PUBLIC REQUEST TO ADDRESS
THE BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES, CALIFORNIA

Correspondence Received

MEMBERS OF THE BOARD

HILDA L. SOLIS
HOLLY J. MITCHELL
LINDSEY P. HORVATH
JANICE HAHN
KATHRYN BARGER

			The following individuals submitted comments on agenda item:	
Agenda #	**Relate To**	**Position**	**Name**	**Comments**
9.		**Other**	Bojidar Marinov	Dear Supervisors, Respectfully, the revised AI Policy 6.106 is not ready. It is half-finished where it matters most to the County workforce, and I ask the Board to continue Item 9 until it is complete. 1. There is no catalog. Departments must submit AI use cases to the AI Governing Board, but nothing requires anyone to publish what is approved, so staff cannot see what they may use. The Policy's own Transparency principle promises that AI use is “proactively communicated and disclosed to the public.” On May 7, 2024, the Board directed that staff be informed of “the innovations available through an AI use case inventory,” and in September 2024 the CEO promised a library of use cases “developed, shared, and continue to grow.” The Policy contains no language about an inventory. 2. No one is responsible for AI training or workforce development. The Board letter promises to “empower County staff through training and workforce development opportunities,” but the Responsibilities section assigns that work to no one. The Department of Human Resources is not even named. 3. “There are no exceptions to this policy.” Technology Directive TD 24-04 lets a department request an exception, with documented justification, from the County's AI governance board. This CEO-proposed Policy closes that door. The attached redline completes the Policy: a published AI Inventory, a route for staff to propose AI uses, access to approved tools for non-confidential work, a responsible office for AI training, TD 24-04's exceptions process language added, and a definition of AI that reflects what current systems can do. Every safeguard stays, and two that the revision dropped are restored. If the Board proceeds on November 17, I ask that it adopt my proposed amendments. Respectfully, Bobby (Bojidar) Marinov, MPA Los Angeles County Department of Mental Health
		Item Total	**1**	
Grand Total			**1**	

As of: 11/13/2026 1:00:20 PM

PROPOSED AMENDMENTS — REDLINE

Board Policy No. 6.106 — Artificial Intelligence Policy (Revised Draft) · Agenda Item 9

Board of Supervisors Meeting of November 17, 2026 · Submitted by Bobby Marinov · November 13, 2026

Base text: the revised draft of Policy 6.106 posted for November 17, 2026, with the County's own revisions shown as accepted.

Legend: underlined green text = proposed insertion; ~~struck red text~~ = proposed deletion.

No safeguard is weakened. Two safeguards removed in the revised draft are restored.

Summary of amendments

#	What the revised Policy is missing	Amendment	Where
1	No catalog. Approvals are never published, though Guiding Principle 4 says the use of AI Systems is "proactively communicated and disclosed to the public."	An AI Inventory, kept by the AI Governing Board, published to the workforce and the public, and reported to the Board annually.	Definitions; AI Governance Framework; CIO
2	No way for staff to propose an AI tool or use.	Staff proposals go through the Department CIO and must be forwarded within 30 days. Decisions are recorded in the AI Inventory.	AI Governance Framework; Department CIOs
3	Guiding Principle 8 (Workforce Empowerment) has no operating mechanism.	Workforce access to Approved AI Systems for public and internal use information. Any departmental restriction is documented, recorded and reviewed annually.	Policy (new section)
4	No office is responsible for AI training or workforce development.	The Department of Human Resources is made responsible, in coordination with the CIO.	Responsibilities (new section)
5	"There are no exceptions to this policy."	The exceptions process from Technology Directive TD 24-04, with a floor: no exception may permit unlawful use.	Policy Exceptions
6	The definition names "agentic AI" but never says what it is or what current AI can do.	The definition describes current AI capability and adds a defined term, "Agentic AI System."	Definitions
7	Two safeguards were removed in the revision.	Restores the social-scoring prohibition and the Chief Privacy Officer's responsibilities.	Prohibited Uses; Responsibilities

Also corrects two drafting errors: a missing comma in the AI Governance Framework, and the missing lead-in sentence to Prohibited Uses.

Policy #:	Title:	Effective Date:
6.106	Artificial Intelligence Policy	11/17/26

PURPOSE

To establish standards, responsibilities, and governance requirements for the safe, ethical, transparent, and effective use of Artificial Intelligence (AI). This policy requires that all AI systems, whether developed in house, procured, or accessed through third party platforms, support the County's Guiding Principles for Responsible AI Systems, protect sensitive information, mitigate bias or discrimination, ensure appropriate human oversight, empower the County workforce, and maintain public trust.

