

## The Right Door for Hope, Recovery and Wellness

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|----------------------------------------------------------------|-----------|--------------|-----------|
| Chapter Title                                                  | Chapter # |              | Subject # |
| Clinical                                                       | C         |              | 340.7     |
| Subject Title                                                  | Adopted   | Last Revised | Reviewed  |
| Use of Artificial Intelligence (AI) for Clinical Documentation | 8/19/2026 | NEW          | 8/19/2026 |

### 1. PURPOSE

The purpose of this procedure is to establish requirements for the appropriate use of Artificial Intelligence (AI) tools in the creation, drafting, transcription, summarization, and support of clinical documentation at The Right Door for Hope, Recovery and Wellness (The Right Door). This procedure is intended to promote patient safety, maintain documentation integrity, protect confidentiality, ensure regulatory compliance, and clarify staff accountability when utilizing AI technologies.

While AI may assist with documentation efficiency, all clinical, legal, ethical, and professional responsibility for the content of the medical record remains with the individual provider who signs and submits the documentation.

### 2. SCOPE

This procedure applies to all workforce members who create, edit, review, approve, or sign documentation in the electronic health record (EHR) at The Right Door.

### 3. DEFINITIONS

**3.1. Artificial Intelligence (AI)** - Computer-based systems that can generate, summarize, transcribe, predict, organize, or otherwise assist in the creation of documentation

**3.2. AI-Assisted Documentation** - Any note, assessment, treatment plan, progress note, summary, report, correspondence, or other documentation that is partially or wholly generated with the assistance of AI technology.

**3.3. Workforce Member** - Any employee, contractor, volunteer, trainee, student, or other individual working on behalf of The Right Door.

### 4. PROCEDURE

#### 4.1. General Requirements

**4.1.1.** AI tools may only be used if approved by The Right Door.

**4.1.2.** Workforce members shall only utilize AI technology in accordance with:

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- 4.1.2.1. HIPAA requirements
- 4.1.2.2. Michigan Mental Health Code requirements
- 4.1.2.3. 42 CFR Part 2, when applicable
- 4.1.2.4. Medicaid documentation standards
- 4.1.2.5. Agency privacy and security policies
- 4.1.2.6. Applicable licensing board requirements
- 4.1.2.7. Agency AI governance standards
- 4.1.3.** The use of AI does not replace professional judgment, clinical decision-making, documentation responsibilities, or ethical obligations.
- 4.1.4.** Documentation generated through AI assistance must accurately reflect the actual services provided and clinical observations made.
- 4.1.5.** The individual signing the documentation remains fully responsible for its content regardless of how much AI assistance was utilized.
- 4.2. Appropriate Uses of AI** - Approved AI tools may be used for the following activities:
  - 4.2.1. Documentation Support**
    - 4.2.1.1.** Drafting progress notes based on provider-entered information
    - 4.2.1.2.** Organizing note content
    - 4.2.1.3.** Summarizing provider-created documentation
    - 4.2.1.4.** Creating documentation templates
    - 4.2.1.5.** Converting approved speech-to-text recordings into draft notes
    - 4.2.1.6.** Drafting treatment plan language based on clinician-entered interventions
    - 4.2.1.7.** Improving grammar, spelling, readability, and formatting
  - 4.2.2. Administrative Support**
    - 4.2.2.1.** Creating educational materials
    - 4.2.2.2.** Drafting internal communications
    - 4.2.2.3.** Creating meeting summaries
    - 4.2.2.4.** Assisting with policy development
    - 4.2.2.5.** Developing non-clinical training materials

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### **4.2.3. Clinical Documentation Enhancement**

**4.2.3.1.** When approved by The Right Door, AI may assist with:

- 4.2.3.1.1.** Summarizing lengthy records
- 4.2.3.1.2.** Identifying documentation gaps for provider review
- 4.2.3.1.3.** Assisting with care plan organization
- 4.2.3.1.4.** Drafting discharge summaries for clinician review

