



**Policy Number: GME 48**

**Policy Title: Artificial Intelligence (AI) Use in Graduate Medical Education**

**I. Purpose**

Artificial Intelligence (AI) and Generative AI (GenAI) technologies are increasingly used in healthcare, education, and research. The purpose of this policy is to establish clear expectations for the ethical, responsible, and transparent use of AI by Graduate Medical Education (GME) trainees, supervising faculty, and program administration at OHSU.

This policy seeks to:

- Enable innovation while safeguarding professionalism and academic integrity
- Promote ethical, equitable, and secure AI use across education, research, and clinical care
- Ensure compliance with OHSU policies and all applicable state and federal laws and regulations (including HIPAA and FERPA)

This policy applies to all GME-related educational, clinical, research, and administrative activities involving AI tools or systems within OHSU. When working at non-OHSU sites, that institution's guidelines and policies determine appropriate use. This policy applies to all individuals engaged in the administration, delivery, or receipt of graduate medical education in an ACGME-accredited program including but not limited to:

- Program Directors, Associate Program Directors, Assistant Program Directors
- Supervising clinicians
- Program Coordinators, other GME program administrative staff, and GME Office Personnel
- Trainees, i.e. residents and fellows

**II. Policy Statement**

OHSU is committed to advancing medical education and patient care through the responsible integration of AI technologies. All AI use must align with institutional values, uphold ethical principles, and maintain compliance with data privacy, professional, and ethical standards. AI tools are intended to supplement—not replace—human judgment and expertise. Clinicians and trainees remain ultimately responsible for the accuracy, integrity, and ethical application of AI-assisted work. Development of clinical skills requires trainees to independently acquire appropriate knowledge and skills, both while utilizing AI tools as an adjunct, as well as without AI-facilitated assistance. Without guidance, trainees and faculty may be unclear on the safest, ethical, and professional ways to utilize AI tools in their learning and professional development.

**III. Definitions**

For the purposes of this policy:

- **Artificial Intelligence (AI):** Computer systems or algorithms capable of performing tasks that typically require human intelligence.



- **Generative AI (GenAI):** AI systems that produce new text, images, or data outputs based on user prompts (e.g., ChatGPT, DALL-E, Copilot, Gemini, Perplexity, Claude, etc.).
- **Automation Bias:** The human tendency to over-rely on AI systems or decision-support tools, even when the output may be incorrect.
- **Confabulation:** Generation of plausible but factually inaccurate information by AI systems.
- **Attribution:** Proper acknowledgment and documentation of AI assistance in academic, clinical, or research work. AI utilizes data from various sources including copyrighted material, owned intellectual property, or other content requiring license for use, which must be recognizable when reviewing AI-generated content.
- **Algorithmic Bias:** Systematic and repeatable errors that create and perpetuate unfair outcomes due to biased data or algorithm design.
- **Consent and disclosure:** Consent is a clear and informed agreement to allow something to happen, while disclosure is the process of communicating relevant information to parties who may be impacted when using AI.
- **Personally Identifiable Information (PII):** Data that can be used to identify, contact, or locate an individual.
- **Protected Health Information (PHI):** Individually identifiable health information protected under HIPAA.
- **Educational Records:** Records maintained by the institution related to a trainee's academic performance.
- **Clinical Learning Environment:** First and foremost, GME trainees are required to follow all GME and program-specific policies that are applicable across all settings (OHSU and non-OHSU sites), including specific program-related policies associated with the use of individual AI tools. An OHSU facility is one that is on the OHSU information network. When working at non-OHSU sites, that institution's guidelines and policies determine the appropriate use of AI tools.

