



CITY OF WEST LAKE HILLS, TEXAS
NOTICE OF CITY COUNCIL WORKSHOP
Wednesday, August 6, 2025 at 12:00 PM

Notice is hereby given that the City Council of the City of West Lake Hills, Texas, will hold a Workshop on the 6th day of August 2025 at 12:00 p.m., in the Janet Room, Municipal Building, 911 Westlake Drive, West Lake Hills, Texas, at which time the following items will be discussed, to-wit:

1. Call to Order
2. Citizen Communications The City Council welcomes public comments at this point on any issue. If the issue is listed on the agenda, the speaker may choose to comment during the Public Comment period or when the specific agenda item is taken up by the Council later in the meeting. The Council cannot respond to or discuss matters not listed on the agenda. The Council may provide factual information, refer the item to a staff member, or request the item be added to a future meeting agenda. Speakers shall limit their comments to five (5) minutes each.
3. Administration Discuss City's Code of Ordinances:
 - a. Code Codification process.
 - b. Article 2.08 Sale of Surplus or Salvage Property.
 - c. Chapter 4 Animals and related provisions.
 - d. Article 6.02 Alarm Systems and related provisions.
 - e. Article 6.03 Peddlers and Solicitors and related provisions.
 - f. Article 6.04 Short-Term Rentals and related provisions.
 - g. Chapter 8 Fire Prevention and Protection.
 - h. Article 12.02 Noise and related provisions.
4. Administration Discuss infrastructure requirements and specifications appropriate to West Lake Hills.
5. Administration Discuss purpose and need for city policy related to artificial intelligence (AI).
6. Adjournment

Approved by: James Vaughan, Mayor

Certificate

I certify that the above Notice of the August 6, 2025 City Council Workshop was posted on the bulletin board at the Municipal Building, 911 Westlake Drive, West Lake Hills, Texas on Friday, August 1, 2025 by 5:00 pm. and will remain posted continuously until said meeting is convened.

Signed by: Terry Blanchard, City Secretary

The City of West Lake Hills is committed to compliance with the Americans with Disabilities Act. Reasonable accommodation and equal access to communications will be provided upon request.

All items on the agenda are for discussion and/or action. City Council reserves the right to adjourn into executive session at any time during the course of this meeting to discuss any of the matters listed above, as authorized by Texas Government Code Sections 551.071 (Consultation with Attorney), 551.072 (Deliberations about Real Property), 551.073 (Deliberations about Gifts and Donations), 551.074 (Personnel Matters), 551.076 (Deliberations about Security Devices), and 551.086 (Economic Development).



City of West Lake Hills City Council

AGENDA REPORT

Meeting Date:	<u>August 6, 2025</u>	Item Number:	<u>3 (a-h)</u>
Department:	<u>Administration</u>		
Prepared By:	<u>Trey Fletcher</u>	Cost / Budget:	<u>n/a</u>
Exhibits:	<u>Item Discussion</u>	Source of Funds:	<u>n/a</u>

Subject

Discuss City's Code of Ordinances:

- a. Code Codification process.
- b. Article 2.08 Sale of Surplus or Salvage Property.
- c. Chapter 4 Animals and related provisions.
- d. Article 6.02 Alarm Systems and related provisions.
- e. Article 6.03 Peddlers and Solicitors and related provisions.
- f. Article 6.04 Short-Term Rentals and related provisions.
- g. Chapter 8 Fire Prevention and Protection.
- h. Article 12.02 Noise and related provisions.

Recommendation

Discuss and provide direction as appropriate.

Discussion

Last year, the City embarked on the process of reviewing the City Code. This codification process has not occurred recently and a number of ordinances in place have become outdated.

[Article 2.08 Sale of Surplus or Salvage Property.](#) This provision requires advertising in the newspaper and an auction for items worth less than \$1000 and sealed bid for items greater than \$1000. Most public entities use websites to conduct auctions, and the ordinance is proposed to be amended to accommodate this practice.

The remaining items are presented in the attached Item Discussion.

Item Discussion

Goal: Explain the problems – from mild to moderate – with our ordinances that attract little notice (i.e. not building, not trees). Build consensus around solutions. Note comparison charts, research reports and draft ordinances were generated by AI and have not been reviewed by staff/legal.

