



## DEQ POLICY STATEMENT PS25-12

### GENERATIVE ARTIFICIAL INTELLIGENCE POLICY

#### Purpose

To establish an Idaho Department of Environmental Quality (DEQ) policy on the appropriate use of generative artificial intelligence (AI) and outline the steps staff must follow before using or publishing any AI-generated material.

#### Definitions

For the purposes of this policy, “AI-generated information” refers to any material, content, summary, dataset, or image created wholly or in part with AI tools or technologies. “AI tools” and “AI technologies” refer to machine-learning computational technologies that simulate human intelligence (e.g., ChatGPT, Google Gemini, Microsoft Co-Pilot, etc.). Microsoft 365 tools, such as spell check and Excel formulas, are not considered AI tools.

#### Background

AI is a wide-ranging technology that can create content when prompted by a user. AI tools can write, summarize, evaluate, illustrate, compose, code, and more. AI offers potential efficiency gains given its capacity to complete complex tasks quickly. However, responsibly using AI and AI-generated content poses ethical, transparency, and accountability challenges, especially for government agencies. DEQ’s employees must use AI in an ethical, responsible, and thoughtful manner. The Idaho Office of Information Technology Services (ITS) lists eight core principles for ethical and responsible AI use in its [AI Advantage Framework](#):

1. Human-Centered Design: AI should be used to enhance human-capability, not replace it.
2. Transparency and Explainability: If used, employees should disclose its use and be able to explain (in plain language) the AI system and prompts used, how and why the AI reached that decision, how outputs are used in decision making, and the limitations of the AI.
3. Appropriate Oversight: Supervision, peer-review from subject-matter experts, and human judgement should review AI-generated content and AI-automated decisions.

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4. **Fairness and Accessibility:** AI must serve all Idahoans equally and without bias. Scrutinize AI systems and content for representation and balance before, during, and after publishing outputs.
  5. **Security and Privacy by Design:** Minimize data collection by AI systems, implement consent mechanisms to clearly inform users of how their data will be used, and never enter personal or sensitive data into AI.
  6. **Risk-Based Governance:** Scale review and oversight for AI according to the system's impact on people, data, and public trust.
  7. **Continuous Improvement:** Routinely evaluate AI-systems used or AI-content generated based on performance, stakeholder input, and shifts in best practices.
  8. **Shared Responsibility:** Agencies and departments share responsibility with ITS for responsibly using and implementing AI. ITS retains the authority to reject high risk AI implementations.

DEQ must also keep in mind the following liabilities surrounding AI tools and information:

- AI information can be misleading, biased, or inaccurate based on how a prompt was written, the quality of data inputted, and the sources drawn from.
- AI tools can produce false or contradictory information, known as hallucinations.
- AI models may rely on historical data that may not be current.
- AI models can draw on all types of information, including opinion, speculation, and satire.
- AI models are built to take in and retain information, which could compromise sensitive information.

## **Statement of Policy**

DEQ must adhere to the following standards when using AI tools:

- A. Use of AI-generated information and tools must comply with all State of Idaho policies. This includes ITS' AI Governance Policy, Standard, and Guideline (P.ITS-01, S.ITS-01, and G.ITS-01).
- B. Use of AI-generation must be confined to approved tools. Adobe AI Assistant, Grammarly, ChatGPT, and Microsoft CoPilot are approved for use at DEQ. All other AI tools must be vetted and procured through an administrator and the Data and Information Management Bureau Chief. If employees are interested in using an AI tool that requires payment or a subscription, they must contact their supervisor, administrator, and the Data and Information Management Bureau Chief. More information can be found on ITS' website.
- C. Use of AI-generated information must be transparent. Staff must prompt the AI tool to provide its sources and review the source material before incorporating AI-generated information into any public document.

Staff must add a disclosure statement to public documents and information that have been materially modified or generated using AI tools so that the recipient is aware of the AI systems involved. Public documents and information include DEQ’s social media, website updates, and materials developed to be publicly available and accessible. Staff must use best judgment when determining whether a disclosure statement is warranted. Below are two examples for guidance.