**4.3.** All AI-generated content must be independently reviewed and validated by the responsible workforce member.

### **4.4. Prohibited and Inappropriate Uses**

**4.4.1.** The following activities are prohibited:

#### **4.4.1.1. Clinical Decision-Making**

**4.4.1.1.1.** AI shall not:

- 4.4.1.1.1.1.** Independently diagnose a recipient
- 4.4.1.1.1.2.** Determine medical necessity
- 4.4.1.1.1.3.** Replace clinical assessment
- 4.4.1.1.1.4.** Authorize services
- 4.4.1.1.1.5.** Develop treatment recommendations without provider review
- 4.4.1.1.1.6.** Create safety plans without provider involvement
- 4.4.1.1.1.7.** Determine risk level for suicide, homicide, abuse, or neglect

#### **4.4.1.2. Documentation Integrity Violations**

**4.4.1.2.1.** Staff shall not:

- 4.4.1.2.1.1.** Sign AI-generated documentation without review
- 4.4.1.2.1.2.** Use AI-generated content that inaccurately reflects the encounter
- 4.4.1.2.1.3.** Copy and paste AI-generated content known to be inaccurate

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**4.4.1.2.1.4.** Submit AI-generated records as a substitute for a patient encounter

**4.4.1.2.1.5.** Create documentation for services not rendered

### **4.4.1.3. Confidentiality Violations**

**4.4.1.3.1.** Staff shall not:

**4.4.1.3.1.1.** Enter protected health information (PHI) into unapproved AI applications

**4.4.1.3.1.2.** Upload clinical records to public AI platforms

**4.4.1.3.1.3.** Share client information with non-secure AI systems

**4.4.1.3.1.4.** Enter substance use treatment records into non-approved systems subject to 42 CFR Part 2 protections

### **4.4.1.4. Professional Misconduct**

**4.4.1.4.1.** Staff shall not:

**4.4.1.4.1.1.** Represent AI conclusions as their professional judgment without validation

**4.4.1.4.1.2.** Allow AI to make treatment decisions

**4.4.1.4.1.3.** Rely solely on AI-generated analyses for patient care decisions

## **4.5. Client Consent Requirements**

**4.5.1. Notification and Transparency** - When AI documentation tools record, transcribe, summarize, or process information from a client interaction, The Right Door workforce shall ensure appropriate disclosure to recipients.

**4.5.2.** The recipient shall be informed:

**4.5.2.1.** That AI-assisted documentation technology may be used

**4.5.2.2.** The purpose of the technology

**4.5.2.3.** How information will be protected

**4.5.2.4.** That the provider remains responsible for all documentation and care decisions

**4.5.3. Consent** - Informed consent shall be obtained before AI-assisted recording or transcription occurs.

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### **4.5.3.1.** Consent documentation should include:

**4.5.3.1.1.** Description of the AI technology being utilized

**4.5.3.1.2.** Purpose of use

**4.5.3.1.3.** Risks and limitations

**4.5.3.1.4.** Privacy protections

**4.5.3.1.5.** Right to decline participation when applicable

**4.5.3.2.** A recipient's refusal to consent shall be honored unless otherwise permitted by law.

**4.5.3.3.** Consent is to be obtained annually.

## **4.6. Privacy and Security Requirements**

**4.6.1.** Only The Right Door approved AI systems may be used.

**4.6.2.** Approved AI platforms must meet established security standards and applicable HIPAA requirements.

**4.6.3.** Workforce members shall follow agency protocols regarding:

**4.6.3.1.** User authentication

**4.6.3.2.** Data storage

**4.6.3.3.** Access controls

**4.6.3.4.** Encryption

**4.6.3.5.** Record retention

**4.6.4.** Any suspected privacy or security incident involving AI technology shall be reported immediately through established incident reporting procedures.

