

Embracing AI in Healthcare

Accolade's policy on AI innovation and compliance

Artificial intelligence (AI) presents an enormous opportunity to increase productivity and scale in healthcare while simultaneously presenting risk in trust, bias, privacy, and security.

We proactively and responsibly incorporate AI systems into our service delivery model and platform in alignment with an enterprise security policy built on six principles.

Federal Guidelines

In October 2023, President Biden issued a sweeping executive order on AI with the goal of promoting "safe, secure and trustworthy development and use of artificial intelligence."

As a milestone in the AI policy landscape, the executive order outlines eight principles and calls for the creation of several National Institute of Standards and Technology (NIST) frameworks to provide a pathway for standardization of development and deployment of AI.

Additionally, the executive order asks the Office of Management and Budget (OMB) to develop standards for procurement and use of AI.

Alignment with Federal Guidelines

Accolade's AI policy aligns with the principles laid out in the executive order and we will evaluate the NIST and OMB frameworks when available.

Our work is informed by a culture of innovation and adherence to our mission to empower people through expertise, empathy, and technology to make the best decisions for their health and well-being. Accolade's approach to AI entails proactive and ethical adoption and development across clinical programs, engineering, operations, product, security, and governance.



Kelli Burns (CISM, CISA)
Chief Information Security Officer
Accolade

Accolade's AI Principles

Conduct review of all AI platforms

A stringent sequence of events unfolds before any work commences. Deployed AI models undergo periodic tests to ensure the model and its generated or discriminative output is free of any malicious intent or discriminatory content. Accolade's Data Governance Committee meets monthly to review our data governance policies.

Ensure appropriate use of public AI systems

Accolade will not use public AI services in any manner that may cause the public exposure of client data or sensitive business information. Accolade employees may not grant AI services unauthorized access to company services and systems, company vendor services or systems, data, data sources, financial accounts, or any other sensitive resources. Accolade provides employee guidelines and trainings on appropriate use.

Require strict confidentiality of data with private AI services

Any private AI service that Accolade engages must agree to strict confidentiality (including HIPAA/privacy requirements) regarding sensitive employee, client or member data, and confidential and proprietary information. Our Compliance & Risk team reviews all private AI service contracts for adherence to our confidentiality policies. We periodically re-evaluate our vendors as they continue to innovate and iterate on AI.

Avoid discriminatory use of AI systems

Accolade will not use AI systems for any purpose that may cause a disparate or discriminatory impact on an individual. Our Compliance & Legal teams review and approve any model where a decision is being made about an individual using AI systems (e.g., for use in talent acquisition, member health profile building, and member engagement).

Provide appropriate notice and disclosure

Various state laws require notice and disclosure to individuals when interacting with an AI system. Accolade provides notice and disclosure on the use of AI. Any AI system that directly interacts with employees, members or customers must undergo a thorough compliance review.

Protect intellectual property

Accolade evaluates employee use of AI systems across our platform to ensure appropriate and acceptable use without material loss of intellectual property rights associated with the content. Accolade policies govern the use of AI capabilities in software programs like Zoom, Office 365 and more.

[Contact us](#) to learn more about our approach to AI systems

