



Is Your Clinic Ready for the IPC's AI Scribe Requirements?

The IPC released new AI scribe guidance in January 2026. If your clinic uses or is considering an AI scribe, every item below is now expected. Non-compliance can result in fines up to \$500,000 for organizations.

GOVERNANCE & ACCOUNTABILITY

- Designated person overseeing AI decisions
- AI risk management process in place
- Privacy Impact Assessment (PIA) completed for AI scribe
- Written policies on authorized AI use and conditions
- AI-specific incident response procedures
- Staff trained on AI tools before getting access
- Confidentiality agreements updated to cover AI (signed annually)

BUYING YOUR AI SCRIBE

- Vendor assessed for safe design and independent testing
- Training data verified as lawful, accurate, and diverse
- Bias prevention safeguards evaluated
- Vendor contract prohibits unauthorized use of PHI
- Contract requires performance updates and breach cooperation
- Contract includes termination and data destruction terms
- Subcontractor provisions included
- Patient consent obtained before sharing data with vendor

DAILY USE & PATIENT CARE

- Clinician reviews every AI-generated note before it enters the record
- Express patient consent obtained before each use
- Patients told about AI risks, limitations, and bias potential
- Patients can refuse AI scribe and still receive equal care
- Alternative documentation method available for opt-outs
- AI-generated content clearly labeled in patient records
- Transcripts/recordings retained only as long as necessary

MONITORING & TRANSPARENCY

- Public privacy statement updated to disclose AI use
- Patients informed if data is stored outside Canada
- Ongoing scheduled monitoring of AI performance
- Clear threshold for shutting down AI if outputs are harmful
- Monitoring results documented and used to improve policies
- Logging and auditing active on the AI system
- Staff can report AI errors/bias without fear of reprisal
- Annual breach statistics reported to the IPC

How did you score?

25+ checked: You're ahead of most clinics. Keep going.

15–24: Significant gaps. Address consent and human oversight first.

Under 15: You have material compliance risk. Get help now.

Need help closing the gaps?

Ciniji Group specializes in AI governance for Ontario healthcare clinics.

claire@cinijigroup.ca