

Nabla Copilot Guidance for ProCare Members



Nabla

 ProCare

Executive summary

- Nabla Copilot is an ambient AI assistant that takes a speech-to-text transcription of a clinical consultation, and feeds it into an AI processor, which generates clinical notes based on the transcription. These notes must be reviewed by the doctor for correctness before they can be copied into the patient's medical record
- Provides improved speed and efficiency documenting each consultation
- Clinicians should ensure explicit patient consent is granted prior to utilising Nabla Copilot. Clinicians must document consent from the patient to use this tool, including their understanding of where data is stored, used, and how it is anonymised
- The clinician can focus on the patient, rather than trying to also type and capture key notes
- Nabla Copilot does not store any patient data, and personal and private data is removed from the transcription
- Clinicians/practices should discuss Nabla Copilot with their IT Support Partners. Ultimately, the decision of whether a practice implements any IT software sits with the practice, and it is recommended you work with your IT provider for input during the process of implementation.

Introduction

Artificial intelligence can help reduce clinician burnout and improve patient care, but only if it is thoughtfully implemented and rigorously tested. The paper [Ambient Artificial Intelligence Scribes to Alleviate the Burden of Clinical Documentation | NEJM Catalyst](#) highlights how [The Permanente Medical Group, Inc.](#) (TPMG) the largest medical group in the United States is using and evaluating innovative AI technology to help reduce the workload surrounding clinical documentation. The AI technology being used by TPMG is [Nabla Copilot](#).

Background

- The emergence of new and exciting technologies, such as AI, have the potential to revolutionise the healthcare sector. It is important to review new technologies to understand benefits to patients, our network and identify possible risks or constraints that may exist. Key questions around privacy, and data security are critical in this regard
- There are multiple clinical scribe tools available, with new ones appearing each week in New Zealand Nabla Copilot is the one we've had the most questions and requests for more information about, hence the development of this guidance document.

What is Nabla Copilot?

- Nabla Copilot is an ambient AI assistant or a generative AI web application which takes a speech-to-text transcription of a clinical consultation, for example, a GP consultation with a patient. This conversation is then fed into an AI processor that generates clinical notes based on the transcription. These notes must be reviewed by the doctor for correctness before they can be copied into the patient's medical record
- The goal of this paper is to provide ProCare members who are using Nabla Copilot guidance for use, from a data privacy and security viewpoint.

How does it work and what data is collected?

- Nabla Copilot captures the audio conversation between the patient and the health practitioner and converts the audio into a structured medical note that can be reviewed and then exported to the patient's PMS
- Nabla Copilot supports consultations in the following languages:
 - English (UK, US)
 - French
 - Spanish (but the note generated is generated in English)
- Importantly, personal and private data is removed from the transcription.



How does Nabla Copilot deal with data?

- Nabla Copilot does not store any patient data – everything remains in the web browser, where a maximum of 40 consultations are held, then automatically deleted
- Nabla Copilot does not store any data (audio, transcript, or note) but it does process the raw data to produce the medical note
- Whilst data is not stored, the data is processed on Public Cloud Servers in the US (Microsoft Azure & Google Cloud) which are HIPAA and GDPR compliant
- Nabla Copilot may store some unidentifiable data as metadata, this will be data about the usage of the system and any configurations used in the software and processing of the transcript. This metadata would likely be used to help refine/improve the software and underlying algorithms used in the AI models. It is not clear what this data is, although it is unlikely to be identifiable data.



Data Security

- Nabla Copilot uses Single Sign On (SSO) and Multi-factor Authentication (MFA) to tightly control access to the platform.

What Data is Shared?

