

AI Acceptable Use Policy

ClearPath Pharmacy: AI Governance Portfolio

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Prepared by	Information Security & Compliance Department
Approved by	Information Security Steering Committee
AI system in scope	Patient Adherence and Outreach Prioritization (AOP) tool

Supersedes: POL-AI-001 v1.0. This version restructures the policy into the standard twelve sections and adds roles, transparency, training, monitoring, and review-cadence sections so it slots cleanly alongside the five-policy security package (CP-POL-001 through CP-POL-005).

1. Purpose

This policy establishes standards for the responsible, compliant, and ethical use of artificial intelligence (AI) and machine learning (ML) tools at ClearPath Pharmacy, especially any tool that processes protected health information (PHI). It aligns with the NIST AI Risk Management Framework, ISO/IEC 42001, and HIPAA Privacy and Security Rules.

2. Scope

This policy applies to:

- All ClearPath employees, contractors, temporary staff, and volunteers.
- Any AI or ML tool accessed on ClearPath systems or used to process ClearPath data, including the AOP tool and any general-purpose AI staff might use.

- Third-party AI vendors and technology partners under contract with ClearPath.
- AI tools used in clinical, operational, administrative, and analytical functions.

3. Definitions

Term	Definition
AI system	Software that, for a set of human-defined objectives, generates outputs such as predictions, recommendations, or rankings.
Generative AI	AI that produces new content such as text, images, or code.
PHI	Protected health information as defined by HIPAA, 45 CFR 160.103.
Approved tool	An AI tool that has passed the AI vendor assessment and, where it touches PHI, is covered by a signed BAA.
AOP tool	The Patient Adherence and Outreach Prioritization tool, a Tier 2 AI use case in scope of this policy.

4. Roles and Responsibilities

Role	Responsibility
Information Security Steering Committee	Owens AI risk acceptance and approves this policy.
AI governance committee	Reviews AI use cases, fairness and drift reports, and incidents.
AOP system owner	Accountable for the AOP tool's day-to-day governance and human-oversight controls.
Compliance / Privacy Officer	Ensures HIPAA alignment, BAA coverage, and breach handling.
Workforce members	Use AI only within approved uses; never enter PHI into unapproved tools.

5. AI Risk Classification

ClearPath classifies AI use cases into three tiers by potential harm to patients, regulatory exposure, and data sensitivity. Higher tiers carry stricter controls.

- **Tier 1 (highest):** AI that touches clinical decisions or controlled processes; requires licensed review of every output.

- **Tier 2:** AI that processes PHI to inform non-clinical decisions, such as the Patient Adherence and Outreach Prioritization (AOP) tool; requires documented human review and fairness monitoring.
- **Tier 3:** AI on non-PHI content, such as grammar or internal search; standard acceptable-use controls.

6. Approved Uses

- Predictive refill and adherence tools, including the AOP tool, to support outreach, with human review (Tier 2).
- AI-assisted drafting of patient or provider communications, with mandatory human approval before sending (Tier 2).
- De-identified or aggregate analytics and reporting (Tier 2).
- Grammar, summarization, and internal knowledge search on non-PHI content (Tier 3).

7. Prohibited Uses

- Entering, uploading, or sharing PHI in any AI tool not approved and covered by a signed BAA.
- Acting on AI-generated clinical recommendations without licensed pharmacist review and override capability.
- Allowing AI to autonomously dispense, modify, or approve prescriptions.
- Using public AI tools (for example consumer ChatGPT, Claude, Gemini, or Copilot without an enterprise agreement) to process PHI or confidential data.
- Using AI to make or inform employment, benefits, or promotion decisions.
- Shadow AI: using unapproved AI tools for ClearPath work.

8. Data Handling and Privacy (HIPAA tie-in)

- Minimum necessary: only the minimum PHI required may be provided to an approved AI tool.
- No PHI may be entered into any tool not covered by a signed BAA.
- De-identify data per HIPAA Safe Harbor or Expert Determination before non-essential AI use.

- Vendors processing PHI are Business Associates and must meet BAA and security obligations.

9. Human Oversight

AI output informs but does not replace clinical or care decisions. For the AOP tool specifically, a care coordinator must apply judgment and may override the ranking; outreach is never driven solely by the model. Staff verify AI output before acting on it, and overrides are logged.

10. Transparency and Accountability

- Each AI system has a named owner accountable for its behavior and risk.
- Patients and staff are entitled to a plain-language explanation of how the AOP tool is used.
- Model documentation, including intended use and known limitations, is maintained for in-scope systems.

11. Training and Awareness

- All staff complete AI acceptable-use training at onboarding and annually.
- AOP tool users receive role-specific training on human oversight, override, and escalation.

12. Monitoring, Enforcement, Review, and Version Control

- Compliance is monitored through access logs, override logs, and periodic fairness and drift reports.
- Violations are handled under ClearPath's disciplinary process and may include access revocation.
- This policy is reviewed at least annually by the AI governance committee, or sooner on a material change.
- Version control: v2.0 effective May 18, 2026; supersedes v1.0. Next review May 18, 2027.