MSHN
Mid-State Health Network

POLICIES AND PROCEDURE MANUAL

Chapter:	**Information Technology**		
Title:	**Artificial Intelligence**		
Policy: ☒ **Procedure:** ☐ **Page:** 1 of 4	**Review Cycle:** Biennial **Author:** Chief Information Officer	**Adopted Date:** 03.04.2025 **Review Date:**	**Related Policies:**

Purpose

Artificial intelligence (AI) is rapidly becoming a critical part of business operations. AI-powered tools can help businesses make better decisions, improve efficiency, and deliver better customer experiences. However, the use of AI also raises various governance, ethical, privacy and legal concerns. This policy outlines the principles that the Mid-State Health Network (MSHN) will follow to ensure the effective and responsible use of AI within the organization.

Policy

MSHN is committed to the ethical and responsible use of AI. This policy outlines the principles that staff will follow to ensure that AI is used in a way that is transparent, accountable, fair, and adheres to MSHN's privacy as well as that of its stakeholders. Additional or related procedures may be required to govern other aspects of the use of AI within the organization. This policy will be reviewed and updated regularly to ensure it remains consistent with the latest developments in AI technology.

MSHN will implement the following to ensure the ethical and responsible use of AI:

- **Data governance:** MSHN will define the roles and responsibilities of those involved in the development, use, and oversight of AI tools used to collect, store, and process data. MSHN is setting forth the ethical principles described below that will guide the use of AI in the business, and include procedures for data collection, storage, and processing.
- **Due diligence on AI tools:** Before deploying an AI tool, MSHN will conduct due diligence to ensure that the tool is safe, effective, and aligned with its ethical principles. This due diligence should include reviewing the tool's data collection and usage practices, its potential for bias, and its compliance with applicable laws and regulations.
- **Technical Controls:** MSHN will implement effective technical controls to protect the security and privacy of the data used by AI tools. These controls will include:
    - Data encryption, for data both at rest and in transit.
    - Access controls including strong passwords and Multi Factor Authentication (MFA).
    - Intrusion detection systems.
    - Audit logging with log retention.
- **Risk assessment:** AI tools may introduce new types of risks not previously considered. To identify and mitigate potential risks MSHN will conduct a risk assessment at least yearly for all AI-powered tools in use. Results of the assessment will be documented and retained for review by the Chief Information Officer, Deputy Director and Chief Executive Officer.
- **Training:** MSHN will provide training to employees on the ethical and responsible use of AI. Training will include its potential benefits and risks. This education should be designed to help employees understand how AI works and how it can be used in the workplace so that they make the right decisions in their daily use of the tools. Training topics should include:

    - What is AI?
    - How does AI work?
    - The benefits of AI.
    - The risks of AI.
    - Ethical considerations when using AI-tools in the workplace.
- **Monitoring:** MSHN will monitor the use of AI tools to ensure that they are being used in accordance with its governance framework and ethical principles. This human oversight should include:
    - Reviewing the outputs of AI tools for bias, discrimination, and accuracy.
    - Tracking user activity.
    - Conducting regular audits of AI-generated outputs.
- **Plan for AI failure:** MSHN will have a plan in place for what to do in the event of an AI failure. This plan will include steps to mitigate the failure's impact and steps to investigate the cause of the failure and prevent it from happening again. Any failure analysis activity will be documented and shared with executive leadership promptly.
- **Credit:** When AI is used it should be credited or cited appropriately.

Principles:

To help mitigate the risks, the use of AI at MSHN will be guided by the following principles:

- **Accountability:** MSHN will be accountable for the use of AI. This means staff will be able to explain and justify their decisions.
- **Privacy:** AI-powered tools will be used in a way that respects the privacy of individuals. This means MSHN Information Technology (IT) systems will only collect and use personal data in accordance with applicable laws and regulations.
- **Transparency:** All AI-powered tools will be transparent to users. This means that staff will be able to understand how the tools work and how they are making decisions.
- **Fairness:** AI-powered tools will be used in a fair and non-discriminatory manner. MSHN is committed to providing a workplace that is free from all forms of discrimination based on ethnicity, race, sex, religion, age, pregnancy, marital status, disability, and any other characteristic protected by federal, state, or local law. MSHN staff will strive to ensure that AI tools will not be used to discriminate against individuals or groups based on any protected characteristics.
- **Legal:** The use of AI-powered tools will be strictly compliant with all applicable laws, including those of the State of Michigan and the United States federal government.

