



AI Ethics Recommendations for Case Managers at OLHSA

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Executive Summary

Oakland Livingston Human Service Agency’s (OLHSA) frontline case managers provide critical aid to vulnerable individuals, families, and communities.¹ When used carefully and responsibly, AI tools may help case managers complete their administrative tasks more efficiently, freeing up more time to focus on direct service to clients. At the same time, case managers must make sure that their AI use aligns with OLHSA’s human service mission and does not undermine accountability, trust, or care.

Methodology

The Science, Technology, and Public Policy (STPP) program at the University of Michigan is dedicated to advancing equity and justice in the development and governance of technology. Within STPP, the Community Partnerships Initiative pairs researchers with community organizations across Michigan to help address the impacts of emerging technologies on their work. This recommendations report was created through independent research and conversations with OLHSA leadership.

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Background: What is AI? What Can it Do?

The definition of AI is very broad and generally includes any technology that mimics human capabilities.² However, most recent advancements in AI have to do with a more specific technique: machine learning. Machine learning is a process where large amounts of data are fed into a computer algorithm, allowing it to make predictions based on patterns (like a more sophisticated autocomplete).³

What AI is Good At:

- Finding patterns in data
- Summarizing large amounts of information
- Creating generic drafts or templates

What AI is Bad At:

- Making judgments that require social or historical context
- Tracing generated content back to correct, legitimate sources
- Communicating with emotional nuance
- Accounting for non-quantitative factors and locally-specific knowledge

Case managers should consider these strengths and weaknesses when interpreting OLHSA’s guidelines and making decisions about how to use AI. Ultimately, each employee must bear responsibility for their own work, regardless of whether or how AI was involved.

OLHSA’S AI Policy Themes

Privacy

OLHSA case managers have a duty to protect any sensitive information that clients share with them—including information about health, finances, income, criminal records, veteran status, and substance use. This duty is both ethical and legal; maintaining confidentiality protects relationships between clients and case managers and also ensures compliance with US privacy laws such as HIPAA and FERPA.⁴

Unfortunately, **commercially-available AI tools—and the companies that make them—cannot be trusted to keep this sensitive information safe.** Most AI companies are not transparent about how they use or store the data that they collect from users (for example, through chat logs records).⁵ If a case manager enters client data into a Large Language Model like ChatGPT or Copilot, that data may be shared with third parties such as law enforcement, insurance companies, and advertisers that lack OLHSA’s commitments to human service. Because AI models are “trained” on large amounts of publicly available data, entering Personally Identifiable Information (PII) such as names or addresses could link a client’s identity to information from other sources.⁶ **To protect clients’ privacy rights, it is critical for case managers to avoid sharing sensitive, personal, and legally-protected information with AI systems.**⁷

Accuracy

AI has an impressive ability to quickly generate lots of text that looks and sounds accurate, but there is no guarantee that any artificially-generated information is actually correct. In fact, AI tools regularly “hallucinate” false information, make up sources, and draw from copyrighted work without acknowledgement or permission.⁸ Using trusted, legitimate sources to check facts and citations before finalizing OLHSA materials is essential for ensuring accuracy and authenticity. In general, case managers should approach AI as a resource rather than as a substitute for high-quality work, for instance when creating community outreach materials or communicating with clients.

Powerful AI tools are owned by companies that have strong financial incentives to keep users on their platforms for as long as possible. To increase engagement, chatbots tend to pursue human approval, sometimes at the expense of telling the truth. AI’s tendency to flatter users, also called “sycophancy,” can undermine the research and writing process by creating an echo chamber of your own ideas instead of providing alternative perspectives.⁹ Case managers can avoid these pitfalls by prioritizing their own expertise, seeking out diverse voices on important issues, and conducting traditional research.



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Equity

Case managers understand the deep connections between poverty and social inequity because of their lived experiences working with disadvantaged communities. AI does not share this understanding. When algorithms “learn” to recognize patterns from datasets without taking into account these underlying causes or contexts, they can end up attributing negative outcomes to innate characteristics such as race, gender, and disability status.¹⁰ These gaps in reasoning can cause discrimination, especially if case managers use AI to analyze a person’s qualifications or predict their behavior.

Another source of AI bias is the data used to build AI systems. AI tools are only as good as their underlying data; for instance, if the populations OLHSA serves are underrepresented in a tool’s training datasets, outputs related to certain groups might be biased or skewed. For AI companies that are not transparent about their data practices, it is much more difficult to identify and address potential bias issues. **To uphold OLHSA’s core values, case managers should avoid using AI in areas where human judgements are necessary to ensure fairness and equal treatment.**

Accountability

Case managers are not just accountable to their supervisors — they are also accountable to the clients they serve. **Accountability is a critical part of building trust between case managers and clients because clients feel empowered to hold their case managers responsible for protecting their interests.** AI tools promise to improve efficiency and remove human error, but delegating tasks to these non-human systems also make it harder to define clear lines of responsibility, and therefore, to find a remedy when things go wrong. “Human-in-the-loop” is a design concept that prioritizes human interaction and feedback in processes that involve AI.¹¹ If OLHSA case managers keep themselves “in the loop,” they can retain control over the meaning and the stakes of their work while still benefiting from AI capabilities.

