THE BOARD OF SUPERVISORS OF THE COUNTY OF STANISLAUS
BOARD ACTION SUMMARY

DEPT: Chief Executive Office

BOARD AGENDA: 5.B.11
AGENDA DATE: October 13, 2026

SUBJECT:
Approval to Adopt the Stanislaus County Employee Personnel Artificial Intelligence (AI) Policy for Responsible Employee Use of AI in the Course of County Work

BOARD ACTION AS FOLLOWS: **RESOLUTION NO. 2026-0543**

On motion of Supervisor B. Condit **Seconded by Supervisor** Withrow
and approved by the following vote,
Ayes: Supervisors: B. Condit, Withrow, Grewal, C. Condit, and Chairman Chiesa
Noes: Supervisors: None
Excused or Absent: Supervisors: None
Abstaining: Supervisor: None

1) X **Approved as recommended**
2) _____ **Denied**
3) _____ **Approved as amended**
4) _____ **Other:**

MOTION:

ATTEST: **MARY E. HARTSFIELD, Clerk of the Board of Supervisors** **File No.**

THE BOARD OF SUPERVISORS OF THE COUNTY OF STANISLAUS
AGENDA ITEM

DEPT: Chief Executive Office

BOARD AGENDA:5.B.11
AGENDA DATE: October 13, 2026

CONSENT: ☑

CEO CONCURRENCE: YES

4/5 Vote Required: NO

SUBJECT:

Approval to Adopt the Stanislaus County Employee Personnel Artificial Intelligence (AI) Policy for Responsible Employee Use of AI in the Course of County Work

STAFF RECOMMENDATION:

1. Approve and Adopt the Stanislaus County Employee Personnel Policy Manual Tab 16 – Artificial Intelligence Policy.

DISCUSSION:

Stanislaus County continues to evaluate emerging technologies that may support efficient, accurate, and effective delivery of County services. One such technology is Artificial Intelligence (AI), including Generative Artificial Intelligence (GenAI). As GenAI-enabled tools become increasingly accessible and widely utilized across industries, they may present opportunities to enhance routine processes, support data analysis, and assist employees in the delivery of public services.

At the same time, the use of GenAI in the public sector requires careful consideration and appropriate safeguards. Government agencies must ensure that the use of these technologies aligns with standards related to ethics, transparency, data privacy, security, accuracy, and accountability. Establishing clear guidance for employees is critical to ensure that GenAI technologies are used responsibly and in a manner that protects the integrity of County operations and maintains public trust.

Stanislaus County convened a workgroup to evaluate the use of GenAI by County staff and develop appropriate policy guidance. The workgroup has developed and refined policy language as state and federal legislation related to GenAI has evolved. This ongoing effort has ensured that the proposed policy reflects current regulatory considerations and best practices for public agencies.

Key components of the proposed policy include:

- Defining key terms related to employee use of GenAI and its application within County operations.
- Establishing clear guidelines regarding the appropriate and inappropriate use of GenAI technologies in the performance of County duties.
- Identifying categories of confidential information that are prohibited from being entered into generative GenAI platforms by employees in the performance of County duties.

- Reinforcing County employee responsibility for verifying the accuracy of AI-generated information and ensuring responsible use of these tools.

The proposed policy provides County employees with guidance on acceptable uses of GenAI technologies, establishes clear expectations and safeguards, and helps mitigate potential risks associated with the use of GenAI in connection with the performance of County duties. Adoption of this policy will support the responsible evaluation and use of emerging technologies while reinforcing the County's commitment to transparency, legal compliance, and responsible governance.

POLICY ISSUE:

As the legislative landscape surrounding GenAI continues to develop, it is important for the County to establish clear and consistent standards for the responsible and appropriate employee use of GenAI technologies.

Without a formal policy in place, the use of GenAI tools may occur inconsistently across departments and without clear guidance related to confidentiality, accuracy, and responsible use. Establishing a policy framework allows the County to support innovation while maintaining appropriate oversight and protecting public trust.

