



# Paradise Irrigation District

6332 Clark Rd, Paradise, CA 95969 · 530-877-4971 · Fax: 530-876-0483 · www.pidwater.com

## AGENDA

**Paradise Irrigation District  
Administration & Personnel Committee  
6332 Clark Road, Paradise, CA 95969**

**TUESDAY, JUNE 24, 2025 – 9:00 AM**

### Committee Members:

Directors Bob Matthews and Marc Sulik

PID Staff – Kevin Phillips, District Manager, Mickey Rich, Assistant District Manager

- ❖ *The Board of Directors is committed to making its meetings accessible to all citizens. Any person requiring special accommodation to participate is requested to contact the District Secretary at (530) 876-2039 at least 72 hours before the meeting.*

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### 1. Opening

### 2. Public Comment

Individuals will be given an opportunity to address the Board regarding matters not scheduled on the agenda; however, the Board cannot take action on any matter not on the agenda. Comments will be limited to three minutes per speaker. An opportunity for public comments on agenda items will be provided when they are discussed by the committee, with comments limited to three minutes per agenda item.

### 3. PID Policy and Procedures

- (Pg. 2-6) a. Chapter 11 – Reimbursement and Business Travel Policy: Establish a Travel Reimbursement Limit for Management Employees who Receive an Automobile Allowance.
- (Pg. 7-9) b. Chapter 13 – Budget, Audits, Accounting, and Finance: Establish Department Spending Limits.
- (Pg. 10-12) c. Appendix B.13 - Mobile Device Use Policy: Provide for Reimbursement of Personal Cell Phone Usage for Contract Employees.
- (Pg. 13-17) d. Appendix B.11 - Addition of an Artificial Intelligence (AI) Usage Policy.
- e. Potential Discussion Item: Addition of a New Acknowledgement Form for the Paradise Irrigation District's Vehicle Safety Program.
- f. Alternative Office Schedule – Customer Service Department
- g. Federal Lobbyist Services - Request for Proposal Review

### 4. Adjournment

## **CHAPTER 11 REIMBURSEMENT & BUSINESS TRAVEL POLICY**

### **11.1 PURPOSE**

The purpose of this policy is to establish rules to reimburse District officials and employees for reasonable and prudent costs associated with travel and business meals while serving a District purpose or for training, which will be of benefit to the District.

### **11.2 EMPLOYEE INCURRED EXPENSES**

Management or your supervisor must pre-approve reimbursable expenses and travel requests that exceed \$25. Expenses under the amount of \$25, which are incurred by employees for PID purposes, will be reimbursed through its petty cash fund. Expenses over that amount will be reimbursed through normal accounting procedures after completion and submission of an expense report or employee reimbursement form. All requests for reimbursement must include an itemized receipt for each expense and be requested within 30 days of the expense.

### **11.3 CREDIT CARD USE**

Credit cards may be issued to specific employees who either travel on a regular basis on District business, or have the need to frequently purchase supplies or services. Credit cards shall be used only for legitimate, approved business of the District, subject to the following regulations. These cards should be used for all approved expenses as authorized in this section.

- A. No personal items may be charged on the business credit card unless approved by management.
- B. All charges must be in line with travel guidelines or as approved by management
- C. Receipts must be submitted to the Manager, Office Manager or Accounting Technician with the approved travel expense report, expense claims reimbursement form or the charge card request/authorization form within one week of making the charge.

### **11.4 MILEAGE**

The mileage reimbursement rate for operating privately owned vehicles will be the allowable IRS rate in effect at the time the vehicle is used. All tolls will be reimbursed at actual expense. The mileage distance should be calculated from home or the PID offices using the shortest reasonable, direct route. Management employees who receive an

automobile allowance may request travel reimbursement only when the round-trip distance exceeds 100 miles.