Preserving a strong human oversight role in AI-assisted work can also facilitate transparency. Disclosing the use of AI to clients in simple, understandable terms fulfills the ethical duty to obtain informed consent and strengthens trust.

Curiosity

OLHSA’s guidelines encourage case managers to experiment with using AI within reasonable ethical and safety limits. Granting the freedom to be curious about AI acknowledges that the most innovative solutions often come from employees themselves; those closest to clients and communities have the greatest understanding of “pain points” and administrative hurdles that are holding them back. In addition, the best way to understand AI tools first-hand is to investigate their capabilities and limitations in a low-stakes environment.

Guidelines on AI Use for OLHSA Case Managers

This section provides general recommendations to guide case managers' use of AI in their everyday work, including some examples and ethical considerations. These guidelines are not intended to be rigid prescriptions or to limit case managers' freedom to make decisions according to their own expertise and comfort with AI tools. Instead, they can serve as a starting point for a collaborative process of experimentation and organizational learning that will inform OLHSA's AI policy.¹²

Use Case #1: Creating Written Materials for Client Outreach

OLHSA maintains multiple accessible contact points with the communities it serves, including virtual and in-person intake options, as well as staff presence at community events and gathering places.¹³ AI tools may be able to enhance the scope and effectiveness of OLHSA's client outreach programs by creating drafts of written and visual materials, such as flyers, informational documents, and social media posts.

Example: Ask Copilot to draft text for a flyer summarizing the programs and services OLHSA offers for families in need, using information from the OLHSA website.

Dos:

- Always check AI generated writing for accuracy and appropriate, culturally-sensitive tone
- Ensure that multiple human perspectives are involved in closely reviewing AI generated content
- Be as specific as possible when writing prompts, including information about the context, the sources that should be used, and the intended audience
- Disclose that the content was developed with AI assistance
- Recognize that you bear responsibility for the final product's use, regardless of how it was created

Don'ts:

- Do not enter any sensitive, confidential, or private information about yourself or others into your prompt
- Do not use AI-assisted outreach materials as a replacement for human presence in the community or live human operators on a phone line
- Do not copy and paste generated text without proper review and disclosure

Use Case #2: Navigating Eligibility and Enrollment Systems

OLHSA's "bundled care" model involves coordinating a variety of social programs—from housing support to Head Start—to minimize labor for clients and more comprehensively address the root causes of poverty.¹⁴ Using AI systems to directly determine a client's eligibility for social programs carries deep ethical problems because biased decision making can exacerbate inequities and cause direct harm to individuals. Nonetheless, case managers can use AI tools to better understand eligibility requirements and model more efficient data entry workflows.¹⁵

Example: Ask ChatGPT to explain changes to Medicaid eligibility under the One Big Beautiful Bill Act and provide example scenarios illustrating how they might affect individuals in different circumstances.¹⁶

Dos:

- Ask the AI tool to provide sources and check them to ensure that facts are accurately represented and interpreted
- Consider how bias might affect the content or usefulness of a response
- Explore AI's ability to help you organize work-related tasks and plan your time

Don'ts:

- Do not use AI to make or inform decisions about an individual's eligibility for any social service program
- Do not enter any sensitive, confidential, or private information about yourself or others into your prompt
- Do not make dramatic changes to data entry or eligibility determination processes without first consulting your supervisor

Use Case #3: Translation Services

OLHSA case managers interact with clients from a diverse range of linguistic backgrounds. AI-powered translation tools, such as Google Translate, can be effective and efficient means of communicating with clients across a language barrier, especially for short and simple conversations. In addition, AI can help improve the accessibility of written materials by translating simple text into other languages commonly used in the community.

Example: If a new client who walks into the Welcome Center has limited comfort with speaking English, offer to communicate with Google Translate while waiting for a human interpreter to arrive.

Dos:

- Use AI to translate simple, straightforward text or messages in a conversation
- Consult with someone proficient in the language before finalizing AI-translated work
- Disclose that a translation was AI-assisted
- Recognize that you bear responsibility for the final converted text, including its accuracy, cultural sensitivity, and any biases
- Include as much information about regional dialects as possible in your prompts

Don'ts:

- Do not rely on AI translation when dealing with sensitive or more complex information that requires tone and context considerations
- Do not use AI as a replacement for human translators, especially if there are fluent speakers of the language already at OLHSA
- Do not assume that AI-translated work will be easily understood by all speakers of a language

Use Case #4: Understanding Program Policies, Requirements, and Performance Standards

Because OLHSA receives federal grant funding, it is subject to various federal regulations. Understanding these government documents is often difficult and time-consuming, especially because the government often changes requirements faster than organizations can react. AI can help summarize large volumes of information from complicated or lengthy documents to help case managers quickly develop a working understanding of program policies, requirements, and performance standards.

