



Cochise County Board of Supervisors

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Policy Title: Generative Artificial Intelligence
Policy Number: 1810

Effective: March 24th 2026

Supersedes: None

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Scope/Coverage: All Cochise County Departments, employees, contractors, and third parties who access, manage, or interact with Cochise County data, systems, or services.

Policy Contact: Cochise County Information Technology (CCIT) Department

Source Document Reference: Cochise County Information Technology Policies

- I. **Purpose:** The purpose of this Policy is to provide a consistent and thoughtful management approach to the use of generative artificial intelligence (“**GAI**”) technologies in the County that will continue to foster an environment for innovation while complying with applicable laws, protecting data privacy, ensuring accuracy and efficiency in public service. These tools have the potential to be extraordinarily useful to public servants in their work, but they also present risks. Therefore, this Policy and any associated procedures or guidelines serve as a resource for employees of the County to encourage responsible use of these emerging technologies.

- II. **Scope:** This Policy applies to all County Departments, employees, contractors, and third parties who access, manage, or interact with County data, systems, or services. Throughout this Policy, references to “County employees” include County Departments, employees, contractors, and third parties covered by this Policy unless otherwise specified. Capitalized terms used herein have the meaning provided in **Addendum I** found at the end of this Policy.



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III. General:

- a. When making use of GAI tools and capabilities, users should consider the following general principles:
 - i. **Employee Responsibility:** County employees are accountable for the decisions that are made and materials created using GAI.
 - ii. **Bias and Accuracy:** All GAI systems have issues with both Bias and Accuracy (as defined herein) that can result in serious outcomes. Responses can reflect the cultural biases of the source materials and algorithms used in training the GAI model. GAI will often prioritize a response that sounds reasonable, even if inaccurate, and may even defend these responses. These are referred to as "Hallucinations," and all GAI output must be assessed for these inaccuracies.
 - iii. **Human Bias:** County employees must be aware of and take reasonable steps to identify and mitigate human bias when reviewing or relying on AI-generated content.
 - iv. **Final Review:** **Review and verification of GAI output by persons familiar with the subject matter are absolutely necessary.** This ensures that all County work products based on any GAI derived information is fair, unbiased, and factually correct.
- b. Exceptions to any provision of this Policy may be approved on a case-by-case basis when justified by legitimate County business needs, operational efficiency, or legal requirements. CCIT is responsible for the technical approval of GAI systems, while the County Attorney's Office will review matters related to legal compliance, including public records, privacy, and contractual restrictions. Appropriate County leadership must also be involved in the approval process as necessary. Any approved exception must be thoroughly documented and may include additional safeguards or conditions of use.
- c. This Policy will be periodically assessed by CCIT and updated to keep pace with changes to GAI capabilities and emerging risks associated with its use.

- ## IV. Security:
- CCIT, in coordination with County Departments, shall take steps to ensure the security and integrity of GAI tools and services and to prevent exposure of County systems, data, or operations to unacceptable risk. CCIT cybersecurity



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staff are available to provide technical assistance with the secure implementation and use of GAI resources.

V. Privacy:

- a.** County personnel must protect the privacy of individuals when using GAI. Users must not type or upload private or sensitive information into GAI tools unless the tool and environment have been formally approved by CCIT for that specific type of data and use case. When using CCIT-approved enterprise GAI environments configured to protect County data, authorized users may process sensitive information strictly for official County purposes and in accordance with all applicable security, privacy, and legal requirements. This rule also applies when the County is training its own GAI tools or models. Any data used for training must be carefully reviewed and approved to ensure it does not include confidential or legally protected information unless explicitly authorized.
- b.** The following types of data must not be utilized with GAI tools unless formal approval has been obtained from CCIT, in consultation with the County Attorney's office:
 - i. Personally Identifiable Information (PII)
 - ii. Medical or health records
 - iii. Employee or HR information
 - iv. Law enforcement reports or restricted legal documents
 - v. Anything not meant for public release
- c.** If you're not sure whether the data is okay to use, ask CCIT first.

- ## **VI. Training:**
- CCIT shall mandate and provide a minimum level of GAI training for users responsible for business processes which are incorporating GAI. CCIT shall ensure that all users of dedicated tools consisting of or incorporating GAI complete this training before being granted access and annually thereafter. CCIT may from time to time update the GAI training required of County employees as it determines



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is necessary, including without limitation with respect to training for use of specific GAI tools.

VII. Procurement:

- a. CCIT shall maintain a list of currently approved GAI Platforms.
- b. In keeping with IT Procurement policies, County Departments shall submit an IT approval request for the planned procurement of any new software solution that incorporates GAI. If a County Department becomes aware of GAI capabilities being deployed to an existing solution, they shall notify the IT Department by emailing support@cochise.az.gov.
- c. New County contracts shall prohibit vendors from using Cochise County data, prompts, outputs, or related metadata for the purpose of training, fine-tuning, or improving GAI models unless explicitly approved in writing by CCIT.