FISCAL IMPACT:

There is no immediate fiscal impact associated with the approval of this recommendation.

BOARD OF SUPERVISORS' PRIORITY:

The recommended action is consistent with the Board's priority of *Delivering Efficient Public Services* by establishing clear guidelines for the employee use of GenAI technologies by employees, ensuring that innovation is implemented thoughtfully, protecting data privacy and security, and promoting transparency and accountability in County operations, while providing staff with guidance for the responsible use of emerging technologies to support service delivery.

STAFFING IMPACT:

The policy will be monitored and administered by existing staff in the Chief Executive Office and Information Technology Central and implemented by existing County staff. All related maintenance will be absorbed by existing resources.

CONTACT PERSON:

Eric McLoughlin — Telephone: (209) 525-4357
CIO/Director, Information Technology Central

Jennifer Jacquez — Telephone: (209) 525-6341
Assistant Director, CEO-Human Relations

ATTACHMENT(S):

1. Stanislaus County Employee Artificial Intelligence Policy

September 2026

Purpose

The purpose of this policy is to establish rules and guidelines for the acquiring and/or using software that meets the definition of "generative artificial intelligence". *This policy does not supersede the Information Technology Security policy.* *Please refer to tab 16, page 31 of the personnel manual for this policy*.

Departments may provide additional or more restrictive rules on the usage of generative AI for their staff.

Scope

This policy applies to the use of any third-party or publicly available GenAI tools, including but not limited to ChatGPT, Google Gemini, Grammarly, DALL-E, Midjourney, and other similar applications that mimic human intelligence to generate answers, work product or perform certain tasks.

Policy

GenAI tools are popular for their ability to streamline work functions and increase our efficiency, however they come with serious security, accuracy, and intellectual property risks. This policy protects the County's confidential or sensitive information, intellectual property, workplace culture, commitment to non-discrimination, and brand.

1. **Misuse**
    a. Agencies, Departments, and Staff shall not:
        i. Enter into public GenAI systems any information that cannot be fully released into the public. Do not upload any confidential, protected, or proprietary information into any public GenAI tool.
        ii. Ask GenAI systems to find facts or make decisions without expert human review.
        iii. Generate images, audio, or video that could be mistaken for real people without providing a disclaimer.
        iv. Conceal use of GenAI during interaction with colleagues or the public, such as tools that may be listening, recording and transcribing the conversation or tools that provide simultaneous translation.
    b. County ITC and/or department IT may immediately block any GenAI tool, system or product that is unauthorized or poses a risk to the County as defined by this policy.

2. **Training and Compliance**
    a. All employees using AI are encouraged to take GenAI Training as administered by Stanislaus County when available.
    b. The Chief Information Officer, in partnership with the Chief Executive Office will regularly review the AI policy to update as advancements, use cases, and new information emerge.
    c. Employees shall not integrate any GenAI tool with internal County software without first receiving specific written permission from ITC; contact the ITC Help Desk to initiate a request.
    d. Federal regulations apply to any and all material generated or obtained through use of GenAI tools with regard to copyright and protected information.

3. **Confidential Information**
    a. Employees shall not upload or input any confidential, proprietary, or sensitive County information into any public GenAI tool. Examples include passwords and other credentials, protected health information, personnel material, information from documents marked confidential, sensitive, or proprietary, or any other information that would not be considered public or harmful to the County if disclosed. This may not comply with obligations to keep certain information confidential and secure, risks widespread disclosure, and may cause the County's rights to that information to be challenged.
    b. Comply with all relevant data privacy and security standards such as, but not limited to Health Insurance Portability and Accountability Act (HIPAA), Criminal Justice Information Systems (CJIS), Internal Revenue Service (IRS), and the California Consumer Privacy Act (CCPA) to protect Personally Identifiable Information (PII), Protected Health Information (PHI), or any sensitive data in generative AI prompts.
    c. Treat public GenAI prompts as if they were publicly visible online to anyone. Treat AI prompts as if they may be subject to the Freedom of Information Act and Public Records Act.

