



Buffalo County Resolution

Drafted By:
Ana Rolbiecki

County Department:
Administration

Presented Month/Year:
June 2026

Involved Committees:
Finance / Human Resources

RESOLUTION # 26-06-09

A RESOLUTION ADOPTING POLICY 405 – ARTIFICIAL INTELLIGENCE ACCEPTABLE USE

WHEREAS, Buffalo County recognizes that Generative Artificial Intelligence (AI) technologies are increasingly used in the workplace and have the potential to improve efficiency, enhance service delivery, and support employee productivity; and

WHEREAS, the use of AI tools presents potential risks related to data security, confidentiality, accuracy, and compliance with applicable laws, including Wisconsin Public Records Law; and

WHEREAS, Buffalo County desires to establish clear guidelines for the responsible, ethical, and secure use of AI by employees, contractors, and other individuals performing work on behalf of the County; and

WHEREAS, Buffalo County Human Resources has developed Policy 405 – Artificial Intelligence Acceptable Use to address appropriate use, prohibited activities, approval requirements, and employee responsibilities related to AI use;

NOW, THEREFORE, BE IT RESOLVED by the Buffalo County Board of Supervisors that:

1. Policy 405 – Artificial Intelligence Acceptable Use Policy, attached hereto as Exhibit A, is hereby adopted and incorporated into the Buffalo County Employee Handbook.
2. All County employees, interns, contractors, and other individuals performing work on behalf of Buffalo County shall comply with the provisions of Policy 405.
3. The County Administrator and Human Resources are authorized to implement, administer, and enforce this policy and to provide training and guidance as necessary.
4. This policy shall become effective immediately upon adoption.
5. Buffalo County reserves the right to amend or revise this policy as necessary to address legal, technological, or operational changes.

Adopted at a duly called and noticed meeting of the Buffalo County Board of Supervisors on the 22nd day of June, 2026.

A handwritten signature in blue ink, appearing to read "Bob Schmitt", written over a horizontal line.
County Clerk



Buffalo County Resolution

ATTEST:

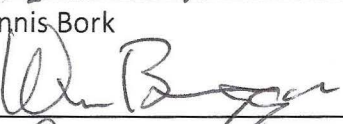


County Board Chairperson

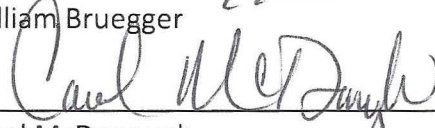
Respectfully Submitted by the Finance / Human Resources Committee:



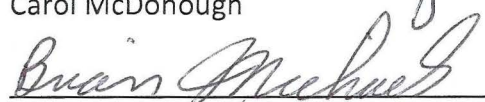
Dennis Bork



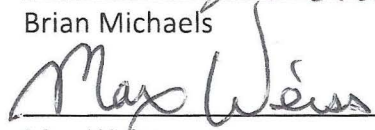
William Bruegger



Carol McDonough



Brian Michaels



Max Weiss

EXHIBIT A

POLICY 405 – ARTIFICIAL INTELLIGENCE ACCEPTABLE USE

Purpose:

Buffalo County recognizes that Generative Artificial Intelligence (AI) has significant potential to provide benefits in our work to serve our community more efficiently and effectively. This policy provides for the responsible and ethical use of Generative AI by Buffalo County staff while also protecting confidential, sensitive, and personally identifiable information (PII), and maintaining compliance with all County policies and applicable laws.

Scope:

This policy applies to all Buffalo County employees, interns, contracted staff, and third parties performing work on behalf of Buffalo County and it provides the framework for assessing appropriate use of Generative AI. The policy complements other existing Buffalo County policies—including confidentiality and security policies—and any applicable policies or restrictions imposed by funding sources, such as private or public grants, or by external regulatory entities—including various Wisconsin governmental agencies (e.g., Department of Children & Families, Department of Health Services, etc.).

This policy applies to the use of Generative AI tools that are standalone in nature (e.g., Microsoft Copilot chat) or embedded within other systems or software tools (e.g., Microsoft Copilot or Google Gemini within Google Chrome browser).

Definitions:

- Active use of AI - defined as interactive, iterative, or conversational engagement with an AI tool beyond a single prompt.
- Artificial intelligence system or AI system - software that performs tasks typically requiring human intelligence, such as learning, reasoning, prediction, decision-making, or content generation.
- Closed AI system - an AI system in which input and data are used only within a private or internal environment and are not shared or reused to train a public model.
- Open AI system - AI system where the input provided by all users is used to train the AI model. Input data from all users is not private and may be revealed to other users.
- Embedded AI Tools - AI tools embedded in existing software tools approved and used by the county.
- Generative Artificial Intelligence (GenAI)/AI - is a tool that creates new content, such as text, images, audio, or code, based on user input and trained data (e.g., ChatGPT, Copilot, Microsoft 365 Copilot, Gemini).
- Non-public data - any information that, if disclosed, could violate the privacy of individuals, government regulations, or statutes.
- Confidential/Sensitive Information – is non-public data the County is obligated to protect by law, regulation, or organizational policy (e.g., PII/PHI/CJIS/PCI, attorney-client privileged materials, non-public HR data, non-public operational/financial information).
 - PII is “Personally Identifiable Information”
 - PHI is “Protected Health Information” (e.g., HIPAA)

- CJIS is “Criminal Justice Information Services”
- PCI is “Payment Card Information”
- Passive use of a generative AI tool embedded within an internet browser - means using a web browser’s built-in generative AI features only for single, one-directional search queries, similar to traditional internet searching. It does not include conversational, iterative, or back-and-forth interactions with the embedded AI. Any use that involves follow-up questions, refinement of responses, or extended dialogue constitutes “active use” and therefore requires approval as set forth in this policy.
- Personal information - information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular person or household.
- Public Information - content suitable for public release (published policies, website copy, press releases, public datasets).

