

New HMIS AI Policy and Self-Assessment Checklist

To: All HMIS Participating Agencies

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Introduction

Artificial Intelligence (AI) tools such as ChatGPT, Microsoft Copilot, Gemini, Claude, and similar products are becoming common in both our personal and professional lives. These tools can help users draft, summarize, organize, and analyze information, but they can also create significant risks when used with confidential client information. To help protect client privacy and ensure compliance with HMIS, HUD, state, and federal requirements, CT HMIS has adopted a new Artificial Intelligence (AI) Use Policy. The full policy is available in the latest edition of the HMIS Policies & Procedures and this memo is not a substitute for reviewing the policy in its entirety. This memo provides a plain-language overview of the policy and what it means for your day-to-day work. An AI Self-Assessment Checklist accompanies this memo and should be used whenever you are considering a new use of AI in your work.

The One Rule Everyone Should Remember

Never enter client data into an unsecured AI tool.

What Is Client Data?

Client data includes names, identifying information like demographics, case notes, client histories, assessments, service records, program enrollment information, outcome information, narrative descriptions, and information derived from HMIS records. Even information that seems anonymous may identify a client when combined with other details.

Before Using AI, Ask Yourself

Use the accompanying AI Self-Assessment Checklist to determine whether your planned use of AI involves client information, privacy concerns, or other risks that may require additional review. If you cannot confidently answer the checklist questions, stop and seek guidance before using the tool.

Does the Policy Apply to Personal Devices and Accounts?

Yes. The policy applies whether you use a work computer, personal device, personal email account, or personal AI account.

Your Responsibilities

Protect client information; follow agency AI policies and procedures; complete required training; use only approved systems and practices; report suspected violations; and review AI-generated content for accuracy before using it.

When in Doubt, Don't Enter the Data

If you are unsure whether a particular use of AI is appropriate, complete the AI Self-Assessment Checklist and discuss the situation with your supervisor, HMIS administrator, or agency leadership.

Quick Reminder: Think before you type. If information came from, describes, or could identify a client, do not enter it into an AI tool unless your agency has determined appropriate privacy and security protections are in place.