



ARTIFICIAL INTELLIGENCE POLICY

Artificial Intelligence Policy, version 1.0		
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ARTIFICIAL INTELLIGENCE POLICY

Purpose

Enable staff to use Artificial Intelligence (AI) for every day, non-clinical work while protecting any **Protected Health Information (PHI)** or **Personally Identifiable Information (PII)** that Lifeworks creates or maintains. As an emerging technology AI has rapidly changing models, and the generative capabilities of AI may produce unpredictable output. Therefore, it is critical that AI tools are continually assessed for suitability toward Lifeworks' mission. This policy balances technology availability with compliance and IT capabilities.

Scope

All Lifeworks Personnel are responsible for being aware of and complying with this policy. **“Lifeworks Personnel”** means paid and unpaid staff including employees and contractors, volunteers, student interns, or any other persons who work for or on behalf of Lifeworks.

Policy

All provisions of this policy shall be interpreted and applied in accordance with all other existing and future corporate policies including but not limited to HIPAA Security Rule Policy, Privacy Practices Policies, and Acceptable Use Policy.

Key Definitions

TERM	MEANING
AI Tool	Software that generates, summarizes, or alters data using machine-learning or rule-based models (e.g., OpenAI ChatGPT, Microsoft Copilot, Google Gemini, etc.).
General-Task AI Tool	Any AI Tool used for drafting policies, writing emails, brainstorming ideas, formatting documents, etc., without PHI/PII in the prompt or output.
Protected-Data AI Tool	Any AI Tool that processes PHI or PII (any data that could identify a client, donor, or employee).
AI Registry	An Excel workbook listing all AI tools cleared for use and those which are banned from use.

Roles and Responsibilities

ROLE	PRIMARY DUTIES
Information Privacy & Security Office (IPSO)	Maintain the AI Registry, review AI Tool requests, oversee regular audits, act as escalation point.
All Personnel	Use only approved tools, complete training, report misuse.
Executive Leadership Team	Ensure resources are allocated; endorse policy updates.

Risk-Based Categorization

CATEGORY	EXAMPLE USES	DATA SENSITIVITY	REQUIRED CONTROLS
A – General-Task AI	Drafting internal memos, creating presentations, brainstorming ideas	No PHI/PII in prompts or outputs	Must appear in the Approved AI Registry
B – Protected-Data AI	Summarizing client notes, generating care-plan language, extracting data from clinical records	PHI or PII present	Must have a signed Business Associate Agreement (BAA) with the vendor; only tools on the Approved AI Registry that have a BAA may be used
C – Experimental AI	Pilot projects, proof-of-concept, research-only tools	Varies	Must be approved by the IPSO before any data is uploaded; limited to sandbox environments with synthetic or fully de-identified data
X – Banned AI	Do not use	No acceptable use	Determined to not comply with Lifeworks' privacy, security or DEIA goals and should not be used

AI Registry

1. **Location** – Excel workbook “**Lifeworks AI Registry.xlsx**” will be stored on the Compliance SharePoint site.
2. **Visibility** – All personnel will have **read-only** access to view this file to assist in choosing AI tools to aid their work.

3. **AI Tools List** – A worksheet in the Excel file containing a list of all AI tools which have been reviewed by the IPSO, listing the category of use they approved for and notes about the AI Tool.
4. **Adding a New Tool** –
 - a. Send an email to D365-compliance@lifeworks.org with: tool name, vendor, intended use (Category A/B/C), and whether PHI/PII will be processed.
 - b. IPSO will review the request and reply within 10 business days.
 - c. The IPSO will verify that the vendor’s published model-card or responsible AI documentation, if available, meets our baseline equity expectations.
 - d. Requestor may be required to assist with the tool validation.
 - e. If approved, IPSO updates the Approved sheet; if rejected, the tool is added to the Banned sheet with a brief rationale.

Training and Awareness

All Lifeworks personnel must complete the required “AI Basics & Safe Use” LMS course within 30 days of hire and annually thereafter.

Monitoring and Compliance

1. **Tool-Level Usage Logs** – For approved AI Tools with the capability to audit data, logs will be maintained for review as required.
2. The IPSO will review the list of approved AI tools annually and may require a test of the AI to ensure it still meets Lifeworks’ standards.
3. **Reporting** – Any suspected incidents (e.g., using an unapproved tool, accidental PHI entry in a Category A AI Tool) must be submitted to the Compliance email at D365-compliance@lifeworks.org. The IPSO will acknowledge within 2 business days and initiate remediation.

Human-in-the-Loop (HITL) Requirements

Any AI generated information used by personnel will be treated as though the content was generated by the individual themselves. It is incumbent on personnel who use any **AI Tool** to generate information to validate that the data is correct before dissemination. Personnel who use AI must ensure the output meets all Lifeworks standards related to bias, fairness, and DEIA.

Rights & Responsibilities

When followed, this policy allows Lifeworks personnel to take advantage of AI Tools to increase their personal and team productivity, and to improve Lifeworks ability to meet its strategic goals.

Responsibilities of AI Tool users:

1. Recognize when the software or website you access uses AI.
2. Check the registry to verify that the AI Tool is approved.
 - a. If Approved, continue using with the appropriate type of data based on approval classification.
 - b. If Banned, stop using the software or website immediately.
 - c. If unlisted, submit the software or website to the IPSO for review.

Consequences up to and including termination may result from violations of this policy:

- Use of an unapproved **AI Tool** for any use
- Processing PHI/PII without an approved **Category B AI Tool**
- Failure to report suspected misuse of any **AI Tool**
- Deliberate circumvention of any provision of this policy

Resources

NIST Artificial Intelligence Risk Management Framework:

<https://nvlpubs.nist.gov/nistpubs/ai/NIST.AI.600-1.pdf>

Lifeworks HIPAA Policy

Lifeworks Acceptable Use Policy

Lifeworks Privacy Practices Policy

Lifeworks Contract Policy

Version History

Version	Modified Date	Approved Date	Author	Reason/Comments
0.1	9/4/2025		Chris Kyarsgaard	Draft
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