



# Interim Policy

Chief Technology Officer

Date: April 18, 2023  
From: Jim Loter, Interim Chief Technology Officer & Department Director, Seattle IT  
Subject: Use of Generative Artificial Intelligence in City of Seattle  
Memo Number: IPM-2301

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*A provisional policy document is issued when a policy is needed within a time period too short to complete the normal policy development process. An Interim Policy is in effect for at least 6 months with possible extensions of six-month increments.*

## Scope

All departments in the City of Seattle.

## Impact Statement

Generative artificial intelligence (AI) systems have become extremely popular and prevalent in a very short amount of time. There is likely interest in using such systems to conduct City business. The field is emergent and rapidly evolving, and the potential policy impacts and risks to the City are not fully understood. Use of generative AI systems with the City of Seattle, therefore, can have unanticipated and unmitigated impacts. This Interim Policy is intended to minimize issues that may arise from the use of this technology while additional research and analysis is conducted.

## Background and Definitions

Generative AI refers to a class of AI systems that are capable of generating content, such as text, images, video, or audio, based on a set of input data rather than simply analyzing or acting on existing data. Popular generative AI systems include GPT-3 and GPT-4/ChatGPT, Dall-E, and Lensa AI among many others. Generative AI technology is rapidly being incorporated into common online tools, such as search engines.

These systems have the potential to support many City business functions and services, however their use also raises important questions, particularly around the sourcing of training data, ensuring proper attribution of generated content, and the handling of sensitive or public data.

Further research into this technology may uncover issues that require more restrictions on its use. Employees are strongly advised to not invest heavily in using this technology or use it to support critical processes.

## Interim Policy

1. **Acquisition or use.** All software services, even if they are free or part of a pilot or proof-of-concept project, must be acquired via Seattle IT's acquisition processes to ensure the software receives all

necessary reviews and considerations (SMC 3.23.040). This requirement applies to downloadable software, Software as a Service, web-based services, browser plug-ins, and smartphone apps.

- a. If a City employee wishes to create an account with a generative AI service or otherwise use generative AI systems to perform functions related to City business, the employee must submit a Service Hub purchase request for software (indicate “z\_Unlisted Software”), specify the AI service and describe how it will be used, and obtain departmental approval.
  - b. Use of generative AI technology that is incorporated into existing services and products, such as internet search engines, does not require permission to use, however the following guidelines must be followed.
2. **Intellectual property.** Content produced by generative AI systems may include copyrighted material. AI systems may be “trained” using data (text, images, etc.) that has been sourced from the internet without regard for copyright or licensing terms. It is extremely difficult to determine what content was used to train an AI system, and difficult to verify whether AI-generated content is wholly original or only a slight stylization of existing copyrighted material. Nevertheless, City employees are required to perform due diligence to ensure that no copyrighted material is published by the City without proper attribution or without obtaining proper rights.
  3. **Attribution and accountability.** Audiences should know when content was produced by AI in whole or in part. If a City employee uses AI-generated content in an official City capacity, the content should be clearly labeled as having been produced using generative AI tools. Employees should also consider including information about how the material was reviewed and edited, and by whom. This allows consumers of the content to understand its authorship and be able to evaluate the content accordingly.
  4. **Reduce bias and harm.** 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 should carefully review any content generated by AI to ensure that unintended or undesirable instances of bias, or even potentially offensive or harmful material, is changed or removed.
  5. **Data privacy.** City employees must not submit any sensitive, confidential, or regulated data, or any personally-identifiable data about members of the public, to a generative AI system.
  6. **Public records.** Employees should be aware of when the use of a generative AI system may result in the creation of a public record that must be retained under Washington state’s Public Records Act. Your department’s Privacy Champion and/or Public Disclosure Officer can be a resource to provide further guidance.

## Next Steps and Actions

Throughout Q2 2023, Seattle IT will work with internal and external stakeholder groups to conduct research into the policy implications for government use of generative AI. In the meantime, this Advisory Memo outlines the preliminary considerations and guidelines that City employees should follow when working with generative AI services in a City context.

Enforcement of this policy will be led by the Chief Technology Officer (CTO) and may be imposed by individual division directors. Non-compliance may result in disciplinary action, restriction of access, or more severe penalties up to and including termination of employment or vendor contract.

## Effective Date

This Interim Policy will be valid until October 31, 2023, unless reauthorized or otherwise communicated.