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|  Lake County Policy | Lake County Artificial Intelligence (AI) End User Usage Policy – <i>Draft</i> |
| | Approved by the County Board on: Month DD, YYYY |

1. Purpose and Intent

- 1.1 The purpose of the Artificial Intelligence (AI) Usage Policy is to provide guidance on the responsible and ethical use of AI technologies in Lake County Systems to safeguard the county's assets, workforce, residents, and reputation from risks associated with inappropriate use or bias.

2. Background

- 2.1 Lake County recognizes that the use of AI poses unique challenges and risks. Lake County's AI-related policies are designed to guide our actions and decisions in a manner that maximizes the benefits of AI, while minimizing its potential risks. Enterprise Information Technology (EIT) believes that everyone in the County has a role to play in establishing the ethical and responsible use of AI, and EIT is committed to providing training and resources to support this.

3. Scope

- 3.1 This policy applies to all County employees in departments supervised by the County Administrator, employees that fall under the authority of the Lake County Board's Employee Policies and Procedures Manual, and all individuals who have access to the county network or information technology (IT) systems (e.g., employees of elected offices, contractors, consultants, vendors, interns, student workers, and temporary employees).
- 3.2 This policy shall be interpreted consistent with and subject to applicable law. It supersedes all previous policies and/or memoranda that may have been issued on subjects covered in this policy. Should any provision in this policy conflict with a specific provision in any other County Board approved policy, the provisions in this policy shall take precedence.
- 3.3 This policy is not intended to supersede or limit the County from enforcing programs or provisions in any applicable collective bargaining agreement.

4. Authority

- 4.1 The County Administrator, through the Chief Information Officer (CIO) has the authority to establish, maintain, and enforce a County-wide AI Usage Policy.
- 4.2 The County Administrator is authorized to develop and issue directives and procedures for the effective implementation and enforcement of this policy and to adapt to changing circumstances and business needs.
- 4.3 Department, office, and commission leadership must establish compliance with this policy, but have the authority to enforce additional AI Policies, not to conflict or replace the Policy provided by the County Administrator through the CIO.

5. Roles and Responsibilities

- 5.1 **County Employees:** Must use AI systems responsibly, adhering to all aspects of this policy and reporting any potential issues or concerns to their supervisors. When a county employee identifies a risk (e.g., an error in an AI output, harmful or offensive content, or data privacy concerns, etc.), they should submit a ticket through the IT ticketing system to report this risk. The employee should include the following information: Date of event, Software used, description of the issue, and if possible, screenshots of the error or risk. In the case of a security or data breach, Lake County staff should follow the existing incident response plan, Incident Response One-Pager Draft v3.

For the complete list of roles and responsibilities pertaining to AI Governance at Lake County, refer to Section 5 of the AI Governance Policy.

6. Definitions

- **Artificial Intelligence (AI):** Tools or technologies that can make independent decisions based on training data inputs. AI allows computers and machines to simulate human learning, comprehension, problem-solving, decision-making, creativity, and autonomy.
- **Machine Learning (ML):** A subfield of AI that focuses on the development of algorithms and statistical models to make independent decisions but still needs humans to guide and correct inaccurate information. Machine learning is the most common type of AI.
- **Large Language Models (LLMs):** A type of AI that has been trained on large amounts of text and datasets to understand patterns in existing content and generate original content.
- **Generative AI (GenAI):** A type of AI that creates original content in the form of images, text, audio, video, or code in response to prompts. It works by using deep

learning models trained on vast amounts of data to identify patterns and relationships, which it then uses to generate new, similar content.