## **11.5 AIR TRAVEL**

Travel exceeding 300 miles in each direction, as measured from the Sacramento Airport should, be done by air travel if practical. The reimbursement rate will be at the most economical and time efficient rate found on the Internet at the time of purchase. Should an employee decide to drive their own vehicle, total mileage reimbursement will not exceed the cost for air travel and associated costs. Payments for travel time will always be paid in consideration of the quickest time (i.e., air travel versus driving time).

## **11.6 CAR RENTALS**

Employees should use the District's corporate accounts for car rentals when needed, but should always seek out the lowest rates available. Employees should search the internet for the lowest available rate. Reimbursement for rental car will include the cost of the rental car, gas, and rental insurance.

## **11.7 MEALS**

The District will not provide reimbursement for meals associated with single day travel.

The following guidelines should be used for reimbursement of meals while traveling overnight on PID business. Meals and incidental expenses (M&IE) will be reimbursed based on the M&IE per diem rates established in IRS publication 1542, using the "high-low" method. If reimbursement is based on actual expense, itemized receipts will be required and there is no reimbursement for alcohol. Special circumstances will be required to justify actual reimbursement (as approved by the Manager). The IRS M&IE per diem rate will be allocated between three meals and incidentals based on the following percentages:

### IRS M&IE PER DIEM %

Breakfast	15%
Lunch	25%
Dinner	50%
Incidentals	10%

In order to be eligible for meal reimbursement, the following criteria must be met:

#### **A. For Breakfast –**

You must have started traveling prior to 7 a.m. or have stayed overnight.

#### **B. For Lunch –**

You must have started traveling prior to 11 a.m. or have stayed overnight. If the travel ends prior to noon, lunch expenses will not be eligible for reimbursement.

C. For Dinner –

You must have started traveling prior to 4 p.m. or have stayed overnight. If the travel ends prior to 6 p.m., dinner expenses will not be eligible for reimbursement.

D. Incidentals –

Only one allowance for incidental expenses will be permitted for each night spent away from home on District Business.

## **11.8 LODGING**

The reimbursement rate will be based on the lodging per diem rate established in IRS publication 1542, using the “high-low” method. This reimbursement amount will cover all hotel-related costs, but additional reimbursement maybe available for parking and internet access if those costs exceed the per diem lodging rate. Hotel-related costs include necessary telephone usage, use of hotel facilities and resort fees, etc. At industry conferences, the reimbursement rate shall be the rate set for single rooms at the conference hotel. Hotel-related costs will be reimbursed when the conference rate option is used. When it is impractical to travel to a seminar or business meeting in the morning before the event occurs, an employee may consider staying overnight the day before. When an event is concluded and the employee cannot reasonably arrive home by 8:00 p.m. that same night, then the employee may consider staying over.

## **11.9 MOBILE DEVICE**

Employees that are issued a mobile device are expected to use that mobile device to place all calls while traveling on PID business in accordance with the District’s Mobile Device Use Policy. Employees not issued a mobile device and traveling on PID business will be reimbursed for up to 10 minutes every night for necessary personal calls unless lodging is being reimbursed on the IRS publication 1542 high-low method, in which case such calls would be covered by reimbursements for lodging and/or incidental expenses. (Mobile Device Use Policy – Appendix B-13).

## **11.10 PARKING**

Daily parking reimbursement must based on the cost of the most reasonable and convenient option. Airport parking shall be reimbursed for the lowest available daily rates only.

## **11.11 TRAVEL APPROVAL PROCESS**

Approval for travel must be signed by the District Manager or Department Supervisor before travel. A travel purchase order must be filled out and signed with approximant total cost of travel.

