Purpose

The purpose of this policy is to establish guidelines for the appropriate use of Artificial Intelligence ("AI") in the workplace, including acceptable and prohibited uses of AI tools. It defines specific standards for ethical conduct, transparent practices, data security, and safe and responsible application, outlining both permitted and prohibited/restricted uses for AI Users at Eden Autism[1] ("Eden").

What Is Covered

This policy applies to all Eden staff, including, without limitation, Eden employees (regular, temporary, substitutes, seasonal), executives, officers, directors, volunteers, interns/students, and independent contractors who access or use AI tools on Eden-owned or Eden-approved devices, or in connection with services performed for or on behalf of Eden or its participants. The individuals subject to the requirements of this policy are referred to herein as "AI Users" or "GenAI Users," as applicable.[2] This policy is subject to revision and may be updated as needed.

Key Terms and Concepts

Core AI Concepts

- **Artificial Intelligence (AI):** A broad field of computer science focused on building systems that perform tasks typically requiring human intelligence. It encompasses Traditional AI, Generative AI (GenAI), and Agentic AI.
- **Traditional AI (non-generative AI):** AI—encompassing supervised, unsupervised, and reinforcement machine learning models—designed to perform narrow, predefined tasks (e.g., data analysis, predictive modeling, classification) based on explicit rules. It does not independently generate novel content.
- **Generative AI (GenAI):** AI technology that generates novel text, images, code, or other content in response to human prompts, based on patterns learned from extensive training data. GenAI technology may be embedded within broader software platforms or services (e.g., Microsoft 365 Copilot, etc.) or within standalone tools to help improve efficiency and optimize execution.
- **Large Language Models (LLMs):** A highly advanced class of Generative AI built on a deep learning neural network architecture known as a "Transformer." Rather than retrieving pre-written answers from a database, LLMs are trained on massive datasets to learn the complex statistical patterns, structures, and relationships within human language. When prompted, an LLM uses a probabilistic mechanism—specifically, predicting the most likely "next word" (or token) in a sequence—to generate novel text. The underlying Transformer technology allows the model to weigh the contextual importance of different words in a prompt (via an "attention mechanism"), enabling it to maintain deep context and produce highly coherent, relevant responses.
- **GenAI Tools:** Applications developed by third parties (e.g., OpenAI's ChatGPT, Microsoft 365 Copilot, Google Gemini) or customized internally ("Eden GenAI") that make GenAI capabilities accessible to users.
- **AI-Enabled Devices:** Hardware that uses AI locally and/or via connected services (e.g., smart speakers, cameras, robots, wearables).
- **Public GenAI Tools** are externally hosted AI systems not governed by Eden's enterprise data protection, security agreements, or approved vendor contracts.

AI Interaction

- **Human in the Loop (HITL):** A mandatory safety and oversight framework where a human is required to review, approve, or correct an AI system's proposed decisions or actions before they are executed. This ensures the AI remains a supportive tool subject to human accountability.
- **Assisted AI / AI Assistant:** An AI application designed to support human users by processing explicit commands and performing specific, user-directed tasks. Assisted AI is entirely dependent on human prompts and is not autonomous.

[1] For purposes of this policy, references to "Eden Autism" or "Eden" include both "Eden Autism Services, Inc." and "Eden Autism Services Foundation, Inc.

[2] While this policy covers all forms of AI usage, certain sections focus specifically on GenAI usage. When GenAI is the focus, it is specified and individuals subject to the requirements of the section are referred to as "GenAI Users."

- **Agentic AI:** An umbrella term for AI technologies that exhibit goal-directed behavior. Agentic AI can draft plans or suggest a sequence of actions to achieve a goal. **[All Agentic AI utilized at Eden is required to operate strictly with a Human in the Loop, rather than acting independently.]**
- **AI Agent:** A software system that uses foundational AI (LLM) to break down a complex user goal into smaller steps, determine a workflow, and use external software tools to execute those steps. While an AI Agent can be proactive in its planning, it relies on human authorization to finalize actions.
- **Autonomous Agents:** Advanced AI systems designed to operate entirely independently. They perceive environments, make final decisions, and execute actions continuously without human intervention, oversight, or a Human in the Loop. While specialized iterations exist in certain industries, fully Autonomous Agents present elevated operational, legal, and data privacy risks and are not approved for use at Eden.

The Spectrum of AI Behavior

- **Reactive:** A mode of operation where an AI system functions strictly on a request-and-response basis. A reactive agent remains dormant until a human provides an explicit prompt or command. It executes only the specific task requested and then waits for the next instruction. (Example: Asking an AI Assistant to summarize a document.)
- **Proactive:** A mode of operation where an AI system can monitor its environment, anticipate needs, and independently formulate plans or suggest workflows without waiting for step-by-step human prompts. In a "Human in the Loop" framework, a proactive agent does the heavy lifting of preparing the work and proposing a solution, but it halts to require human authorization before executing the final action.
- **Autonomous:** A mode of operation where an AI system has the authority to perceive, decide, and execute tasks from start to finish entirely on its own. Autonomous operation bypasses the "Human in the Loop," taking final actions and adapting to new information with zero human oversight or approval.

Training and Expertise

All AI Users are responsible for ensuring they have a working familiarity with the functionality, capabilities, and inherent limitations of the GenAI Tools and AI Agents they use. This responsibility extends to the critical interpretation, utilization, and, where appropriate, rejection of AI-generated insights, content, or data.

Every GenAI User must complete the approved training and obtain the formal certification of completion within the allocated timeframe as determined by Eden, prior to any engagement with GenAI Tools and/or AI Agents.