- **Data Subjects:** People whose personal, health, financial, or other sensitive data is used by the system (e.g., a citizen applying for government benefits).
- **Users Impacted by AI Decisions:** Those directly or indirectly affected by AI decisions (e.g., someone denied a service or flagged for fraud based on an AI-enabled decision).
- **Incident:** Any event where an AI system causes unexpected or undesired outcomes that impact operations, data, or stakeholders. This can include issues such as data breaches, system failures, biased decision-making, or any other event that compromises the integrity, security, or effectiveness of the AI system.
- **Data Sensitivity Scales:**
 - **Sensitive Personal Data:** Data that falls under sensitive categories, such as personally identifiable information (PII), personal health information (PHI), and payment card industry (PCI) data.
 - **High-Privacy Data:** Data with high security or privacy risks, such as intellectual property, financial records, legal records, cybersecurity, critical infrastructure, or defense data.
 - **Protected Characteristics:** Data related to race, ethnicity, gender, religion, sexual orientation, and other protected characteristics that have the potential for unfair bias and discrimination.

7. Policies

- 7.1. **Approved Tools:** County employees are only permitted to use AI tools that have been approved according to the AI Governance Policy. This includes commercial software, developed software, and open-source tools. If a department wishes to use an AI system or tool, it must go through the County's standard AI evaluation process.
- 7.2. **Approved Users:** To begin using approved AI-enabled technology, Lake County employees must first complete fundamental AI trainings, and review and sign the AI Usage Policy and Lake County AI Ethical Charter.
- 7.3. **Validation:** County employees must validate AI content prior to use as AI tools may provide information that is biased and not based on facts. Users must be mindful of this possibility and cross-check critical information to verify system responses. To validate the accuracy and reliability of AI-generated content, the following steps should be taken:
 - 7.3.1. **Cross-Verification:** Always cross-verify AI content with reliable sources to confirm its accuracy. This includes checking facts, figures, and any other critical information against trusted references.

7.3.2. **Human Oversight:** Implement a human-in-the-loop (HITL) process where human oversight is incorporated into AI decision-making. This involves having humans review and approve AI outputs before final decisions are made.

7.4. **Examples of Acceptable Use of AI Systems:** County employees are encouraged to use approved AI systems ethically and responsibly to enhance productivity and efficiency. Some examples of acceptable uses of AI systems include, but are not limited to:

- **Content Curation:** AI can be used for drafting, refining, editing, reviewing, and creating stylized writing. This includes emails, presentations, memos, and marketing materials.
- **Text Summarization:** AI tools can be used to summarize large volumes of text, making it easier to extract key information.
- **Preliminary Research:** AI can assist in conducting preliminary research by gathering and organizing relevant information.
- **Programming/Code Generation:** AI can help in generating code snippets, automating repetitive coding tasks, and providing programming assistance.
- **Automation:** AI can be used to automate routine tasks, improving efficiency and reducing manual effort.
- **Media Creation:** AI tools can be used to create audio, video, and images, enhancing multimedia content creation.

7.5. **Unauthorized Access:** County employees must not use AI tools to access or process data beyond their authorized access level. This includes both internal County data and data obtained from external sources. Unauthorized access can lead to data breaches, privacy violations, and other security risks.

Examples of Unauthorized Access:

- Using AI tools to analyze data from departments or systems to which the employee does not have access.
- Manipulating AI tools to bypass security measures or access restricted information.

7.6. **Unauthorized Installation:** County employees must not procure, implement, install or use AI systems or tools – this can include applications, web browser extensions, and application add-ins, among other things – without prior approval according to the AI Governance Policy to confirm that all relevant data security and privacy risks are considered prior to implementation. Some AI tools have applications, web browser extensions, and application add-ins. These tools can end up sharing more information

than intended. As a result, unauthorized procurement, installation or use of AI tools may result in unintended data breaches, privacy violations, and other security risks.

- 7.7. **Sensitive Data:** County employees shall not share any data with AI tools that could be considered sensitive. Departments may augment this policy with department-specific rules regarding data privacy, and users should consult their departmental leadership with any questions.

Sensitive data includes, but is not limited to, the following:

- Usernames and passwords.
- Personally Identifiable Information (PII), such as addresses, phone numbers, and social security numbers.
- Protected Health Information (PHI), including medical records and health insurance details.
- Payment Card Industry Data Security Standard (PCI-DSS) data, such as credit card numbers and financial account information.
- Criminal Justice Information (CJI), including criminal history reports and court records.
- Data related to network security such as network diagrams, network device configurations, security configurations, application diagrams, and data flow diagrams.
- Other. If there are any concerns about the disclosure of data, the data shall not be shared with an AI tool and the matter should be discussed with a supervisor.

