



CITY OF DUBLIN
ADMINISTRATIVE ORDERS
OF THE CITY MANAGER

ADMINISTRATIVE ORDER 9.4	
TO:	All City of Dublin Employees
FROM:	Megan D. O'Callaghan, City Manager <i>Megan O'Callaghan</i>
SUBJECT:	Generative AI Guidance Policy
DATE:	June 23, 2025
<i>New Administrative Order</i>	
PROPONENT:	Division of Information Technology

1. PURPOSE

- A. The purpose of this policy is to set forth requirements and guidance that the City of Dublin users must adhere to when acquiring and using solutions that meet the definition of generative artificial intelligence (AI).
- B. Generative AI, such as ChatGPT and Microsoft CoPilot, presents an opportunity for people to increase their efficiency and efficacy in work. In an effort to actively create policies and procedures on utilizing AI in general, this document serves as part of an evolving governance structure around responsible AI usage.
- C. With consultation of the Department of Innovation & Technology, departments may provide additional rules on the usage of Generative AI. Users should consult their Director if there are additional rules specific to their department.

2. PRINCIPLES FOR USING GENERATIVE AI

- A. **Privacy:** Submit information to Generative AI tools that are ready for public disclosure. This includes any text, photos, videos, or voice recordings you share with the AI. Be mindful that the AI output may include unexpected personal information from another user and ensure removing any potential private information before publishing.
- B. **Accuracy:** The City of Dublin maintains trust with its residents and partners by providing accurate information. Users should therefore review and fact check all outputs from a Generative AI query and consult trustworthy sources to confirm

that the facts and details in the AI-generated content are accurate. Trustworthy sources include official City documents and peer-reviewed journals. Consult your supervisor for other trustworthy sources. Be aware that many systems, like ChatGPT, may only use information up to a certain date and these systems cannot guarantee the content they generate is relevant, up-to-date and accurate.

- C. **Transparency:** The user shall be clear when using Generative AI. This can often include citing that AI was used in creating a product.
- D. **Equity:** AI system responses are based on patterns and relationships learned from large datasets derived from existing human knowledge, which may contain errors and is historically biased across race, sex, gender identity, ability, and many other factors. Users of Generative AI need to be mindful that results may make assumptions based on past stereotypes and need to be corrected.
- E. **Accountability:** The employee using AI is accountable for the content it generates; therefore, the use of Generative AI should be done with a healthy dose of skepticism. The level of caution used should correspond to the risk level of the use case (see "Assessing Risk in Generative AI Use Cases" below). It is important to always verify information provided by Generative AI.
- F. **Beneficial Uses:** Users should be open to responsibly incorporating Generative AI into their work where it can make services better and more efficient. For example, a tool like ChatGPT can help users go from an outline to a draft Council memorandum quickly, enabling them to focus more time on the analyses and findings that inform recommendations to Council.

3. SCOPE

This document applies to all use of Generative AI by a City of Dublin staff member, contractor, volunteer, or other person while performing a role for the City of Dublin. This document does not apply to users of Generative AI for personal purposes or business purposes unassociated with the City.

This policy encompasses all Generative AI systems, automated and manual, for which the City has administrative responsibility, including systems managed or hosted by third parties on behalf of the City. It addresses all information, regardless of the form or format, which is created or used in support of business activities.

4. GENERATIVE AI FOR CITY USE

- A. Usage of Generative AI may be Subject to the Public Records Act

- a. Any retained conversations relating to City work may be subject to public records requests. Users will need to comply with all State of Ohio and other applicable public records laws for all City usage of Generative AI. This includes any prompts, outputs, or other information used in relation to a Generative AI tool that may be released publicly. Users may not use any prompts that may include information not meant for public release.
 - b. If users use personal devices or accounts to conduct City work, the records generated may still be subject to search and disclosure. The records generated may include both the content users input and the content users receive from the Generative AI system.
- B. Understand the Terms and Conditions
- a. The City does not currently have citywide standard agreements in place for common Generative AI systems like ChatGPT or CoPilot. If you choose to use Generative AI for City work and agree to the terms and conditions of a system without a City agreement in place, you are responsible for complying with those terms and conditions.
- C. Opt Out of Data Collection if Possible
- a. Some services offer an option to opt out of data collection. This means the generative AI system will not keep the data provided, and it will not be used in the system's models. Employees shall opt out of data collection and model training whenever possible.
- D. Verify the Copyright of All Generated Content
- a. Users shall verify the content they use from any Generative AI systems does not infringe any copyright laws. If users are uncertain if content violates copyright, they should either edit the content to be original or not use it.
- E. Ownership of Generated Content
- a. In most cases, the user owns the content they input into a Generative AI service and the information they receive as an output. The user can use the content at their discretion, in accordance with City policy and any terms and conditions they agreed to. However, many Generative AI companies still retain the right to use both the input and output content for their own commercial purposes. For example, this could include a Generative AI company using City data to train their models or distributing City output data for marketing campaigns. This emphasizes the importance that only information the City is ready to make public should be entered into a Generative AI system.

5. Assessing Risk in Generative AI Use Cases

- a. Risk of Information Breach: The potential harm if the information exchanged with a Generative AI is released to an unintended audience. This can include entering personally identifiable information, sensitive records, or confidential business information into Generative AI. If the information would not be shared in a public forum, it shall not be shared with Generative AI.
- b. Risk of Adverse Impact: The potential harm of using the output for a decision, task, or service. This impact can be different for diverse populations and should be considered from an equity lens, such as adverse impacts to people of a certain race, age, gender identity, or disability status. Not only can AI be biased, but it can also provide false information. In general, if Generative AI is used in relation to City processes that can alter an individual or community's rights, freedoms, or access to services, it shall be thoroughly reviewed by legal and the City Manager.

6. Procurement of Generative AI Solutions

- a. To procure Generative AI solutions, staff must follow the existing policies and procedures for acquiring hardware and software. The procurement process may be slower than normal as a risk and impact assessment may be required.
- b. The policy and procedures for acquiring Generative AI solutions also applies to free-to-use, freemium, open source, software-as-a-service (SaaS), and any other solution formats.
- c. Use of any Generative AI solution may be restricted or revoked at any time if, in the judgement of the City, the risk of use results in non-compliance in part or full, with this policy or any other City policy, or other relevant policy, rule, or law.