**4.7. Documentation Review Requirements** - Prior to signing any AI-assisted documentation, the responsible workforce member shall:

### **4.7.1. Verify Accuracy**

**4.7.1.1.** Confirm that:

**4.7.1.1.1.** The documentation reflects the actual encounter

**4.7.1.1.2.** Statements are factually correct

**4.7.1.1.3.** Demographics are correct

**4.7.1.1.4.** Dates and times are accurate

### **4.7.2. Verify Completeness**

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**4.7.2.1.** Confirm that:

- 4.7.2.1.1.** Required elements are included
- 4.7.2.1.2.** Services rendered are documented
- 4.7.2.1.3.** Clinical rationale is documented
- 4.7.2.1.4.** Interventions are accurately described

**4.7.3. Verify Clinical Integrity**

**4.7.3.1.** Confirm that:

- 4.7.3.1.1.** Diagnoses are accurate
- 4.7.3.1.2.** Treatment plans are appropriate
- 4.7.3.1.3.** Risk assessments are complete
- 4.7.3.1.4.** Clinical conclusions are supported by documentation

**4.7.4. Verify Compliance**

**4.7.4.1.** Confirm compliance with:

- 4.7.4.1.1.** Agency requirements
- 4.7.4.1.2.** Medicaid standards
- 4.7.4.1.3.** Accreditation standards
- 4.7.4.1.4.** Licensing standards
- 4.7.4.1.5.** Medical record requirements

**4.7.5.** Corrections shall be made prior to signature.

**4.8. Attestation Requirement** - All workforce members utilizing AI-assisted documentation shall complete and sign The Right Door's **Clinician Attestation for Review of AI-Assisted Documentation** prior to the use of AI for documentation assistance.

**4.8.1.** The signed attestation acknowledges that the workforce member:

- 4.8.1.1.** Understands AI-generated documentation may contain errors, omissions, or fabricated information;
- 4.8.1.2.** Will review all AI-generated documentation before signing;
- 4.8.1.3.** Remains responsible for documentation accuracy, completeness, and compliance;
- 4.8.1.4.** Will exercise independent professional judgment;

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**4.8.1.5.** Understands that their signature indicates personal review and validation of the record.

**4.8.2.** Completed attestations shall be maintained in accordance with agency record retention requirements and be kept in HR folders/RELIAS training logs.

### **4.9. Training Requirements**

**4.9.1.** Prior to utilizing approved AI tools, staff shall receive education regarding:

- 4.9.1.1.** Appropriate use of AI
- 4.9.1.2.** Documentation standards
- 4.9.1.3.** HIPAA and confidentiality requirements
- 4.9.1.4.** AI limitations and risks
- 4.9.1.5.** Procedures for correcting inaccuracies
- 4.9.1.6.** Agency-specific AI governance expectations.

**4.9.2.** Additional training may be required when new AI technologies are implemented.

### **4.10. Monitoring and Auditing**

**4.10.1.** The Right Door will conduct audits of AI-assisted documentation to evaluate:

- 4.10.1.1.** Documentation quality
- 4.10.1.2.** Compliance with requirements
- 4.10.1.3.** Accuracy and completeness
- 4.10.1.4.** Privacy and security compliance
- 4.10.1.5.** Appropriate use of approved technology

**4.10.2.** Patterns of noncompliance may result in corrective action, additional training, restriction of AI usage privileges, or disciplinary action consistent with agency policy.

## **5. REFERENCES**

**5.1.** Health Insurance Portability and Accountability Act (HIPAA)

**5.2.** 45 CFR Parts 160 and 164

**5.3.** 42 CFR Part 2

**5.4.** Michigan Mental Health Code

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**5.5.** Michigan Medicaid Provider Manual

**5.6.** Applicable Licensing Board Standards

**5.7.** Agency Privacy and Security Policies

**5.8.** Agency Clinician Attestation for Review of AI-Assisted Documentation

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|                                        |      |  |  |
| Kerry Possehn, Chief Executive Officer | Date |  |  |