

Policy Title	Responsible and Ethical Use of Artificial Intelligence (AI)
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Department:	BSMCON
Functional Area:	IT
Contributing Department	
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Manual	To be entered by Compliance360 System administrators or N/A if not in C360
Section	ADM z10

I. Mission, Vision and Values

This policy reflects our commitment to human dignity, integrity, compassion, stewardship, and service by guiding decisions and actions that uphold respect for all individuals and promote excellence in our work.

This policy aligns with our mission of extending the compassionate ministry of Jesus by improving the health and well-being of our communities and providing good help to those in need, especially the poor, dying, and underserved by ensuring that our practices support ethical, effective, and accountable service across all areas of the organization.

II. Policy

Bon Secours Memorial College of Nursing permits the use of Artificial Intelligence (AI) technology in support of its educational and operational mission. AI technology used with institutional, student, or associate data must be reviewed and approved by the Richmond Higher Education Institutions Leadership Team (RLT), or appropriate Bon Secours Mercy Health (BSMH) body, in accordance with the BSMH Artificial and Augmented Intelligence Policy. All AI users are responsible for ensuring AI technology aligns with all applicable legal requirements and BSMH policies and procedures.

All AI Users must use AI Technology in a manner that:

- Supports, but does not replace human critical thinking, professional judgment and person-centered care or service.
- Protects the privacy, security, and confidentiality of student, associate, and institutional data.
- Promotes academic integrity.
- Advances equity and access for all college staff, faculty and students.

- Complies with copyright, intellectual property, and regulatory requirements.

III. Purpose

The purpose of this policy is to:

- Establish governance, oversight, and standards for the responsible and ethical use of AI Technology in teaching, learning, research, and operations.
- Define the responsibilities and competencies expected of faculty, staff, and students who use AI Technology.
- Prepare graduates to practice safely and ethically in AI-enabled professional environments, including clinical and other practice settings, where AI may be integrated into decision-making and workflow.

IV. Scope

This policy applies to:

- All students, faculty, staff, administrators, contractors, and other associates (“AI Users”) who use AI Technology.
- All meaningful use of AI Technology in or for:
 - o Courses, laboratories, simulations, and clinical education
 - o Assessment and evaluation of student learning
 - o Student services, advising, financial aid, and enrollment services
 - o Research and scholarly activities
 - o Operational, administrative, and IT functions

V. Policy Details

A. Governance and Oversight

1. AI Governance Structure

Bon Secours Memorial College of Nursing will leverage existing BSMH and institutional oversight bodies—including the RHEI Leadership Team and the RHEI Educational Technology Committee—as well as key institutional leaders, such as the Director of Information Technology and the Director of Digital Learning and Distance Education, to:

- Review and approve AI Technology for institutional use.

- Monitor risk, bias, privacy, and security issues.
- Recommend updates to this and related policies.

2. Approval and Use of AI Technology

- Only approved AI technology may be used with institutional, student, or associate data. Approved technologies can be found on the BSMH Application Inventory.
- Experimental use of public or consumer AI utilizing protected or sensitive information is prohibited unless explicitly approved through governance review.

3. Ongoing Evaluation of AI Tools

- AI Tools used programmatically should be annually evaluated for educational effectiveness, equity and usability.
- Findings from such evaluations may inform changes to tool selection, implementation, or training.

B. Privacy, Security, and Data Protection

1. Handling of Data in AI Tools

- AI Users must not input personally identifiable information (PII), protected health information (PHI), education records (e.g., grades, clinical evaluations, or other sensitive data into AI Technology unless such use is authorized by IT/ cybersecurity and complies with BSMH privacy, FERPA and security requirements.

2. Consent, Retention, and Deletion

When AI Technology processes student data, Bon Secours Memorial College of Nursing will:

- Obtain student consent where required by law or policy.
- Make reasonable efforts to inform students when and how their data is used and stored.
- Follow applicable retention and deletion standards (from ADM 1.04 Records Management) and ensure that data can be removed upon request when required and where possible.

C. Equity and Access

1. Equitable Access to Required AI Tools

When AI use is required in coursework or program activities, Bon Secours Memorial College of Nursing must:

- Provide access through institutional licensing, on-campus resources, or no-cost/low-cost options and provide alternatives when students cannot reasonably access tools.
- Ensure tools are reasonably accessible to students with disabilities and compatible with assistive technologies.

2. Institutional Infrastructure and Resources

- Bon Secours Memorial College of Nursing will consider AI technology infrastructure, licensing, support, data ownership, and staffing needs when adopting AI tools, to enable scalable and equitable implementation across programs and student populations.

D. Teaching and Learning

1. Instructor Agency, Including Non-Use

- Course faculty and instructors are expected to follow and support the AI usage guidelines established by their academic program, both in their own use of AI tools and in the expectations, they establish for student use of AI in their courses.
- Within those program guidelines, instructors may exercise professional judgment in determining the specific ways AI tools may be incorporated into course activities and assignments.
- Course syllabi and/or assignment instructions must clearly state expectations regarding AI use.