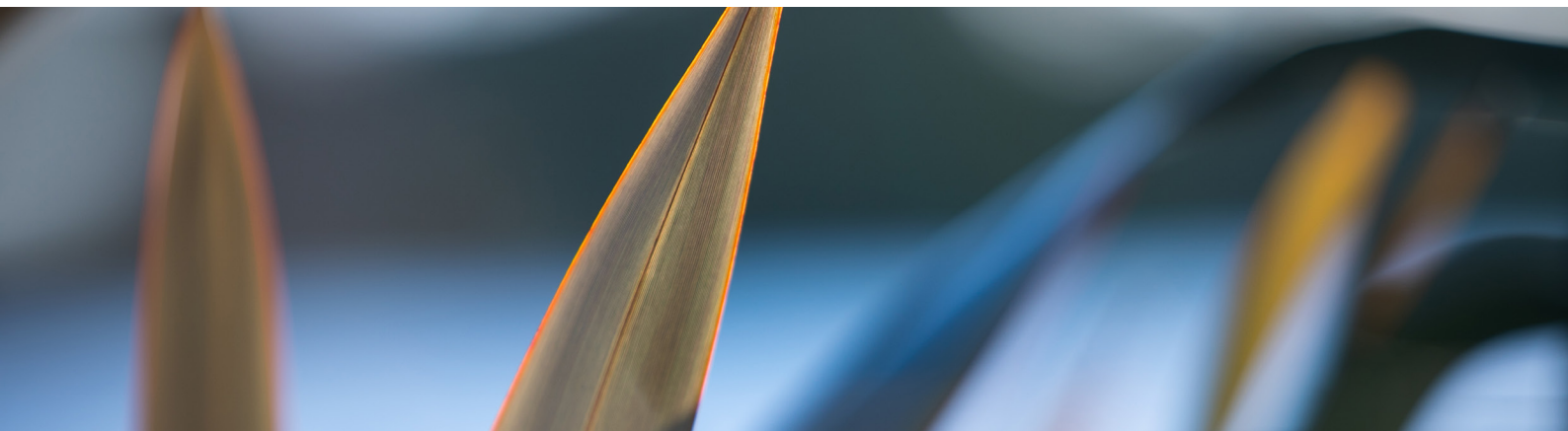
- Data is not shared to any third party.

Data Privacy

- Nabla Copilot does not store any patient data: everything remains within the web browser. To enable the generation of the medical note, all protected health information (PHI) is de-identified.
- Nabla Copilot is also SOC2-certified and HIPAA compliant
- Data is anonymised and encrypted in transit to and from Nabla's servers to the clinician's browser
- No personally identifiable information data is used to train the AI models.