A. [Chapter 4 Animals](#) and related provisions.

- a. **Animals Problems:** Our current code only allows for an animal to be designated dangerous after a verified attack. There's nothing we can do about a verified threatening or menacing animal. Despite the word "rural" appearing nearly everywhere we look, we are tough on the maintenance of typical rural livestock (i.e. chickens, ducks, goats – nobody's suggesting cows). There's been growing interest in goats as a tool for fire prevention after our successful trial. Finally, native bees are extremely beneficial to our vegetation – should we be preventing them?
- b. **Solutions and Debate:** Create a new definition of potentially dangerous animal and provide for appropriate regulations. Debate whether and, how many, typical rural animals we want to permit based on lot size. Debate whether or not to create a permit system to authorize ownership. In my mind – there's no need for a permit. It's annoying to administer. Enforcement can occur if the homeowner violates the provisions. Here's a chart purely for debate:

Minimum lot size	Hens/Ducks	Goats	Bee hives
less than one-quarter (1/4) acre	Up to 6	2 miniature	Not permitted
one-quarter (1/4) acre up to one-half (1/2) acre	Up to 10	4 miniature / 2 standard	Not permitted
one-half (1/2) acre up to one (1) acre	Up to 15	6 miniature / 4 standard	Not permitted
one (1) acre or larger	15 (+2 hens per ½ acre >1)	6 miniature / 4 standard (+1 goat per ½ acre >1)	Up to 5

c. **Related Statutes:**

- i. [Dangerous Dogs – Legal Q&A](#) (TML)
- ii. [HB 294](#) related to Food Production on Residential Lot
- d. **Note:** Roosters are always banned in all peer cities would suggest the same here, enclosures must respect setbacks, and odors/lack of maintenance result a fine.
- e. **See comparison chart:** <https://chatgpt.com/share/68869f3d-cd00-8011-b96c-421b0a8821c1>
- f. **Animals ordinance draft** (generated by AI not reviewed by staff/legal): <https://www.dropbox.com/scl/fi/wiuk1c8s58kxquvmegda5/Animal-Ordinance-Final-and-Styled.docx?rlkey=yzrmx8h4s1agiptz3j0gr8we2&dl=0>

- g. **Full research report on noise ordinance draft:** <https://chatgpt.com/share/6886a027-a600-8011-b51d-87742411f009>
- B. [Article 6.02 Alarm Systems and](#) related provisions.
 - a. **Home Alarms Problem:** Our current code doesn't have a permit system, yet requires that the city must be "furnished" all the information related to the alarm in order to expect a response. All similar cities have instituted a permit system in lieu of this language. We also require sufficient names of persons with access to the building to constantly grant police access to said building. Modern ordinances take care of that with two step-verification. There are requirements of "alarm notification relayers" – which are also antiquated.
 - b. **Facts On The Ground:** A permit system is hard to administer, unnecessary, and will annoy residents/staff. Modern best practices that all our residents' alarm system operators deploy essentially replace any utility a permit system had. So we don't need a permit system. We should update our "alarm notification relayers" language etc... to reflect modern best practices (which all the operators always used called Enhanced Call Verification). We should also update our fines. No one has ever been fined to the knowledge of the Lieutenant, but it's good to keep a penalty system active just in case we get one truly egregious person.
 - c. **Solution:** Replace with enhanced call verification, a noise restriction system based on best practices of similar cities, and a tiered fine system.
 - d. **Bank Alarms Problem:** Our current bank protection (Division 3) ordinance references regulations that no longer exist and permit signal line connections to a police dispatch which doesn't exist.
 - i. The Bank Protection Act of 1968 is still the federal statute that underpins branch-security rules, but today the implementing regulations no longer require (or even mention) a hard-wired "signal line" to the police. Modern rules only require "an alarm system or other appropriate device" capable of promptly alerting law-enforcement, leaving the technology—cellular, IP, radio, central-station monitoring, etc.—to each institution's discretion. The citation in your local code (12 U.S.C. 1812) is also wrong; the Act is codified at 12 U.S.C. §§ 1881-1884.
 - ii. WLH no longer has a police dispatch that a signal line could be installed to.
 - e. **Bank Alarms Solution:** Repeal current ordinance – replace with language that follows modern rules of the Bank Protection Act. Also, don't require permits.
- C. [Article 6.03 Peddlers and Solicitors](#) and related provisions.
 - a. **Problem:** Our peddlers ordinance is simultaneously likely unconstitutional – in theory we require a permit for political campaigns, charities, and churches (although it's never been enforced) – and also not hitting the mark on restrictions on streetside soliciting. It's important that we hit the mark on these types of regulations before attempting to improve/create public spaces. The ordinance also creates food truck confusion as mobile food vendors are regulated both here and elsewhere.

