



AI Use Policy

Template for ABA agencies and practices · built on the HIPAA rules (45 CFR), the BACB Ethics Code and CASP's 2025 practice parameters

How to use: replace every [bracketed prompt], delete what does not apply and have it reviewed by your attorney and IT or security adviser before you adopt it (the BACB encourages legal and technical guidance). This template is not legal advice.

Organization	
Policy owner (name and role)	
Privacy officer	
Effective date	
Next review date	

1. Purpose and scope

[This policy covers every employee, contractor and supervisee of [Organization] who uses an artificial intelligence (AI) tool for work, including drafting documents, summarizing records, scheduling and training materials.]

2. Approved tools

- ☐ Only the tools listed in the AI tools register (attached) may be used for work.
- ☐ No client health information goes into a tool until a business associate agreement (BAA) covering that exact product and plan is signed.
- ☐ Personal or consumer accounts are never used for client information.
- ☐ The register records, for each tool, whether the vendor keeps inputs, for how long and whether it uses them to train its models.

3. What may go into an AI tool

- ☐ Only the client information the task needs (HIPAA minimum necessary).
- ☐ When information is shared with a third party, only what is critical to the purpose (Ethics Code 2.04).
- ☐ De-identified text only if it meets one of HIPAA's two methods: an expert determination, or removing the listed identifiers of the client and of relatives, employers and household members, with no actual knowledge that what remains could identify the client.
- ☐ Free text is checked before it is pasted: names of siblings, schools, places and dates count as identifiers.

[List what may never go into any AI tool at your organization, for example full assessment reports or session videos.]

4. Consent and transparency

- ☐ Families are told how AI is used, its risks and benefits, and that they may decline it.
- ☐ Consent covers exchanging or releasing confidential information through the tool (Ethics Code 2.11).

- ☐ AI use is disclosed in any work product where it contributed to the content.
- ☐ Each payer's policy is checked; when it is silent, the intended use is described to the payer.

5. Review and signature

- ☐ The clinician reviews, edits and signs every AI-assisted document.
- ☐ Each document reflects the specific encounter and does not reuse text from other sources.
- ☐ Reports and notes stay accurate and complete (Ethics Code 2.06), and inaccuracies are corrected as soon as they are found (Ethics Code 1.01).
- ☐ Staff learn how a tool works and where it fails before relying on it (Ethics Code 1.05).

6. Supervisees

- ☐ Supervisees are trained on this policy before they use any AI tool.
- ☐ Tasks with AI are delegated only after confirming the person can do them competently (Ethics Code 4.09).
- ☐ Supervisors remain accountable for their supervisees' professional activities (Ethics Code 4.04).

Acceptable uses	Not acceptable
[e.g., drafting a parent letter without client identifiers]	[e.g., deciding hours or medical necessity]

7. Records

- ☐ AI outputs and logs are stored, kept and destroyed like any other electronic documentation (Ethics Code 2.05).
- ☐ A usage log records who used which tool, when and for what purpose.

8. Incidents and breaches

- ☐ Any suspected exposure of client information is reported to the privacy officer within [number] hours.
- ☐ HIPAA: notice to the people affected without unreasonable delay and no later than 60 calendar days after discovery (45 CFR 164.404).
- ☐ Each BAA states how the vendor reports a breach to us; a business associate must notify without unreasonable delay (45 CFR 164.410).
- ☐ Florida: if 500 or more Floridians are affected, notice to the Department of Legal Affairs no later than 30 days after the breach is determined or there is reason to believe one occurred (s. 501.171, F.S.).
- ☐ Our attorney confirms how HIPAA and Florida law apply to each incident.

9. Review and approval

[This policy is reviewed every [12] months and whenever a tool, plan or agreement changes.]

Approved by: name and role	
Date	

Privacy officer: name	
Date	

Template by ABA PARTNERS Resources · updated October 15, 2026 · resources.aba.partners · Not legal advice.

Sources

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4. 45 CFR 164.404, Notification to individuals. eCFR, current. <https://www.ecfr.gov/current/title-45/subtitle-A/subchapter-C/part-164/subpart-D/section-164.404>
5. Florida Statutes 501.171, Security of confidential personal information. Florida Legislature, 2026. https://www.leg.state.fl.us/statutes/index.cfm?App_mode=Display_Statute&URL=0500-0599/0501/Sections/0501.171.html
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