4. **Fact-checking**
    a. Validate information, sources, and relevancy to our own current County policies.
    b. Employees take full responsibility for the accuracy and impact of the information shared.

c. Employees are solely responsible for ensuring the quality, accuracy, and regulatory compliance of all AI generated content utilized in the scope of employment.
d. AI is a fallible error-prone tool and requires employee validation, proofreading, and verification.

5. Fairness & Bias

a. GenAI tools must be monitored for fairness and bias, assuring that AI does not discriminate based on race, sex, or other protected classes.
b. Employees shall not use GenAI to form judgments.
c. Employees shall not use GenAI tools to make employment decisions about applicants or employees, including recruitment, hiring, retention, promotions, transfers, performance monitoring, discipline, demotion, or terminations.

6. Responsible Use

a. Employees shall not use AI tools to access data or systems they are not authorized to use.
b. AI tools must not be used for any illegal, harmful, or malicious activities. This includes activities that perpetuate unlawful bias, automate unlawful discrimination, and produce other harmful outcomes.
c. If you come across any potential issues or concerns related to the use of generative AI tools, report them to your IT help desk.

Use Cases

Category	Use Cases and Examples	Recommended Actions
Generally Permissible Use Cases	Uses that do not involve personal information or confidential information **Examples:** • Translating text from a secondary, publicly available source (ex: ChatGPT).	• Ensure that any uses of output conform with existing guidelines. • Review output to ensure it conforms to Stanislaus County Human Relations guidelines for appropriateness in the workplace.

	• Conducting high-level background research into a non-sensitive topic.	
Use Cases That Require ITC Approval	• Integrating AI into new or existing County systems	• Provide justification through Information Technology Central (ITC), contact the ITC Help Desk to initiate a request.
Prohibited Use	• See Misuse Section	If you have questions on certain use of AI, please reach out to the ITC Help Desk for confirmation of acceptable use.

Definitions

Employees: For the purposes of this policy, "Employees" includes all County personnel, including full-time staff, part-time/extra help, volunteers, embedded contractors, and may include other individuals performing work on behalf of the County.

Generative AI (GenAI): GenAI refers to an artificial intelligence technology that derives new versions of text, audio, or visual imagery from large bodies of data in response to user prompts. GenAI can be used in stand-alone applications, such as ChatGPT or Google Gemini, or incorporated into other applications, such as Microsoft Bing or Microsoft Office Suite.

Public GenAI: Public AI refers to publicly available artificial intelligence algorithms that train on a wide set of data, typically pulled from users or customers. ChatGPT is an example of public AI, which was trained on publicly available data from across the internet, such as text articles, images, and videos.

Trusted GenAI: Trusted GenAI is a designation given to GenAI solutions reviewed and approved by the Chief Information Officer, in partnership with the Chief Executive Office. These policy guidelines may not apply to Trusted GenAI solutions.

Confidentiality and Privacy: Confidential and sensitive information, including customer, employee, or others' personal data entered into Public GenAI applications may leave residue inside the model that can become part of an output elsewhere afterwards, or used to (re)train new models. Thus, any customer or employee personal information, proprietary information or intellectual property, or otherwise confidential information entered into the prompt may appear in other users' output.

Intellectual Property: GenAI models are often trained on large, publicly available datasets (e.g., through data extraction of public webpages). The outputs may therefore contain copyrighted information, or others' intellectual property. While ownership in many of these cases is unclear, users should err on the side of caution and not use any output that contains material they suspect to be under copyright protection in any materials, internal or externally facing.

Bias: GenAI tools incorporate any biases of the data sets that were used to train them. Therefore, output may contain systematic errors or favor certain groups, leading to unfair or discriminatory outcomes.