



*City of Milwaukee*

## **Generative AI Policy**

NIST Reference: AC – Access Control AT – Awareness and Training	Implementation Date: September 2024	Revision Number: 1.0
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## Generative AI Policy

### Purpose

This Generative AI Policy is intended to promote responsible and ethical usage of AI technologies within the City of Milwaukee. It aims to provide guidelines and principles for the proper and secure application of Generative AI to enhance work efficiency while mitigating risks and ensuring accountability.

### Scope

This policy applies to all employees, contractors, and authorized personnel who may use Generative AI for work purposes within the City of Milwaukee.

## Principles for Using Generative AI

### Privacy

Users are required to provide information to Generative AI systems that is suitable for public disclosure, safeguarding private or sensitive data in accordance with the City's [Privacy Policy](#) to ensure responsible use within the City. Users should opt-out of data collection when possible and be aware of the AI service's data collection settings.

### Accuracy

Building and preserving trust with stakeholders requires the thorough review and fact-checking of AI-generated content. Users should cross-reference AI-generated information with reliable sources to ensure the accuracy of facts and details.

### Transparency

A clear understanding regarding the use of Generative AI in content creation is essential. Users must include proper citations in documents and content to transparently disclose the involvement of Generative AI in their creation.

### Equity

It's important to recognize that Generative AI might inherit biases from historical data. Users should actively address and rectify any underlying assumptions that could perpetuate stereotypes and ensure that AI outputs do not reinforce existing biases.

### Accountability

Users are accountable for the content produced by Generative AI within the city. This responsibility involves ensuring that the generated content adheres to established standards, ethical guidelines, and

the City's values. Users must thoroughly review AI-generated output, validate information, and uphold transparency and accountability in all AI-driven processes and outputs.

## Introducing Generative AI to Your Work Environment

### Generative AI Software Acquisition, Implementation, and Management

Employees are permitted to use generative AI tools that meet pre-approved standards. Employees must submit a request through the current technology request process for non-standard tools. Use must follow the City of Milwaukee's Generative AI Guidelines. Exception requests will be evaluated using the current risk and impact methodology, which includes criteria specific to generative AI technology. No additional approval is needed if an approved technology introduces generative AI capabilities; however, all other aspects of this policy still apply. Authorization may be revoked if any unmitigated risks are identified

### Account Creation

Users should create dedicated accounts for work-related Generative AI use to ensure proper record-keeping and avoid mixing personal and work records.

### Terms and Conditions

Users must understand and comply with the terms and conditions of the Generative AI service, ensuring alignment with City standards and responsible use of AI.

### Data Collection

Users should opt out of data collection when possible to protect privacy. City staff and other authorized users should be aware of the data collection settings provided by the AI service and make informed choices to protect privacy while benefiting from Generative AI technology.

### Copyright Verification

Users should verify that content generated by Generative AI does not infringe copyright laws.

### Ownership of Generated Content

In most cases, users own the content they input, but they should be cautious as Generative AI companies may retain the right to use the content.

### Citing Generative AI

When a substantial portion of content is derived from generative AI, users should cite the specific AI system in accordance with the Generative AI Guidelines. Citations must include the AI system's name and confirmation that the content has been fact-checked for accuracy.

### Recording Usage

Users must report any use of Generative AI that involves City information as input or creates a public record subject to disclosure and retention requirements. This reporting is necessary to track AI usage collectively. Reports should be submitted through established channels and must include key details about the purpose, nature of the AI usage, and any significant outcomes or insights. This aggregated data helps assess the broader impact and benefits of Generative AI across different city departments and use cases.

## Assessing the Risk

Users are responsible for assessing the risk associated with different Generative AI use cases within the City. This assessment should consider the potential harm that may arise from information breaches and adverse impacts resulting from AI-generated content.

## Definitions

**Generative AI:** Generative AI refers to machine learning systems capable of automatically creating content such as text, audio, or images.

**Artificial Intelligence (AI):** AI encompasses machines performing tasks that typically require human intelligence. This is the overarching field of technology that includes Generative AI.

**Machine Learning:** A subset of AI in which computers learn tasks through algorithms by analyzing data and patterns.

**Algorithm:** Algorithms are sets of instructions, such as mathematical operations or logical rules, that dictate how a machine processes data.

## Resources

AI Principles from Microsoft:

<https://www.microsoft.com/en-us/ai/responsible-ai?activetab=pivot1%3aprimar6>

NIST AI Risk Framework:

<https://nvlpubs.nist.gov/nistpubs/ai/NIST.AI.100-1.pdf>

## Review and Updates

This policy underscores our commitment to proactively assess and integrate emerging AI technologies into our operations.

This policy shall be reviewed at least annually by the Information Security team and Management to assess its effectiveness, identify areas for improvement, and ensure alignment with changing security needs and regulatory requirements. Updates shall be made as necessary to maintain a robust and secure environment for the organization's information systems and assets.

## Compliance

All use of Generative AI services must adhere to the City's Acceptable Use , Data Governance, and Records and Information Management Policies, and other officially adopted policies. Any employee who is found to have violated this policy may be subject to disciplinary action, up to and including discharge of employment.

In cases where there are questions or disputes regarding compliance with policies or regulations related to Generative AI usage, the Chief Information Officer (CIO) shall have the final authority to make determinations and decisions.

## Revision

Date of Change	Responsible	Summary of Change
November 2023	DOA/ITMD	Draft Created.
August 2024	DOA/ITMD	Final Revision
September 2024	CIMC	Approval of Policy