Risks:

AI can be utilized to summarize content, identify patterns and can assist with writing.

It is important to carefully consider the risks of using AI tools before deploying them. By taking steps to mitigate these risks, MSHN can use AI tools toward business advantage while minimizing the potential for harm. Before any AI tool or project is deployed a risk assessment must be completed by the Chief Information Officer, or designee, and any risks must be documented and mitigated prior to approval of use.

- **Data privacy and security risks:** AI tools often collect and process substantial amounts of data, which can be vulnerable to hacking and data breaches. This could lead to the unauthorized disclosure of sensitive information, such as customer data or trade secrets.
- **Bias and discrimination:** AI tools can be biased if they are trained on data that is biased. This could lead to AI tools making unfair or discriminatory decisions, such as denying access to people of color or recommending lower salaries for women.

- **Job displacement:** AI tools can automate tasks that are currently done by humans. This could lead to job losses, especially in low-skilled and repetitive jobs.
- **Ethical dilemmas:** AI tools can be used to make decisions that have ethical implications, such as deciding who gets admitted for services or who is hired for a job. It is important to carefully consider the ethical implications of using AI tools before making decisions.
- **Lack of transparency and accountability:** AI tools can be complex and difficult to understand, making it hard to understand how AI tools make decisions, which can lead to concerns about accountability and fairness.
- **Cybersecurity risks:** AI tools can be vulnerable to cyberattacks. This could lead to the unauthorized access or manipulation of AI tools, which could have a significant impact on MSHN.
- **Loss of control:** AI tools can make decisions that are outside of human control. This could lead to unintended consequences, such as a large monetary loss or a public relations disaster.

Restrictions on use of AI:

- **Do not upload confidential or personal data to AI tools:** This includes financial data of any kind, private meeting minutes, as well as personal information such as name, address, phone number, and social security number. AI tools can be hacked, and if this type of confidential data is compromised, it could be used for identity theft or other crimes.
- **Do not use AI tools to generate harmful content:** This includes content that is violent, hateful, or discriminatory. AI tools can be used to create this type of content, and it can have a negative impact on individuals and MSHN.
- **Do not use AI tools to automate tasks that are best done by humans:** Care should be taken to ensure that AI tools are used to augment human capabilities, not replace them. AI can help streamline and standardize processes and administrative tasks.
- **Do not use AI tools to make decisions that could have a negative impact on people:** This includes decisions about hiring, firing, treatment and admissions. AI tools should be used to support human decision-making, not make decisions on their own.
- **Be aware of the limitations of AI tools:** AI tools are not perfect, and they can make mistakes. It is important to be aware of the limitations of AI tools and to use them with caution.

In addition to these specific restrictions, it is also important to be mindful of the general ethical considerations that apply to the use of AI tools. These considerations include fairness, transparency, accountability, and responsibility.

Applies to

☐ All Mid-State Health Network Staff

☐ Selected MSHN Staff, as follows:

☐ MSHN's CMHSP Participants: ☐Policy Only ☐Policy and Procedure

☐ Other: Sub-contract Providers

Definitions

Artificial intelligence (AI): AI is a broad term that encompasses a wide range of technologies that allow machines to perform tasks that are typically associated with human intelligence. Some examples of AI include machine learning, natural language processing, Chatbots and Generative AI.

IT: Information Technology

Machine learning: Machine learning is a type of AI that allows software applications to become more accurate in predicting outcomes without being explicitly programmed to do so. Machine learning

algorithms learn from data, and they can be used to solve a wide variety of problems, such as fraud detection, spam filtering, and product recommendations.
MFA: Multi Factor Authentication
MSHN: Mid-State Health Network
Natural language processing (NLP): NLP is a field of computer science that deals with the interaction between computers and human (natural) languages. NLP algorithms can be used to perform various tasks, such as text analysis, machine translation, and question answering, such as chat bot on a website.
Generative artificial intelligence (GAI): GAI is a type of AI that can create content, such as text, images, or music. It does this by learning from existing data and then using that data to generate new outputs that are like the original data.
Chatbots: Chatbots are computer programs that can simulate conversation with human users. They are often used in customer service applications to answer questions, provide support, and resolve issues. Chatbots can be a cost-effective way for business organizations to provide 24/7 customer service without having to hire additional staff.

Other Related Materials

N/A

References/Legal Authority

N/A

Change Log:

Date of Change	Description of Change	Responsible Party
08.01.2024	New Policy	Chief Information Officer