PINAL COUNTY POLICY AND PROCEDURE

Subject: **USE OF ARTIFICIAL INTELLIGENCE (AI) IN THE WORKPLACE**

Date: **March 18, 2026**

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PURPOSE: This policy outlines the guidelines for the responsible use of Artificial Intelligence (AI) technologies in the workplace.

STATEMENT OF POLICY: Pinal County recognizes that the use of AI tools can increase employee productivity and foster innovation, and supports the use of AI in a safe, ethical, and secure manner. At the same time, Pinal County recognizes that the use of AI can pose risks related to data security, confidentiality, accuracy, and ethical considerations. Pinal County's goal is to ensure that AI tools are used in a way that promotes productivity, complies with legal requirements, and protects data privacy and security.

SCOPE: This Policy applies to all Pinal County employees, contractors, and any other individuals who may use AI tools or systems in their professional capacity within Pinal County for authorized business purposes, including in their dealings with third-party agents and vendors, and when using an employee's personal devices for authorized business purposes.

A list of permitted AI tools can be found on the County Employee Intranet Information Technology Services page. AI tools not included on the list are prohibited. To request an AI system be added to the approved list, contact Pinal County Information Technology Services. Free systems are not approved.

DEFINITIONS:

A. Artificial Intelligence (AI): The science and engineering of making machines capable of performing tasks that are typically associated with human intelligence, such as learning and problem-solving. When used in this Policy, AI includes without limitation AI systems, Classic (Non-Generative) AI, External AI, Generative AI (Gen AI) and Large Language Model AI (LLM AI).

B. AI Systems: Products and services that incorporate AI hardware and software components that support machine learning, expert systems, and robust data sets to be adaptable and autonomous in providing requested solutions.

C. AI Supplier or AI Vendor: Any entity that supplies AI services or components, such as research, development, training, implementation, deployment, maintenance, provision, or sale of AI systems.

D. <u>Classic (or Non-Generative) AI</u>: Any system that uses aspects of Artificial Intelligence to apply predefined rules to automate steps in an existing workflow or to predict an outcome based on a set of training data.

E. <u>External AI Systems</u>: An AI model or engine that depends on infrastructure or data resources outside the immediate and complete control of the State.

F. <u>Gen AI</u>: See 'Generative AI' below.

G. <u>Generative AI</u>: An AI system that learns the patterns and structures of input training data to generate new content.

H. <u>LLM or Large Language Model AI</u>: Also referred to as Foundation Model AI, this is a type of AI that uses deep learning techniques to recognize, generate, translate, and/or summarize vast quantities of data (usually written human language and textual data). This type of AI is adaptable for use on a wide range of tasks.

PROCEDURE:

Acceptable Use of AI Tools:

AI tools must be used for business purposes aligned with Pinal County objectives. Employees are responsible for ensuring AI tools do not perform tasks outside the scope of their role or access sensitive or confidential data unnecessarily.

When using AI in the workplace, all employees must use them only for the following authorized purposes:

- Analyzing data;
- Drafting emails, letters, memoranda, and presentations;
- Creating outlines and checklists;
- Conducting research;
- Assisting with repetitive tasks;
- Data processing; and
- Other authorized purposes approved by the Appointing Authority or Elected Official

Employees shall not enter any Pinal County, employee, customer, or third-party confidential, personal, or proprietary information into a prompt for an AI tool, unless authorized in advance in writing by the Pinal County Information Technology Department. For questions about what information should not be entered into an AI tool, employees should contact their supervisor for guidance.

Employees shall thoroughly review all AI tool outputs before using them or forwarding them to others inside or outside the County to:

- Ensure that they do not contain biased, offensive, or discriminatory content;
- Ensure that they do not improperly use or disclose personal or confidential information;
- Verify accuracy or reported facts with other trust sources;
- Understand to a reasonable degree how the AI tool works, its limitations, and the applicable terms of use and other policies governing the use of Pinal County data by the AI tool; and
- Where a commercial AI model is used, employees should detail the AI model, prompts, and methods employed. This documentation aids comprehension and safe usage by colleagues and stakeholders. Example: "This content was generated with the aid of _____ and subsequently revised by the staff of Pinal County [Department Name]."

