

When the surveyor asks what the AI was allowed to do

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A practical framework for deploying AI safely in senior housing & care — covering risk classification, audit trails, clinician oversight, and HIPAA boundaries.

A comprehensive white paper proposing a four-tier AI governance framework and policy recommendations for the senior care industry in response to HHS Health Sector AI RFI.

Executive Summary

The integration of artificial intelligence into senior housing & care operations presents unprecedented opportunities for improving resident outcomes, operational efficiency, and quality of life. However, the deployment of AI systems in healthcare settings demands robust governance frameworks that address safety, transparency, equity, and accountability.

This white paper proposes a four-tier governance framework specifically designed for senior care organizations, informed by the Health and Human Services Office of the National Coordinator's health sector AI RFI. The framework balances innovation with protection, enabling operators to leverage AI capabilities while maintaining compliance with emerging regulatory standards and industry best practices.

Key Recommendations

1. Establish AI Governance Committees

Every senior housing & care organization should establish an AI Governance Committee responsible for oversight of all AI deployments, including clinical decision support, resident monitoring, and administrative automation.

2. Implement Risk-Based Assessment Protocols

Establish standardized protocols for assessing the risk profile of AI systems based on their clinical impact, decision scope, and resident population vulnerabilities.

3. Develop Transparency and Accountability Standards

Create clear documentation requirements for AI systems, including algorithm explainability, performance metrics, and audit trails that satisfy regulatory expectations.

4. Ensure Equitable AI Deployment

Conduct bias audits and equity assessments before deploying AI systems that impact care decisions, and establish ongoing monitoring to detect disparities.

The Four-Tier Governance Framework

Tier 1: Administrative & Operational AI

Examples: Scheduling, billing, inventory management, staffing optimization

Governance Requirements: Standard documentation, basic audit trails, annual review cycles. These systems have minimal direct clinical impact and follow conventional IT governance practices.

Tier 2: Resident Monitoring & Risk Alerting

Examples: Fall risk detection, medication adherence monitoring, behavioral pattern analysis

Governance Requirements: Enhanced documentation, performance validation, staff training protocols, and quarterly reviews. These systems assist human decision-making but don't override clinical judgment.

Tier 3: Clinical Decision Support

Examples: Care plan optimization, medication interaction warnings, hospitalization risk prediction

Governance Requirements: Comprehensive clinical validation, regulatory compliance review, physician oversight protocols, and monthly governance committee reviews. Systems require transparent reasoning for recommendations.

Tier 4: Autonomous Clinical Actions

Examples: Automated medication dispensing, autonomous resident monitoring systems with alert suppression capabilities

Governance Requirements: Strict regulatory compliance (FDA authorization if required), rigorous clinical validation, continuous monitoring, real-time audit logging, and weekly governance oversight. Currently rarely recommended without significant regulatory constraints.

Policy Recommendations for Industry and Regulators

For Senior Care Organizations:

- Adopt the four-tier framework as a governance baseline
- Document all AI system deployments and their governance tier classification
- Establish AI ethics committees with clinical, compliance, and resident representation
- Conduct annual bias audits and equity assessments
- Provide transparency to residents and families about AI system use

For Policymakers:

- Develop sector-specific AI governance guidance for senior care providers
- Establish transparency and documentation standards for healthcare AI systems
- Create pathways for lower-risk AI systems to be deployed with streamlined oversight
- Require equity impact assessments before deploying AI systems in clinical settings
- Support AI governance infrastructure development in smaller organizations

Get the Full White Paper

Download the complete white paper with detailed governance frameworks, implementation guidance, and policy recommendations.

See how SeniorCRE makes this operational

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