

# AI MEDICAL SCRIBE USAGE POLICY

## HIPAA-Compliant Clinical Documentation with AI Tools

Practice Name:

Effective Date:

Last Reviewed:

Policy Owner:

## 1. PURPOSE & SCOPE

This policy establishes requirements for the use of AI-powered medical scribe tools (AI scribes) to document patient encounters in compliance with:

- HIPAA Privacy and Security Rules (45 CFR Parts 160, 162, and 164)
- OCR's January 2025 Guidance on AI Clinical Documentation
- CMS documentation and billing requirements (42 CFR § 412.46)
- State medical record and consent laws

### Scope

This policy applies to:

- All physicians, nurse practitioners, physician assistants, and licensed clinical staff
- All AI scribe tools used for clinical documentation (ambient, speech-to-text, GPT-based)
- All patient encounters documented using AI assistance

## 2. DEFINITIONS

Term	Definition
AI Medical Scribe	Software that uses artificial intelligence and NLP to automatically generate clinical documentation from patient-provider conversations.
Physician Attestation	Documented review and approval of an AI-generated note by a licensed physician, including signature and timestamp.
PHI Minimization	Limiting Protected Health Information to the minimum necessary for clinical purpose (45 CFR § 164.502(b)).
AI Hallucination	When AI generates false or fabricated information not present in the original encounter.

### 3. APPROVED AI SCRIBE TOOLS

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The following AI scribe tools are approved for use at this practice:

Tool Name	Vendor	BAA Signed?		Date Approved
Abridge		Yes	No	
Nuance DAX		Yes	No	
Nabla Copilot		Yes	No	
Other		Yes	No	

**PROHIBITED:** Consumer-grade AI tools (ChatGPT, Claude, Google Bard) are NEVER permitted for clinical documentation without a signed Business Associate Agreement.