



Policy Statement:

The City of San Rafael is committed to leveraging Artificial Intelligence (AI) technologies to enhance public services, improve operational efficiency, and foster innovation. Employees, contractors, and partners are required to follow this AI Acceptable Use Policy to ensure AI is used responsibly, ethically, and in accordance with the City's values, legal obligations, and community expectations. This policy supports the safe and beneficial use of AI while helping prevent potential harm.

Guiding Principles and Requirements:

The following principles and requirements reflect the City of San Rafael's values regarding the acquisition, configuration, development, operation, and maintenance of AI systems.

- **Keep People Safe and Systems Secure:** AI systems must be safe, reliable, and protected from misuse and abuse. We take steps to reduce risks to people, our community, and the environment.
- **Protect Privacy:** We safeguard personal and sensitive information. AI tools must protect people's data from being exposed, changed, or misused.
- **Be Transparent:** The City's AI policies are clear and accessible to everyone, and the City publishes a list of AI systems for public review.
- **Promote Equity:** AI should help create fair and equitable outcomes for all residents. We take steps to reduce bias in AI systems and prevent harm to anyone affected by their use.
- **Stay Accountable:** City staff are responsible for how AI is used. Human oversight ensures that the use of AI aligns with laws, policies, and community expectations.
- **Focus on Results:** AI tools must work well and do what they're meant to do. We only use systems that are accurate, dependable, and useful.
- **Support Our Staff:** We give staff the training, support, and guidance they need to use AI tools confidently and responsibly.

Roles and Responsibilities:

This policy applies to the design, development, deployment, and procurement of AI for all employees and agents of the City of San Rafael, including permanent and temporary staff, interns, volunteers, contractors, consultants, vendors, and other third parties operating AI systems on behalf of the City. Additional roles and responsibilities are summarized below.

Title	Description
City Manager	Establishes policy, ensures policy implementation, and enforces compliance.
City Attorney	Reviews AI policies and City contracts for legality and risk.
City Clerk, Risk Manager, Assistant City Managers	Review requests for medium-risk and high-risk AI tools, make recommendations to the City Manager, establish mechanisms for ongoing monitoring and evaluation of AI solutions to ensure compliance with this policy and relevant laws and regulations, and review updates to this policy.
Department Directors	Review technology procurement requests and consult with the Director of Digital Services and Open Government (DSOG).
Digital Service Director	Ensures policy compliance, reviews procurement requests, and determines whether the technology is low, medium, or high-risk according to this framework, approves the use of low-risk technology, involves the City Clerk, Risk Manager, and Assistant City Managers on medium and high-risk requests, and recommends policy updates as technology evolves.
Employees	Follow City policy, and propose pilots, ideas, or potential use cases for AI.

Definitions:

- A. **Artificial Intelligence (AI):** A machine-based system that can, for a given set of human-defined objectives, make predictions, recommendations, or decisions that typically require human intelligence. This policy uses the term “AI system” to describe any technology that uses some form of AI.
- B. **Generative AI (GenAI):** GenAI refers to AI systems capable of generating new content, such as images, text, audio, or videos, which imitate or are indistinguishable from human-created content. Examples of GenAI include Microsoft Coilot, ChatGPT, DALL-E, Gemini, and Claude.

- C. **Machine Learning:** Machine Learning (ML) is a subset of AI that focuses on the development of algorithms and models that enable computers to learn from data and make predictions or decisions without being explicitly programmed. For example, machine learning algorithms are used to filter email spam and to recommend products, videos, or other content.

Applicability:

This policy shall also apply to all instances where AI functionality is known to be included, such as new tools for existing products, new products being considered for use, or AI technology developed by City of San Rafael employees, contractors, partner agencies, or other stakeholders.

Acceptable Uses of AI:

AI technologies may be used for the following purposes, provided they align with the principles outlined above:

- Enhancing public services (e.g., traffic management, utility optimization, emergency response).
- Improving data analysis and decision-making processes.
- Automating routine tasks to increase efficiency.
- Supporting community engagement and communication efforts.
- Advancing public safety and security in compliance with legal standards.

AI Use Requirements:

Any City Department seeking to use an AI system must comply with the following:

1. **Ethical use:** Employees should use AI in accordance with this policy.
2. **Privacy considerations:** Staff must protect sensitive information when using AI tools. Follow these guidelines:
 - **Default Rule - No Personally Identifiable Information in AI Systems:** Do not input any information into AI tools that you would not disclose to a member of the public under the California Public Records Act (CPRA). This information includes:
 - i. Personally Identifiable Information (PII): Any data that can be used to specifically identify individuals, such as full names, Employee IDs, Social Security numbers, or even a combination of zip code, race, gender, etc.
 - ii. Information that may be attorney-client privileged
 - iii. Health records collected
 - iv. Data is reasonably likely to compromise a police investigation, reveal confidential law enforcement techniques, training, or procedures, or risk the safety of any individual if it were to become publicly accessible. Refer to the Police AI Policy for additional information.
 - **When in doubt, protect the information.** Contact the Digital Service and Open Government Department if you're unsure whether an AI system is approved for sensitive data.

