



# Chief Executive Office.

## COUNTY OF LOS ANGELES


Kenneth Hahn Hall of Administration  
500 West Temple Street, Room 713, Los Angeles, CA 90012  
(213) 974-1101 ceo.lacounty.gov

### CHIEF EXECUTIVE OFFICER

Fesia A. Davenport

September 12, 2024

To: Supervisor Lindsey P. Horvath, Chair  
Supervisor Hilda L. Solis  
Supervisor Holly J. Mitchell  
Supervisor Janice Hahn  
Supervisor Kathryn Barger

From: Fesia A. Davenport   
Chief Executive Officer FAD (Sep 12, 2024 17:11 PDT)

## **DEVELOPMENT OF LOS ANGELES COUNTY'S ARTIFICIAL INTELLIGENCE POLICY FRAMEWORK (ITEM NO. 9, AGENDA OF MAY 7, 2024)**

On May 7, 2024, the Board of Supervisors (Board) directed the Chief Information Office (CIO), in direct consultation with the Internal Services Department (ISD) and other relevant departments, to report back in writing to the Board in 90 days with a proposed Artificial Intelligence/Generative Artificial Intelligence (GenAI) policy and governance framework as a result of their engagement with the Government AI Coalition, which includes:

1. A technology directive to County departments on the responsible use of AI, which includes guidance on data privacy and cyber security;
2. Options for a County AI governance framework that would involve relevant County departments and other stakeholders;
3. A focus on responsible use of generative AI, mitigation of unintended consequences, including but not limited to bias, privacy breaches, security risks, and job displacement;
4. An external stakeholder input process to ensure we are leveraging best practices and the best minds on this cutting-edge and rapidly changing technology; and
5. A communication plan beyond the technology directive to ensure both technology staff and program staff are aware of the policy framework governing the use of AI and the innovations available through an AI use case inventory.



An extension was provided to allow time for the CIO to include feedback from external reviews by UCLA Luskin Center for Innovation, USC Marshall School of Business, InfoTech and Gartner research services, as well as Microsoft, and Google.

### **The Responsible Use of GenAI**

GenAI, as distinguished from AI in general, is defined as a set of technologies that is capable of learning patterns and structure of input data to generate recommendations, predictions, or decisions, for a given set of objectives. While the utilization of AI as a feature of business solutions has been around for decades, it is the more recent advances and rapid growth of the more exponentially powerful GenAI technologies and services, which have the potential to not only help but also harm, that predicates this need to establish good governance. To that end, eight guiding principles for the responsible use of GenAI systems within the County have been identified and established. They speak to ensuring said systems adhere to standards of Human-Centered Design, Security & Safety, Privacy, Transparency, Equity, Accountability, Effectiveness, and Workforce Empowerment.

It is important to note that a fair and balanced approach for responsible use of GenAI requires a means of incorporating input from external as well as internal stakeholders. As such, the CIO participates as a member of the Government AI Coalition, comprising state and local government IT, security, and privacy involved individuals from across the United States. Concepts such as the guiding principles and templates being developed as part of a GenAI toolkit have been vetted by entities within this coalition. Additionally, GenAI governance subject matter experts from professional consultancies and local academic institutions have either provided feedback on our deliverables or are in the process of being solicited to do so.

### **GenAI Framework**

The purpose of the GenAI Framework (Framework) is to facilitate the deployment of GenAI at scale in a responsible manner, based on two high level guiding principles:

1. Departments using GenAI for decision-making or content generation should ensure that the decision-making process is explainable, transparent, and fair.
2. GenAI solutions should be human centric - used to amplify or augment human capabilities and protect human interests, including well-being and safety.

The Framework is composed of two areas – internal governance and operational enablement – and is intended to guide the procurement, deployment, utilization and retirement of GenAI-enabled solutions which offer products and/or services to County constituents. This Framework is not intended for organizations that are

deploying updated commercial off-the-shelf software packages that happen to incorporate GenAI in their feature set.

**Internal Governance** is a structure to incorporate values, assess risks, and assign responsibilities to support the adoption of GenAI. To provide this, the following steps have recently been taken:

#### Creation of a Technology Directive (TD)

TD 24-04 "Generative Artificial Intelligence (GenAI) Governance" (Attachment I), approved by the Technology Management Council on June 26, 2024, establishes a structure for GenAI Governance in the County. It describes guiding principles for the responsible and ethical use of GenAI, creates a GenAI Governance Board, and provides guidance for using GenAI technologies.