#### **11.12 BOARD MEMBER TRAVEL**

- A. Where there is any question regarding the level of appropriate reimbursement, the Board shall approve the reimbursement rate at the Board meeting held before the expense is incurred.
- B. Budgeted and reimbursable Board Member travel includes industry conferences, training, official meetings with officials from other governmental bodies to conduct official District business.
- C. Board Member Travel must comply with Government Code Sections 53232.2 & 53232.3.
- D. The District will not pay for or prepay for Director's guest expenses.
- E. If the lodging is in connection with a conference or organized educational activity, lodging costs shall not exceed the maximum group rate published by the conference or activity sponsor, provided that lodging at the group rate is available to the Board Member at the time of booking. If the group rate is not available, the Board Member shall use comparable lodging that is consistent with the District's Travel Reimbursement Policy.
- F. Board Members shall use government and group rates offered by a provider of transportation or lodging services for travel and lodging when available.
- G. If the District reimburses a Board Member for actual and necessary expenses incurred in the performance of official duties, then they shall provide expense report forms to be filed by the Board Members for reimbursement for actual and necessary expenses incurred on behalf of the District in the performance of official duties. Reimbursable expenses shall include, but not be limited to, meals, lodging, and travel.
- H. Expense reports shall document that expenses meet the existing policy, adopted pursuant to Section 53232.2, for expenditure of public resources.
- I. Board Members shall submit expense reports within a reasonable time after incurring the expense, as determined by the District, and the reports shall be accompanied by the receipts documenting each expense.
- J. Board Members shall provide brief reports on meetings attended at the expense of the District at the next regular meeting of the Board.

- K. Board Members shall report to the District Manager as soon as possible if they are unable to attend pre paid meetings in order to attempt to find a replacement.
- L. Board Members shall report at the next regular Board meeting the reason for missing any prepaid, preapproved meetings for which expenses were incurred. A majority of the Board may require that the Board member reimburse the District for expenses incurred by the District.
- M. All documents related to reimbursable District expenditures are public records subject to disclosure under the California Public Records Act (California Government Code § 6250 st seq.).
- N. Directors driving private vehicles on PID business are encouraged to attend a defensive driving class every four years to be held at the District office.

#### **11.13 SMALL REIMBURSABLE AMOUNTS**

The Manager and his staff shall pre-approve reimbursable District travel and business meal requests. Expenses under the amount of \$25.00, which are incurred by District personnel, may be reimbursed through the District petty cash fund. Expenses over that amount will be reimbursed through normal accounting procedures after completion and submission of an expense claim report. All petty cash requests for reimbursement must include an itemized receipt for each expense and be requested within thirty days of the expense date.

#### **11.14 CONTRACT EMPLOYEE REPORTS**

Contract employees of the District shall provide brief reports on meetings attended at the expense of the District at the next regular meeting of the Board.

#### **11.15 DISCLOSURE OF REIMBURSEMENTS**

An annual disclosure of Board Member or employee reimbursements for individual charges over \$100 shall be recorded and is available to the public in accordance with the California Public Records Act during the hours when the District offices are open.

**CHAPTER 13**  
**BUDGET, AUDITS, ACCOUNTING AND FINANCE**

**13.1 BUDGET**

- A. By May 1st of each year, the Treasurer shall present to the Finance Committee an outline of concepts for the revenue, operating, and capital budget amounts. Final drafts of the budget shall be submitted for committee review prior to presenting to the Board.
- B. On or before the first regularly scheduled meeting of the Board in July, the Treasurer shall prepare for the ensuing year, and file with the Board, tentative revenue, operating, and capital budgets, together with specific District goals and work programs and any other supporting data required by the Board.
- C. The tentative budget shall be reviewed and considered by the Board at any regular meeting or special meeting called for that purpose. The Board may make any changes considered advisable in the tentative budget, pursuant to statute and generally acceptable accounting standards. The District will continue normal expenditures of funds during the period of time from the first day of each fiscal year through the date the Board adopts that fiscal year's budget, unless specifically instructed by the Board to do otherwise.
- D. After review, the Board shall adopt operating and capital budgets for the fiscal year period. Upon final adoption, the operating and capital budgets shall be in effect for the budget year, subject to any later amendment. During the budget year, and at a minimum during the mid-year review, the Board may, in any regular meeting or special meeting called for that purpose, review the operating and capital budget for the purpose of determining if the budget amounts need to be amended.
- E. During the budget process and at the mid-year budget review, the Treasurer shall discuss District reserving requirements for debt service obligations and short and long-term replacement, capital projects, connection fee requirements and other reserving obligations. This review shall also include any discussions regarding debt service bond covenant requirements impacting the District.