#### IV. Guiding Principles

1. **Professionalism and Ethics:** Physicians and trainees are stewards of the ethical use of technology consistent with medical professionalism and in alignment with OHSU policies.
2. **Responsible Use:** AI tools may only be used when approved or authorized by OHSU. When working at non-OHSU sites, that institution's guidelines and policies determine appropriate use.
3. **Attribution:** Regardless of the AI tool used, attribution of how the tool is used is required. This applies to AI tools used in the course of performing one's duties at OHSU (clinical, educational, and research) outside of OHSU approved and/or embedded AI tools.
4. **Transparency and Disclosure:** Users must disclose any use of AI in educational, clinical, or scholarly work, including details on the tool, uses, their purpose, and the application in the work and consistent with any applicable OHSU policies.
5. **Accountability:** Supervising clinicians and trainees have shared responsibility for the integrity, accuracy, and originality of their work when using AI tools. Ensuring the



accuracy and appropriateness of the AI outputs is essential to the safe, ethical use of AI in the healthcare environment. To achieve this, it is imperative to include a “human in the loop” to maintain oversight of the AI-assisted process.

6. **Data Protection:** Protected Health Information (PHI) or identifiable data (PII) may only be entered into OHSU prior-approved AI tools. Violations of the AI use with OHSU Information policy will be handled in accordance with the Information Privacy and Security Sanctions Policy (ISP-23).
7. **Oversight:** AI use in performance of OHSU duties requires oversight by supervising clinicians or designated supervisors as well as oversight of other academic endeavors.

## V. Acceptable and Prohibited Uses

### 1. Prohibited AI Use (strictly prohibited and subject to disciplinary action)

- a. Inputting PHI, PII, or identifiable data or education records (including evaluations, milestones, data for CCC, or applicant data) into non-approved tools.
- b. Submitting AI-generated work as original without disclosure.
- c. Using AI to evaluate, rank or score residency or fellowship applicants unless the process is approved by institutional leadership and uses OHSU-approved methods.
- d. Using AI to bypass required academic or administrative work without appropriate engagement, editing, and verifying such work.

### 2. Permitted with Attribution (Disclosure and verification of accuracy required)

- a. As a learning or teaching aid, provided content is critically reviewed by faculty or trainee.
- b. In clinical decision support tools approved by the institution and integrated into secure, HIPAA compliant systems.

### 3. Encouraged (requires adherence to disclosure and oversight standards)

- a. Using institutionally approved AI for education, workflow efficiency, or patient communication enhancement.

## VI. Application by Setting

### A. Clinical Setting

- Only OHSU-approved AI tools may be used for patient care or documentation as determined by the OHSU AI Governance Committee.
- Individual programs may restrict or prohibit the use of certain OHSU-approved AI tools by trainees until the program has determined the trainee has reached pre-determined educational milestones.
- Patient **consent and disclosure** are required prior to use of AI scribes or documentation tools including documentation of the consent.
- Clinicians and supervisors remain responsible for the accuracy and completeness of the clinical note including clinical note editing practices such as timely review, information thoroughness, accuracy check, examination for confabulations, hallucinations, etc., consistent with policy.



- Faculty oversight and timely review of AI-assisted documentation are mandatory.

## **B. Educational Setting**

- Trainees must ensure that assignments and assessments submitted under their name are their own original work. If AI tools are used, transparency and appropriate acknowledgement must be provided.
- Trainees may use AI tools to enhance understanding or assist with assignments, provided such use is permitted and disclosed.
- Programs will include AI-use expectations in course syllabi and model transparent, appropriate use.
- Unauthorized or undisclosed use of AI tools in coursework for the receiving audience constitutes a violation of the academic integrity policy.
- Trainees will provide attribution when discussing with team members and faculty supervisors (e.g., “the differential I am presenting was generated by AI”, etc.).
- Any educational data about current or prospective trainees (evaluations, interview scores, milestones data) must only be entered into OHSU approved AI tools.

## **C. Research and Scholarly Work**

- AI use in research must comply with OHSU’s Research Integrity and Data Governance policies.
- Scholarly work must disclose AI use in manuscripts, abstracts, or presentations and verify factual accuracy of AI-generated content.
- Confidential or proprietary data must not be entered into AI tools without prior approval from the Office of Research Integrity.
- Authors must accept responsibility for the accuracy and veracity of the work submitted in their name(s).

