



Generative AI — Principles & Policy

Last Updated August 2026

1. Purpose

This policy establishes the principles, standards, and safeguards governing Pair Team's use of its proprietary AI platform and services, including its "Flora" digital care advocate in supporting the delivery of services. The policy is in furtherance of Pair Team's goal of engaging in responsible AI and transparency consistent with organizational values.

2. Scope

This policy applies to:

- All use cases in which Flora may process, generate, or transmit Protected Health Information (PHI) or Personally Identifiable Information (PII)
 - The underlying AI model infrastructure and vendor relationships supporting Flora
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3. HIPAA Framework

3.1 HIPAA

Flora is a component of Pair Team's covered entity operations. Any use of Flora that involves the creation, receipt, maintenance, or transmission of PHI is governed by HIPAA.

3.2 Permitted Uses of PHI with Flora

Flora is used with PHI only for the following approved purposes:

- Care coordination, outreach and, communications with prospective or enrolled members
- Documentation drafting, summarization, and coding support under workforce supervision
- Social determinants of health (SDOH) screening and referral facilitation
- Member navigation support and benefits coordination
- Improving services to members



3.3 Prohibited Uses of PHI with Flora

The following uses are expressly prohibited:

- Using Flora to share member PHI with individuals not authorized
 - Using Flora to generate marketing or fundraising communications tied to individual health conditions without explicit HIPAA-compliant authorization
 - Exporting PHI-containing outputs from Flora to unauthorized external systems
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4. Privacy Safeguards

4.1 Data Minimization

Pair Team is committed to collecting and processing only the data necessary for Flora's intended functions set forth in this Policy.

4.2 Retention

- Conversational logs containing PHI will be retained for clinical operations, product improvement, legal, and compliance purposes.

4.3 Third-Party Data Sharing

Flora outputs containing PHI will not be shared with third parties except:

- As permitted or required under HIPAA (e.g., treatment, payment, operations)
 - Pursuant to a valid member authorization
 - As required by law or court order
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5. Member Disclosures

5.1 Disclosure Principles

Pair Team is committed to transparent, meaningful disclosure practices for the use of AI in member interactions. Members should be able to understand when and how AI tools like Flora are involved in supporting their care experience.



5.2 Disclosures

Members interacting with Flora will be clearly informed that Flora is an AI advocate intended to support a member's care. A member can also ask about the following:

- A plain-language description of Flora and its role
 - The types of information Flora may use or generate about the member
 - How Flora-generated content is reviewed and overseen by human workforce members
 - The member's ability to request further discussion with a clinician
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6. Governance and Oversight

6.1 AI Governance Committee

Pair Team maintains a cross-functional Governance Committee responsible for:

- Reviewing and approving new use cases for AI, including Flora
- Monitoring regulatory developments affecting AI in healthcare
- Reviewing audit logs and incident reports related to Flora

6.2 Policy Review

This policy will be reviewed at minimum annually and updated as necessary to reflect:

- Changes in applicable law or regulation
 - Material changes to Flora's capabilities or use cases
 - Findings from audits, incidents, or risk assessments
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7. Flora is Not a Software as a Medical Device (SaMD)

7.1 Regulatory Classification

Flora is not a SaMD. Flora functions as a care coordination, communication, and administrative support tool, not a clinical decision-making system. Flora does not replace or drive clinical judgment — design, inputs, and outputs are continually reviewed by qualified clinical members and the basis for any recommendation is transparent and reviewable by qualified clinicians.



7.2 Ongoing Regulatory Monitoring

The regulatory landscape for AI in healthcare is actively evolving. Pair Team's Legal team, in coordination with the AI Governance Committee, will monitor federal and state guidance and legislative developments to remain consistent with applicable requirements.