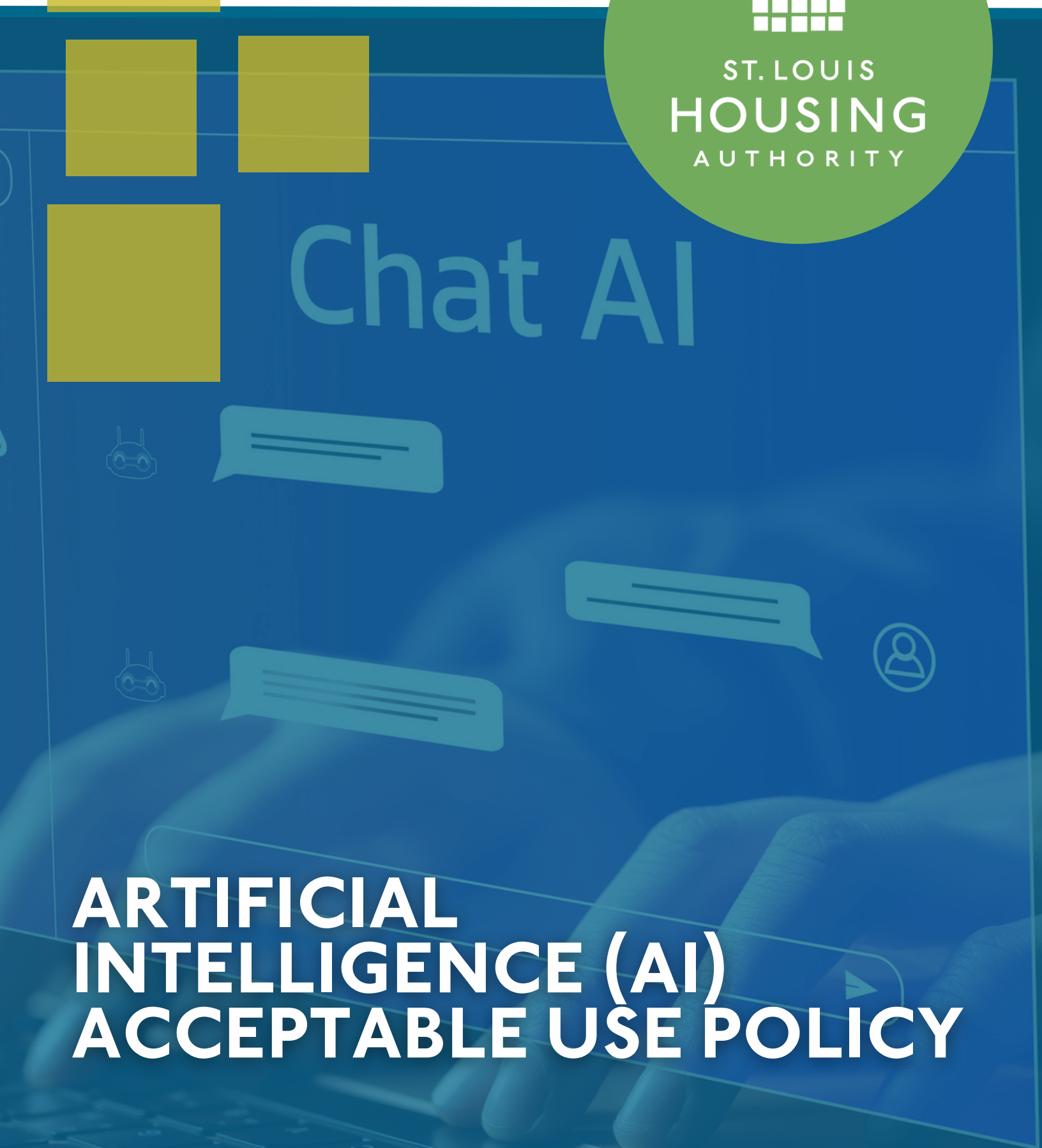
ST. LOUIS HOUSING AUTHORITY



ARTIFICIAL INTELLIGENCE (AI) ACCEPTABLE USE POLICY

ARTIFICIAL INTELLIGENCE (A.I.) ACCEPTABLE USE POLICY

1. **Purpose**
   This policy outlines the acceptable use of artificial intelligence (A.I.) technologies within the St. Louis Housing Authority (SLHA). It aims to ensure ethical, responsible, and lawful use of A.I. tools. This policy is intended to balance the potential uses of A.I. against SLHA's interests in protecting the private and personal data of our applications, residents, voucher participants, and employees, as well as the preservation of jobs, and the safeguarding of our natural environment (as A.I. poses considerable demands on electric infrastructure and freshwater usage). This policy provides employees with guidelines for appropriate, responsible use of A.I. tools while protecting the business and mitigating the risk of misuse, unethical outcomes, potential biases, inaccuracy, and information security breaches. This policy is not intended to restrict communications or actions protected or required by state or federal law. Nothing in this policy shall prevent employees from saying or doing things that the law says they are allowed to do or must do.