Guiding Principles:

- The intent of this policy is to provide general guidance on the use of AI as a tool while ensuring it continues to meet legal and ethical obligations. The use of AI should never compromise core values or introduce undue risk to the organization. Rather, the use of AI should be focused on improving business efficiencies and enhancing our ability to fulfill our mission.
- This policy is not intended to address every use of AI. There are certain functions that bear more consideration and potential risks. If an employee has concerns related to a potential use of AI, the employee should consult with their supervisor.
- The following high-level principles apply when considering using an AI system:
 - *Security & Privacy First.* Do not expose confidential or regulated data in AI tools unless (1) expressly authorized by your Department Head and the County Administrator and (2) you are using an approved, closed AI tool. Consider the information you are putting into AI the same way you would approach information you disclose in a public records request where redactions would be needed to maintain confidentiality and/or compliance with laws or county ordinances.
 - *Transparency and Public Records Compliance.* Information entered into AI systems may be subject to Wisconsin Public Records Law (Wis. Stat. §§ 19.21–19.39). AI-generated content and outputs used for County business are considered County records and must comply with applicable records retention and disclosure requirements.
 - *AI is NOT a substitute for Expertise and Human Review is Required.* AI is assistive—not authoritative. All AI output must be reviewed by the human author for accuracy, bias, completeness, and tone prior to use or release. The AI generated work product is best viewed as the starting point, not the ending point for a project. The user will be responsible for the work product, and the user should ensure that they have sufficient knowledge to ensure the quality of output. Employees are responsible for all AI-assisted work product and must ensure accuracy, completeness, and compliance with County policy prior to use or distribution. AI-generated content may not be used for County business unless it has been independently verified for accuracy. The following strategies are critical in ensuring quality work product:

- Ask AI to cite sources used in generating its response.
- Develop a procedure to verify the outputs from generative AI tools, including review of source material (e.g., the sources cited in its response)
- Develop a procedure to ensure that copyrighted, or otherwise protected work (e.g., images), are not improperly used and that work product is properly attributed (e.g., citations to quotations)
- Remember, AI tools can generate incorrect and/or fictional information. Directing AI not to guess may help, but the tool may still speculate or hallucinate. Always double-check AI outputs (i.e., the results).
- *Department Layering.* Departments may impose additional training, approvals, and stricter rules for high-risk use. Departmental rules complement this policy. Employees must ensure that they are aware of the various authorities that may relate to their use of AI tools.

Prohibited Uses & Areas of Risk:

- *No sensitive, confidential, or regulated data (e.g., PII/PHI/CJIS/PCI/privileged or non-public HR data)* may be entered into AI tools, absent an expressed written approval to do so by the supervising Department Head and the County Administrator.
- *No use of personal AI accounts for County business.* Employees may not use personal AI accounts or tools for County business.
- *No use contrary to other regulatory body guidance.* Employees that perform work that is governed by other regulatory bodies or agencies, such as the Wisconsin Department of Children & Families or the Wisconsin Department of Administration, must refrain from using AI in any circumstance that would be contrary to such regulatory body guidance.
- *No unethical or unlawful use.* This includes content that is misleading, harassing, discriminatory, or otherwise violates County policy or core values, or applicable law. Employees should avoid using AI in situations that pose ethical, operational, or other serious risks. If, through the course of using AI, you think its outputs may have inadvertently strayed into one of these areas, stop where you are and notify your supervisor.
- *Be wary of potentially copyrighted material.* Generative AI tools may rely upon material that is copyright protected, such as branded images, slogans, photos, or other trademarked content. Further dissemination of such information can expose the county to liability.

Permitted Uses and Approved Generative AI Tools:

- Buffalo County recognizes Microsoft 365 Copilot (M365) as a secure AI tool for internal use and approved for active use consistent with this policy. Copilot has been evaluated and is available under the County's current IT licensing program. The public version of Copilot is not approved for active use. Employees may use M365 Copilot for tasks consistent with this policy, such as drafting internal content, generating educational resources, and supporting administrative workflows, provided that:
 - All outputs are reviewed by a qualified staff member before dissemination.
 - Use complies with Buffalo County's privacy, security, and ethical standards.
- Use of other Generative AI tools, except the passive use of generative AI embedded in an internet browser, require the approval of both the Department Head and the County Administrator. "Passive use" means using a web browser's built-in generative AI features only for single, one-directional search queries, similar to traditional internet searching. It

does not include conversational, iterative, or back-and-forth interactions with the embedded AI. Any use that involves follow-up questions, refinement of responses, or extended dialogue constitutes active use and therefore requires approval as outlined in this section.

Obligation to Report Non-Compliance & Violation Response:

- Buffalo County employees aware of any conduct that may violate this policy have a responsibility to report it. Individuals are encouraged to make reports through normal reporting relationships beginning with their immediate supervisor or as otherwise provided under Buffalo County employee conduct policies.
- The County will investigate and respond to all reports of violations of this policy. Violations may result in the loss of access, or prohibition of use, to these tools and disciplinary action up to and including termination.

Required Training and Acknowledgement:

All personnel must complete Buffalo County's **AI Awareness and Responsible Use** training and all ongoing training and education as assigned. Supervisors are responsible for ensuring staff understand and comply with this policy.

Policy 405 – Effective June 23, 2026