



Accreditation Council for Pharmacy Education (ACPE)
Artificial Intelligence Usage Guidance for Continuing Pharmacy Education Providers

This document includes guidance for the responsible use of artificial intelligence (AI) in the development and presentation of accredited continuing pharmacy education. More specifically, this guidance focuses on “generative AI” tools, which are machine-based systems that generate new content based on inputs from a user. Certain generative AI tools are publicly available for no fee (or for a nominal fee) while others may be licensed from third-party vendors (closed-source). By describing potential risks and general considerations related to the use of AI, this guidance aims to uphold the quality of continuing education programs and ACPE-accredited providers.

Risks Related to the Use of AI in Continuing Education Activities

When considering whether (or how) to use AI, employees/staff, faculty, and learners should consider several risks.¹ While this document is not intended to serve as a comprehensive resource to identify and mitigate these risks, several potential risks are described below:

- **Content Validity, Accuracy, and Bias:** AI systems and tools, particularly generative AI tools, may generate content and citations that are incorrect or do not exist (called “hallucinations”), potentially resulting in educational materials or other output content that are not evidence-based, supported by existing literature, or accurate. Further, the data used to train these models may contain bias or discrimination, which may result in biased recommendations or results, and which may contribute to harmful or discriminatory actions. As such, if AI is used to generate content or serve as input for or recommend an action that could have a discriminatory or harmful impact, the user should conduct a thorough review of all such AI generated content and verify the resulting action or decision is appropriate.
- **Regulatory Risks:** As the development and use of AI becomes increasingly prevalent, states (i.e., Colorado, Utah, California) are enacting legislation to regulate AI systems and/or require certain disclosures to residents of these states who are interacting with an AI system. It is important that the user of the AI system monitors and complies with all state requirements and future laws or regulations.
- **Intellectual Property (IP) Rights:** Autonomous creations by AI, such as content produced by generative AI applications, may not be protected by traditional IP rights, as they may lack sufficient human creativity and contribution. In addition, content produced by AI systems must be verified to ensure that the content itself does not infringe on another party’s IP rights. Furthermore, generative AI tools may rely on “training data” gathered from third-party sources. Therefore, adequate rights in the “training data” may not have been obtained, which results in the risk of the use of the AI tool infringing a third party’s intellectual property.
- **Confidentiality:** Confidential or proprietary information should only be inputted into AI systems that are “private” or “closed” (i.e. company-specific / licensed) AI systems. Data, content, and other information entered into AI systems are potentially at risk for breaches and unauthorized access related to personal and confidential information, including confidential organizational and

learner information. Furthermore, such inputs may be used to further train or improve AI models, which means such data may be inadvertently released to other users of the AI tools. It is important to review and negotiate terms in the software license agreements to mitigate these risks.

General Guidance

- Use of AI should be made apparent and disclosed. You should never pass AI-generated content for your own. You should also review all content generated by AI for accuracy and IP, bias and infringement risks.
- Furthermore, AI should not introduce bias or discrimination in the educational or accreditation process.
- Accredited providers are responsible for ensuring that their education is fair and balanced and that any clinical content presented is based on scientific evidence and supports safe, effective patient care. This is the current state of programming.
 - Data collected and used by AI systems should comply with relevant data protection regulations.
 - Data used for AI training should be anonymized and de-identified where necessary.
 - Data retention should follow best practices and legal requirements.
 - Organizations should consider closed-based systems and ensuring that these systems meet requirements as related to copyright, intellectual property, and data-privacy.

Guidance for Providers Related to Staff, Faculty, and Learners^{1,2}

- **Staff:** Providers are encouraged to develop organizational policy or specific guidance surrounding AI that considers organizational structure, educational development processes, and target audiences for education. While there is no one-size-fits all policy, organizations should consider the following questions when developing AI policy for their organization and staff:
 - Who at your organization might use generative AI?
 - How might they use AI?
 - When is the use of AI appropriate? Prohibited?
 - What AI does our organization and staff currently have access to?
 - What potential risks exist related to AI use?

These questions can serve as a starting point when developing AI policy. It is important to consider whether staff will have access to an organization-specific AI system (closed-source) or a system that is publicly available. The type of AI system, and the types of information entered in the system, are essential considerations for AI use by staff and employees within an organization.

- **Faculty:** Providers are encouraged to include guidance related to AI in their faculty guidance materials. This guidance may include the following:
 - A description of when the use of AI is or is not appropriate for the development of content.
 - If faculty use AI in the development of educational content for a CE activity, it is strongly suggested to disclose to learners:
 - The name of the AI application.
 - The purpose for which the faculty used the AI application.
 - The version of the AI application.
 - The date the AI application was used.

- Notification that current AI systems may not always produce accurate and evidence-based information. Faculty, and all individuals in control of content development, should ensure that content is accurate, evidence-based, and that resources cited are appropriate and accurate.
- *Per the AMA Manual of Style (11th Edition): Section 5.2.1.1 Acknowledgment of Use of Artificial Intelligence and Language Models in Writing and Editing*
 - “Authors should report the use of artificial intelligence, language models, machine learning, or similar technologies to create content or assist with writing or editing of manuscripts in the Acknowledgment section or the Methods section if this is part of formal research design or methods. This should include a description of the content that was created or edited and the name of the language model or tool, version and extension numbers, and manufacturer. (Note: this does not include basic tools for checking grammar, spelling, references, etc.).”
- **Learners:** Providers are encouraged to develop guidance or policy related to the use of AI by learners who participate in educational activities. Providers should consider the following:
 - Is it appropriate for learners to use AI to record, transcribe, or otherwise collect and interpret information presented during an educational session?
 - Is the educational material proprietary, copyrighted, or is its use otherwise restricted?

Providers are encouraged to consider when, and if, the use of AI by learners is appropriate and implement appropriate processes to notify learners when AI should not be used during educational activities or to summarize, analyze, or interpret information or materials included with the educational activities.

References

1. Masters K. Ethical use of Artificial Intelligence in Health Professions Education: AMEE Guide No. 158. *Med Teach*. 2023 Jun;45(6):574-584. doi: 10.1080/0142159X.2023.2186203. Epub 2023 Mar 13. PMID: 36912253.
2. Ensign D, Nisly SA, Pardo CO. The Future of Generative AI in Continuing Professional Development (CPD): Crowdsourcing the Alliance Community. *J CME*. 2024 Dec 9;13(1):2437288. doi: 10.1080/28338073.2024.2437288. PMID: 39664116; PMCID: PMC11633854.