

# Artificial Intelligence Policy

Version 1.10 – December 15, 2025

Al Center of Excellence

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## Related Standards and Policies

- Administrative Policies
  - o <u>Disposal of Personal Identifying Information Policy</u>
  - o Open Records Request Procedure and Fees
  - o Purchasing of Goods and Services
  - o Internet Use
  - o Use of Electronic Mail
- Employee Handbook
  - o Section VII: Confidential Information page 36
  - o Section VIII: Electronic Communications Systems pages 37-42
- Records Retention Schedules
- Colorado Al Act SB24-205 updated Aug 28, 2025.pdf





# Scope

All County commissioners, departments, employees, contractors, agents, volunteers, and vendors acting or operating on behalf of the County (Staff) are subject to this Douglas County Artificial Intelligence Policy (Policy). This Policy applies to Staff use of and access to Al systems and software on County issued/owned devices and/or personal devices when used for work purposes.

## **Definitions**

Staff are encouraged to refer to the Al Glossary, an alphabetized list of Al terms and definitions to help with understanding and clarifying complex, unfamiliar, or technical vocabulary related to Al technology. The Al glossary can be accessed from the <u>Douglas County Al Resource Hub</u>.

# **Purpose**

The purpose of this Policy is to set forth requirements that Staff must observe when acquiring and using systems and/or software that meets the definition of "Artificial Intelligence (AI)." The purpose of the AI Center of Excellence (AI CoE) is to establish the County's AI technology and use. Outlined below are acceptable use practices. If you have questions about what constitutes AI, please contact the County's Information Technology department (DCIT).

## Governance

All County AI related technology and use will be overseen by the County's Chief Information Officer (CIO) or designee. The CIO has established an Artificial Intelligence Center of Excellence (AI CoE). The purpose of the AI CoE is to build the County's governance framework for AI adopted and used by all Staff. The governance framework includes but is not limited to enterprise strategy, policy, legal compliance, cybersecurity, data surety, risk management, ethical use, a mechanism for intake of AI requests, funding, and Staff skills and training. The County's AI CoE is available via email at AICoE@douglas.co.us

# **Alignment**

The County's adoption of AI will align with the County's established priorities of enhancing County services, protecting historic and natural resources, supporting economic growth, strengthening public safety, improving health and human services, and optimizing transportation systems. Each AI use case will be designed to address a specific business need while directly supporting the County's strategic priorities.

# **Guiding Principles**

As AI is becoming an increasingly integral part of government operations, it is essential for the County to establish clear guiding principles to ensure its use is secure, ethical, effective, and aligned with County values. By defining our guiding AI principles early, we create a structured framework for responsible AI adoption – one that is driven by business needs, organizational capabilities, and public trust. These guiding principles will support Staff AI related decision-making, development, and deployment, and ensure that Staff use of AI initiatives align with the County's mission and priorities, and the expectations of our community.

Staff shall comply with the principles outlined in this Policy.



## **Data Privacy & Security**

A commitment to data privacy, security, and compliance with applicable laws.

The County values public service innovation to meet residents' needs. The County is committed to responsibly exploring and evaluating AI technologies that enhance services and advance beneficial outcomes for both people and the environment.

The County upholds data privacy as a fundamental principle and recognizes the importance of protecting personal information. The County shall establish policies and standard operating procedures designed to reduce privacy risk and these policies shall be applied to all AI systems throughout development, testing, deployment, and use.

The County affirms that securing its data, systems, and infrastructure is essential to maintaining public trust. The County shall maintain the confidentiality, integrity, and availability of data and critical County systems. The County will use protection mechanisms that minimize security risks, in alignment with governing policy and recognized best practices.

#### Accountability & Ethical Use

A commitment to responsible use and accountability for outcomes.

The County recognizes that AI systems have the potential to perpetuate inequity and bias that could negatively impact Douglas County residents. To address this, the County shall evaluate AI systems through an equity lens for potential impacts such as discrimination, bias, or unintended consequences arising from data, algorithmic design, or human decisions informed by AI.

The County will ensure that the development, deployment, and use of AI systems are conducted in compliance with all laws and regulations applicable to the County.

## Transparency & Public Trust

A commitment to openness, clarity, and public trust.

To promote transparency and maintain public trust, the County shall document work related to the use of AI systems available to the public to the extent permissible under applicable laws and regulations.

## Innovation & Sustainability

A commitment to innovative solutions that provide measurable value and long-term service improvements.

The County shall ensure that AI systems perform reliably and consistently under the conditions of expected use, and that ongoing evaluation of system accuracy throughout the development and/or deployment lifecycle is managed, governed, and auditable.

## People Centered Al

A commitment to enhance human connections where they provide the most value.

The County shall ensure human oversight over AI systems by integrating human judgment, review and correction into AI-driven processes. Human oversight mitigates bias and errors, ensures transparency and accountability, and provides essential empathy and context that AI lacks.

The County will prioritize use of AI systems that generate outputs and enable human intervention with continuous feedback, a key component of the County's human-in-the-loop (HITL) approach.





# **Policy**

#### Acquisition of AI Technology

- a. Consistent with the County's standards for Procurement of Technology Items, Staff may be authorized to use pre-approved AI software or Staff may request a non-standard acquisition of AI software through IT current request process for AI. Refer to <a href="Douglas County Administrative Policies and Procedures page 5">Douglas County Administrative Policies and Procedures page 5</a>.
- b. DCIT shall review non-standard acquisition requests according to established risk and impact methodology, which should include specific review criteria for AI technology. DCIT shall either approve or deny a request according to this criteria.
- c. The County's standard for technology acquisition applies to all technology, including free-to-use software or software-as-a-service tools.
- d. If a technology that has already been approved for use in the County adds or incorporates Al capabilities, then additional technical, risk, and data review approval is required prior to contracting, procuring, implementing, and using those capabilities.
- e. DCIT may revoke authorization or restrict use of any technology that adds AI capabilities presenting any risk that cannot effectively be mitigated to comply with this or another County policy.