VIII. Collaboration and Requirements:

- a. Before deployment of GAI into any County production environment, County Departments shall collaborate directly with CCIT to review the use case, data classification, risk profile, and security controls. CCIT must review all GAI software services intended for County operational use to ensure that the software meets all necessary policy, security and privacy requirements. This requirement applies to but is not limited to downloadable software, free or proof-of-concept projects, Software as a Service (SaaS), web-based services, browser plug-ins, operating systems, and smartphone apps.
- b. County employees may use publicly available GAI tools for general research and information gathering only, provided that no sensitive or non-public County data is entered into the tool and all outputs are independently reviewed prior to use in County work. This allowance is limited to low-risk exploratory use and does not authorize operational, decision-making, or production use of unapproved GAI systems. If you are unsure whether certain information may be shared with the GAI tool, ask CCIT first.
- c. GAI features embedded within software applications that have been procured, installed, or formally approved by CCIT for County use are considered approved at the level enabled by CCIT. Departments must not independently enable, purchase, or expand AI functionality within these platforms without CCIT review.



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IX. Output Review:

- a. GAI outputs must be reviewed by knowledgeable human operators for accuracy, appropriateness, privacy, and security before being:
 - i. Sent to the public
 - ii. Entered into County records
 - iii. Used to inform actions or decisions
 - iv. Shared with elected officials or external partners
- b. **GAI outputs should not be assumed to be truthful, credible or accurate.** County employees must review the content for truthfulness, accuracy, appropriateness, and context. Hallucinations, errors, and misleading content must be corrected prior to use. AI system disclaimers should not appear in final County documents unless relevant. Additionally, all final content should be consistent with County policy and public messaging.
- c. GAI outputs shall not be used to impersonate individuals or organizations without their prior written permission.
- d. All software code generated through the use of GAI may not be used in production until fully reviewed and tested for proper functionality and security. Any such use shall be properly documented.

X. Permitted Use Cases: GAI may be used to support legitimate County business activities where such use complies with this Policy, other County policies, applicable law, and CCIT guidance. Acceptable uses generally include drafting, summarization, research support, analysis assistance, formatting, translation of non-sensitive content, coding assistance, and other productivity-support activities, provided that:

- i. Human review is performed prior to reliance or release;
- ii. Sensitive data requirements in this Policy are followed; and
- iii. Employees remain responsible for the accuracy and appropriateness of the final work product.

The examples of safeguards above are illustrative and not exhaustive. Departments shall consult CCIT when evaluating new or higher-risk use cases.



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XI. Prohibited Use Cases: GAI may not be used for the below purposes or any other purpose reasonably expected to present significant risk to the County, County employees, or third parties.

- i. Making policy decisions without human review.
- ii. Processing sensitive information or other regulated data using non-approved GAI tools. Only GAI tools that have been vetted and approved by CCIT for secure data handling may be used for this purpose.
- iii. Replacing expert judgment in specialized fields.
- iv. Any use that might violate the Acceptable Use Policy or any other County policy.

The examples of prohibited uses above are illustrative and not exhaustive. Departments shall consult CCIT when evaluating new or higher-risk use cases.

XII. Records Classification and Retention. GAI prompts and outputs that relate to public business may constitute public records under A.R.S. § 39-121 and applicable Arizona retention requirements. Departments are responsible for ensuring that GAI-assisted content that is relied upon in the development of official County work products is retained in accordance with applicable records retention schedules. Exploratory prompts, background research queries, or draft interactions that do not substantively contribute to official County actions or records may be treated as transitory in accordance with existing records guidance.

Use Type	Record Type	Retention Period
Drafting / Brainstorming	Transitory	Until no longer administratively useful
Used in final policy or report	Official Record	Per subject-specific retention (e.g., 5–10 years)
Public-facing or citizen communications	Public Record	Retain as correspondence (per subject)



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When there is uncertainty regarding classification or retention, Departments should consult the County Attorney and applicable Arizona State Library guidance.

- XIII. Public Records and Disclosure.** Prompts and outputs created by County employees in the course of public business may be subject to disclosure under Arizona public records law as described in Records Classification and Retention. Departments must retain such records when required under applicable retention schedules and respond to public records requests in accordance with standard County procedures. Nothing in this Policy alters existing County records retention or disclosure obligations.



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XIV. Addendum I – Terms and Definitions Cochise County Generative AI Policy – Glossary of Terms