- b. **Solution:** Distinguish between practices we can distinctly restrict – commercial soliciting – and those who we can more generally guide based on health, safety, and public nuisance concerns (charitable, political). Add best practices from other similar cities. Eliminate food peddlers definition entirely, although the code tries to separate *business licensing* (peddler) from *public-health* (food-truck), it ends up regulating the same vehicle twice, with conflicting temperature limits and duplicate definitions. Rely on public health section for Mobile Food Vendor regulation.
 - c. **Points for Debate:** Regulate peddler hygiene?
 - i. I.e. (Not reviewed by staff/legal generated by AI to be legal)
 - ii. (e) Hygiene and Dress. A Canvasser shall not engage in any activity regulated by this Article if the individual:
 - (1) fails to wear garments that fully cover both the upper and lower torso;
 - (2) wears clothing that is visibly soiled by any substance, including but not limited to dirt, mud, grease, paint, food, or bodily fluids; or
 - (3) emits a foul or offensive odor that a reasonable person would judge to unreasonably interfere with the comfort or safety of others in the vicinity.
 - d. **Points for Debate:** Are taco trucks that go to construction sites food trucks? Should commercial landlords who want to have a food truck have to prove that doing so won't push them below parking minimum? As far as I know, I've been approached by two tenants who would like a food truck – Barton Springs Nursery and Trianon.
 - e. **See General Peddler's Comparison Chart:** <https://chatgpt.com/share/68869f07-4a64-8011-9d24-ae49abf320fe>
 - f. **See Food Truck's Comparison Chart:** <https://chatgpt.com/share/68869f99-5438-8011-aa71-8c2f4ef2724d>
- D. [Article 6.04 Short-Term Rentals](#) and related provisions.
- a. **Problem:** STR ordinance lives in the wrong place for maximal enforcement – business instead of zoning and planning. We require three violations instead of two for suspension of permit. We require homestead exemption to get a permit which is no longer allowed in Texas due to Court rulings.
 - b. **Solutions:** Fix the above – simple enough.
- E. [Chapter 8 Fire Prevention and Protection](#) includes provisions regarding [Arson](#) and [Fireworks](#).
- a. **Problem:** Our Arson information reward is comically antiquated – even if its unlikely to ever apply. Fireworks definitions are out of date. We don't have provisions in place to enforce the ban to its maximal extent.
 - b. **Solution:** Pretty simple update. Only real point for debate is whether to exempt sparklers. I suggest we explicitly exempt sparklers.
- F. [Article 12.02 Noise](#) and related provisions.
- a. **Problem:** Almost everything relies on person of ordinary sensibilities instead of quantitative measurements. Retain person of ordinary sensibilities as a fallback, but put into place measurable violations.