#### Establishment of a GenAI Governance Board

The GenAI Governance Board will serve to guide departments in advancing their business case(s) to deploy GenAI. It comprises of the Chief Information Officer, Chief Information Security Officer, Chief Privacy Officer, and ISD/Information Technology Service General Manager. Departments are required to submit their use case proposals to the GenAI Governance Board for review and approval.

#### Update IT Board policies to include responsible use of GenAI

The IT Board Policy 6.100 and 6.101, which are scheduled for sunset review by December 31, 2024, will be updated to include definitions and provisions for the responsible use of GenAI. The County Acceptable Use Agreement will also be updated to include prohibitions in the County use of GenAI and protection of non-public information.

**Operational Enablement** concerns the tools and infrastructure to support the selection, development, and management of GenAI models, including data management and security/privacy controls. There are five areas to support this:

- Guidelines for Procurement and Implementation – Given the potential for unintended consequences and other harm, information in the form of guidance and guardrails is necessary when soliciting or installing a GenAI system.
- A Toolkit of Sample Templates – Comprising necessary forms such as a Project Proposal, Use Case, Vendor Requirements, and an Algorithmic Impact Assessment. The documents are designed to serve as a guide and help

departments think through what should be used and what may not be appropriate tools for their business needs.

- Data Classification and Protection – Sensitive data (e.g., PII, HIPAA, CJIS) needs to be properly and accurately identified so that it is not mistakenly ingested by the GenAI tool and exposed (e.g., used in the training of a vendor’s large language model).
- Enablement Platform and Solution Catalog – ISD serves as the main broker for public cloud services for County departments and as such is working with such vendors to provide a vetted and secured infrastructure platform in support of GenAI technology solutions. Additionally, a library of acceptable use cases will be developed, shared, and continue to grow as department project proposals are reviewed and approved by the GenAI Governance Board.
- Stakeholder Communications – The Technology Management Council meets bi-monthly and is perfectly suited to be a communication hub for this purpose as it exists as a forum for the sharing of information within the County’s federated IT organizational structure. The GenAI Governance Board will draw members from the Technology Management Council, as will the subcommittees and workgroups that will likely need to be convened in order to support some of the operational responsibilities and activities of the GenAI Governance Board.

## **Next Steps**

1. Members of the GenAI Governance Board will be selected and convened. The first act for the GenAI Governance Board will be to review the draft GenAI Governance Board Charter (Attachment II).
2. Initial Templates in the GenAI Governance Toolkit will be reviewed and finalized by the GenAI Governance Advisory Workgroup.

Should you have any questions concerning this report, please contact Peter Loo, Chief Information Officer, at (213) 253-5627 or [ploo@cio.lacounty.gov](mailto:ploo@cio.lacounty.gov).

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PKL:DC:jmn

## **Attachments**

- c: Executive Office, Board of Supervisors  
All Department Heads



Office of the CIO  
**Technology Directive**

NUMBER:

**TD 24-04**

SUBJECT:

**Generative Artificial Intelligence (GenAI)  
 Governance**

DATE ISSUED:

June 26, 2024

DATE REVISED:

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EXPIRES:

UNTIL RESCINDED

CIO PROGRAM:

ENTERPRISE INITIATIVES & STRATEGIC  
 PLANNING

REFERENCES:

[Board Policy 6.100 - Information Security Policy](#)  
[Board Policy 6.101 - Use of County Information Assets](#)  
[California GenAI Toolkit](#)  
[CIO.gov - Algorithmic Impact Assessment](#)  
[DRAFT - GenAI Governing Board Charter](#)

**Distribution**

Chief Deputies  
 Administrative Deputies  
 Technology Management Council (TMC)  
 County Procurement and Purchasing

**Purpose**

1. Establish guiding principles for the responsible and ethical use of GenAI
2. Outline the roles and responsibilities of Departments and the GenAI Governance Board.
3. Provide guidance and guardrails to departments soliciting and/or utilizing systems that employ GenAI technologies, including a “starter kit” to assist in the process.
4. Identify some preliminary prohibited actions and uses.

**Background & Context**

With the advent of freely accessible GenAI platforms such as, but not limited to ChatGPT, Gemini, and Copilot, the exponential growth in development of AI-powered applications and tools promises another renaissance in technological advances. At the same time, it forebodes the potential and risks for biases, privacy, copyright infringement, and general misuse. To gain the public’s trust and leverage this technology, it is imperative to ensure GenAI is developed and used ethically and responsibly. GenAI governance is needed to provide the principles, policies, and processes for systems development and deployment.