2. Academic Integrity in the Use of AI

- Use of AI must comply with Bon Secours Memorial College of Nursing ACA 1.09: Academic Integrity, ADM 3.05: Student Conduct Rights and Responsibilities, or other related policies.
- Students must:
 - Follow program-level, course-level, or assignment specific guidelines around acknowledgement of when and how AI has been used.

3. Critical Appraisal of AI Outputs

When AI tools are used for teaching or learning, associates and students are expected to:

- Critically appraise AI outputs, recognizing the potential for error, bias, or misinformation.
- Verify information from AI tools against reliable, evidence-based, or otherwise authoritative sources before relying on it for teaching, learning, or decision-making.

4. Preparation for AI-Enabled Practice Environments

AI use in teaching and learning should, where appropriate, help students:

- Understand how AI may be integrated into real-world practice environments.
- Develop the ability to collaborate with AI systems while maintaining accountability for professional and clinical judgment and person-centered decision-making.

E. AI and User-facing Services

AI may be used for user-facing services (e.g., chatbots, FAQs, schedule assistance) when:

- AI users are clearly informed that they are interacting with an AI system.
- Pathways to a human staff member are made available for complex or sensitive issues.
- Content is monitored and periodically reviewed for accuracy, bias, and tone by the appropriate administrative leader identified as the “business owner” for the relevant application or technology.

F. Copyright and Intellectual Property

1. Risk Management

- AI users must not input copyrighted, licensed, confidential, or proprietary material into AI tools unless they have documented permission (e.g. license, contract, written authorization) and the tool has been approved for that data classification by the Richmond Leadership Team, the RHEI Educational Technology Committee, or BSMH Information Technology.

2. Risk Mitigation

Where risks are identified, mitigation steps may include:

- Selection of tools with clear licensing terms and acceptable training data practices.
- Restrictions on the type of content that may be uploaded.

- Guidance for faculty and students on lawful sharing and use of content in AI systems.

3. Institutional Protection

All Bon Secours Memorial College of Nursing faculty and staff AI Users must comply with:

- BSMH Artificial and Augmented Intelligence Policy
- BSMH Intellectual Property Policy
- BSMH Code of Conduct
- BSMH Acceptable Use Standard
- Applicable copyright laws and licensing agreements.

G. Research

1. Data Protections

AI use in research must comply with:

- Institutional Review Board (IRB) requirements.
- Data Use Agreements and sponsor requirements.
- Privacy and security standards for research data.

2. Attribution and Intellectual Property Requirements

- Researchers must disclose significant AI assistance in publications, when required by journals or sponsors, and comply with IP and authorship standards.

3. Evaluation and Scholarship Related to AI Tools

- Evaluation of AI tools and their impact on learning, equity, or outcomes may be conducted as part of research or scholarship of teaching and learning, in accordance with applicable research and ethical standards.

H. AI Competency, Literacy, and Training

1. Training Expectations

Bon Secours Memorial College of Nursing will provide training and resources related to:

- Basic AI concepts, limitations, and biases.
- Privacy, security, and data protection obligations.
- Ethical and pedagogical considerations for integrating or limiting AI in coursework.

2. Minimum Competency

- Certain roles (e.g., faculty, instructional designers, IT, data stewards) may be required to complete AI-specific training as determined by the Richmond Leadership Team.

3. AI Literacy and Competency Outcomes

- Bon Secours Memorial College of Nursing will identify and periodically update AI literacy and competency expectations for both students and faculty, aligned where feasible with relevant professional and accreditation standards, and will address these expectations through curriculum design and faculty development rather than in this policy document.

I. Partnerships, Procurement, and Vendor Agreements

1. Shared Governance and Transparency

Meaningfully AI-enabled vendor solutions that may touch or intake sensitive data must:

- Undergo review through the BSMH IT Governance process, facilitated by the Director of Information Technology.

2. Bias and Quality Standards

Contracts should require vendors to:

- Provide documentation on efforts to identify and mitigate bias where appropriate.
- Support audits or reviews, as feasible, to assess performance, safety, and fairness.

3. Culture of Innovation

- Bon Secours Memorial College of Nursing encourages appropriate practitioner- and educator-led innovation in the design, evaluation, and improvement of AI-enabled tools, in collaboration with internal and external partners and within the guardrails of this policy and related BSMH policies.

VI. Definitions

AI-Assisted Work:

Work created by a person with help from AI (for example, brainstorming, outlining, editing, or summarizing), where the person remains responsible for the final result.

AI-Generated Content:

Content created mostly or entirely by an AI tool, rather than written or produced by a person.