Key Takeaways and Recommendations

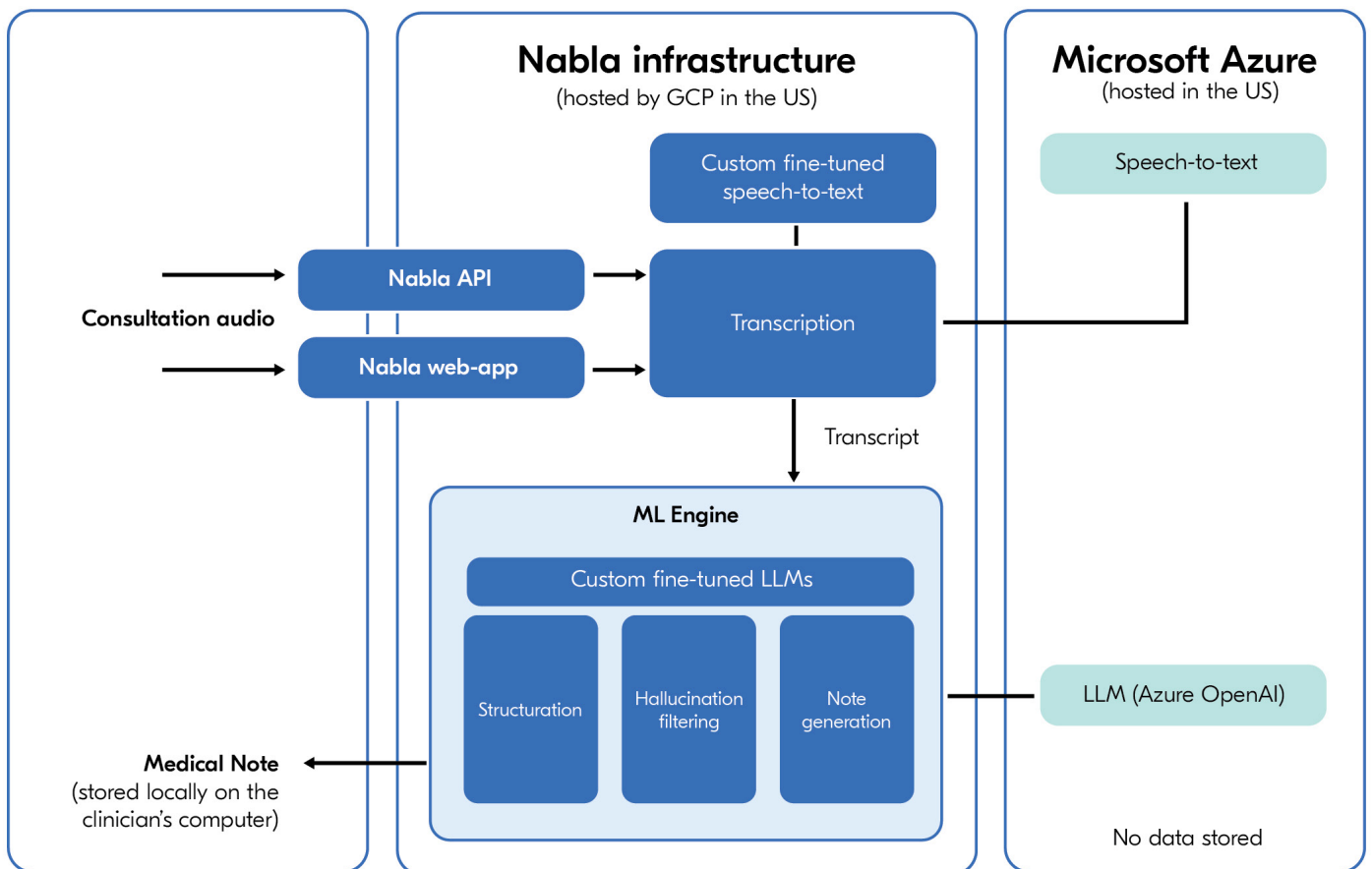
- Clinicians should ensure explicit patient consent is granted prior to utilising Nabla Copilot, in a consultation with that patient. Clinicians must document consent from the patient to use this tool, including their understanding of where data is stored, used and how it is anonymised
- There is the option to show the patient:
 - how it is transcribing in real time
 - the synthesised notes and obtain their understanding and sign off
 - the patient information leaflet function, this can help patients better understand their plan
- Nabla Copilot supports the generation of clinical documentation, but the clinician needs to review this documentation before it is published into a patient's medical notes
 - Clinicians should carefully review Nabla Copilot outputs to ensure that the notes are representative of the discussion before copying text into the PMS. The notes may have small mistakes, it is the clinician's role to ensure the medical note has been carefully read, redacted, and corrected before finalising them in the PMS notes
 - This includes ensuring they have spelt Māori or Pacific words correctly, correcting any colloquialisms like New Zealand drug names
 - Some GPs have found it doesn't understand safety netting well, so make sure you document these if they're missed out
 - Unless you have spoken your examination findings aloud, e.g. 'lung bases clear', you will have to add these manually
 - General practices should also audit the use of Nabla Copilot to ensure the quality of notes is appropriate, not missing anything, and not making obvious mistakes. Audits should also include written documentation of the above consent processes
 - It is not a clinical decision-making tool
- Due to the way Nabla processes data and supporting security certifications, it is considered low risk of a data breach
- Although Nabla systems are hosted on well-known computing platforms that have strong cybersecurity certifications, data is temporarily processed offshore albeit it is immediately pseudonymised. This guidance will be reviewed regularly to ensure that any updates to the software or risk assessments are captured
- Nabla Copilot has been reviewed and is supported by the ProCare Clinical Quality Committee as a member service
- Clinicians/Practices should discuss Nabla Copilot with their IT Support Partners. Ultimately the decision whether a practice implements any IT software sits with the practice, and we recommend you work with your IT provider for input during the process of implementation.



Further Information:

- [NABLA - Terms of service](#)
- [NABLA - Data protection agreement](#)
- [NABLA - Privacy Policy \(Customer data not health data\)](#)
- Podcast, p 42: GPs and GenAI Podcast [episodes - Health Informatics New Zealand \(hinz.org.nz\)](#) You can hear how [Dr Karl Cole](#) and [Dr Richard Medicott](#) speak about their use of Nabla Copilot
- [Reducing Risk - Episode 22 - AI in healthcare: what's so risky about that? - Part one](#), Medical Protection Society NZ
- [Reducing Risk - Episode 23 - AI in healthcare: what's so risky about that? - Part two](#), Medical Protection Society NZ
- [Te Whatu Ora urges a cautious approach to AI in healthcare - Pulse+IT 11 April 2024](#)

Appendix 1: How the data flows through the Nabla platform:



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www.nabla.com

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www.procare.co.nz