#### Data Governance & Privacy

- a. Staff are required to seek guidance on how to manage and use data with AI to ensure that data used in AI systems meets quality, classification, retention, and data management standards. The prevailing authority is the <u>AI Data Governance Guide</u>.
- b. Staff should consider developing appropriate processes for data tagging and labeling to support their specific data classification and handling practices. For instance, Public, Internal Use Only, Sensitive Confidential, Regulated Confidential.
- c. Staff shall not submit data that is classified by the County as Sensitive Confidential, Regulated Confidential, or any data otherwise not considered to be acceptable for public disclosure to Al systems. Refer to the County's <u>Al Common Sense Guide</u>.
- d. No County data or records, including inputs or prompts, are to be used for training or fine-tuning of Al models that have not been approved by DCIT and/or are outside the County's control. Staff may not use Al technologies that cannot prevent County data or records from contributing to the Al's language models.

## Acceptable Use

- a. To maintain the security of County data and IT systems, employees may only use <a href="maintainto:approved Al tools">approved Al tools</a> listed on the <a href="maintainto:Douglas County Al Resource Hub">Douglas County Al Resource Hub</a>.
- b. Unauthorized use or installation of non-approved AI technology is prohibited.





#### Responsible Use & Oversight of Al System

- a. Al systems may inadvertently incorporate or reinforce bias, and stereotypes present in their training data. Staff shall assess Al tools and outputs prior to use to ensure they are accurate, fair, and free from discriminatory or biased outcomes.
- b. Staff must always review output, particularly from generative AI systems, before information is shared, published, or used in any official County capacity HITL. Staff using AI tools retain full responsibility for ensuring that the AI-generated content is factually accurate, fair, unbiased, appropriate, and compliant with County policies, standards, and laws. Staff must correct or discard any output that does not meet these standards.
- c. A formal risk management program must be in place prior to deployment and use for systems that use Al algorithms to make or support decisions affecting individuals or County operations, as well as systems that autonomously interact with people without immediate human oversight. The risk management program shall assess and mitigate risks related to accuracy, fairness, transparency, accountability, data integrity, and potential impact on individuals or County operations.
- d. The County's use of AI technology shall comply with the Colorado Artificial Intelligence Act (SB24-205, C.R.S. § 6-1-1701 et seq.) and all other applicable laws and regulations governing the use of AI technology.

#### Al Attribution & Disclosure Requirements

- a. Staff must acknowledge the respective AI system that Staff use to create any image or video. For example, "This material includes content developed with assistance of ChatGPT 4.0 and reviewed for accuracy by the Department of Human Resources."
- b. Staff should fix or embed a digital watermark "Douglas County" into all AI produced images and videos.
- c. If Staff use a significant amount of source code generated by an AI system in a final software product, or use any amount for an important or critical function, then Staff must attribute to the respective AI system via comments in the source code and in product documentation.
- d. When a department elects to attribute or disclose the AI used, Staff should include the name of the AI system used and, where applicable, a HITL statement identifying the department or group that reviewed or edited the content.
- e. Systems that use AI algorithms to make or support decisions affecting individuals or County operations, as well as systems that autonomously interact with people without immediate human oversight, must clearly disclose that the user is interacting with an AI system. The disclosure shall be provided in understandable plain language at the beginning of the interaction.
- f. Staff are not required to reference an Al system if they review and edit Al produced text to a final product following the County's HITL requirement. Staff assume full responsibility for final content.
- g. All disclosures and attributions shall be made in accordance with applicable intellectual property, copyright and privacy laws.





## Public Records & County Records Management

a. The County and its use of AI technology are subject to the Colorado Open Records Act (CORA) and other applicable public records laws. Records generated, used, or maintained through AI systems or by AI vendors on behalf of the County may be considered public records and are subject to disclosure in accordance with those laws.

# Non-Compliance

It is the responsibility of each Douglas County employee and contractor to comply with this policy. Non-compliance may result in department leaders imposing disciplinary action, restriction of access, or more severe penalties up to and including termination of employment or vendor contract.

# Reporting Violations

All suspected violations of this Policy must be reported immediately to the CIO, the Al CoE, ethics hotline and/or the appropriate supervisory personnel. The County will promptly investigate all reports and take necessary corrective actions.

# **Version History**

Name	Role	Description	Version	Date
Thom Curtis	Al CoE Program Manager	Initial Draft	1.0	5/28/25
_	Al CoE Program Manager	Policy Revisions / Content Updates	1.1 - 1.2	7/30/25
Al CoE Members	Al CoE Review	Policy Review Input Consolidation / Content Updates	1.3 - 1.6	10/15/25
IT Leadership	IT Review	Policy Review Input Consolidation / Content Updates	1.7	10/21/25
County Attorney Office	CAO Review	Policy Review Input Consolidation / Content Updates	1.8	11/13/25
Human Resources Review	HR Review	Policy Review Input Consolidation / Content Updates	1.9	12/12/25
_	Al CoE Program Manager	Final	1.10	12/15/25

This Policy shall be effective on 12/15/2025 and shall be reviewed annually at a minimum.

