

COP 1300. Artificial Intelligence (AI) Policy

Effective 2-25-26

Scope

To protect the civil rights and democratic values of the citizens of Tulsa, this policy outlines the principles and methodology that will guide the design, use, and deployment of AI for city business.

This policy includes user responsibilities related to data protection, acceptable use, and ensuring alignment with organizational security policies and regulatory obligations.

It applies to **all users** ("Users") who access, manage, or interact with the City's information systems and perform work on behalf of the City, including:

- Employees,
- Contractors,
- Temporary staff, and
- Third-party partners.

It covers the use of organizational devices, networks, applications, and data, whether accessed on-premises, through remote connections, on personal devices being used to perform work on behalf of the City and/or using the City's data, or using cloud-based platforms.

Purpose

This policy employs best practices from the National Institute of Standards and Technology guidelines ensuring the City takes reasonable measures in safeguarding and protecting individuals, organizations, and the citizens of Tulsa from unsafe or ineffective algorithms, models, or systems.

The purpose of this policy is multifactorial. It:

- Establishes guiding principles for all AI systems used at the City of Tulsa.
 - Defines roles and responsibilities of individuals across the organization that interact with these technologies as required, applicable, and permitted based on role-based duties.
 - Requires these technologies are used in a manner that promotes efficient and effective operations.
 - Ethically advances strategic goals of the Office of the Mayor.
 - Mitigates risks and harm to the City of Tulsa, employees, citizens, residents, and the greater community.
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1. Illegal discrimination against any individual, employee, organization, or community by algorithms, models, or systems will not be tolerated. Algorithms, models, and systems must be used responsibly in alignment with the priorities of the Office of the Mayor.
 2. Upon approval of this policy, all AI use cases will be submitted for and subject to a risk evaluation in accordance with the AI evaluation framework ("Framework") before use is permitted. The initial Framework was approved in detail by the Technology Governance Board on October 23, 2025 but may be amended in the future.
 - a. The Framework consists of four key steps:
 - i. Department Use-Case Submittal where both the business need and technology solution are brought forth.
 - ii. Use-Case Review by a Subcommittee established by the TGB to help condense similar uses into common platforms and classify risk.
 - iii. Vendor risk review under the common or critical risk questionnaire and interview performed by the IT Security Team. There may be risk mitigation recommendations by the IT Security Team that must be addressed.
 - iv. AI-specific risk review questionnaire and interview performed by the IT Security Team. There may be risk mitigation recommendations by the IT Security Team that must be addressed.
 3. All City Departments will abide by the findings and risk mitigation strategies of the Framework
 - a. Any requested exception to the Framework will be reviewed on a case-by-case basis. Approval will be based on operational need and balanced against potential risk(s).
 - b. All exceptions to the Framework require approval of management and relevant IT security personnel and will be communicated as needed to departments in a transparent manner.
 - c. Final approval will be at the discretion of the Mayor or Mayor's designee.
 4. It is understood that as technology continues to advance exponentially, that software and systems currently in use with the City may, independent of the City's knowledge or authority, add generative AI, Machine Learning (ML), or algorithmic features and components during vendor-initiated software updates; (Microsoft, for example).
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- a. Existing Software and Systems that have previously been evaluated as described in section 5 that add AI features of which the City cannot opt out should be submitted for risk assessment by the department that owns the software.
 - b. Risk assessment is required regardless of whether the AI features were added with or without the City's prior knowledge and consent.
5. All assigned AI usage and policy training are:
- a. Mandatory
 - b. Required before accessing AI systems for city business
 - c. The responsibility of all parties including the authorized User, management, and the IT Department. IT will make available general generative AI use and policy training applicable to all users. Department management will make available more specialized training for software that is not used Citywide in alignment with department goals. Additional training sponsored by the IT department will be prioritized and triaged via TGB.

Each time a User accesses the network and/or uses a City device, there should be a focus on security and precaution that cannot be compromised. Failure to follow the policy may lead to disciplinary action up to and including termination of employment and/or user access.

6. Users are not permitted to represent work product that has been entirely or mostly created by an AI tool as their own original work. That work must come with a direct citation or notice within the software that content is AI generated. The specifics of the citation are software and context dependent. Users must carefully review, adapt, and edit AI content before completing and submitting their final work products. Users are ultimately responsible for the quality and accuracy of any and all work they produce and submit even if assisted by AI.
7. All City of Tulsa Employees are subject to Personnel Policies and Procedure Manual (PPPM), including PPPM 411, City Work Rules. Any violation of the provisions of this policy may result in disciplinary action up to and including termination of employment for a City of Tulsa employee and/or other appropriate legal action and/or termination of system access as it applies to all Users.

Responsibility

The responsibility of governing artificial intelligence systems lies with the Technology Governance Board.