- b. **Solution and Debate:** Again, adopt best practices from similar communities. That's simple enough. A few points for debate: should permitted construction be subject to noise limits? Some similar communities impose the restriction, some don't. All ban the amplified music (i.e. workers' boomboxes), but it seems a little draconian to apply the restrictions themselves to permitted construction. With construction, there's occasionally little that can be done. Second, should the noise limits apply to gardening/lawn equipment? Remember that in both cases, decibel limits apply at the property line. Time to determine the decibel levels! It's activity time.
- i. **Download this app:** Niosh Sound Level Meter
 - ii. **Then go to this website:**
<https://www.youtube.com/watch?v=KilQtE5NI90&t=886s> (it's vacuum cleaner sounds for three hours).
 - iii. Then measure the sound, put yourself in a resident's place, and ask at what level this would be really annoying during the day/then during the night.
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- c. Noise regulations in comparable cities: <https://chatgpt.com/share/68869f74-ff88-8011-ae9c-6914e6d726bf>
- d. Full research report on noise ordinance draft: <https://chatgpt.com/share/6886a093-3a88-8011-8bf4-70006e998287>
- e. Noise ordinance draft (generated by AI not reviewed by staff/legal):
<https://www.dropbox.com/scl/fi/8chn889zm4u9akl0wobw/Noise-Ordinance-Final-and-Styled.docx?rlkey=w16d7ed1c34irtlknt83r23t5&dl=0>
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City of West Lake Hills City Council

AGENDA REPORT

Meeting Date:	August 6, 2025	Item Number:	4
Department:	Administration		
	Trey Fletcher,		
Prepared By:	City Administrator	Cost / Budget:	n/a
Exhibits:	None	Source of Funds:	n/a

Subject

Discuss infrastructure requirements and specifications appropriate to West Lake Hills.

Recommendation

Discuss and provide direction as appropriate.

Discussion

Common among cities in the central Texas region, the City of West Lake Hills does not have its own standards and specifications related to infrastructure and drainage. Instead, the City refers to the City of Austin Engineering Design Manual. In some case, Travis County standards are utilized.

Given the unique attributes of West Lake Hills and the city's Master Plan, the current standards do not conform as well as they perhaps could, and alternatives could be contemplated using a hybrid or blended approach.

Resources for this agenda item discussion include the following:

- Civil (Site) & Environmental Engineering Standards <https://www.nps.gov/dscw/ds-civil-environmental.htm>
- (National) Park Road Standards 1984 <https://highways.dot.gov/federal-lands/design/library/park-road-std.pdf>
- City of Austin
 - <https://library.municode.com/TX/Austin> and
 - <https://www.austintexas.gov/departments/construction-standards>
- Travis County <https://online.encodeplus.com/regs/traviscounty-tx/doc-viewer.aspx?secid=3257#secid-3257>

Side-by-Side Comparison of Standards (AI Generated) for discussion purposes

Category	U.S. National Park Service (NPS) Standard	City of Austin Standard	Potential Considerations for West Lake Hills
Roadways	Narrow lanes, no curb-and-gutter, natural drainage	Standard lane widths, curb-and-gutter, storm drains	Use NPS for local streets; Austin for arterials
Paving Materials	Chip seal, native color asphalt, pervious surfaces	Asphalt or concrete, standard materials	Prioritize NPS aesthetic with City specs as backup
Trails	Pervious trails, natural alignment, ADA-grade compliance	Concrete shared-use paths, ADA ramps and tactile strips	NPS trail guidance with ADA compliance
Sidewalks	Not typically included	Required per zoning; concrete with curb ramps	Use Austin standard only in subdivisions
Stormwater	Bioswales, rain gardens, sheet flow	Detention ponds, storm sewer systems	Hybrid: NPS methods with Austin performance criteria
Lighting	Dark sky compliant, shielded, warm light spectrum	Full urban lighting coverage, 3000K+ fixtures	Use NPS throughout
Tree Preservation	Avoidance preferred, minimal clearing	Regulated by mitigation standards	Prioritize NPS-style preservation
Parking Lots	Pervious paving, vegetated buffers, minimal footprint	Concrete or asphalt, standard layouts	Use NPS layout with Austin fire access standards
Water/Wastewater	N/A – site-based systems	Austin Water Utility standards	Use Austin standards and coordination
Signage	Rustic, low-profile, interpretive	MUTCD-compliant urban signage	NPS for internal wayfinding, Austin for road signs



City of West Lake Hills City Council

AGENDA REPORT

Meeting Date:	August 6, 2025	Item Number:	5
Department:	Administration		
Prepared By:	Trey Fletcher	Cost / Budget:	n/a
Exhibits:	Example policies	Source of Funds:	n/a

Subject

Discuss purpose and need for city policy related to artificial intelligence (AI).

Recommendation

Discuss and provide direction as appropriate.