- Example 1: A fact sheet that will be posted on the website that was generated using AI must undergo a human review and include a disclosure statement.
- Example 2: A letter or email that was written by an employee and edited by an AI tool does not require a disclosure statement.

The disclosure statement must identify the AI-generated information, the AI tool used, the prompt(s) used, and a statement noting that the information has undergone human review:

“AI Usage Disclosure: This document was created with the assistance of [specify the AI tool] using the following prompt(s): [insert prompt(s) used]. All information has been reviewed and edited for accuracy by [author’s full name].”

Staff must cite the AI tool and prompt(s) whenever its words or information are reproduced in any public document. See the DEQ Writing and Style Guide for instructions on citing AI-generated content.

D. AI-generated information must undergo human review.

All AI-generated information created for external use must be reviewed by a human. Materials produced without the assistance of AI should still undergo a review as a best practice.

Human reviews must evaluate data and content for accuracy, objectivity, and fairness to ensure it aligns with DEQ’s mission and legal obligations.

E. DEQ must follow data safety protocols when using AI tools.

Only Level 1 data can be entered into AI tools. This includes public information with minimal privacy or security concerns (e.g., information on the public website).

Entering Level 2 through 4 information requires administrator and director approval.

Data Classification			
Level 1 Unrestricted   Public	Level 2 Limited   Private	Level 3 Restricted   Confidential/Federal	Level 4 Critical
<ul style="list-style-type: none"> <li>- Press releases</li> <li>- Brochures</li> <li>- Pamphlets</li> <li>- Public access web pages</li> <li>- Materials created for public consumption</li> </ul>	<ul style="list-style-type: none"> <li>- Enterprise risk management planning document</li> <li>- Published internal audit reports</li> <li>- Detailed financial transactions</li> <li>- Email</li> <li>- Non-public phone numbers</li> <li>- Building schematics</li> <li>- Names and addresses that are not protected from disclosure</li> </ul>	<ul style="list-style-type: none"> <li>- Network diagrams</li> <li>- Information systems and telecommunications systems configuration information</li> <li>- Security plans</li> <li>- Passwords and PINs</li> <li>- Personally Identifiable Information</li> <li>- Bank account numbers</li> <li>- Child Welfare and legal information about minors</li> <li>- Student education records</li> <li>- Social Security numbers</li> <li>- Other information exempt from public disclosure</li> </ul>	<ul style="list-style-type: none"> <li>- Disclosure that could result in loss of life, disability, or serious injury</li> <li>- Regulated information with significant penalties for unauthorized disclosure. This includes information that is typically exempt from public disclosure</li> </ul>

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Never enter personally identifiable information, protected health information, confidential enforcement actions, and any other sensitive information or data that would be exempt from a public records request into an AI tool.

## AI Uses

All “Appropriate Uses” must adhere to items A–E in the Statement of Policy.

### Appropriate Use

- Generating ideas
- Drafting an email
- Drafting a PowerPoint slide deck
- Drafting plain language summaries
- Drafting a decision packet for legislation
- Drafting internal policies
- Summarizing internal, informal, nonconfidential meetings
- Reviewing Level 1 data
- Comparing and screening documents
- Aggregating, summarizing, and compiling public comments
- Preparing initial application completeness reviews

### Inappropriate Use

- Generating images, videos, or audio of others without written consent
- Generating tables or figures without validating the data and disclosing the use of AI
- Relying on AI information for calculations without thorough vetting and review
- Relying on AI to write, edit, and format information without citing AI tools and undergoing a human review
- Publishing AI information without adding a disclosure statement for public documents
- Using AI in lieu of person-to-person collaboration and/or not disclosing the use of AI to other participants
- Entering data into an AI tool that is not intended to be public (see Statement of Policy, item E)

## Responsibility

DEQ’s Deputy Director is responsible for maintaining this policy.

## Implementation

This policy is effective immediately and will remain in effect for 5 years unless amended, replaced, or rescinded prior to expiration.

Dated this 5th day of November, 2025

**Jess Byrne** Digitally signed by Jess Byrne  
Date: 2025.11.05 08:48:36 -0700

Jess Byrne  
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