

CITY OF RENO – Policies and Procedures

Use of Artificial Intelligence

Approved by: Jackie Bryant, Interim City Manager

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I. PURPOSE

The City of Reno is committed to leveraging technology solutions to drive innovation, improve the efficiency and effectiveness of service delivery, and improve constituent experiences and community engagement. This policy is intended to provide an initial guiding framework for the utilization of Artificial Intelligence (AI) to generate content within the City of Reno operations. As a leading technological development, AI still carries unknown and unquantified implications. Emerging trends suggest that there is a fine line between utilizing AI-generated content for added value and harming one's perceived honesty and competency by perpetuating incorrect or misleading results generated by AI. Employees must use sound judgement when deploying AI to avoid perpetuating AI hallucinations, which harm the reputations of the employee and the City.

II. REVISION HISTORY

07-19-2024 Adopted

III. REFERENCES

U.S. Equal Employment Opportunity Commission – Artificial Intelligence and Algorithmic Fairness Initiative

IV. PERSONS AFFECTED

All City of Reno elected officials, officers, employees, departments, divisions and volunteers.

V. POLICY

It is the policy of the City of Reno (City) to source, purchase, design, develop and/or deploy technologies in a responsible, ethical, transparent, secure, and compliant manner. To achieve this policy objective as it relates to Artificial Intelligence (AI), the City has adopted the following guidelines in an effort to clearly establish responsibility and accountability to limit the risk and/or liability associated with the use and integration of this evolving technology solution.

VI. DEFINITIONS

- A. Algorithm - A set of steps, such as mathematical operations or logic rules, that drives generative AI.

- B. Algorithmic Discrimination - Occurs when automated systems contribute to unjustified different treatment or impacts disfavoring people based on their race, skin color, national or ethnic origin, hairstyles or textures, cultural group, language, gender identity or expression, sexual orientation, mental or physical ability, age, religious or political opinion or activity, economic status, immigration status, or housing status.
- C. AI Hallucination – Content generated by AI that misrepresents key facts with great flourish, often time as a result of misguided prompts that cannot be filtered through an algorithm for truth or factual validity and reliability, as such algorithms do not exist.
- D. Artificial Intelligence (AI) – A type of computer science that deals with computer systems that perform tasks which usually require a human’s cognitive processing and intelligence, such as reasoning, problem solving, perception, and language. Artificial intelligence means the use of computers and related equipment to enable a machine to duplicate or mimic the behavior of human beings.
- E. Chatbot / Virtual Assistant / Speech Recognition – AI software that seeks to mimic human conversation through prompted interactions.
- F. Generative AI – Complex machine learning model that is able to produce various types of content, including text, imagery, audio, and synthetic data, with a high level of accuracy, using computer algorithms and/or large volumes of data filtration to create (i.e., generate) new content.
- G. Work Product – Tangible materials and/or products produced and/or developed by and/or arising from the work performed by an individual.
- H. Large Language Model (LLM) - A deep learning algorithm that can perform a variety of natural language processing (NLP) tasks. Large language models use transformer models and are trained using massive datasets. This enables them to recognize, translate, predict, or generate text or other content. A component of AI.
- I. Natural Language Processing (NLP) - Ability of a computer program to understand human language as it's spoken and written -- referred to as natural language. A component of AI.
- J. Personal Information (PI) - As defined by Chapter 603A – Security and Privacy of Personal Information, of the Nevada Revised Statutes.

VII. RESPONSIBILITIES

A. Employees are responsible for:

1. Understanding and complying with applicable laws, standards, and regulations.

2. Compliance with this policy.
3. The outcome of using AI-generated content. Employees using AI must be aware that AI may draw conclusions from incomplete datasets that can be based upon stereotypes. If this occurs, it is the employee's responsibility to correct faulty conclusions in work product before acting upon the information.
4. Taking reasonable steps to mitigate any potential harm and/or unintended consequences resulting from the use of AI technology.
5. Using AI technology fairly and equitably, and actively working to eliminate bias and ensure fairness in design, development, and deployment of AI technology and/or AI-generated outputs.
6. Reviewing and verifying any and all AI-generated outputs for accuracy, completeness, and compliance, before use and/or dissemination.
7. Disclosing the use of AI-generated outputs.
8. Ensuring that information inputted into AI tools can be disclosed to the public.
9. Safeguarding and securing any PI within data held by the City of Reno, including citizen and employee data. Ensuring that City of Reno data is not knowingly entered into unsecured AI.
10. Identifying and reporting AI generated outputs that are inaccurate, or demonstrative of false, misleading, and/or incomplete data analysis.

B. The Information Technology Department is responsible for:

1. Understanding and complying with applicable laws, standards, and regulations.
2. Compliance with this policy.
3. Providing computer science subject matter expertise to department heads and City leadership in the review of new and/or current technology solutions that have integrated AI capacities.
4. Supporting departments in identifying the prevalence of AI integration within its operations.
5. Supporting departments in educating employees on the risks associated with using AI integrated systems.

6. Providing computer science subject matter expertise to department heads and City leadership when evaluating and auditing AI systems to ensure their compliance with this policy.