Any department, with the approval of the Manager and Treasurer, may utilize up to 15% of funds designated for another department's use within a budget line item.

**Commented [MR1]:** This should be removed as our budget is small enough that there is much overlap between departments.

**13.2 INDEPENDENT AUDITOR**

- A. The independent auditor has the responsibility of reporting whether the District's financial statements are prepared in conformity with auditing standards accepted in the United States of America, the state Controller's Minimum Audit Requirements for California Special Districts, and the standards applicable to financial audits contained in Government Auditing Standards, issued by the Comptroller General of the United

Amended 03/30/2021; § 13.3  
Amended 03/20/2024; § 13.1.E & 13.5

States. Copies of the annual audit report shall be filed with the California State Controller's Office and shall be filed as a public document in the office of the District.

- B. Every three years, the District shall select its auditor by a competitive request for proposal process. Contracts shall be issued for three-year terms and in accordance with Section 12.4.5 of this manual. The District shall not retain the same auditor for more than six consecutive years.

### **13.3 ACCOUNTING AND FINANCE**

#### **A. General Fund and Payroll Check Signers**

Any two of the following individuals shall sign general fund and payroll checks: Treasurer, District Manager, Assistant District Manager, Office & Customer Service Manager, District Secretary, Board President, Board Vice-President, or any other individual authorized by resolution of the Board of Directors.

##### **1. General Fund Checks**

On a day-to-day basis, the preferred signers shall be a combination of at least two of the following: Treasurer, Office & Customer Service Manager, Assistant District Manager, or District Manager, with the internal control preference being the Treasurer and Office & Customer Service Manager in accordance with the Procurement Policy.

A complete descriptive register of general checks issued in a given month shall be prepared by accounting personnel and provided in the agenda packet for Board review and acceptance by no later than the Board meeting of the following month.

##### **2. Payroll Checks**

On a day-to-day basis, the preferred signers shall be a combination of at least two of the following: Treasurer, Office & Customer Service Manager, District Secretary, Assistant District Manager and/or District Manager.

### **13.4 CAPITALIZATION VERSUS EXPENSE**

Single item purchases with at least an anticipated useful life of three years and exceeding \$10,000 each shall be capitalized as a fixed asset. The purchase of these fixed assets shall be included on the District's statement of net assets and depreciated over the asset's estimated useful life. The purchase of fixed assets for less than \$10,000 shall be expensed. Other expenditures, for \$10,000 or more, which provided a significant increase in future service potential of a fixed asset shall also be capitalized as part of the existing asset. To meet the criteria for a capital expenditure, the purchase should extend the useful life of an asset, increase the quantity of service provided by an asset, or increase the quality of service

Amended 03/30/2021; § 13.3  
Amended 03/20/2024; § 13.1.E & 13.5



by an asset. Capital expenditures may include the following: additions (enlargements, expansions or extensions of existing assets), replacements and improvements, and rearrangement and relocation of an asset.

Expenditures for normal repairs and maintenance shall not be considered as capital expenditures.

### **13.5 PETTY CASH**

A petty cash fund in the amount of \$1,200 will be maintained for the purpose of providing cash for miscellaneous cash purchases, front counter drawer customer transactions, and certain employee reimbursements in accordance with Sections 11.2 and 11.13 of this Policy Manual. Access to petty cash shall be limited to the Finance & Accounting Manager, Office Manager, the Accounting Technician, and Utility Billing Technician.

## MOBILE DEVICE USE POLICY

### **PURPOSE:**

The purpose of the **Mobile Device Use Policy** is to provide procedures for mobile device use by District employees.