Confidentiality, Privacy, and Professional Obligations

All AI Users must ensure that any use or development of AI content, AI Agents and GenAI Tools strictly comply with Eden's confidentiality and privacy standards.

Without exception, a GenAI User is prohibited from using a Public GenAI Tool in any manner that allows access to any of the following categories of information related to any Eden employee, student, participant, customer, volunteer, or other individual:

- Personally Identifiable Information("PII");
- Protected Health Information ("PHI");
- any other non-public data related to an Eden student/participant ("Student/Participant Data"); or
- any confidential information or intellectual property related to Eden or its's vendors ("Eden Autism Data").

All GenAI Users must also ensure that any use of any Public GenAI Tool fully complies with applicable legal, professional and ethical requirements, including without limitation:

(i) Eden's internal policies;
(ii) all applicable laws and regulations, including data protection and privacy laws;
(iii) all applicable professional rules and codes of conduct ("Professional Rules"), including rules governing the confidentiality of Student/Participant Data, Eden Autism Data, and attorney-client privilege; and
(iv) the applicable Privacy Policy and Terms of Use published by the GenAI Tool.

GenAI Users must comply with any contract that prohibits or limits the use of GenAI Tools in connection with customer data, employee/staff data, or Student/Participant Data. If you are unsure whether such restrictions apply, please contact Eden's Compliance Officer before using GenAI Tools in that context.

All GenAI Users must also:

- Review output of GenAI applications to make sure it meets Eden's and applicable professional standards and principles of equity, ethics, and appropriateness; and
- Not use any output that discriminates against individuals on the basis of race, color, religion, sex, national origin, age, disability, marital status, political affiliation, or sexual orientation.

Prohibited/Restricted Uses

The following is strictly prohibited:

- Use of autonomous AI.
- Use of any Public GenAI Tools that involve access to or transmission of any PII, Student/Participant Data or Eden Autism Data, such as tools like Grammarly, Copy.ai, and Wordtune.
- Use of any GenAI Tools—whether public or internal—within Electronic Health Record (EHR) systems, such as *Therap*. This includes entering (including Adult Services Therap services notes), transmitting, or referencing any Student/Participant Data, PII, or Eden Autism Data in connection with GenAI technology embedded in or used alongside EHR platforms. Such use poses significant risk to data privacy Non-compliant Eden staff will be subject to current progressive disciplinary action, up to and including termination of employment.

AI Acceptable Uses

The following represents acceptable use of AI:

1. Written communications not pertaining to individual students or adult participants.
2. Finance Department operations.
3. Human Resources Department operations.
4. Staff Training.
5. Development and Communications Department operations.
6. IT Department operations

Please note: Only Microsoft Copilot with Business License and Eden login is permitted for the above uses. AI recording of meetings and discussions, including note taking and meeting minutes is not permitted.

Eden's President and CEO may approve certain AI applications and tools to be studied in Eden's AI Learning Lab.

Compliance and Oversight

AI usage within the organization is subject to oversight to ensure responsible, ethical, and lawful practices. The IT Team, in conjunction with the Compliance officer, monitors usage through automated logging and periodic reviews. Audits are conducted semi-annually, with additional reviews as needed. Employees are expected to report concerns through established channels (i.e., compliance hotline, self-reporting form), and violations may result in disciplinary action (refer to Non-Compliance section). Staff found to be in non-compliance with AI usage standards must undergo additional policy review and training. This policy is reviewed and/or updated yearly to adapt to changing regulations and organizational needs.

Quality Control

- By their own admission, GenAI Tools may generate incorrect, false, or misleading information, presented as facts. Additionally, many early forms of GenAI Tools have been determined to contain biased information and may produce biased results.
- All GenAI Users must:
  (i) make reasonable efforts to help ensure that any GenAI Tools used are generally accepted to be accurate and reliable, as well as consistent with the query made or instructions provided; and
  (ii) critically review generated results for bias, accuracy, and completeness.

Transparency and Record-Keeping

GenAI Users must comply with the Terms of Use of a Public GenAI tool with respect to disclosing that a document, image, or other item was created in whole or in part using the Public GenAI tool. In addition, GenAI Users must comply with any Terms of Use of an Eden GenAI tool with respect to disclosing that a document, image, or other item was created in whole or in part using the Eden GenAI tool.

- GenAI Users shall use reasonable efforts to keep accurate records of their use of GenAI Tools, the instructions given to the GenAI Tools, the output generated by the GenAI Tools, and any follow-up research and analysis related to such output.
- Any person at Eden involved in implementing or creating an Eden GenAI tool must use reasonable efforts to keep accurate records of the data used to train and operate the Eden GenAI tool. These records must be kept in a secure and confidential manner and must be retained in accordance with applicable laws, regulations, Professional Rules, and customer contractual requirements.

Continuous Improvement

- GenAI Users must continually evaluate the effectiveness of the GenAI Tools they use, take reasonable steps to update their knowledge of technological development with those GenAI Tools, and seek to improve their use of the GenAI Tools.
- GenAI Users shall make reasonable efforts to identify areas where the use of GenAI Tools can improve the efficiency and effectiveness of Eden and its services and work collaboratively with other GenAI Users to identify potential improvements in the use, development, and implementation of new GenAI tools and applications.

Non-Compliance

- Eden reserves the right to access and monitor the use of AI Tools on any Eden-issued device, or any other device connected to Eden's managed networks to ensure compliance with this policy.
- All individuals subject to this Artificial Intelligence Policy must promptly report any known or suspected non-compliance to the **Director of IT or the Director of Health Information Management, Privacy and Compliance Officer at 609 987 0099.**
- Non-compliance with this Artificial Intelligence Policy may result in disciplinary action, including but not limited to termination of employment, contract, or professional privileges.