AI Output:

The response produced by an AI tool, such as generated text, summaries, recommendations, images, or code.

AI Tool / AI System:

Any software or service that uses AI, including writing assistants, chatbots, image generators, coding assistants, and AI features built into other software.

Artificial Intelligence (AI):

Computer systems that can generate content, analyze information, or make recommendations in ways that may resemble human thinking or communication.

Approved AI Tools:

AI tools that the institution has reviewed and authorized for use through its normal processes (such as IT/security, privacy, procurement, or academic governance).

Bias (in AI):

Unfair or inaccurate patterns in AI outputs that can reflect gaps or patterns in the data the system learned from, sometimes resulting in stereotypes, uneven treatment, or misleading conclusions.

Generative AI:

AI that creates new content, such as text, images, audio, video, or computer code, based on what a user asks it to do.

Hallucination:

When an AI tool presents incorrect information as if it were true (for example, misrepresenting facts, sources, quotes, or citations).

Human Oversight:

A person's responsibility to review and verify AI outputs before using them for academic, administrative, or operational purposes.

Prompt:

The question, instruction, or text a person enters into an AI tool to get a response.

Sensitive Data:

Information that must be protected and should not be entered into AI tools unless explicitly approved by RLT (or appropriate BSMH body), such as student records, health information, personal identifiers, confidential institutional information, or other restricted data otherwise protected by local, state, federal, or international laws or by any BSMH or institutional policy.

VII. Attachments

N/A

VIII. Related Policies and Procedures

- BSMH Artificial and Augmented Intelligence Policy
- BSMH Code of Conduct
- BSMH IT Governance Process
- BSMH Intellectual Property Policy
- BSMH Authorized Signatory Policy
- BSMH Acceptable Use Standard
- Bon Secours Memorial College of Nursing ACA 1.09 Academic Integrity / Academic Honesty Policies
- ADM 3.05 Student Conduct Rights & Responsibilities
- ADM 7.01 Copyright compliance
- ADM 1.04 Records Management
- Bon Secours Memorial College of Nursing Student Handbook (as applicable)

IX. Regulatory Notices

Nothing in this policy creates a contractual relationship between Bon Secours Memorial College of Nursing (BSMCON), a department operated and controlled by Bon Secours Memorial Regional Medical Center, LLC, and any party. BSMCON, in its sole discretion, reserves the right to amend, terminate or discontinue this policy at any time, with or without advance notice.

X. Version Control

Version	Effective Date	Next Review Date	Description	Supersedes, if applicable	Prepared By
1.0	1/22/2025		Initial Policy		Director of Information Technology
1	7/15/2026	7/15/2029	Revision and Version Changed – BSMH Template Adopted	1.0	Director of Information Technology

This policy/procedure/guideline is not intended to establish a standard of clinical or non-clinical care or practice. Rather, this policy/procedure/guideline creates a general tool to help guide decision-making with the understanding that different action(s) may be necessary in response to the totality of the circumstances presented.

Sites revised 05/06/2025- Bon Secours Mercy Health adopts the above policy, procedure, policy & procedure, guideline, manual / reference guide / instructions, or principle / standard / guidance document for all Bon Secours Mercy Health entities including, but not limited to, facilities doing business as Mercy Health – St. Vincent Medical Center, St. Vincent – St. Charles Hospital, St. Vincent – St. Anne Hospital, Mercy Health – Perrysburg Medical Center, Mercy Health – Tiffin Hospital, Mercy Health – Willard Hospital, Mercy Health – Defiance Hospital, Mercy Health Allen Hospital LLC, Mercy Health - Lorain Hospital, Mercy Health St. Elizabeth Youngstown Hospital, Mercy Health St. Joseph Warren Hospital, Mercy Health - St. Elizabeth Boardman Hospital, Mercy Health - St. Rita's Medical Center, Mercy Health – Springfield Regional Medical Center, Mercy Health - Urbana Hospital, Mercy Health - Anderson Hospital, Mercy Health - Clermont Hospital, Mercy Health – Fairfield Hospital, Mercy Health - West Hospital, The Jewish Hospital – Mercy Health, Mercy Health – Kings Mills Hospital, LLC, Mercy Health - Lourdes Hospital LLC, Mercy Health – Marcum and Wallace Hospital, Chesapeake Hospital Corporation DBA Rappahannock General, Maryview Hospital, Bon Secours Richmond Community, Bon Secours Memorial Regional Medical Center, Bon Secours – St. Mary's Hospital, Bon Secours St. Francis Health System, Bon Secours St. Francis Medical Center, Bon Secours Mary Immaculate Hospital, Bon Secours - Southside Medical Center, Bon Secours Mercy Health Franklin, LLC, Southern Virginia Medical Center, and Bon Secours Harbour View Medical Center. This also may apply to Bon Secours Mercy Health Medical Group LLC and its medical group affiliates.