District mobile devices are property of the Paradise Irrigation District and subject to District rules and regulations, public information requests, maintenance, and security policies. Employees using District mobile devices have no expectation of privacy as devices are subject to inspection at any time. Permission to use District mobile devices can be revoked at any time. Supervisors have the authority to restrict or prohibit use of mobile devices when they determine the use may present a safety hazard. Employees may be subject to disciplinary action up to and including termination for unauthorized mobile device use or failure to comply with District policies.

The District will verify compliance to this policy through various methods, including but not limited to, periodic device inspections, business reports, internal and external audit and feedback from District personnel.

### **DEFINITION:**

References to mobile devices include cell phones or wireless Personal Digital Assistants (PDA) such as a BlackBerry, Treo, iPhone, iPad, tablet etc.

### **DEVICE USAGE**

Employees with a business need for a mobile device, as determined by the employee's supervisor, will be assigned a District-owned mobile device. Mobile device usage is restricted to business-use only except in the case of an emergency.

Employees are expected to use their personal device during designated breaks for non-district use. Employees are prohibited from performing District duties on a personal device. Unrepresented management employees, including the CFO, District Manager, and Assistant District Manager, may choose to use their personal mobile phone for district-related business purposes. The district will provide reimbursement equivalent to the monthly cost of the mobile devices it provides to district employees. Unrepresented management employees who opt to use their personal device are required to maintain the device in active service with data capabilities to ensure they can effectively perform their assigned duties. Additionally, such personal devices may be subject to state and federal public information requests, and management employees must comply with any applicable legal and regulatory requirements regarding access to records and communications.

### **MOBILE DEVICE USE IN VEHICLES**

Employees must comply with California law regarding use of mobile devices in moving vehicles. Sending and/or receiving text messages, emails or any other data transmission while operating any vehicle is prohibited. Employees must follow applicable state or federal laws or regulations regarding the use of electronic devices. Currently, California law prohibits use of a cell phone or similar electronic communication device while holding it in your hand while driving. Driving includes being stopped at a traffic signal or stop sign. Use in a hands-free manner is permissible. Employees with any questions regarding laws and

regulations regarding the use of cellular phones while operating moving vehicles should contact their supervisor immediately.

Employees should only use a mobile device when it is safe to do so. Employees are required to pull off to the side of the road and safely stop the vehicle before placing or accepting a call, texting or sending an email. The only exception to this is if the call can be placed or accepted entirely hands-free. Safe mobile device use includes, but is not limited to:

- a. If your device rings when you are driving– let your mobile voice mail service take the call and listen to the message later when you are parked, or pull over before answering, if traffic conditions permit;
- b. Suspend hands free conversations during hazardous driving conditions or situations.
- c. Place your calls before you begin your trip or call when your vehicle is parked. Never dial a number while driving. Pre-programmed number dial features are available on your device.
- d. DO NOT engage in conduct that may distract you from safely operating the vehicle.

### **MOBILE DEVICE USE AT WORK SITE**

Mobile devices should only be used at work sites when it is safe to do so. Work sites include but are not limited to: road repair, maintenance, and construction, operating or repairing energized equipment such as electrical panels, motors, or energized circuits.

### **MOBILE DEVICE USE AND OFF-ROAD EQUIPMENT**

Use of a mobile device, including hands free service, while operating a motorized off-road (maintenance/construction type) equipment is prohibited. Mobile devices cannot be used unless the off-road equipment has been properly stopped and turned off.

### **EMPLOYEE RESPONSIBILITIES:**

1. Employees must take reasonable steps to protect mobile devices and the information contained therein. This can be done with a secure password or pin. When possible, employees should use two-factor or two-step verification for added application/device security. Notwithstanding the password, the District can still access the device at any time.
2. Employees must keep mobile device and accessories in good working order.
3. The employee must notify their immediate supervisor upon detection of a security incident or when a mobile device may have been lost or stolen.
4. Mobile devices that contain confidential, personal, or sensitive District information must use encryption or equally strong measures to protect the data while it is being stored. District will provide encryption and prohibits disabling it.
5. Unless written approval has been obtained from the District Manager, and notification given to the Information Systems Manager, databases or portions thereof, which reside on the network at the District, shall not be downloaded to mobile devices.

