Memo

Date: November 2, 2026

To: Board of Commissioners

From: Holly Miller

Subject: AI Policy Executive Summary

An initial draft of a county-wide AI Policy has been created. To help ensure that our policy is in-line with other similar agencies in the state, I requested a copy of policies from cities and counties participating in an Oregon government IT association that I belong to. I received and reviewed 9 policies, 8 of which were local government and one from the state. I also reviewed guidelines published by the state of Oregon for AI Policy development. Appropriate elements were included in the draft policy, summarized below.

Draft Policy Overview

Artificial intelligence can help County employees work more efficiently, improve accessibility, analyze information, and serve the public. It can also create privacy, security, legal, accuracy, public-records, and accountability risks. The proposed policy establishes a practical framework for responsible use: AI may support County work, but it does not replace employee judgment or responsibility.

This policy applies to stand-alone AI tools, AI features built into products such as Adobe or Microsoft software, and AI agents that can interact with County systems. Routine, low-risk uses may be allowed with appropriate safeguards; uses involving sensitive data, public-facing decisions, connected systems, or significant consequences require formal review and written approval.

Key Policy Points

- **Human accountability remains.** AI may assist with work, but qualified County personnel must review important outputs and remain responsible for decisions and official actions.

- **Approval is specific.** Approval of a software product does not automatically approve every AI feature within it. Approval is tied to the particular feature, users, data, connections, and intended use.

- **Sensitive information is protected.** Confidential or legally protected County data may be used only under a narrow, written exception for an expressly approved system and use. Personal accounts and unapproved consumer tools are prohibited for County

business.

- **AI agents face added controls.** Agents must be specifically approved, have limited access and a named County owner, maintain activity logs, and obtain human confirmation immediately before every action such as sending, publishing, deleting, changing access, or initiating a transaction.

- **Higher-risk uses receive greater review.** Uses affecting employment, benefits, permits, enforcement, public safety, legal rights, or public services require enhanced review and may not rely on AI as the sole decision-maker.

- **County records rules still apply.** Prompts, outputs, approvals, and agent logs may be public records when they document County business and must be retained in County-controlled systems under applicable schedules.

- **Vendors must disclose AI.** Vendors must identify AI functions, data use, sub processors, and material changes. Contract review must address security, retention, training use, records access, accessibility, and the County's ability to suspend or end use.

- **Ongoing oversight is required.** IT will maintain an approved-use inventory; departments remain accountable for their uses; and material changes, incidents, or emerging risks can trigger reassessment, suspension, or revocation. In addition, a governance body will be set up to review requests for non-standard and/or higher-risk uses. This policy currently recommends using the Security subcommittee of the Risk Management Committee for this purpose.

Board-Level Takeaway

The policy does not prohibit AI. It creates a controlled path for useful, lower-risk applications while requiring stronger safeguards for uses that could expose County information, affect residents or employees, or allow software to act on the County's behalf.