Building AI-Ready Organizations: Policies, Governance, and Regulation

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Presenter

Karen Niedermeier
Associate Director of Business Development, Therap Services

- 20+ Years experience working in the I/DD Field
- Joined Therap in 2015
- Worked for an I/DD provider in NY in quality assurance and corporate compliance
- BS in Human Services, MS in Human Services Administration
- MS in Health Law and Healthcare Compliance; Albany Law School, Dec. 2025
- Located in Albany, New York

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You’re Already Using AI (Whether You Planned To or Not)

- Documentation summaries generated from records
- Systems flagging risks or inconsistencies
- Automated quality assurance reviews
- Embedded tools inside vendor platforms

Most organizations are already using AI, they just haven’t decided how they’re governing it.

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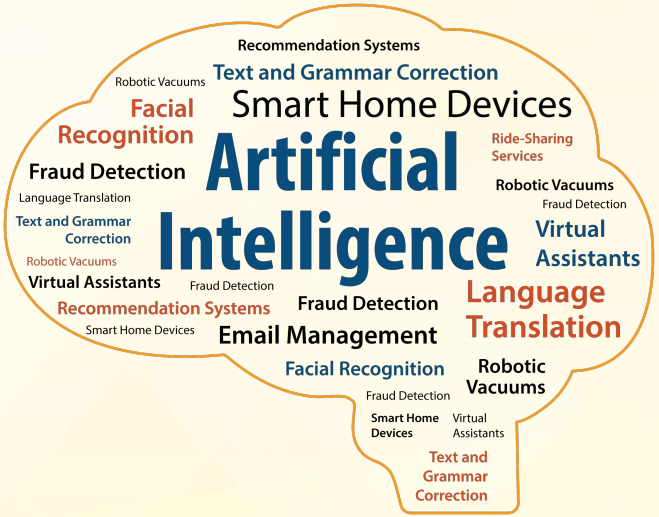
Why This Matters Now

- AI increases the speed and volume of documentation
- Small issues can quickly become system-wide patterns
- Regulators are using data more aggressively
- States are moving faster than federal guidance



AI doesn’t create new risk, it makes existing risk easier to find.

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Massachusetts Expectations Are Already High

- MassHealth → documentation integrity and billing accuracy
- DDS → person-centered services and oversight
- Strong focus on:
  - Quality assurance
  - Accountability
  - Rights and protections

AI use will be evaluated through frameworks that already exist.

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The Rules That Anchor Everything

The Rules Didn’t Change; Your Exposure Did

- HIPAA still applies
- Medicaid billing rules still apply
- Documentation standards still apply
- Disability rights protections still apply

What changed:

- Errors scale faster
- Patterns are easier to detect
- Oversight expectations increase

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Documentation Risk and False Claims Exposure

What This Means in Practice

- AI-generated documentation = your documentation
- Repeated errors can trigger audit findings
- Inaccurate records can lead to repayment risk
- “We didn’t know” is harder to defend

Automation increases the scale of both compliance and mistakes.

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Accreditation is Catching Up

- AI Is Now Part of Accreditation Expectations
- CARF introduced its first AI-related standard

Focus areas include:

- Transparency
- Ethical use
- Risk management
- Human oversight

AI governance is becoming part of what “quality” looks like, not just compliance.

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Where AI Shows Up in HCBS

Documentation Support

Summaries, suggested language

Quality and Compliance Review

Flags, alerts, pattern detection

Risk Identification

Trends across large datasets

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Where Risk Really Comes From

AI Risk Is Not Technical, It's Operational

Risk comes from:

- Informal or inconsistent use
- Lack of clear expectations
- No required review process
- Over-reliance on outputs

The biggest risk is not bad AI, it's unmanaged AI.

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Common Mistakes

What Creates Problems Quickly

- “Set it and forget it” use
- Staff using AI without guidance
- Copying outputs directly into records
- Assuming vendors are responsible
- Using AI outputs for billing decisions

Errors can repeat across dozens, or hundreds, of records.

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What Regulators Are Looking For

What Auditors and Regulators Expect to See

- Accurate, complete documentation
- Evidence of human review
- Consistent internal processes
- Clear accountability when issues occur

Oversight must be visible, not assumed.

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What Good Looks Like (4 things every provider should have)

Clear Rules for AI Use

Human Review before finalization

Defined Accountability

Ongoing Monitoring

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What Real World Oversight Looks Like

Oversight in Daily Operations

- Supervisor reviews AI-assisted documentation
- QA validates flagged issues before action
- Documentation checked before billing
- Errors corrected and tracked

Oversight happens every day, not just during audits.

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Policies Every Provider Should Have

Basic Policy Expectations

- Where AI can be used
- Where AI should not be used
- Required review steps
- What staff should do if something looks wrong

These can often be short additions to existing policies.

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Workforce Responsibilities

Different Roles, Different Responsibilities

- Direct support staff: Use tools appropriately, flag concerns
- Supervisors: Review and validate documentation
- QA/compliance: Monitor trends and repeat issues
- Leadership: Own oversight and accountability

AI doesn’t remove responsibility, it redistributes it.

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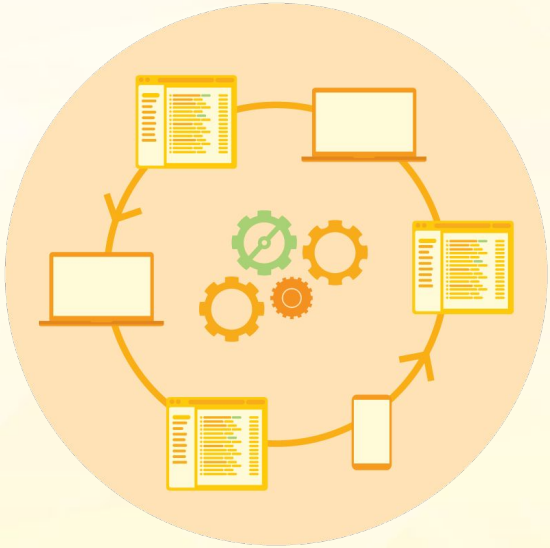
Vendors Don’t Reduce Your Responsibility

Using AI Tools Does Not Shift Responsibility

Providers should understand:

- What the tool does (and doesn’t do)
- What data is used
- How errors are identified and corrected
- When updates or changes occur



Buying a tool does not outsource compliance.

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Practical Takeaways for Providers

What to Do Next

- Treat AI as a high-risk operational function
- Build oversight into existing processes
- Train staff based on their roles
- Document review and monitoring activities

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This Is Not About Technology

It's about:

- Structure
- Accountability
- Consistency

Organizations that treat AI like a compliance function, not just a feature, will be the ones that succeed.

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AI Questions?

Connect with me

Karen Niedermeier
Associate Director of Business Development, Therap Services

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