

MAY 2025

Position Statement:

Ensuring Responsible Use of AI in Healthcare Information Collection and Use

Artificial Intelligence (AI) is rapidly reshaping healthcare worldwide. From clinical documentation to coding and decision support, AI promises to improve health outcomes, reduce administrative burden, and streamline workflows.

The Medscape & HIMSS AI Adoption by Health Systems
Report 2024 found that 86% of respondents are already using
AI in their organizations, with 60% recognizing its ability to
uncover health patterns and diagnoses.

However, as Dr. Tedros Adhanom Ghebreyesus, Director-General of the World Health Organization, <u>notes</u>, "Artificial intelligence holds great promise for health, but also comes with serious challenges, including unethical data collection, cybersecurity threats and amplifying biases or misinformation."

IFHIMA believes that health information professionals must play a leading role in guiding AI integrations with electronic medical record systems and related technologies that require strong data governance and regulatory compliance. Rather than viewing AI as a threat, health information professionals

About IFHIMA

The International Federation of Health Information Management Associations (IFHIMA) is an NGO affiliated with the World Health Organization (WHO) for over 45 years. Its Executive Board includes representatives from each of the six WHO regions, and its members include Health Information (HI) professionals from 59 countries.

IFHIMA advocates for the profession by promoting education, high-quality data, and privacy to improve health outcomes worldwide.

must develop AI literacy and ensure they have a seat at the table to shape how AI is used in healthcare. Doing so will demonstrate the vital contribution of health information professionals in protecting health data while unlocking its value for initiatives such as timely reimbursement, improved documentation and population health.

The Essential Role of Data Governance

As AI becomes embedded in electronic health records (EHRs), coding tools, and revenue cycle systems, robust data governance is more crucial than ever. Comprehensive data governance, as advocated for and practiced by health information professionals, includes practices to:

- Understand data flows, access, and use to ensure appropriateness, integrity, and authorized usage
- Ensure data and documentation are high quality, accurate, consistent, and complete
- Manage the data lifecycle through metadata management
- Validate compliance with privacy and security regulations, including consent and other applicable standards
- Test and address the validity and bias of AI-generated data interpretations
- Manage risks through ongoing monitoring mechanisms for drift, error and non-compliance
- Implement and monitor standards compliance while generating audit trails
- Ensure transparent vendor contracts address data use, model training, and privacy and security accountabilities



Health information professionals are uniquely positioned to apply and adapt data governance frameworks to AI technologies while upholding data integrity and privacy. They can also help ensure that AI tools are trained on accurate, diverse, and representative datasets.

Without proper oversight, shadow AI systems — including those embedded in commercial applications without transparency, and non-health regulated AI solutions — can introduce risks to privacy, accuracy, and patient safety.

Health information professionals should also lead or participate in formal AI risk assessments to ensure tools meet the standards of their regulatory frameworks, such as the EU AI Act., HTI-1 in the United States, and others that continue to evolve. The International Organization for Standardization (ISO), the Organisation for Economic Co-operation and Development (OECD), and World Health Organization (WHO) are also conducting valuable work that should be monitored by those across the industry.

Human in the Loop: Safeguarding AI-Driven Healthcare

IFHIMA supports the indispensable role of the "human in the loop" (HITL) as AI adoption grows in healthcare. Simply put, health information professionals and clinicians must remain active participants in AI-assisted processes. **AI should support, not replace, their judgment.**

Even in advanced ambient listening systems that transcribe patient visits in real time, human review and sign-off are critical to ensuring accuracy and protecting patient rights. Ultimately, the clinician is accountable for what is documented in the electronic health record, not the AI system, and it's the clinician who bears legal responsibility. Health Information professionals have always provided invaluable support to clinicians in this area, educating on standards and regulations, advising on documentation precision, and implementing technology and tools to streamline and simplify.

HITL frameworks help maintain trust, ethical oversight, and public confidence in AI-driven systems in healthcare.

AI Risks and the Need for Strong Compliance Frameworks

AI adoption introduces new risks, including bias in training data, black-box decision-making, and cybersecurity threats. AI models can also be vulnerable to prompt injection, data poisoning, and misuse of sensitive personal information.

To mitigate these threats, IFHIMA advocates for strong regulatory alignment across countries and regions. This includes:

- AI governance councils with health information professionals to oversee implementation
- Transparent vendor contracts addressing data use and model training
- Continuous monitoring of AI systems for model change, error, and noncompliance

IFHIMA supports the use of tools such as explainability dashboards and bias detection engines to identify and assess data-related risks in AI deployments in healthcare.

IFHIMA's Call to Action

AI holds transformative potential for healthcare systems across the globe. But realizing its benefits requires accountability, transparency, and a commitment to ethical oversight. IFHIMA urges policymakers, healthcare leaders, and technology developers to:

- Mandate human-in-the-loop safeguards for all AI systems in healthcare.
- Embed health information professionals and practices in every phase of AI development, implementation, and use to ensure patient data protection and integrity
- Standardize data governance and AI risk assessment frameworks
- Support health information education and training to ensure AI-related competencies

In this era of rapid technological change, health information professionals must remain the stewards of accurate, ethical, and effective health information. With proper governance and human insight, AI can truly serve its highest purpose: improving health for all.

2 IFHIMA.ORG



Sources

- "AI Adoption in Healthcare Report 2024: Early Successes, Untapped Potential, Lingering Questions." HIMSS and Medscape, December 6, 2024. https://www.himss.org/futureofai/
- Almyranti, M. et al. (2024), "Artificial Intelligence and the health workforce: Perspectives from medical associations on AI in health", OECD Artificial Intelligence Papers, No. 28, OECD Publishing, Paris. https://doi.org/10.1787/9a31d8af-en
- "Ethics and Governance of Artificial Intelligence for Health: Guidance on Large Multi-Modal Models." World Health Organization, 2024. https://iris.who.int/bitstream/handle/10665/375579/9789240084759-eng.pdf
- "Global Initiative on AI for Health." World Health Organization, accessed May 19, 2025. https://www.who.int/initiatives/global-initiative-on-ai-for-health
- "ISO/IEC JTC 1/SC 42: Artificial Intelligence." International Organization for Standardization (ISO), accessed May 19, 2025. https://www.iso.org/committee/6794475.html
- Lekadir K, Frangi A F, Porras A R, Glocker B, Cintas C, Langlotz C P et al. "FUTURE-AI: international consensus guideline for trustworthy and deployable artificial intelligence in healthcare." BMJ 2025, February 5, 2025. https://www.bmj.com/content/388/bmj-2024-081554

- Matheny, Michael E., Jennifer C. Goldsack, Suchi Saria, Nigam
 H. Shah, et al. "Artificial Intelligence in Health and Health Care:
 Priorities for Action." Health Affairs, January 22, 2025. https://www.healthaffairs.org/doi/10.1377/hlthaff.2024.01003
- OECD (2024), "AI, data governance and privacy: Synergies and areas of international co-operation", OECD Artificial Intelligence Papers, No. 22, OECD Publishing, Paris. https://doi.org/10.1787/2476b1a4-en.
- OECD (2024), "Explanatory memorandum on the updated OECD definition of an AI system", OECD Artificial Intelligence Papers, No. 8, OECD Publishing, Paris. https://doi.org/10.1787/623da898-en.
- "Regulatory Considerations on Artificial Intelligence for Health."
 World Health Organization, October 19, 2023. https://www.who.int/
 publications/i/item/9789240078871

3 IFHIMA.ORG