REFERENCE

Los Angeles County Ordinance 2.080.070 – Information Technology

Board Policy No. 6.100 - Information Security Policy

Board Policy No. 6.101 - Use of County Information Assets

Board Policy No. 6.103 – Information Security Incident Reporting and Response

Board Policy No. 6.104 - Information Classification Policy

Board Policy 6.105, Information Technology Audit and Risk Assessment Policy

Board Policy No. 6.200 - Information Sharing and Management Policy

Board Policy 10.010, Countywide Privacy Program Policy

Board Policy 10.020, Privacy Impact Assessment and Privacy Threshold Assessment Policy

Board Report - Los Angeles County's Artificial Intelligence Framework, September 12, 2024

Technology Directive TD 24-04 – Generative Artificial Intelligence (GenAI) Governance

Agreement for Acceptable Use and Confidentiality of County Information Assets

DEFINITIONS

Artificial Intelligence (AI): Technology that enables a machine-based system to generate predictions, recommendations, decisions, content, classifications, or actions that influence physical and virtual environments. AI includes but is not limited to, generative AI, predictive AI, decision-support AI, and autonomous or agentic AI Systems. Current AI Systems can interpret and generate text, code, images, audio, and video; analyze large volumes of documents and data; reason through multi-step problems; and, as Agentic AI Systems, plan and carry out tasks across software applications and systems with varying degrees of autonomy.

Agentic AI System: An AI System that can pursue a goal by planning and carrying out a sequence of actions, such as using software tools, writing and running code, retrieving or modifying data, operating applications, or initiating transactions, with limited or no human direction at each step.

AI Models: Any computational system designed to perform tasks by analyzing data, identifying patterns, and generating outputs based on mathematical algorithms and statistical techniques.

AI System: Any device, application, model, process, or integrated capability employing AI, including third-party and embedded functionality.

AI Inventory: The countywide record, maintained by the AI Governing Board, of Approved AI Systems and approved AI use cases, including for each the department, the System Owner, the information classifications approved for use, and any departmental restriction or approved exception.

Approved AI System: An AI System approved for County business under the AI Governance Framework and listed in the AI Inventory, including the authorized shared AI platforms operated by ISD.

System Owner: The designated County official accountable for the operational lifecycle of an AI system.

AI Governance Framework

The County's AI Governance Framework establishes the structure, roles, responsibilities, and processes for overseeing the procurement, development, deployment, use, risk management, monitoring, and retirement of AI Systems. The framework includes an AI Governing Board, established by charter on November 27, 2024, comprised of the Chief Information Officer, Chief Information Security Officer, Chief Privacy Officer, ISD/Information Technology Service General Manager, ISD Procurement, and at-large members from the Technology Management Council. Departments are required to submit proposed AI use cases to the AI Governing Board for review and approval in accordance with established governance requirements. The AI Governing Board shall maintain the AI Inventory and publish it to the County workforce and, except for information exempt from public disclosure or whose disclosure would compromise security, to the public. County workforce members may propose an AI System or AI use case for review by submitting it to their Department CIO or IT Manager, who shall forward it to the AI Governing Board with the department's recommendation within 30 days. The AI Governing Board's decision on each proposal shall be recorded in the AI Inventory.

POLICY

This policy requires that all AI technologies be acquired, designed, and used in a manner that upholds the Guiding Principles for Responsible AI Systems and consistent with County policies and applicable laws.

Guiding Principles for Responsible AI Systems

The following principles describe the County's values with regard to how AI Systems are to be purchased, configured, developed, operated, or maintained:

1. **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.
2. **Security & Safety:** AI Systems maintain confidentiality, integrity, and availability through safeguards that prevent unauthorized access and use. AI Systems are implemented reliably and safely, minimizing risks to individuals, society, and the environment.
3. **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.
4. **Transparency:** The purpose and use of AI Systems is proactively communicated and disclosed to the public. An AI System, its data sources, operational model(s), 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.
5. **Equity:** AI Systems support equitable outcomes for everyone. Bias in AI Systems is managed effectively to reduce harm to anyone impacted by its use.
6. **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, with users remaining accountable for the accuracy, appropriateness, confidentiality, and lawful use of their work.

7. **Effectiveness:** AI Systems are reliable, meet their objectives, and deliver precise and dependable outcomes for the utility and contexts in which they are deployed. AI Systems are cost-effective compared to reasonable alternatives and include controls to limit unexpected financial impact during normal operations and in the case of malfunction.
8. **Workforce Empowerment:** Staff are empowered to use AI in their roles through education, training, and collaborations that promote participation and opportunity. The focus is on job enhancement and, where necessary, retraining, rather than displacement.