Discussion

As artificial intelligence technologies become more accessible and are increasingly embedded in government operations, cities across Texas are facing the challenge of integrating these tools responsibly. AI has the potential to streamline administrative processes, enhance service delivery, and support data-driven decision-making. At the same time, it introduces a range of legal, ethical, and operational risks, especially if implemented without proper safeguards. Given recent developments in Texas law and guidance from the Texas Municipal League (TML), the City has a compelling need to establish a formal policy governing the use of AI systems across departments.

In 2025, the Texas Legislature passed the Texas Responsible Artificial Intelligence Governance Act (TRAIGA 2.0), which goes into effect on January 1, 2026. This law creates a baseline framework for the use of AI across public-sector agencies, including local governments. Under TRAIGA, cities must disclose when residents interact with AI-powered systems and are prohibited from deploying AI in ways that infringe on individual rights, including biometric surveillance or social-scoring applications. Additional legislation—specifically House Bills 2818 and 3512, and Senate Bill 1964—requires municipalities to conduct impact assessments for high-risk AI applications, develop public-facing AI policies, and provide staff training on responsible and equitable use of AI. These legal requirements apply to any AI tool that may influence access to public services, eligibility determinations, or enforcement actions.

Given this landscape, the City should consider developing a municipal AI policy that defines the types of technologies covered, outlines acceptable and prohibited uses, and establishes procedures for evaluation, implementation, and oversight. Such a policy would include several key components:

- A clear definition of AI systems, including machine learning, generative tools, and automated decision-making technologies, along with the scope of their use within the City;
- A commitment to transparency, ensuring residents are notified when AI influences their interactions with the City;
- Procedures for conducting risk assessments and impact evaluations prior to implementing any high-risk AI tools;
- Prohibitions on uses that violate state law, such as biometric tracking without consent, manipulative behavioral algorithms, or deepfake content generation;
- Procurement standards and vendor accountability, including disclosure of training data and algorithmic bias mitigation strategies;
- Human oversight requirements, ensuring critical decisions are subject to review and not fully automated;
- Data governance policies, protecting the accuracy, privacy, and lawful use of data used in or generated by AI systems;
- Staff training, consistent with Texas House Bill 3512, to promote understanding of AI's benefits and risks, especially in public service contexts;
- Regular audits and policy updates, to ensure ongoing compliance with Texas law and alignment with evolving TML recommendations.

Without such a framework, the City risks non-compliance with emerging state mandates, exposure to legal liability, and erosion of public trust. Conversely, by adopting a proactive and well-structured AI policy, the City can support innovation while upholding its legal obligations and ethical responsibilities.

Staff recommends initiating a process to develop this policy in coordination with legal counsel, department leadership, and city council direction.

Univista AI Policy

Received July 8, 2025 from Univista

Overview

This policy is intended to provide guidance to any procedures created to guide or document the usage of Artificial Intelligence (AI) tools used by UniVista that are either independent or integrated into UniVista system or applications. Current **public AI tools** widely in use include but are not exclusive to the following: ChatGPT, Bing Chat, Google Bard, and **AI integrations** in Office 365 and other Microsoft Products (CoPilot).

Definitions and Terminology

- **Artificial Intelligence (AI)** - AI combines three disciplines—math, computer science, and cognitive science—to mimic human behavior through various technologies. All of the AI in place today is task-specific, or narrow AI. This is an important distinction as many think of AI as the general ability to reason, think, and perceive. This is known as Artificial General Intelligence
- **Closed AI System** - A closed AI system is a self-contained system that only allows certain users to access its models and data. Closed AI systems are designed to perform specific tasks within a defined environment.
- How closed AI systems work
 - **Training** - Models are fine-tuned using proprietary datasets without exposing them to external entities.
 - **Processing** - Data processing and inference occur locally, eliminating the need for internet connectivity to third-party servers.
 - **Data location** - Data is kept on-premises or in a private cloud.
 - **Access** - Only certain groups, such as an AI developer company or a specific group within it, can access the system. Benefits of closed AI systems protect proprietary information, ensure the control and accuracy of training datasets, avoid legal issues surrounding open source systems, and maintain an edge in commercializing innovations.
- **Prompt** - This is the field where you provide the AI tool the directions it needs to solve your question or task.