I, \_\_\_\_\_ have read and understand the mobile device policy on this date, \_\_\_\_\_, 2020. I understand that any previous mobile device reimbursement provided to me will end 30 days from the date I was issued the PID-owned mobile device.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

## Paradise Irrigation District Artificial Intelligence (AI) Use Policy

The Paradise Irrigation District recognizes that technological resources enhance employee performance by offering effective tools to assist in providing quality services, facilitating communications with customers, employees, and the community, and supporting district operations.

### **Purpose**

The purpose of this policy is to define the scope in which Artificial Intelligence (AI) may be utilized by Paradise Irrigation District (District) employees and others performing work on behalf of the District. This policy is to be followed to ensure compliance with existing laws, regulations, and policies related to data protection and proper usage.

### **Scope**

This policy applies to all PID employees, contractors, and any other third-party individuals or entities who have access to AI technologies or are involved in using AI tools or platforms on behalf of the District, whether on or off District premises.

### **Maintenance**

This Policy is subject to review at least annually by the Assistant District Manager or Designee.

### **Definitions**

**Artificial Intelligence (AI)** — Artificial intelligence is the simulation of human intelligence processes by machines, especially computer systems that are used to perform tasks that could act and learn in such a way that could replace human intelligence. Examples of AI include, but are not limited to: Limited Memory Artificial Intelligence, Generative Artificial Intelligence, ChatGPT (CHAT Generative Pretrained Transformer), Machine Learning, Microsoft Copilot for Office 365.

### **Adverse Action**

Failure to comply with this Policy may result in disciplinary action up to and including termination in accordance with the employee's separate and distinct disciplinary rules and procedures.

### **Policy**

#### **1. Introduction**

This policy encompasses the use of all AI technologies, with a particular focus on Limited

Memory AI technologies, such as Generative AI, given that Generative AI represents the predominant form of AI currently in use. Some examples of common tasks that Generative AI may assist users with, include creating or editing:

- Emails and letters
- Sales and advertising materials
- Spreadsheet calculations
- Document or information sorting
- Dictation and meeting note taking
- Blog posts, reports, and other publications
- Outlines or summaries of information
- Policies and job descriptions
- Memoranda and similar documents

There are risks in using this technology, including uncertainty about ownership of the AI-created content and security and privacy concerns with inputting proprietary or confidential information about an employee, customer, operations, etc., when interacting with the AI technology. Additionally, the accuracy of the content created by these technologies cannot be relied upon, as the information may be incorrect, outdated, protected, misleading, or fabricated.

## **2. User Responsibilities**

Users are all employees or any other individual performing work on behalf of, or with approval of the District and are responsible for:

1. Reviewing this policy to ensure they understand the risks of using AI tools, and
2. Using artificial intelligence in accordance with this policy.

## **3. Limited Use**

Due to the inherent risks of this new and evolving tool, and the need to comply with this policy and other policies, use of AI technology while performing work for the district must be limited. For example, no District confidential, restricted, personal, proprietary, or protected data of any kind, including data that is not owned by the District, may be shared (copied, typed, interfaced, etc.) with these platforms without performing a due diligence and compliance review as described below, which may include a review by District legal counsel.

Employees and consultants are prohibited from installing AI technologies on District-owned and managed systems. One of the key features of AI is its ability to memorize and learn from the information and data that is shared with it so, when AI has access to district

data, even self-contained AI technologies that run on District owned and managed systems, it may share the sensitive data that was used to train it with others.

The use of transcription or other tools that have access to phone calls, video conferences, or other recorded conversations shall not be used without permission from the District Assistant Manager and only with guidance from District legal counsel, as this may violate multiple California State laws.