- a. **Acceptable Use Policy** A set of County rules governing how technology resources—including AI—may and may not be used. Any misuse of GAI tools (e.g., for impersonation, policy decisions without review, or handling restricted data) may violate this policy.
- b. **Accuracy** The factual correctness and reliability of AI-generated outputs. Due to the limitations of LLMs, accuracy is not guaranteed and must be verified by human experts.
- c. **AI-Assisted Content** Content that has been created, edited, or enhanced using AI tools but includes human review, modification, or approval. This term reinforces human oversight in the content production process.
- d. **AI Output** The content produced by an AI tool in response to a prompt. Outputs can include text, images, summaries, code, or other forms of generative content.
- e. **AI Prompt** A user-submitted input or question designed to elicit a response from a GAI system. Prompts can be natural language instructions or more structured data, depending on the tool.
- f. **Approved GAI Tools** AI platforms or services that have been formally reviewed and authorized by CCIT for specific use cases within Cochise County, based on security, privacy, and compliance standards.
- g. **Attribution** Acknowledging the use of AI in content creation by noting which AI tool was used and how. Attribution can appear in footnotes, signatures, document headers, or body text (e.g., “Drafted with ChatGPT, reviewed by staff”).
- h. **Bias (in GAI)** Inherent or learned tendencies in AI systems to produce skewed or unfair results based on the data they were trained on. These can reflect cultural, social, or economic stereotypes present in training datasets.
- i. **Deployment Collaboration**
- j. The requirement that departments work directly with CCIT to assess risk, data classification, and system impact before integrating GAI into any workflow or platform.



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- k. **Environment** The technical and operational framework in which a GAI tool operates, including infrastructure, hosting location (e.g., cloud or on-premises), security configurations, data handling and retention policies, access controls, and monitoring mechanisms that ensure compliance with County information security and privacy requirements.
- l. **Generative Artificial Intelligence (GAI)** A category of artificial intelligence that uses machine learning models to generate text, images, code, or other content in response to prompts. These tools learn patterns from large datasets and can create original outputs based on user input.
- m. **Hallucination (in GAI)** An AI-generated response that is factually incorrect, misleading, or fabricated but presented in a convincing or authoritative manner. Human review is required to identify and correct hallucinations.
- n. **Human Bias** The conscious or unconscious attitudes, assumptions, or predispositions of individuals that may influence the design, input, interpretation, or use of Generative Artificial Intelligence (GAI) systems. Human bias can impact the evaluation of AI-generated content and may result in decisions or outcomes that are inaccurate, unfair, or inconsistent with County policies or legal requirements.
- o. **Human-in-the-Loop** A required process in which a knowledgeable County employee reviews and validates all AI-generated content before it is released, implemented, or made public. This ensures accountability and contextual judgment.
- p. **Knowledgeable County Employee** A County employee who has the appropriate training, experience, and subject matter expertise to evaluate AI-generated content and determine its accuracy, appropriateness, and compliance with applicable laws, regulations, and County policies prior to use.
- q. **Large Language Model (LLM)** A type of GAI model, typically trained on vast amounts of text data, that can understand and generate human-like language. Examples include GPT (used in ChatGPT), Bard, and Claude.
- r. **Legally Protected Information** Any information that is confidential, restricted, or otherwise protected from disclosure by federal or Arizona state law, regulation, court order, or legally binding agreement. This includes, but is not limited to, personally identifiable information (PII), protected health information (PHI), criminal justice information (CJI), information subject to attorney-client privilege, personnel records, and any data classified as confidential or restricted under applicable law or County policy.



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- s. **Official Record** Any recorded information, regardless of physical form or characteristics, that is made or received by the County in connection with the transaction of public business and is preserved or appropriate for preservation as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the County, in accordance with applicable Arizona public records laws. AI-generated content becomes an Official Record when it is used to support decision-making, included in official communications, or otherwise relied upon in the conduct of County business.
- t. **Policy Decision** Any decision or recommendation that creates, modifies, interprets, or directs County policies, procedures, regulations, or official actions, including those that impact public programs, legal compliance, resource allocation, or the rights, duties, or services affecting County employees or the public.
- u. **Procurement Approval** The required process of notifying CCIT and receiving formal approval prior to acquiring any new software or tools that incorporate GAI capabilities.
- v. **Production Environment** Any live County system or application in which public service delivery or official business operations take place. GAI must not be deployed in production without prior CCIT review.
- w. **Public Record** Any content (including AI-generated) that pertains to public business and is subject to Arizona's public records laws (A.R.S. § 39-121). It must be retained and disclosed upon request, if applicable.
- x. **SaaS (Software as a Service)** Cloud-based software solutions delivered via the internet. AI tools provided via SaaS must undergo CCIT review prior to use, regardless of whether they are free, paid, or in a pilot phase.

Sensitive Information Information that is legally protected or confidential. This includes:

- i. Personally Identifiable Information (PII)
 - ii. Health records (HIPAA-protected)
 - iii. Employee or HR information
 - iv. Law enforcement and legal documents
 - v. Non-public government data
- y. **Tool** Any software application, platform, system, or service that uses Generative Artificial Intelligence (GAI) capabilities to generate, analyze,



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summarize, or transform content, including but not limited to text, images, audio, video, or code. This includes publicly available AI services, third-party applications, and County-approved enterprise solutions.

- z. Training Requirements** The mandated education and certification (initial and annual) for users of GAI tools. Training is coordinated by CCIT and required before access is granted to any AI-enabled system.
- aa. Transparency** The principle of disclosing AI use to relevant stakeholders, including the public, elected officials, and internal teams. This includes documenting how AI was used and providing appropriate annotations or disclaimers.
- bb. Transitory Record** Temporary documentation created during the drafting or brainstorming phase using GAI. These records are not retained permanently unless they contribute to final public or official County outputs.