee.

AI Must Not be Used to:

- Enter personal, confidential, or sensitive information of staff or clients. Do not upload screenshots, attachments, transcripts, or chart extracts containing PHI into non-approved tools.
- Make decisions without human review or responsibility. AI doesn't supplement the employee's due diligence or responsibilities in carrying out assigned tasks accurately, appropriately or timely.
- Create false or misleading information for any aspect of the organization.
- Enter **PHI or ePHI** unless the AI tool has been formally approved by CEO or designee, security-reviewed, and covered by a **BAA**.
- Substitute for legal, medical, financial or professional judgement/advice. It can be used as a research tool and not relied on to provide professional services.

Human Responsibility/Oversite:

- Using AI does not remove personal accountability.
- Users are responsible for all work they submit. All clinical, human relations, disciplinary, financial, policy and procedural decisions will be the responsibility of staff and not AI.
- All AI-generated content must be checked for accuracy. AI cannot be used to generate or alter existing clinical documentation; however, the AI imbedded in our electronic health record can assist the provider in note taking and transcription. **Permission from the client is required before the use of this system.**

Data Protection and Incident Reporting:

- Only approved AI tools are allowed where required. To be approved the software must have a compliance review, security review, a business associate agreement if PHI or ePHI is used, approved by CEO or designee and appropriate level of training for staff to access and use software.
- All public, consumer, or enterprise level AI tools must be treated as **non-approved** unless explicitly approved, and confidential or personal data must not be uploaded to those.
- If PHI is entered into an unapproved AI tool or disclosed to the wrong vendor, this triggers immediate reporting to Privacy/Security Officer for breach analysis. HIPAA's Breach Notification Rule applies to impermissible uses/disclosures of unsecured PHI, and business associates also have notification obligations.
- 42 CFR Part 2: SUD records and Part 2 data may only be used/disclosed through AI tools when permitted by applicable law and organizational policy.
- If data is de-identified, separate rules may apply, but "de-identified" means de-identified under HIPAA standards, not just "names removed." Please see HHS de-identification guidance and 45 CFR 164.514 for reference.

Frank Willard _____ 04/13/2026 _____

CEO Signature Date