- 7.8. **Illegal Activities:** County employees must not use AI tools for any unlawful activities, including but not limited to generating content that violates copyright, engages in discriminatory practices, or spreads misinformation. Additional examples of prohibited illegal activities can be found below.

Examples of Illegal Activities:

- **Fraud:** Using AI tools to commit fraud, such as generating fake documents, manipulating data, or engaging in deceptive practices such as utilizing subliminal techniques to influence behavior or manipulating content to deceive audiences.
- **Hacking:** Using AI tools to gain unauthorized access to computer systems, networks, or data.
- **Creation of Malicious Logic:** Using AI tools to create malware, computer viruses, or any other malicious logic.
- **Discrimination:** Using AI tools to discriminate against individuals or groups based on protected characteristics such as race, gender, religion, or sexual orientation.
- **Privacy Violations:** Using AI tools to invade the privacy of individuals, such as unauthorized surveillance or data collection
- **Intellectual Property Theft:** Using AI tools to steal or misuse intellectual property, such as copyrighted materials, trade secrets, or proprietary information.
- **Harassment:** Using AI tools to harass, threaten, or intimidate individuals or groups.

- 7.9. **Decision Making in Sensitive Areas:** County employees must not use AI systems to make decisions in sensitive areas without human oversight. AI systems can be used to assist in decision-making, but final decisions must be made by County employees to validate that ethical considerations, context, and individual circumstances are taken into account. Additionally, decisions made in sensitive areas with the assistance of AI systems should be documented, including the rationale for the decision and the role of the AI system in the decision-making process.

Examples of Decision-Making in Sensitive Areas:

- Employment: Hiring, firing, promotions, and other employment-related decisions.
- Healthcare: Diagnoses, treatment plans, and other healthcare-related decisions.
- Legal Matters: Sentencing, parole, and other legal decisions.
- Financial Services: Loan approvals, credit scoring, and other financial decisions.
- Education: Admissions, grading, and other education-related decisions.

- 7.10. **Requesting AI Technology:** Lake County leadership encourages the application of approved AI tools, including GenAI, to modernize operations, enhance operational efficiency, improve decision-making processes, and improve public services. To limit the potential unintended consequences associated with the implementation of AI systems, employees should follow the AI Software Request Process and request process and collaborate with designated parties to mitigate any associated risks. Any County employee who identifies a need for an AI system can initiate the request process. Requests for procurement, access to, or implementation of AI systems should be made through a formal request to the AI Governance Advisory Group, which is responsible for reviewing AI system procurement, access, and implementation requests.

- 7.11. **Training and Education:** County employees must participate in County-provided AI training sessions to enhance their understanding and proficiency in AI before using AI technologies. These training programs will cover AI awareness and data privacy considerations, the ethical and responsible use of AI, and AI risk management.

- 7.12. **Compliance Enforcement:** Any employee that has access to the Lake County network and fails to comply with the policy will be subject to discipline up to and including removal of access to the network and termination.

Exceptions

Generally, all uses of AI must be aligned with this policy. However, some users may be permitted to use AI systems for experimental, conceptual, or other applications that may not align with this policy. Exceptions to this policy must be reviewed by the AI Governance Advisory Group.

- 7.13. **Policy Updates:** The County Administrator through the CIO shall review this policy according to 1.1 Policy on Policy Making Framework. Any modifications to this policy will be provided to the Lake County Board according to 1.1 Policy on Policy Making Framework.

8. **Severability:** If any section or provision of this policy should be held invalid by operation of law, none of the remainder shall be affected.
9. **Non-Discrimination:** Lake County prohibits the discriminatory application, implementation, or enforcement of any provision of this policy on the basis of race, color, sex, age, religion, disability, national origin, ancestry, sexual orientation, marital status, parental status, military discharge status, source of income, gender identity, housing status, or any other protected category established by law, statute, or ordinance.

| Policy History | | | |
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| Original | XX, XX, 2025 | | -- |