

AI Governance Summary

ClearPath Pharmacy: AI Governance Portfolio

Leadership brief | ClearPath Pharmacy: Specialty Pharmacy Services |
Prepared by Information Security & Compliance | May 18, 2026

The AI Use Case

ClearPath uses a Patient Adherence and Outreach Prioritization (AOP) tool, supplied by MedSignal Analytics under a Business Associate Agreement. It predicts which patients are at risk of stopping therapy and ranks them so care staff know whom to contact first. It informs outreach; it does not make clinical or dispensing decisions.

Frameworks Applied

- **NIST AI RMF 1.0:** assessed across Govern, Map, Measure, and Manage, plus the seven trustworthy-AI characteristics.
- **ISO/IEC 42001:2023:** gap analysis across clauses 4 to 10 and key Annex A controls, mirroring our NIST CSF gap analysis.
- **EU AI Act:** not currently applicable (US-only operations); would likely be high-risk if deployed in the EU.
- **HIPAA:** Privacy and Security Rule obligations apply wherever the tool touches PHI.

The HIPAA / AI Intersection (our differentiator)

Because the AOP tool processes PHI, every AI governance control here is also a HIPAA control: minimum necessary, the signed BAA, access logging, and breach handling. ClearPath's 20-plus years of healthcare compliance depth is exactly what makes this AI program credible. This overlap is the thread through every document in the portfolio.

Top Risks

ID	Risk	Why it matters
AR1	Biased or inequitable prioritization	Some patient groups could systematically receive less outreach.

ID	Risk	Why it matters
AR2	PHI exposure through the AI vendor	Privacy, minimum-necessary, and BAA exposure.
AR3	Automation bias	Staff may defer to the ranking over clinical judgment.
AR4 to AR6	Drift, opacity, governance gaps	Accuracy decay, unexplainable outputs, unclear ownership.

Recommended Governance Actions

1. Name an AOP system owner and charter an AI governance committee.
2. Complete an AI impact assessment and document data lineage.
3. Require fairness testing and drift monitoring with thresholds.
4. Mandate and log human review before outreach decisions.
5. Add AI-specific clauses and reporting to the vendor agreement.

Portfolio Contents

This summary sits on top of four documents: the NIST AI RMF Profile, the ISO/IEC 42001 Gap Analysis, the AI Acceptable Use Policy (POL-AI-001 v2.0), and the EU AI Act Applicability Memo. Together they extend ClearPath's existing GRC portfolio (HIPAA risk assessment, NIST CSF gap analysis, and security policy package) with a full AI governance layer.