

# **Information Services Agency IT Policy: Generative Artificial Intelligence (GenAI)**



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## Generative Artificial Intelligence (GenAI) Policy

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## Authority

The Information Technology Board (IT Board) has the following powers and duties pursuant to Section 281-212 of the Revised Code of Indianapolis and Marion County:

- To establish and revise information technology guidelines, standards and benchmark processes for subject agencies and other users; and
- To develop and oversee adherence to standards for security and confidentiality of all data, information, and telecommunication systems.

The City of Indianapolis-Marion County depends on the integrity and availability of information systems and is committed to protecting such. Resolution 18-7 was approved by the IT Board on March 27, 2018, and revised with Resolution 24-61 on October 24, 2024. The resolution sets forth an executive mandate to formalize the [Enterprise Security Program](#) (ESP). This document supports the ESP.

## Purpose

The purpose of this policy is to establish principles and guidelines for appropriate usage of Generative Artificial Intelligence (GenAI) systems within the City-County.

## Scope

The scope of this policy covers all City-County agencies and departments that are major consumers of services and resources provided by the Information Services Agency (ISA). This policy expands on the principles and fair/ethical use outlined in the [Artificial Intelligence](#) (AI) policy.

This policy applies to all employees, contractors, or any other individuals using City-County systems with access to GenAI solutions, whether through company-owned or BYOD (bring your own device.). This policy does not apply to personal or business usage unassociated with the City-County.

Each agency/department may provide additional guidelines around GenAI. Consult your supervisor to ensure compliance with any additional agency/department specific GenAI policies/guidelines.

## Policy

Employees are authorized to use GenAI for work-related purposes within the boundaries and guidelines listed below. In using GenAI, employees must commit to responsible, transparent, lawful, and ethical uses of GenAI, focusing on the benefits for residents and to promote public trust, while also mitigating potential risks and avoiding unintended consequences. The use of GenAI should support the work of our workforce to deliver better, safer, more efficient, and equitable services and products to the public.

## GenAI Tools

**Standalone, ISA-issued/approved (Preferred):** As of June 2025, Microsoft Copilot is the only ISA-approved, standalone generative AI system. The City-County has a formal agreement with Microsoft, and all GenAI usage is governed by those terms and conditions. ISA has reviewed this solution to ensure it aligns with the risk management and responsible use principles outlined in [NIST AI 600-1](#).

**Standalone, Non-ISA-issued (Not Recommended):** Non-ISA-issued standalone GenAI systems are defined as any standalone GenAI system that the City-County does not have a formal agreement with and includes, but is not limited to: ChatGPT, Gemini, and Claude. While use of these systems is allowed, but

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not recommended, all use is contingent on responsible data and account management; see the following sections. Additionally, participation in enterprise AI training is strongly encouraged when using any GenAI systems.

**Embedded GenAI (Allowed):** Increasingly, GenAI functionality may be embedded in third-party applications. For existing contracts that are offering new GenAI functionality, contract review by the Office of Corporation Counsel and the ISA attorney is recommended prior to deployment to review data and privacy terms. For new contracts that include GenAI functionality, the Office of Corporation Counsel, and the ISA attorney must review contract terms for required data and privacy terms prior to signature.

**Prohibited GenAI:** GenAI systems developed by entities based in, controlled by, or subject to the laws of foreign adversary nations are prohibited from any and all City-County use. This includes systems from countries identified as strategic competitors or adversaries by U.S. national security agencies including, but not limited to, China, Russia, DPRK, and Iran. Prohibited systems include, but are not limited to, DeepSeek, Moonshot AI, Baidu, and Alibaba.

ISA will keep a list of popular prohibited tools on its SharePoint site here:

<https://indygov.sharepoint.com/sites/ISAHome/SitePages/AI-in-Indy.aspx>

## Public Records & Data

Data entered into any GenAI systems may be subject to an Access to Public Records Act (APRA) request. All GenAI systems used must ensure that City-County data remains within U.S. borders and under U.S. legal jurisdiction.

Any data entered into non-ISA-issued GenAI systems may be viewable and usable by the GenAI company. This means any prompts, outputs, or other information used in relation to a GenAI system may be released publicly.

If personal devices or personal accounts (see Account & Terms section for best practices) are used to conduct City-County business, 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 GenAI system.