3. **Fact check:** AI tools can sometimes produce made-up or inaccurate information — a phenomenon known as "hallucination." Even if AI is used to assist in creating a document, **staff are ultimately responsible for the accuracy of all work products.** Always review and verify AI-generated content before using it in your work.
4. **Make it your own:** AI tools should assist and enhance your work process, not replace it. In addition to fact-checking all AI output before using it, edit and refine AI output to reflect your point of view, decision-making, and expertise.
5. **Check for bias:** All AI systems are subject to the bias of the source materials used for training. Carefully review any content generated by AI for unintended or undesirable instances of bias or potentially harmful material.
6. **Account usage:** All Generative AI tools used for work purposes require an account that is explicitly for City use. Personal accounts are not permitted for work use.
7. **Cite AI usage for image creation:** Cite any AI tools used for generating images in final documents or work products, such as staff reports and external presentations.
8. **Get approval:** Get approval from your **Department Director** and **the Digital Service and Open Government Department** before acquiring or using a new AI tool. Please refer to the guidance in the AI Procurement section below. A list of approved tools is linked from this policy.

Prohibited Uses:

The use of certain AI systems is prohibited due to the sensitive nature of the information processed and the severe potential risk associated with it.

Staff will not use AI to:

- Mimic or impersonate any living person.
- Classify human facial or body movements into certain emotions or sentiments using computer vision techniques or emotion analysis (e.g., positive, negative, neutral, happy, angry, nervous).
- Make fully automated decisions that do not require any meaningful human oversight.
- Engage in cognitive behavioral manipulation of people or specific vulnerable groups.
- Operate autonomous weapons systems.
- Make or support decisions based on the unlawful or improper consideration of protected classes, including race, ethnicity, gender, national origin, and medical condition.
- Conduct unlawful or improper systemic, indiscriminate, or large-scale monitoring, surveillance, or tracking of individuals.

If City staff become aware of an instance where an AI system has caused harm, staff must report the instance to their Department Director and the Human Resources Director.

Translation:

City-certified bilingual staff or professional translators must review AI-generated content for accuracy, especially for critical or high-impact materials. When using AI for translation:

- Ensure precision, appropriate tone, consistency, and cultural sensitivity.
- Use gender-neutral terms when appropriate.
- Update and maintain City-approved glossaries for use in AI translation
- Document the tool used for translation.

AI tools can be inconsistent when translating within a document. Therefore, human review is critical for high-impact, sensitive documents such as legal notices, emergency alerts, and staff reports.

AI Procurement:

Staff must follow the following process to purchase and/or operate an AI system:

1. **Department Approval:** Staff discuss AI needs with their Department Director to get approval and support before moving forward.
2. **Digital Service Risk Assessment:** Submit your request to the Digital Team. Digital will assess the risk of the requested technology, using the guidelines outlined in [this document](#).
3. **Approval or Escalated Review (if needed):** The Digital Service Department approves low-risk technologies. Medium- and high-risk AI tools are submitted to the City Attorney, City Manager, City Clerk, Risk Manager, and the City Manager's office (also known as the Data Governance Committee) for review and recommendation.
4. **City Manager Approval:** The City Manager provides final approval for medium and high-risk technologies.

Sunset Procedures:

If an AI system operated by the City or on its behalf no longer provides a clear benefit to the City of San Rafael's residents, as determined by the relevant Department Director or Digital Service and Open Government Director, they may make a recommendation to the City Manager to retire the tool. If approved, the use of the AI system must be stopped. If the abrupt cessation of the AI system's use would significantly disrupt the City of San Rafael's services, its use may be gradually phased out over time at the discretion of the Digital Director.

Training:

The City of San Rafael will provide AI security and use training as part of the new staff onboarding process, offer additional training at least annually to all staff members, and make supplemental training videos available on demand. Additionally, staff must meet any department-specific training requirements, i.e., those identified in the SRPD Generative AI Policy.

Violations of Policy:

Failure to comply with the City of San Rafael's AI Acceptable Use Policy may result in disciplinary action. Violations made by a third party while operating an AI system on behalf of the City may result in a breach of contract and/or pursuit of damages.

References:

- California Public Records Act
- Health Insurance Portability and Accountability Act (HIPAA)
- City of San Rafael Computer Use Policy
- City of San Rafael Harassment, Discrimination, and Retaliation Prevention Policy
- City of San Rafael Purchasing Policy
- SRPD Generative AI Policy
- Some of the content of this document was generated and revised by ChatGPT v4.0 and subsequently edited and extended by the authors.

Attachments:

- List of Approved AI Tools
- AI Acceptable Use Policy: Staff Quick Reference

APPROVED BY:


Cristine Alilovich (Sep 15, 2025 22:23:23 PDT)

Cristine Alilovich, City Manager

09/15/2025

Date

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