- Types of prompting
 - **Zero-shot prompting:** Provides the AI with a direct instruction or question without additional context or examples.
 - **N-shot prompting:** Provides the AI with a series of input-output pairs to learn from.
 - **Chain-of-thought prompting:** A type of prompting that can be used to improve the quality of AI outputs.
- Best practices
 - Be specific
 - Provide instructions on what to do instead of what not to do
 - Give the model a persona or frame of reference
- **Personally Identifiable Information (PII)** - names, social security numbers, and biometric records
- **Public AI Tools** - These AI systems are publicly available AI algorithms, programs, or systems. Public AI systems are designed to be inclusive and available to a wide range of people. The data, queries, and search history contained in a Public AI tool are available to the general public. Providers of public AI may use customer data to improve their own services.
- **Regulated Data** - Regulated data is information that is subject to laws and regulations that protect it. It can include personal health information, financial information, and personally identifiable information (PII).
 - Examples of regulated data
 - Healthcare history
 - Criminal History
 - Education records
 - Social Security numbers
 - Driver's license numbers Bank account numbers
 - Credit card numbers
 - Laws and regulations that protect regulated data

- **Health Insurance Portability & Accountability Act (HIPAA)** : Protects the privacy and security of electronic health care records
- **Gramm Leach Bliley Act (GLBA)**: Requires financial institutions to protect customer information
- **Family Educational Rights and Privacy Act (FERPA)** : Protects education records
- **Sarbanes-Oxley Act of 2002 (SOX)**: Requires public companies to meet certain requirements to make accurate corporate disclosures
- **National Credit Union Administration (NCUA)**: NCUA compliance is the process of following the federal laws and regulations that govern credit unions.
 - What does NCUA compliance include?
 - **Anti-money laundering (AML)**: Credit unions must comply with AML laws
 - **Customer protection**: Credit unions must protect customers from harm
 - **Credit score reporting**: Credit unions must comply with credit score reporting regulations
 - **Data security**: Credit unions must protect member information
- **Criminal Justice Information Services (CJIS)**: A division of the FBI that provides services and technologies to law enforcement, intelligence, and the public.
 - What does CJIS do?
 - Manages a variety of systems, including the National Crime Information Center (NCIC), Automated Fingerprint Systems (AFIS), and the National Instant Criminal Background Check System (NICS)
 - Provides tools and services to law enforcement, intelligence, and the public
 - Protects Criminal Justice Information (CJI)

- Data compliance - Regulated data is always sensitive and should be kept confidential. It should be classified and protected by technical safeguards and contractual protections.

Staff Usage Guidelines

- **No Sensitive Data in Prompts**
 - Only use close, secured AI systems for UniVista use.
 - Do not input confidential or regulated data (e.g., CJI, PII, medical info) into **AI tools**.
 - If unsure, treat any data as sensitive and consult your organization's designated AI expert.
- **Acceptable Use Cases**
 - Drafting general communications (emails, memos) that contain **no regulated data or personal info**.
 - Brainstorming or summarizing **publicly available** information.
 - Generating outlines or templates for routine tasks.
 - Developing and using specific trained models for specific tasks.
- **Human Oversight**
 - Always review and confirm AI output for **accuracy** and **appropriateness** before using it.
 - Staff remain fully responsible for any AI-assisted content they publish or decisions they make.
- **Compliance with CJIS**
 - **CJIS data may not be used with non-CJIS-compliant AI** or stored in public platforms.
 - For any AI handling regulated data, ensure it is in a **CJIS-approved** environment (e.g., Microsoft Government Cloud).
- **Respect Ethical Standards**
 - Do not use AI to produce **discriminatory, harassing, or harmful** content.
 - No AI-based decisions should **replace** critical human judgment.

PII Concerns

- **PII Examples:** Full names, social security numbers, addresses, phone numbers, email addresses, dates of birth, driver's license numbers, financial accounts, criminal record info, etc.
- **Prohibitions:** **Never** paste PII into public AI prompts. This violates both privacy law and CJIS rules, and can risk data leaks.
- **Secure Handling:** If you must analyze data containing PII, use **authorized internal systems** or CJIS-compliant solutions—**not** publicly accessible AI.