Unacceptable Use of AI Tools:

AI tools can be used for a variety of purposes including misinformation. This can often happen unintentionally. To prevent this from happening the following uses of AI must **not** be used by Pinal County Employees:

- Creating synthetic images, videos, or audio of real people without their consent
- Attempting to identify individuals from photo or audio
- Knowingly creating false information
- Creating election materials without the consent of the Communications department, Officer in Charge of Elections, and the County Recorder
- Sharing confidential / restricted data
- Creating legal documentations
- Making HR Decisions
- Bypassing security restrictions
- Uploading entire documents without review for private data or approval from a department head
- Using AI tools that have not been vetted by Pinal County IT

Data Privacy and Security:

Employees must comply with current Pinal County data policies, all data privacy laws (e.g., Arizona Criminal Justice Information System (ACJIS), Health Insurance Portability and Accountability Act (HIPAA)) when using AI tools, ensuring that no personal or sensitive information is improperly accessed, processed, or shared. Departments may provide additional rules on the usage of AI for their staff.

When creating accounts with AI providers for generative AI tools, County staff should use their official County email address for better security and accountability.

AI tools should not be used to store or process sensitive company or client data unless authorized by the Information Technology Services Department.

Ethical Use of AI:

AI tools must not be used to make decisions that could lead to discrimination, bias, or unethical treatment of individuals or groups. AI systems can reflect the cultural, economic, and social biases of the source materials used for training, and the algorithms used to parse and process that content can be a source of bias as well. Employees are expected to monitor the output of AI tools for any unintended biases or inaccuracies and report these issues to their supervisors.

AI-generated content is to be treated as a draft requiring review. AI tools must not be cited as authoritative sources, nor used as a substitute for legal, policy, or technical expertise.

Critical decisions regarding employment, customer relationships, finances, or business strategy must not rely solely on AI recommendations.

Compliance with Legal and Regulatory Requirements:

This Policy is intended to add to, not contradict, limit, or replace, applicable mandatory rules, policies, legal requirements, legal prohibitions, and contractual obligations, all of which remain in full force and effect. Any use of AI tools under this Policy must comply with the relevant policies of Pinal County, including, but not limited to:

- Pinal County Policies and Procedures 1.05 – Ethics in County Employment;
- Pinal County Policies and Procedures 3.30 – Code of Conduct;

- Pinal County Policies and Procedures 3.15 – Preventing Unlawful Discrimination and Harassment;
- Pinal County Policies and Procedures 11.00 – IT Information Security Policy; and
- Pinal County Policies and Procedures 11.02 – Acceptable Use of Information Technology.

Employees must ensure that their use of AI complies with all applicable laws and regulations, including intellectual property and copyright laws. AI tools should not be used to generate, copy, or manipulate content that infringes on third-party copyrights, including text, images, audio, or software code, unless explicitly permitted under license or fair use provisions. Employees are responsible for verifying the originality of AI-generated content to avoid unintentional copyright infringement. If AI tools are used to process or create content, employees must respect the copyright terms of the original content sources and ensure appropriate attribution where required. Any potential copyright concerns related to AI use must be reported to Human Resources immediately to prevent infringement or liability.

Restrictions on AI Usage in Elections Department:

The use of AI tools will help the County in completing repetitive tasks, but critical and sensitive processes will still be handled with the highest level of care.

As it pertains specifically to the Elections Department, AI tools shall never touch the EMS

(Election Management System) system, tabulators, expressvotes, or any other certified elections equipment. This equipment certified by the EAC (Election Assistance Commission) and the AZSOS (Arizona Secretary of State), and may not be changed or modified in any way.

As always, all activities within the Elections Department will conform to the applicable titles of Arizona Revised Statutes and the Elections Procedures Manual.

AI Tool Audits:

County department use of an AI tool is subject to audit by the Pinal County Information Technology Department to ensure compliance with this policy.

Reporting Non-Compliance with This Policy:

If an employee becomes aware of an actual or potential violation of this Policy, or have reason to believe that any of the following has been downloaded to or installed on Pinal County's networks, systems, or devices, you must promptly disclose this fact to the Pinal County Information Technology Department together with all relevant documents and information:

- An unlicensed AI Tool, if usage requires a license;
- An AI Tool that has not been approved for use according to this Policy;
- An AI Tool that is used outside of the approved manner or scope; and
- An AI Tool that poses an identified, unaddressed security risk or contains any material defects or malicious code.

Pinal County prohibits any form of discipline, reprisal, intimidation, or retaliation for reporting a violation of this Policy.

Violations of this Policy:

Violations of this policy may result in disciplinary action, up to and including termination of employment, depending on the severity of the violation as determined by Human Resources.

Data Retention:

Historical inquiries/prompts using Google Gemini are not retained or maintained by the Pinal County Information Technology Department. However, prompts, responses, and documentation related to AI use may be subject to public records requests under Arizona law. Prompts should be written with the professionalism appropriate for potential disclosure.

Effective Date:
This policy is effective as of March 18, 2026.