

 Anderson Center for Autism LIFE LONG LEARNING™	STANDARD OPERATING PROCEDURES	
DEPARTMENT:	HIPPA/HITECH	PROCEDURE: HHC-49
ISSUE DATE:	03.26.2025	PAGE 1 of 3
EFFECTIVE DATE:	04.01.2025	
TITLE:	USE and REQUEST of ARTIFICIAL INTELLIGENCE (AI) in AGENCY OPERATIONS	

APPROVED BY:



Patrick D. Paul
Chief Executive Officer

This procedure/memorandum does not imply a contractual agreement. This document should be used as a guideline to assist staff in fulfilling their responsibilities. Anderson Center for Autism reserves the right to change this document at any time with or without advance notice.

I. SCOPE

This Standard Operating Procedure (SOP) applies to all team members, consultants, contractors, volunteers, perspective researchers and vendors, collectively referred to as “workforce members” of Anderson Center for Autism (ACA). ACA workforce members are responsible for the implementation and management of this SOP in accordance with their job responsibilities while the Chief Information Officer who is designated to serve as the HIPAA Security Officer is responsible for oversight.

II. PURPOSE

This SOP establishes agency practices for the general use, request, approval of Artificial Intelligence and Large Language Model (AI/LLM) technologies in agency operations in order to safeguard Protected Health Information (PHI) and Personal Identifiable Information (PII).

III. REGULATORY REFERENCE

45CFR164.304

IV. QUALITY OF LIFE DOMAIN AREAS [Check Applicable Domains]

☐ Self Determination	☐ Physical Well-Being	☒ Rights
☐ Social Inclusion	☐ Emotional Well-Being	☒ Material Well-Being
☐ Personal Development	☐ Interpersonal Relations	

V. KEY WORDS [Reference Glossary of Terms]

None.

VI. POLICY STATEMENT

Anderson Center for Autism is committed to safeguarding the confidentiality and integrity of Protected Health Information (PHI) and Personal Identifiable Information (PII) of individuals. ACA recognizes the usefulness of some of the AI/LLM products and

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continually monitors products to identify those that meet the agency's business and service needs. When the agency purchases an AI/LLM product, such as the agency-controlled instance of Grammarly, it will be managed and deployed by ACA IT Staff.

This SOP applies to all technology systems that leverage Artificial Intelligence or Large Language Model technology (AI/LLM). For the purposes of this policy, AI/LLM is defined as a machine-based system that can, for a given set of human-defined objectives, make predictions, recommendations, or decisions influencing real or virtual environments. Artificial intelligence systems use machine and human-based inputs to perceive real and virtual environments; abstract such perceptions into models through analysis in an automated manner; and use model inference to formulate options for information or action.

The definition of AI includes but is not limited to systems that use machine learning, large language models, natural language processing, and computer vision technologies, including generative AI such as ChatGPT, Bard, Gemini, Bing Chat, Dalle, and LLaMA, etc.

In an effort to maintain the confidentiality of individuals' data, ACA cannot allow ePHI to pass through these AI/LLM servers for training purposes. AI/LLMs require the constant ingestion of information in order to update its data set and improve its output. Unless otherwise noted it should be assumed ALL information entered into an AI/LLM is being used for further training of the system. Additionally, there are no assurances of how that data is being stored, analyzed or purged after use. For these reasons, ACA workforce members are not permitted to leverage AI technologies for work purposes, even on personal computing devices, without prior approval from the ACA Security Officer.

ACA workforce members must request approval to use free software that utilizes AI/LLM technologies by completing Request to Use Artificial Intelligence (AI) Tools (Form IT-11) before using the software. Workforce members may begin using the software only when its use is approved by IT. An individual's PHI or PII may not be entered into the system.

ACA workforce members who request approval to purchase software that utilizes AI/LLM technologies must follow procedures outlined in SOP GPS-24 Contract Development and Approval Process and obtain approval. The AI/LLM technologies will be examined for HIPAA compliance. If approval is granted, the Chief Corporate Compliance Officer will verify that a related Business Associate Agreement (BAA) is incorporated into the contract that contains assurances that the product is in compliance with HIPAA security rule 45CFR164.304, National Institute of Standards and Technology (NIST) AI 100-1 Artificial Intelligence Risk Management Framework (RMF) and accompanying NIST

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Artificial Intelligence Risk Management Framework Playbook to address and meet the characteristics of trustworthy AI/LLM.

VII. PROCEDURES

RESPONSIBILITY	PROCEDURES
Human Resources Employment Specialist	1. Ensures all new employees review and sign Form IT-02 in Human Resources Information System (HRIS) during initial onboarding.
Workforce Member	2. Completes Form IT-11 Request to Use Public AI Tools to identify the product(s) and reason for use and forwards to supervisor for approval.
Designated Management Personnel	3. Reviews and approves Form IT-11 and submits IT request with attached form.
IT Workforce Member	4. Evaluates the product(s) and reason for use, potential issues and approves or denies requests, and includes user and management personnel on IT ticket to receive updates.
	5. Installs approved AI product(s) and updates IT request and forwards to Human Resources Specialist.
Human Resources Specialist	6. Adds approved form to team member's record in HRIS.

VIII. VERIFICATION

The ACA Security Officer will verify systems related to AI are being implemented as identified in this SOP.

IX. MONITORING

- Agency AI products
- Requested AI products
- HRIS records

X. APPENDIX

SOP HHC-24
SOP GPS-24
Form IT-02
Form IT-11