AI tools are known for generating content that is not accurate or, in some cases, the content is completely made up. For this reason, the employee or consultant is responsible for reviewing all AI-generated or assisted content for accuracy. AI tools may also generate content that is the same or closely similar to content owned by others, including content that has a copyright, patent, or trademark. If any AI-generated content is known to be or later discovered to be owned by others, immediately cease use and report the issue to the Assistant Manager.

Reliable sources for fact checking include official documents and statements, academic journals and publications, encyclopedia, and reference books (this does not include Wikipedia, or similar user-data driven websites), and government websites. Best practices for verifying data include but are not limited to checking multiple sources, critical thinking and context, peer-expert consultation, and checking for citations and references.

AI technology shall not be used for obtaining legal or other professional advice otherwise requiring licensure. AI technology shall not be used to create work product that requires a professional license or certificate e.g., legal, engineering, surveying, etc. AI technology shall not be used as a replacement for required review by any other licensed professionals.

#### **4. Bias and Discrimination**

AI technologies may produce biased or discriminatory results. AI shall not be used for any type of decision-making activities that may exclude options from otherwise being considered. Specifically, AI shall not be used as part of an employee hiring or promotion selection process. AI shall not be used to review proposals submitted by potential vendors responding to requests for proposals (RFP). AI shall not be used in evaluating options or making decisions regarding health care, benefits, or any other type of activity that might exclude an option from otherwise being considered.

AI should only be used in a similar manner to a general internet search, as part of an information gathering activity or to fine tune verbiage for a letter, email, or other document, where the final decision on how to proceed is left up to a human being.

Employees and consultants shall follow all applicable laws, regulations, and District policies when using AI.

## **5. Ethical Use**

Each employee and consultant are responsible for using AI tools in a manner that ensures the security of sensitive information and aligns with other District policies.

Employees shall also comply with all data privacy and security standards such as those found in HIPAA, CJIS, the Internal Revenue Service (IRS), and the California Consumer Privacy Act (CCPA) to protect Personally Identifiable Information (PII), Protected Health Information (PHI), or any sensitive data in AI prompts. Employees must also treat AI prompts as if they were publicly visible online to anyone, and treat AI prompts, data inputs, and outputs as if they are subject to the California Public Records Act.

## **6. Transparency**

The use of AI systems should be explainable to those who use and are affected by their use. To ensure transparency when using this technology, indicate when AI significantly contributed to a work product. When considering types of contributions, use the following guide as a template for citations:

1. Whole Document Example: [AI Assistance: This document was generated with the assistance of an Artificial Intelligence language model, OpenAI GPT-4, 2023.]
2. Whole Document Example: [Artificial Intelligence contributed to the development of this document using Google Bard, 2023.]
3. Specific Citation Example: OpenAI. (2023). ChatGPT (Mar 14 version) [Large language model]
4. In text example for specific information: (OpenAI, 2023)

## **7. AI Due Diligence and Compliance Review**

Given the high risks associated with using AI, all AI technologies must be reviewed for security and compliance before they are implemented in order to ensure data protection, legal compliance, and adherence to District policies, covering the following key areas:

### **1. Data Access and Protection:**

- Identification of the types of data AI technologies will access; and
- Assurance that data will be adequately protected against unauthorized access.

### **2. Vendor Data Usage:**

- Clarification on the vendor's intentions with the District's data, including:



- i. Utilization for AI platform training purposes; and
- ii. Potential sale or use of insights derived from District data.

3. Legal and Regulatory Compliance:

- Evaluation of AI deployment against existing laws, regulations, and District policies to prevent legal violations.

4. Security Assessment:

- Completion of a security review by the District's IT consultant to identify and mitigate potential vulnerabilities.

5. Contractual and Legal Safeguards:

- Review by Legal Counsel of all contracts or terms of use to ensure they contain adequate legal protections for the use and confidentiality of District data.

This comprehensive due diligence process is designed to safeguard both the District's interests and users of AI technologies.