Information entered in non-ISA-issued GenAI systems carry risk of leaking data and information in the event of a data breach within the GenAI company. To avoid this risk, unless you are using an ISA-issued GenAI system, do not use any prompts that may include information not suitable for public release (such as confidential or personally identifiable information). All critical, restricted, and internal data, as defined in ISA's [Data Classification Standard](#), is prohibited from use in non-ISA issued GenAI systems.

Examples of information that **must be excluded** from non-ISA-issued GenAI services, includes, but is not limited to:

- draft RFP requirements not yet public
- vendor transactions
- procurement approvals
- content that could propagate discrimination, harassment, or biased viewpoints (e.g., stereotypical language)
- internal City-County decisions or communications containing privileged or classified information (e.g., legal case files, attorney work product, non-disclosure agreement information, City-County financial/bank account information, law enforcement investigations, information that could lead to

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security breaches, etc.).

Examples of information that **can be included** in non-ISA-issued GenAI services is limited to information that is already public. One use case includes copying a large public document, such as a public meeting recording, into a GenAI system and asking the AI questions about the document/file.

## Account & Terms

When using non-ISA issued GenAI systems for City-County business, users should create an account using their City-County (indy.gov) email address to ensure public records are kept separate from personal records. Users must use a unique password for all services. This password must not be the same password used to log in to any City-County devices.

If a user is required to agree to the terms and conditions of a non-ISA issued GenAI system, the user is responsible for complying with those terms and conditions (see above for current ISA-approved GenAI systems).

## Ownership

In the context of non-ISA-issued GenAI services, in most situations, the user owns the content they input into a GenAI service and the information they receive as an output. The user can use the content at their discretion, in accordance with City-County policy and any terms and conditions agreed to.

However, it is important to note that depending on the terms and conditions, many GenAI companies retain the right to use both the input and output content for their own commercial purposes including, but not limited to, using City-County data to train their models, or distributing output data for commercial purposes. This emphasizes the importance to opt-out of data collection and only provide public information into a non-ISA-issued GenAI system.

Some non-ISA-issued GenAI services offer an option to opt out of data collection. This means the GenAI system will not keep the data you provide, and it will not be used in the system's models. If available, users should opt out of data collection and model training whenever possible.

## Compliance

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment.

ISA will verify compliance with this policy through various methods including, but not limited to, network monitoring, business tool reports, internal and external audits, and feedback to ISA. If a user account or device is determined to be non-compliant with this policy in a way that poses a security risk, ISA may take actions in accordance with the [Enterprise Security Program Policy](#) to address the threat. Such actions include but are not limited to, disabling user accounts, blocking IP addresses, and removing accounts and City-County data from devices. Any data that is confidential and found in an audit conducted by ISA will remain confidential and only be shared with that specific agency or department. Agencies and departments will not waive confidentiality rules by allowing ISA to perform audits.

As defined in the [Data Ownership Policy](#), under no circumstance is ISA considered the owner of any data originating in a different agency or department. ISA understands their role as custodian of data. Access, use, or release of agency or department data, by ISA, shall only occur with the relevant agency or department's

approval, or as required by law.

### Acknowledgement

This policy is accessible to all employees with the City-County; therefore, by using GenAI systems, employees acknowledge that they have read and understand this policy and understand the risks associated with the use of GenAI. Employees also agree to comply with this policy and to report any violations or concerns.

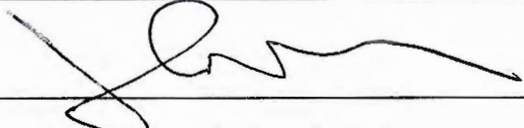

### References and Standards

- [Enterprise Security Program](#)
- [Artificial Intelligence Policy](#)
- [Data Classification Standard](#)
- [Data Ownership Policy](#)

### Disclaimer

This policy is subject to change without notice. ISA will make every effort to communicate any changes to the Enterprise via email notification. A current and complete list of [ISA Policies and Standards](#) is maintained on the ISA Intranet site.

### Policy Approval

<p>Per Indianapolis Marion County Municipal Code Sec. 281-212.13, the City of Indianapolis/Marion County IT Board has the power and authority to promulgate rules and regulations for the efficient administration of its policies and procedures for users.</p> <p>This policy has been reviewed and approved by the IT Board and will be enforced as of the effective date by the Chief Information Officer. It is the responsibility of all City/County IT users to always comply with this policy.</p>	
Policy Sign-off	
	
Joseph O'Connor, IT Board Chair	Collin Hill, Chief Information Officer
Date 7/25/25	Date 7/22/25