On-Site AI Expert

- An **on-site AI expert will be designated**, who:
 - Reviews AI use cases against this policy and answers staff questions.
 - Ensures **compliance** with CJIS and all other applicable regulations.
 - Liaises with technical staff to maintain secure and up-to-date AI tools.
 - Oversees **incident reporting** if sensitive data is ever exposed or misused.

Security Measures

- **Access Control:** Limit AI tool access to authorized staff.
- **Encryption:** Use **secure connections** (HTTPS, TLS) for data transfers.
- **Logging & Auditing:** Keep records of AI usage. Review logs for **policy violations**.
- **Vendor Agreements:** Ensure AI providers **commit to data protection** (e.g., no training on client data).
- **User Training:** Train staff to recognize **safe AI usage** practices and to report suspicious activity.

Transparency & User Control

- If AI assists with public-facing communications (e.g., chatbots), **disclose** that it is AI-driven and provide an option to **opt out** for a human alternative.
- Users with concerns can **escalate** to the on-site AI expert.

Policy Updates

- This policy is reviewed **annually** (or sooner if needed) to align with **CJIS updates** and emerging AI regulations.



Policy: Artificial Intelligence (AI) Governance

Effective Date: 3/28/2025

Policy Purpose

The purpose of this policy is to establish guidelines for the ethical, secure, and effective use of artificial intelligence (AI) technologies by Team Garland Members. This policy promotes transparency, accountability, and human oversight in AI-driven processes while ensuring continuous evaluation and improvement of AI systems as technology evolves. Through this policy, the City is committed to leveraging AI in a manner that enhances public services and the quality of life for all residents while remaining adaptable to future advancements in AI technologies.

Applicability

This policy applies to all City of Garland departments, Team Members, contractors, and third-party vendors who develop, implement, or use AI systems for City operations. It covers all AI applications, from simple automation tools to complex decision-making systems.

General Administration

It is the Policy of the City to use artificial intelligence (AI) technologies ethically and responsibly to enhance City services and efficiency while prioritizing citizen privacy and rights. In so doing, the City commits to maintaining the highest standards of data privacy and security; ensuring transparency and accountability in AI systems; preserving human oversight for critical decisions; providing comprehensive training to Members of Team Garland on AI usage; complying with all relevant laws and regulations; regularly reviewing and updating AI governance policies; and fostering collaboration both within the City and with external experts. Through these commitments, the City of Garland seeks to harness the benefits of AI technology while maintaining ethical conduct, transparency, and respect for citizen rights and privacy, ultimately striving to improve the quality of life for all residents through responsible technological advancement.

1. Authorized AI Tools

The City of Garland authorizes the use of specific AI tools to support its operations while ensuring compliance with security, ethical, and regulatory requirements. The following AI tools are currently approved for use by Members of Team Garland:

- 1.1. OpenAI ChatGPT – A generative AI tool designed for natural language processing, content creation, and automation of routine workflows.
- 1.2. Anthropic Claude – A conversational AI model optimized for safe and helpful interactions in decision support and knowledge management.
- 1.3. Google Gemini – A multimodal AI tool used for research, summarization, and workflow automation.
- 1.4. Google AI Studio and Notebook LM – AI-driven tools for document processing, knowledge synthesis, and collaboration.

Use of any AI tool outside of those listed requires prior approval from the IT Department to ensure compliance with the City's security, privacy, and governance standards.

2. Information Privacy and Security

Members of Team Garland must not enter confidential information into AI systems. The following types of information should never be input into any AI tool:

- 2.1. Personally Identifiable Information (PII) -- Personal information about citizens, Team Members, or any individuals must not be entered into AI systems. This includes but is not limited to names, addresses, phone numbers, email addresses, social security numbers, driver's license numbers, and any other information that could identify an individual.
- 2.2. HIPAA Information – Any data subject to HIPAA regulations should never be entered into AI systems, including patient records, health histories, treatment information, or any other health-related data.
- 2.3. Confidential Information – AI tools must not be used with confidential City information such as CJIS data, security information, passwords, banking information, or private information regarding Members of Team Garland. This prohibition includes screenshots, summaries, or paraphrased versions of such information.

