Keystone First Family of Health Plans
200 Stevens Drive
Philadelphia, PA 19113

Keystone First
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To: **Keystone First/Keystone First Community HealthChoices (CHC)/Keystone First – CHIP/Keystone First VIP Choice Providers**

Date: **October 22, 2026**

Subject: **Use of Artificial Intelligence (AI) Guidelines**

Summary: With the increased use of Artificial Intelligence (AI) in healthcare and other industries, Keystone First/Keystone First Community HealthChoices (CHC)/Keystone First – CHIP/Keystone First VIP Choice (hereinafter known as "the Plan") would like to share our use of AI guidelines for providers.

Responsible Use of AI

AI is any technology that can simulate human intelligence and includes, without limitation, machine learning, natural language processing, deep learning, and generative AI. Providers may use AI tools, as appropriate, to improve efficiency and quality in the performance of health care services for their patients, including for routine and repeatable tasks such as research, document summarization, charting, and similar activities. All use of AI tools must be responsible, secure, and consistent with all applicable federal and state legal and contractual requirements, ethical rules, professional standards, and these guidelines.

Restrictions

Providers **shall not** use AI voice generators, chatbots, or similar voice technologies to communicate with the Plan. The prohibition includes communications for all administrative tasks and, for the avoidance of doubt, includes communications related to prior authorization, concurrent authorization, eligibility verification, claims disputes, and other billing inquiries. As a result of this prohibition, any communications made with the use of AI will not be considered valid for purposes of calculating provider's metrics.

Providers **shall not** use AI as the decision maker for any outcome that leads to a negative impact for the Plan's Members, Participants, and Enrollees. A qualified medical professional must be the "human-in-the-loop" for any such decision. A negative impact includes denials (full or partial), reductions, modifications, or delays in service and can stem from things like appeals, utilization management, and prior authorization reviews.

Providers **shall not** use the Plan's business confidential information as inputs to AI tools unless expressly authorized in writing by the Plan's Legal department. Plan information may not be used to train, fine-tune, or improve any AI model without prior written authorization from the Plan.

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Transparency and Review

Providers shall maintain documentation relating to its use of AI and provide such information to the Plan or appropriate state or federal regulatory agencies and Plan Members, Participants, and Enrollees as may be necessary for compliance by the Plan with applicable state or federal law or other applicable agreements with the Plan's government clients.

Responsibility for Services

Providers are responsible for implementing mechanisms and safeguards consistent with the degree and nature of the risks posed by AI to ensure that all applicable laws and regulations are followed, including ongoing (human or otherwise) monitoring and, when appropriate, human intervention.
Providers remain fully responsible for all treatment, services, diagnostics, etc., regardless of whether AI tools are used.

Questions

If you have questions about this communication, please contact your Provider Account Executive or the Provider Services department at **1-800-521-6007**.

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