**Directive**

This technology directive establishes a governance structure for GenAI systems used and/or implemented by the County of Los Angeles. The

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intention is to enable and help facilitate County departments in the responsible use of such technologies and systems for the benefit of the County and our constituents, while at the same time providing guardrails to protect against potential unintentional harms or misuse. While the integration of such safeguards outlined here align and logically integrate with the procurement of a new system, it is still incumbent upon individual department project owners to identify the utilization/implementation of applicable use cases of GenAI in existing and updated/upgraded systems (even if it does not involve an actual solicitation) and follow the appropriate procedures for submitting them for GenAI Governance Board review and approval.

#### Guiding Principles for Responsible GenAI Systems

These guiding principles describe the values regarding how AI systems are purchased, configured, developed, operated, and maintained.

- **Human-Centered Design:** AI systems are developed and deployed with a human-centered approach that evaluates AI powered services for their impact on the public, employees, and County partners.
- **Security & Safety:** AI systems maintain confidentiality, integrity, and availability through safeguards that prevent unauthorized access and use. Implementation of AI systems is reliable and safe, and minimizes risks to individuals, society, and the environment.
- **Privacy:** Privacy is preserved in all AI systems by safeguarding personally identifiable information (PII), Protected Health Information (PHI), Criminal Justice Information (CJI), and other sensitive data from unauthorized access, disclosure, and manipulation.
- **Transparency:** The purpose and use of AI systems is proactively communicated and disclosed to the public. An AI system, its data sources, operational model, and policies that govern its use are understandable and documented. Any output or work product that is the result of an AI system is disclosed as such.
- **Equity:** AI systems support equitable outcomes for everyone. Bias in AI systems is effectively managed with the intention of reducing harm for anyone impacted by its use.
- **Accountability:** Roles and responsibilities govern the deployment and maintenance of AI systems, and human review and oversight ensures ownership, appropriateness, accuracy, and adherence to relevant laws and regulations.
- **Effectiveness:** AI systems are reliable, meet their objectives, and deliver precise and dependable outcomes for the utility and contexts in which they are deployed.
- **Workforce Empowerment:** Staff are empowered to use AI in their roles through education, training, and collaborations that promote

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participation and opportunity. There is a focus on job enhancement and, where necessary, retraining, as opposed to displacement.

#### GenAI Governance Board

A governance board shall be created to provide oversight and guidance for any departmental or countywide initiatives that involve the use of GenAI, with membership comprising a representative from the Office of the CIO, ISD Information Technology Service, ISD Purchasing and Contracts Service, County Counsel or Office of Privacy, and at-large members from the Technology Management Council. The board will be charged with ensuring any County owned and/or administered systems employing in-scope defined GenAI use cases are in alignment with the Guiding Principles outlined in this directive. Adherence and enforcement of such will be established through a formal review and approval process to be created and conducted by the governance board.

#### GenAI-related Use Cases

In determining whether a system using GenAI technologies should be reviewed by the GenAI Governance Board, the following should be considered:

- System purview. The Board shall only review County-owned and/or administered systems.
- Ingestion, analysis, or otherwise use of sensitive and/or private data.
- Type and sensitivity of the actions or decisions that are to be taken as a result of the analysis/output.
- Quality of the data used as input to the system.

The preceding is not a comprehensive list of considerations, and Department CIOs should consult with their assigned Deputy CIO for clarification/assessment of their use case.

When purchasing, configuring, developing, operating, maintaining, or updating/upgrading GenAI systems, departments will:

1. Follow the Guiding Principles for Responsible use of GenAI Systems.
2. Perform an Algorithmic Impact Assessment to help assess and mitigate any potential risks of the GenAI system.
3. Obtain technical documentation about the GenAI systems to complete a GenAI Project Proposal.
4. Require vendors to comply with the Requirements for GenAI Systems.

#### Prohibited Actions and Uses

Certain actions and use cases are prohibited due to the sensitive nature of the information processed and potential risk. This includes the following prohibitions:

- Ingestion and use of sensitive, confidential, or otherwise protected data in ways other than their specific and intended purposes (e.g., the
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training of a vendor’s large language model).

- Fully automated decisions, based on generated output, that do not require meaningful human oversight but substantially impact individuals.

The list of items is not all inclusive and any prohibitions are subject to change, addition, deletion as time and technology progresses.

**Scope & Applicability**

This Directive applies to all County departments. The scope is any solution, service, application, system, or platform that utilizes GenAI technologies, whether or not it is directly solicited or supported by a department’s information technology organization.

**Exceptions**

Requests for exceptions to this Directive shall be reviewed and approved by the GenAI Governance Board.