2. **Scope**
   This policy applies to: All components of SLHA, including all subsidiaries and affiliated non-profits, clients, employees, advisors, agents of SLHA, and all authorized third parties that require use of and are granted access to SLHA computer and information resources.

3. **Definitions**
   "Artificial Intelligence," or "A.I." as used in this policy, is a machine-based system that can, for a given set of human objectives, make predictions, recommendations, or decisions.

   "Generative Artificial Intelligence" ("Generative A.I.") is a type of artificial intelligence technology that can generate many forms of content including but not limited to texts, images, and multimedia.

   "A.I. Tools" means any data system, software, hardware, application, tool, or utility that operates in whole or in part using A.I., including Generative A.I.

4. **Principles**
   - **Compliance with Related Policies and Agreements:** Any use of A.I. Tools under this Policy must comply with the relevant policies, internal controls, and guidelines of SLHA, including, but not limited to:

     - IT Handbook and Acceptable Use Policy
     - Conflict of Interest Law
     - Privacy Act Notice
     - Anti-Harassment/Anti-Discrimination Policy
     - Written Information and Security Plan

- **Accountability:** Users of A.I. tools are responsible for ensuring compliance with this policy and are accountable for the performance, accuracy, and impact of any A.I.-assisted work. All content created or informed by A.I. must be reviewed and validated by the user for accuracy and reliability. A.I. tools may be used to enhance productivity, decision-making, and innovation; however, they must not replace the user's professional judgment, oversight, or accountability. A.I. may assist by generating information or suggestions, but users must interpret results within context and remain responsible for all outcomes.

- **Transparency:** Use of A.I. Tools should be transparent, with clear documentation on their purpose, capabilities, and limitations. Transparent is defined as open and clear in communication about when, how, and why A.I. tools are being used, as per SLHA's A.I. policy. Compliance with this policy accomplishes this principle of transparency. A copy of this policy will be posted on SLHA website to serve as SLHA's method of transparency.

- **Fairness:** A.I. Tools should be used fairly and should not discriminate against anyone. Because A.I. systems can sometimes reflect bias from the data or the way they are built, users should be aware of these risks and take steps to reduce unfair or unequal outcomes, as described in the Acceptable Use Guidelines below.

5. Request and Approval Process

- Only trained, authorized employees may use approved A.I. tools. Employees wishing to use A.I. tools must submit a written request to their Department Head specifying:

    - The type of A.I. tool requested; and
    - What the employee intends to use the A.I. tool for, including how it supports a specific business need or helps resolve an identified challenge or problem.

- IT must review each request to ensure the proposed tool:

    - Can be securely managed and protected from unauthorized access or misuse.
    - Requires a login or other secure method of access.
    - Meets IT security standards, including that the subscription level allows for opt-out of model training and that it is a private instance of the A.I., not a public A.I.

- Department Heads must approve or deny requests in writing. Approvals may be revoked at any time. Requests denied by IT may be elevated by the Department Head for further review and approval by the Executive Director. Requests denied by the Department Head are not subject to further review.

6. **Acceptable Use Guidelines**
    - Upon approval, employees may only use a work account (not a personal account) with a subscription-based license that is assigned by SLHA's IT department.

    - Use of A.I. Tools must comply with data protection laws and respect user privacy, including but not limited to:

        - The Privacy Act of 1974
        - Ch.610 RSMo.
        - SLHA's policies
        - HUD Privacy Handbook 1325.1 Rev. 1.0
        - HUD Handbook 2400.25 Rev 4 (HUD IT Security Policy)

    - Employees are expected to verify results generated by an A.I. tool before acting on them, and report any potential legal, ethical, or policy concerns to a supervisor.

    - Programming/Coding: A.I. tools are permitted to aid in programming and coding, providing a human code review is performed before deployment. Checks to ensure security, reliability, and integrity of the code need to be performed by a qualified human before A.I.- generated code is deployed or used in or with SLHA systems.

7. **Prohibited Use of A.I. Tools**
   The following uses are prohibited:

    - Entering any company, employee, resident, participant, applicant, or third-party confidential, trade secret, or other personal or proprietary information into a prompt for any A.I. tool, regardless of any incognito or privacy function that the A.I. tool promotes.

        - Examples may include but are not limited to
            - Name
            - Date of Birth
            - Social Security Number
            - Phone Number
            - Address - including building and unit numbers
            - Driver License Number
            - Any unique identifiers tied to a resident/participant/applicant's file or household
            - Health or disability-related information
            - Financial information

    - Using A.I. tools to make decisions about resident/participant/applicant eligibility, compliance, or enforcement.
    - Copying and pasting A.I.-generated reports or correspondence without verifying facts or causing misinformation or errors in official communications.

- Using A.I. to fabricate progress reports, meeting notes, or time-tracking data to mislead supervisors about completed work.
- Using A.I. tools to automate work tasks, such as communication with residents. Automation is defined as: A task or action which occurs without any human intervention, participation, oversight, or review.
- Engaging in unlawful activities or violating human or civil rights.
- Deploying A.I. tools that result in biased or discriminatory outcomes.
- Deploying unapproved chatbots, scripts, or automation that send unnecessary messages, alter shared documents, or flood communication channels.
- Collecting data without consent.
- Connecting a third-party A.I. tool to internal systems without IT approval or otherwise create security or data privacy risks that impact team operations.