C. Department heads are responsible for:

1. Understanding and complying with applicable laws, standards, and regulations.
2. Compliance with this policy.
3. Developing and maintaining a comprehensive departmental plan for the use of AI integrations.
4. Developing and maintaining standard operating procedures for the use of AI integrations to ensure quality, accuracy, completeness, and conformity of AI-generated outputs, where necessary.
5. Developing and maintaining standard operating procedures for the use of AI integrations to prevent data and sampling bias and/or algorithmic discrimination, where necessary.
6. Ensuring employees are trained on the areas where AI has been integrated into departmental operations and educating employees on the risk associated with using these types of systems.
7. Regularly engaging in monitoring, evaluating, and assessing AI systems and/or interfaces to ensure it is complying with this policy.
8. Monitoring the work environment for the perpetuation of AI hallucinations, and promptly addressing and remedying any such occurrences.

D. The Human Resources Department is responsible for:

1. Understanding and complying with applicable laws, standards, and regulations.
2. Compliance with this policy.
3. Supporting departments in the development of standard operating procedures to prevent data and sampling bias and/or algorithmic discrimination.

VIII. PROCEDURES

A. Departmental AI Plans

1. Each department shall develop and maintain a plan for the use of AI integrations into their operations.
 - a. Departmental plans shall be developed within six months of the adoption of this policy.
 - b. Departmental plans shall be reviewed and updated at least annually thereafter.
2. Departmental plans will include the following elements:
 - a. A clear criterion for determining when the use of AI is appropriate and beneficial for departmental operations and the approval process for authorizing use.
 - b. Identification of current technology solutions that have AI integrations and the nature of the AI integration.
 - c. Descriptions of specific tasks and/or processes for which AI integrations are to be used and how this use complements the expertise of staff, not replaces.
 - d. Framework for regular review of departmental AI integrations for policy and regulatory compliance.
 - e. Framework for an ad-hoc review of AI-generated outputs that are inaccurate or demonstrative of false, misleading, and/or incomplete data analysis, as identified by employees.
 - f. Framework for a member of the public to request a human re-review of an automated AI process when the member of the public brings forward plausible reasons to believe the AI technology has failed to deliver a fair and equitable outcome.

B. Use of AI-Generated Outputs

1. AI is not intended to, nor should it be used in ways that, replace the expertise of employees. AI-generated outputs are best utilized in circumstances where such outputs are the results of collaboration between employees and AI systems that leverage the strengths of both to enhance efficiency and effectiveness.
2. AI is a tool, the use of which does not absolve the employee of their responsibility to exercise their subject matter expertise, engage in review and verification of AI-generated content, and exercise appropriate control over any work product they are putting forward.

3. As employees have ultimate accountability for the content of their work product. Should an employee misuse an AI tool, the employee may be subject to disciplinary action, up to and including termination.

C. Transparency of AI-Generated Outputs

1. Employees utilizing AI-generated output, in any part, for the construction of a work product shall disclose the use of AI-generated outputs.
 - a. AI-generated output can range from utilizing AI generative language tools to engage in dialogue; utilizing AI for research, information gathering and/or idea generation; utilizing AI tools as integrated analytical outputs within software; or utilizing AI tools to produce imagery or audio.
 - b. This disclosure shall be a footnote within the work product that the work product contains AI-generated outputs.
 - c. Employees using AI-generated outputs when crafting staff reports shall include the disclosure that AI was used in creating this document as a footnote.
2. If AI-generated outputs are integrated into an automated process, such integration should be disclosed in the most appropriate location for the initiation of that process (e.g., the main webpage that houses the platform for the process).

D. Privacy and Security

1. AI integrations shall include data security measures and safeguards to protect personal data from unauthorized access, misuse, and/or breaches.
2. Information entered into certain generative AI systems can be viewed by others external to the City, so any information entered into these systems is considered to have been “released to the public.”
3. Employees are strongly encouraged to be cognizant of the privacy provisions of any AI tool they seek to use to ensure personal data is to be handled in accordance with applicable policies, laws, and regulations.

E. Ethics and Human Alternatives

1. The evolution of AI has ethical considerations. All departments that integrate AI into their operations have a responsibility to ensure that the use is consistent with the City's core values.

2. Human operators are to remain in control of AI technologies in order to be able to intervene in AI technology decisions and/or outputs that border on AI hallucinations.

F. Fairness, Equity, and Compliance

1. All employees using AI will comply with applicable laws, standards, and regulations related to AI and data protection.
2. AI should never be deployed in a manner that discriminates against any individual or community based upon legally protected characteristics or has a disparate impact on any individual or community based on protected characteristics.
3. All employees are responsible for using AI technology fairly and equitably. Employees shall monitor AI-generated outputs for underrepresented groups or individuals and/or disadvantaged groups or individuals within datasets.
4. All employees shall actively support and contribute to the enhanced accuracy and compliance of AI-generated outputs by monitoring, reviewing, and verifying AI-generated outputs.
5. When AI-generated outputs are inaccurate, or demonstrative of false, misleading, and/or incomplete data analysis, the employee will bring this issue forward for further review as outlined in the departmental AI plan.

G. High Risk Areas of AI Use

1. The following examples of AI uses are high-risk and are not advisable uses of such a tool at this stage in its development:
 - a. Generate programming or coding.
 - b. Screen applicants.
 - c. Replicate another person's voice or likeness.

H. Review Process

1. The pace at which AI is evolving both from a technology integration perspective, as well as a regulatory perspective, necessitates the regular review of the City's policies, procedure, process, and practices to remain intentionally focused on the responsible, ethical, transparent, secure, sustainable, and compliant integration of AI tools for the enhancement of City services.

2. This policy will be periodically reviewed, and updated as necessary, to address emerging challenges, technological advancements, and changes in AI tools.

END