Departments requesting exceptions shall document and submit their requests to this Board. The request should specifically state the scope of the exception along with the justification for granting the exception, the potential impact(s) and risk(s) granting the exception, costs, and timeframes for complying with the policies set forth herein.

**Definitions**

**Generative AI** – A technology system that is capable of learning patterns and structure of input training data thus generating recommendations, predictions, or decisions for a given set of objectives. Generative AI uses machine and/or human-based inputs/data to perceive environments; abstract these perceptions into models; and interpret the models to formulate options for outcomes. AI systems are designed to operate with varying levels of autonomy. With Generative AI, the machine produces new information rather than simply recognizing, analyzing, or classifying existing content.

**Algorithmic Impact Assessment** – The AIA is a questionnaire designed to help the user assess and mitigate the impacts associated with deploying an automated decision system. The questions are focused on the business processes, data, and system design decisions.

**Approved**

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Peter Loo, Chief Information Officer  
County of Los Angeles



# Generative Artificial Intelligence (GenAI) Governance Board Charter

## Purpose and Objectives

### **Purpose:**

The purpose of the GenAI Governance Board is to provide oversight, guidance, and approval for any departmental or countywide initiatives that involve the use of GenAI. Governance is needed to provide the principles, policies, and processes for systems development and deployment. The intention of the GenAI Governance Board is to enable and help facilitate County departments in the responsible use of such technologies and systems for the benefit of our constituents, while at the same time providing guardrails to protect against potential unintentional harms or misuse. This Board is established based on Technology Directive [TD 24-04](#).

### **Objectives:**

1. Review and evaluate GenAI-involved project proposals to ensure alignment with the Guiding Principles for Responsible GenAI Systems outlined in [TD 24-04](#).
2. Review and evaluate GenAI-involved project and purchase proposals taking into consideration risk factors such as bias, privacy infringement, statutory compliance, and information security , and other potential adverse impacts.
3. Manage an inventory of previously reviewed GenAI applications and use cases.

### **Use Cases:**

In determining whether a system using GenAI technologies should be reviewed by the GenAI Governance Board, the following should be considered:

1. System purview. The Board shall only review County-owned and/or administered systems.
2. Ingestion, analysis, or otherwise use of sensitive and/or private data.
3. Type and sensitivity of the actions or decisions that are to be taken as a result of the analysis/output.
4. Quality of the data used as input to the system.

## Roles and Responsibilities

### **Membership:**

The GenAI Governance Board comprises an interdepartmental body and is chaired by the County's Chief Information Officer (CIO). Other members include a representative from ISD Information Technology Service, ISD Purchasing and Contracts Service, Chief Information Security Officer, Chief

	<p>Privacy Officer and at-large members from the Technology Management Council. Membership is subject to change as needed.</p> <p><b>Responsibilities:</b></p> <p>The Chair will set the agenda for each meeting and distribute the agenda approximately one week prior to the scheduled meeting</p> <p><b>Members Shall:</b></p> <ol style="list-style-type: none"> <li>1. Attend the meetings or coordinate with the chair before the meeting if they cannot attend.</li> <li>2. Review the project proposals prior to the meetings and conduct any additional inquiry or research to come to the meetings prepared to discuss the proposals.</li> <li>3. Participate in positive, solutions-oriented engagement in the meetings.</li> <li>4. Support proposals that align with provisions of <a href="#">TD 24-04</a> and thoroughly vet any perceived risks to the County.</li> </ol>
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<p>Procedures</p>	<p><b>Meetings:</b></p> <p>GenAI Governance meetings will be held monthly, as needed, on &lt;TBD&gt; of each month and is scheduled for one hour.</p> <p><b>Approval Authority:</b></p> <p>The Board has responsibility to review and approve/reject/defer projects and purchases that involve covered use cases of GenAI under the authority of <a href="#">TD 24-04</a>.</p> <p><b>Decision Making Process:</b></p> <p>The Board will drive to a consensus decision whenever possible on items put forth for its review.</p> <p>The following procedure will be followed to make decisions:</p> <ul style="list-style-type: none"> <li>• Department submits project proposal to the Board for review and consideration.</li> <li>• Department project sponsor and project team present their respective project proposal and respond to questions.</li> <li>• Board members will discuss project proposals after the meeting and vote to approve/reject or request a follow up meeting for further discussion.</li> <li>• Department will be informed of Board decision for their project and/or solicitation.</li> </ul>
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<p>Resources and Support</p>	<p>Monthly meetings will be held virtually via the Microsoft Teams platform.</p> <p>The Board shall utilize collaboration tools to facilitate communication. A GenAI Governance Board site will be managed and maintained by OCIO staff.</p>
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