## **D. Professionalism and Ethical Use**

- Physicians are stewards in the ethical use of technology and follow the principles of medical professionalism. In our role, we acknowledge AI based contributions to our work, reflect and act accordingly on the potential health impacts of AI, model responsible AI use and adhere to institutional AI Governance policies. We aim to mitigate bias introduced and inherent in AI algorithms and will cross-check AI contributed work with validated academic sources.

## **VII. Institutional Access and Resources**

- OHSU will maintain a **registry of institutionally approved and prohibited AI tools**, accessible through the IT Security portal.
- Requests for AI tool evaluation or pilot approval will be submitted through the OHSU AI Governance Committee.
- Accessibility and assistive AI use will comply with all applicable laws and regulations.

## **VIII. Governance, Oversight, and Review**



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- **Policy Oversight:** The AI Governance Committee will coordinate review, implementation, and updates of this policy.
- **Policy Ownership:** The Office of Graduate Medical Education (GME) will maintain and disseminate this policy.
- **Review Cycle:** This policy will be reviewed annually or more frequently as AI technologies evolve.
- **Alignment:** This policy aligns with the OHSU Academic Integrity Policy, HIPAA/FERPA standards, and Institutional Information Security Policy.

### IX. Compliance and Enforcement

Violations of this policy may result in corrective or disciplinary action under applicable institutional policies.

Violations should be reported to the Program Director, GME, and/or the OHSU Integrity Office.

#### Policy Owner

**Graduate Medical Education**

#### Amendment/Approving Committee

**GMEC**

#### Additional Resources

Resource	Use	Links
Center for AI Enabled Learning Health Science (CAILHS)	School of Medicine group combining AI and clinical data to improve health outcomes.	<a href="https://www.ohsu.edu/school-of-medicine/center-ai-enabled-learning-health-science">https://www.ohsu.edu/school-of-medicine/center-ai-enabled-learning-health-science</a>
ITG Artificial Intelligence	Includes OHSU Statement on AI and list of approved AI tools	<a href="https://o2.ohsu.edu/information-technology-group/artificial-intelligence-ai">https://o2.ohsu.edu/information-technology-group/artificial-intelligence-ai</a>
OHSU Artificial Intelligence Policy (ISP-25)	OHSU Information Security Policy	<a href="https://ohsu.ellucid.com/pman/documents/view/25891/">https://ohsu.ellucid.com/pman/documents/view/25891/</a>
Code of Conduct	Outline of OHSU principles, expectations, rights and responsibilities for success of OHSU members	<a href="https://o2.ohsu.edu/integrity-department/code-conduct">https://o2.ohsu.edu/integrity-department/code-conduct</a>
Research Integrity Policies	OHSU Integrity Office policies	<a href="https://ohsu.ellucid.com/pman/manuals/binder/1989/false?">https://ohsu.ellucid.com/pman/manuals/binder/1989/false?</a>



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HIPAA	Federal protection for privacy of health care data.	<a href="https://www.ohsu.edu/information-technology/health-insurance-portability-and-accountability-act-hippa">https://www.ohsu.edu/information-technology/health-insurance-portability-and-accountability-act-hippa</a>
FERPA	Family Educational Rights and Privacy Act of 1974 (FERPA) provides students certain rights of access, privacy, and protection of Education Records.	<a href="https://studentprivacy.ed.gov/ferpa">https://studentprivacy.ed.gov/ferpa</a>
AI Governance Committee Intake form	The AI Governance committee will use this framework to analyze all AI related initiatives, pilots, and projects brought forth across all of OHSU missions and administrative functions.	<a href="https://app.smartsheet.com/b/form/8c7d6b0a57394693a678e7fd7383f80d">https://app.smartsheet.com/b/form/8c7d6b0a57394693a678e7fd7383f80d</a>
UT Health San Antonio GME AI Policy	GME AI policy used as resource in development of OHSU GME AI policy.	TBD

### Version control

Version	Effective Date	Author	Description of Change
1	12/18/2025	GMEC	Original
2	2/12/2026	GMEC	Addition of language as recommended by AI Governance Committee