Workforce Access to Approved AI Systems

County workforce members may use Approved AI Systems for County business with public information and internal use information, without individual pre-approval, subject to this policy and the Agreement for Acceptable Use. Such uses include drafting, summarizing, research, analysis of laws and regulations, and analysis of County financial and operational data, with human review of all output. Confidential or restricted information may be used only in an Approved AI System that the AI Inventory lists as approved for that classification of information. An Approved AI System listed in the AI Inventory for use with public and internal use information is approved for that use in every department unless the department records a restriction under this section. A department that restricts workforce use of an Approved AI System shall document the scope of and reasons for the restriction and submit them to the AI Governing Board, which shall record the restriction in the AI Inventory and review it at least annually. The CIO, through ISD, shall make one or more Approved AI Systems available to County workforce members.

Prohibited Uses

The following uses of AI are prohibited:

- AI used in violation of applicable law, constitutional rights, or County policy.
- Fully automated consequential decisions about individuals without meaningful, authorized human review and an available process for reconsideration, except where expressly permitted by law and approved under the governance framework.
- Unauthorized use of AI Systems to track individuals based on their behaviors, socioeconomic status, or personal characteristics, for any purpose, including social scoring.
- AI designed or deployed to unlawfully manipulate individuals or exploit vulnerabilities.
- Use of AI output as verified fact, legal authority, or an official decision without human review commensurate with the consequences of error.
- Autonomous actions or transactions outside documented permission, spending limits, or approved operational boundaries.

"Including social scoring" restores text removed in the revised draft.

RESPONSIBILITIES

Chief Information Officer

The Chief Information Officer (CIO) is responsible for ensuring, maintaining and administering the AI Governance Framework which governs the use of AI Systems in accordance with this policy. The CIO is also responsible for ensuring that the AI Inventory is published; for reporting to the Board annually on the AI Inventory, including Approved AI Systems and approved use cases by department, departmental restrictions, exceptions granted, workforce proposals received and their disposition, and AI training delivered; and for returning to the Board any conforming amendments to Board Policy No. 6.101 and the Agreement for Acceptable Use needed to implement this policy.

Chief Information Security Officer

The Chief Information Security Officer (CISO) is responsible for establishing cybersecurity review requirements under the AI Governance Framework.

Chief Privacy Officer

The Chief Privacy Officer (CPO) is responsible for maintaining, overseeing, and ensuring compliance with the Countywide Privacy Program and Board of Supervisors policies pertaining to the access, use, disclosure, and protection of County Information and Personal Information, and for establishing privacy review requirements for AI Systems and AI use cases under the AI Governance Framework.

Restores the Chief Privacy Officer paragraph removed in the revised draft, with the final clause added to parallel the CISO's review role.

Internal Services Department

The Internal Services Department (ISD) is responsible for establishing and implementing technical and operational standards for ISD-managed infrastructure and services; assessing architecture and integrations affecting those services; operating authorized shared AI platforms; maintaining applicable technical safeguards and operational monitoring; and responding to technical incidents within its areas of responsibility.

Department of Human Resources

The Department of Human Resources, in coordination with the CIO, is responsible for AI training and workforce development in furtherance of Guiding Principle 8 (Workforce Empowerment), including AI-literacy training available to all County workforce members; for incorporating AI skills into County training and career development programs; and for meeting and conferring with certified employee organizations as required by law.

Department CIO or IT Manager and System Owners

County Department CIOs or IT Managers and System Owners~~,~~ are responsible for implementing, maintaining and managing departmental-operated AI Systems in accordance with this policy and the AI Governance Framework, in coordination with the Department CISO and Department Privacy Officer. Department CIOs or IT Managers are also responsible for informing their department's workforce of the Approved AI Systems available to it and of any departmental restriction, and for forwarding workforce proposals to the AI Governing Board as provided in the AI Governance Framework.

Policy Exceptions

~~There are no exceptions to this policy.~~

Requests for exceptions to this policy shall be reviewed and approved by the AI Governing Board. Departments requesting exceptions shall document and submit their requests to the AI Governing 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) of granting the exception, costs, and timeframes for complying with this policy. No exception may authorize a use of AI that violates applicable law or constitutional rights. Each approved exception shall be recorded in the AI Inventory.

Adapted from Technology Directive TD 24-04, "Exceptions," with the final two sentences added.

RESPONSIBLE DEPARTMENT

Chief Executive Office/ Office of the CIO

DATE ISSUED/SUNSET DATE

Issue Date: November 17, 2026 Sunset Date: October 31, 2030