*Example: Paste the OMB's Uniform Guidance for federal awards into Copilot and ask for a plain language summary of any provisions that relate to the daily work of case managers.*¹⁷

Dos:

- Ask the AI tool to limit its analysis to specific sources that you paste or upload directly into the prompt
- Check to ensure that all facts are accurately represented
- Experiment with summarizing a document you've already read or written yourself to see if you agree with the result
- Consult with your supervisor on all legal issues or anything else that remains unclear
- Consider how bias might affect the content or usefulness of a summary

Don'ts:

- Do not paste confidential or sensitive information into your prompts
- Do not rely on AI summaries to make significant decisions about your work
- Do not use AI as a replacement for researching an important issue from the source materials

Not Recommended Use Cases

Despite AI's potential benefits, it can also pose significant risks to equity, privacy, and transparency—especially in use cases that involve interacting directly with people or processing data about people. OLHSA case managers are inherently more effective in these areas because AI lacks their nuanced understanding, specific skills, and ethical compass.

Client Screening and Intake

OLHSA should not use AI chatbots to screen or communicate with clients during the intake process. AI products developed by corporations lack the training to provide high-quality support and understanding in critical moments such as the intake process. In addition, these products are built to maximize engagement and attention, which may not align with a client's best interests. To build trust and demonstrate care, it is important that clients can reach a live human in their first moments of contact with OLHSA, even if contact is initiated online or by phone.



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Case Notes and Meeting Notes/Transcription

OLHSA should not use AI transcription, summary, or note-taking tools to record information from meetings, unless sensitive information will not be discussed at all. Privacy protections cannot be guaranteed when personal information is fed into an AI system, and it is very difficult to maintain a strict boundary between sensitive and non-sensitive topics in conversations with clients.

In addition, AI summary features may miss important context or nuance that a human notetaker would capture. OLHSA's paid AI tools, such as Microsoft 365 Copilot, may provide more data security and confidentiality than free commercial tools. However, there are still inherent privacy risks associated with increasing the scope of personal information that is recorded verbatim, even when that information is stored locally on OLHSA's servers.¹⁸

Case Management Supervision

OLHSA should not use AI to evaluate case managers' performance; predict behavior; or make decisions about discipline, pay, or promotion. AI tools have demonstrated biases that can undermine the accuracy and fairness of their assessments in this area. Unlike a human supervisor, an AI system cannot be held accountable for discrimination or unfairness in the decisions that it makes. Therefore, relying on AI for supervision work can also harm trust between case managers and their supervisors.

AI Procurement Recommendations

The excitement surrounding AI tools can trigger an overvaluation of technologies that incorporate machine learning. OLHSA should carefully consider risks and benefits before investing vital resources and energy into a specific AI tool or application. The following questions can help systematically evaluate the true value and capabilities of a potential AI tool before making a procurement decision:

Truth in Advertising

- What does the company promoting this product claim that it can achieve? Does the company back up those claims, and if so, how convincing is the evidence provided?
- Are there any reviews or reports from similar client organizations that have used this product? How satisfied were they with the outcome?

Performance Evaluation

- What concrete metrics can be used to evaluate the AI tool's effectiveness? Are independent performance evaluations available?
- What internal tests can OLHSA employ to collect performance data? Can these tests be conducted before committing to implementation?

Data Quality

- What data source was used to train this algorithm, and what source(s) is it currently drawing on? Are there any issues with the quality of that data, including completeness, accuracy, or bias?
- If the AI tool uses human data, to what extent do these underlying datasets represent the population that OLHSA serves?

Cost Analysis

- How much labor, time, and money will be required to acquire and integrate this technology into OLHSA's operations? How else could those resources be spent?
- What additional labor will be required to maintain rigorous human oversight?
- What specific benefits will be necessary to offset the costs of implementation?

Alternative Pathways

- Can OLHSA achieve its goals with simpler process improvements or automation that does not use AI?
- Is AI adoption the simplest path forward?

Consequences of Failure

- How could OLHSA be harmed if the AI tool does not work as expected?
- What level of financial risk, uncertainty, and disruption is OLHSA willing to take on in order to incorporate AI?

Talking to Clients About AI

Most people have heard the "hype" about AI's capacity to solve complicated problems and even surpass human abilities.¹⁹ These stories, combined with the constant availability of AI tools, often convince vulnerable people to turn to chatbots for emotional support, concrete advice, or other needs. Without directly discouraging all AI use, case managers can talk to clients about some of the risks and limitations of these tools. A good place to start would be asking some general questions:

1. When do you use AI, and what topics do you ask it about?
2. What kind of answers are you looking for?
3. How often do you feel satisfied with what you receive?
4. Is there anything that you get out of talking to an AI chatbot that you feel like you don't get out of talking to a person?
5. How do you feel after a conversation with AI vs. a conversation with a case manager?²⁰

Regardless of a client's answers to these questions, it's important to communicate the following points to convey a baseline level of understanding and safety:

- AI chatbots are not therapists and do not have any specialized training in mental health.
- AI is designed to validate the user. It may support harmful ideas or make crises worse instead of looking out for your best interests.²¹
- AI sometimes gets facts wrong.
- Assume that none of the information you share with an AI chatbot is private. There is no confidentiality agreement in place to protect sensitive information.²²

Endnotes

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