The following scenarios are offered as some examples of acceptable and prohibited uses of A.I. tools at SLHA:

Proposed Use	Acceptable? (Yes/No)	Notes
Using generative A.I. to draft a newsletter introduction	Yes	So long as no sensitive information, for example, PII, is included
Having A.I. summarize a resident complaint	No	This involves confidential details, such as resident names
Asking A.I. to suggest general policy language	Yes	For internal brainstorming and initial drafting only
Using A.I. to analyze resident incomes	No	Prohibited (secure platform verification required)
Using A.I. to help craft Excel formulas or programming code	Yes	So long as no sensitive information, for example, PII, is included
Using A.I. to craft a response (email, letter, etc.) to a resident issue	No	Under no situation can generative A.I. be used in direct communication to residents. Use approved templates instead
Using A.I. to brainstorm ideas for generalized or non-specific content	Yes	So long as the content has no protected internal or external information (PII, building info, unit info, etc.)
Using A.I. to complete a notice terminating tenancy or assistance to a resident	No	This involves confidential details regarding resident

8. **Implementation and Monitoring**
    - Regular audits and assessments of SLHA's approved A.I. tools and their use to ensure compliance with this policy.

    - Access to approved A.I. tools must be administered by SLHA IT department. Access will only be granted to approved SLHA A.I. tools, as listed in **Appendix A** of this document. Access will only be granted after users have received approval from their department manager and completed A.I. Use Training.

    - Training programs for users to understand ethical A.I. use and potential risks.
        - SLHA recognizes that an informed workforce is the safest and most capable workforce. Therefore, training resources will be provided to help employees understand their obligations under this Policy and avoid creating undue risks.
        - Employees must complete A.I. Use Training within 3 months of initial hire. All employees must complete the training on an annual basis. Directors and Managers must ensure their staff complete the required training.
        - SLHA may deem failure to participate in required A.I. Use Training as a violation of this Policy. SLHA will retain attendance records and copies of A.I. training materials provided to employees.

    - Department Heads will monitor for the following potential indicators of A.I. misuse:
        - Sudden, repeated use of external A.I. tools from non-approved accounts
        - Unexplained changes in output quality or sudden mistakes in work products
        - Large or unusual file uploads to third-party sites
        - An employee repeatedly asking for access to privileged data with unclear justification
        - Spike in communications with unusual tone/language

9. **Reporting and Enforcement**
    - Employees must report any misuse or unethical use of A.I. technologies to their supervisor and the IT department.

    - Violations of this policy may result in disciplinary action, up to and including termination.

10. **Review and Updates**

    This policy will be reviewed annually and updated as necessary to reflect changes in technology and regulations.

Appendix A
SLHA Approved A.I. Platforms

Company	Platform	Edition	Requires Separate License	Requires Training	Assigned By
Microsoft	Copilot	Bundled	No	Yes	SLHA IT Department
Microsoft	Copilot	M365	Yes $30.60/user/mo	Yes	SLHA IT Department
Open AI	ChatGPT	Plus	Yes $20/user/mo	Yes	SLHA IT Department
Anthropic	Claude	Pro	Yes $17/user/mo	Yes	SLHA IT Department

Departments have multiple approved AI tools to choose from. Regardless of the tool selected, users must be signed in with their Agency account (where applicable) to remain in compliance with this policy. Free, public versions of these tools should NOT be used for Agency work, as they may not provide the same data protections. IT has worked to automate sign-in where possible, but users are responsible for ensuring they are properly authenticated when using these tools.

Microsoft Copilot Options

Option 1: Bundled

This version comes with the Agency's Microsoft GCC3 license. It performs general chat, search, and analysis functions with basic image generation capabilities and is grounded in web-trained data. For most users, this will meet their needs.

Option 2: M365

This version is an add-on to the Agency's Microsoft GCC3 license. It performs the same functions as the bundled version but uses more advanced models. It also integrates across Microsoft products (Word, Excel, PowerPoint, etc.) and can securely access and analyze Agency data.

Other Approved AI Tools

ChatGPT (Enterprise / Team / Approved Workspace Version)

ChatGPT provides advanced conversational AI, content generation, coding assistance, and data analysis capabilities. Approved versions offer enhanced privacy and security protections compared to the public version. Users must ensure they are logged into an approved SLHA device when using ChatGPT for Agency work.

Claude (Enterprise / Team Version)

Claude offers similar capabilities, including document analysis, writing assistance, and conversational support. Approved versions are designed with stronger data handling protections. As with other tools, users must confirm they are signed into an authorized account and approved SLHA device before use.

ST. LOUIS
HOUSING
AUTHORITY

3520 PAGE BOULEVARD ■ ST. LOUIS, MISSOURI 63106 ■ P 314.531.4770 ■ F 314.531.0184 ■ TDD 314.286.4223 ■ SLHA.ORG