



# INTERIM INSTRUCTION NOTICE #25-001

04-22-2026

**SUBJECT: Guidance on the Use of Generative Artificial Intelligence (GAI) Tools**

**DISTRIBUTION: Department of Behavioral Health**

**OBSOLETE: Upon completion of related policy and/or procedure**

**Effective Date** 04-22-2026

**From** Department of Behavioral Health (DBH) Information Technology (IT)

**Introduction** The purpose of this Interim Information Notice (IIN) is to provide DBH staff with official guidance on the use of Generative Artificial Intelligence technologies within Department of Behavioral Health (DBH).

**Background** Generative Artificial Intelligence (GAI) technologies are increasingly being incorporated into commonly used online tools (e.g., search engines). Given the growing presence of GAI in County operations, it is imperative that these technologies be utilized in a manner that is responsible, secure, and fully compliant with all applicable County policies, regulations, and professional standards. San Bernardino County Innovation and Technology Department (ITD) is developing a Countywide policy to govern the use of GAI. Pending formal adoption, this IIN applies to the use of GAI tools, within County DBH.

**GAI Tool Guidance**

**Approved Tool – Microsoft Copilot**

Microsoft Copilot is the only County DBH-supported GAI tool at this time. Staff are expected to use Copilot within the secured DBH environment via their official County accounts. This environment ensures compliance with security standards and protects confidential and regulated information. Staff are responsible for ensuring they are logging into the County supported Copilot environment rather than a public Copilot login account.

Staff must obtain approval from their supervisor prior to using Microsoft Copilot. Supervisors are required to submit a request to, [dbhhelp@dbh.sbcounty.gov](mailto:dbhhelp@dbh.sbcounty.gov) for requested Copilot access.

**Prohibited Tools – ChatGPT and Others**

ChatGPT and other external GAI tools are **not** currently authorized for DBH staff use and must **not** be used for any County work.

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GAI Tool  
Guidance,  
continued

## **Prohibition of Client-Facing AI Technology**

Client-facing AI technology use is strictly prohibited. Further, it is mandated that only qualified behavioral health professionals can offer advice, treat and/or diagnose psychiatric and/or substance use disorder conditions.

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Guidelines

DBH Workforce and Community-Based Organizations (CBOs) are required to adhere to the following guidelines when using DBH Copilot or CBO-approved GAI Tools.

## **Protection of Confidential, Sensitive, and Regulated Information:**

DBH Workforce and affiliated personnel must not enter confidential, sensitive, or regulated data into GAI tools, including personally identifiable information (PII) and protected health information (PHI). Individuals must be mindful of the information and documents entered into these tools; **under no circumstances** may client-related documents or information be inputted.

If there is any uncertainty as to whether data is confidential, sensitive, or regulated, the information must **not** be entered into the tool. Individuals must consult with their supervisor or appropriate DBH contact for guidance on how to proceed.

DBH is currently exploring the use of AI for treatment services exclusively within the electronic health record (EHR) system. This use will require member consent prior to the initiation of any encounter. Additional guidance will be issued prior to implementation.

## **Security**

County passwords must **not** be used when creating accounts for GAI tools. All account creation and usage must comply with established County and DBH information security standards.

## **Client-Related Activities**

GAI tools **must not** be used in connection with client documentation, client-focused activities, or multidisciplinary team (MDT) meetings.

## **Bias and Potential Harm**

GAI tools are still evolving and may generate content that reflects unintended bias or harmful material. Users are responsible for reviewing outputs and removing content that is offensive or inappropriate.

## **Accuracy**

All content generated using GAI tools must be independently verified for accuracy. Users are required to “fact-check” all responses and materials produced to ensure they do not contain factual errors, misinformation, or inappropriate statements prior to use.

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## Guidelines, continued

### Copyright Considerations

Content generated by GAI tools may be subject to copyright protections. Staff may use tools for research or preliminary drafts, but unedited GAI content must not be included in final documents. Users must consult supervisors or appropriate DBH contact for guidance to ensure GAI produced content is appropriately developed, used, and attributed. **When in doubt, leave it out!**

DBH contract agencies must ensure compliance with all Data Security Requirements as outlined in their contract agreements. Agencies utilizing Artificial Intelligence (AI) for administrative purposes must establish and maintain appropriate policies and procedures governing such use.

All AI use must incorporate human verification and validation processes and adhere to the ethical standards described herein, as well as all applicable state and federal laws and regulations. This includes, but is not limited to:

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## AI Use Ethical Considerations

DBH Workforce and CBOs are expected to comply with this guidance, along with all applicable County and DBH policies, and any subsequent County directives, while adhering to relevant legal, ethical, and professional standards to ensure the protection of County systems and the confidentiality of client PHI when using GAI tools.

DBH Workforce and affiliated personnel are further reminded of their responsibility to adhere to ethical standards while utilizing DBH approved GAI tool, Copilot or CBO-approved GAI tools. These standards include but are not limited to:

- Ensuring material produced via GAI tool is factual, and not false or harmful
- Ensuring products generated with use of GAI are not bias and/or otherwise discriminatory
- Ensuring human validation is occurring systematically when using GAI, especially when critical decisions are made
- Maintaining accountability for individual work and/or business practices conducted with the support of GAI

**Note:** Use of GAI must be in accordance with DBH Privacy and Security Policies notated in the reference section of this IIN. Any unauthorized disclosure or compromise of client PHI must be reported **immediately** to the DBH Office of Compliance at, [DBH-PrivacyIncidents@dbh.sbcounty.gov](mailto:DBH-PrivacyIncidents@dbh.sbcounty.gov).

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## Contract Agency Requirements for AI Use

DBH contract agencies must ensure compliance with all Data Security Requirements as outlined in their contract agreements. Agencies utilizing AI for administrative purposes must establish and maintain appropriate policies and procedures to govern its use.

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## Interim Instruction Notice 25-001, Continued

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### Contract Agency Requirements for AI Use, continued

All AI use must incorporate human verification and validation processes and adhere to the ethical standards described herein, as well as all applicable state and federal laws and regulations. This includes, but is not limited to:

- AB 3030 – Health Care Services: Artificial Intelligence
  - AB 489 – Health Care Professionals: Deceptive Terms or Letters: Artificial Intelligence
  - SB 243 – Chatbots: Minors
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### Referenced Policies

#### [DBH Standard Practice Manual:](#)

- Security of Electronic PHI Policy (COM0923)
  - Privacy and Security Incident Sanctions Policy (COM0926),
  - Privacy Incident Policy (COM0944)
  - Computer and Network Appropriate Use Policy (IT5004)
  - Workstation and System Security Policy (IT5022).
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### Questions

For questions regarding this Interim Instruction Notice, please contact DBH IT at (909) 386-9730 or via email at [dbh-it-helpdesk@dbh.sbcounty.gov](mailto:dbh-it-helpdesk@dbh.sbcounty.gov)

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