3. Verification and Validation of AI Outputs

Members of Team Garland must not rely solely on AI-generated outputs without verification. Members of Team Garland are required to:

- 3.1. Review AI Outputs for Accuracy – Members of Team Garland must independently verify any output produced by AI systems to ensure its accuracy, especially in matters involving significant decisions, policy recommendations, or external communications.
- 3.2. Understand AI Limitations – AI systems may provide incomplete or inaccurate information. Users must be cautious when interpreting results and ensure that AI-generated information aligns with established facts and legal requirements.

4. Workflow Documentation and Continuity

To ensure long-term continuity and clarity in AI-driven workflows:

- 4.1. Document AI Workflows – Members of Team Garland should maintain basic documentation of workflows performed by AI. The IT Department will provide templates for this purpose.
- 4.2. Ensuring Continuity – Any new AI workflow or update to an existing workflow must be documented to ensure continuity, especially in cases of personnel turnover. This guarantees Team Garland can continue to operate, modify, or troubleshoot AI workflows when necessary.

5. Ethical Use of AI

AI systems must be used ethically and in ways that promote fairness and avoid bias. To this end, AI systems must be monitored to prevent discriminatory outcomes against any protected class or group.

6. Training and Education

Members of Team Garland who interact with AI systems must receive adequate training to ensure they understand the tools they are using and the ethical implications:

- 6.1. KnowBe4 AI Training Requirement – Each user of AI systems must take, and pass, AI-specific training developed using the KnowBe4 platform twice per year. This training will focus on AI usage, risks, and best practices. Compliance with this training requirement will be monitored and enforced by the City's IT Department.

- 6.2. Regular Training Sessions – In addition to the KnowBe4 training, Members of Team Garland will be required to participate in ongoing training sessions on AI systems, including their limitations, proper use, and governance.
- Understanding AI Risks – Training will emphasize the risks of over-reliance on AI, the importance of verifying AI outputs, and strategies to mitigate potential errors.

7. Compliance with Laws and Regulations

- 7.1. Regulatory Compliance – All AI systems used by the City must comply with relevant federal, state, and local laws, including but not limited to privacy laws, non-discrimination regulations, and records management statutes.
- 7.2. Ongoing Review of Legal Obligations – The City will conduct periodic reviews to ensure AI systems remain compliant with new or evolving regulations that impact AI technology.

8. Human-in-the-Loop for Critical Decisions

- 8.1. Human Oversight Required – AI systems should not be fully automated for critical decisions, such as those that impact City services or citizen rights. Human judgment and oversight must always be included to ensure accuracy, fairness, and context are applied.

9. Regular Policy Review

- 9.1. Review and Updating – This AI Governance Policy will be reviewed and updated annually, or more frequently if required, to keep pace with rapidly evolving AI technology and regulations.
- 9.2. Review Input – The review process will involve input from various departments and external experts as needed.

10. IT Department Oversight

- 10.1. AI Oversight – The City of Garland IT Department will be responsible for the overall oversight and management of AI technology used within the City.
- 10.2. Responsibilities of the IT Department include:
- Maintaining an inventory of all AI systems used across City departments.
 - Ensuring all AI systems comply with this policy and other relevant City policies.
 - Coordinating with departments to implement appropriate security measures for AI systems.
 - Providing technical support and guidance for AI implementation and use.
 - Managing the AI training program, including the KnowBe4 AI training requirement.

- Staying informed about emerging AI technologies and best practices.
- Recommending updates to this policy based on technological advancements.

10.3. All departments must consult with the IT Department before procuring or implementing new AI systems to ensure alignment with City-wide standards and this policy.

10.4. The IT Department will provide reports to City leadership as necessary on the status of AI implementation, any significant issues or incidents, and recommendations for improvements.

11. Collaboration and Knowledge Sharing

11.1. Inter-departmental collaboration and knowledge sharing on AI best practices within the City is strongly encouraged.

11.2. Regular forums and workshops will be organized to facilitate this knowledge exchange.

Definitions

Artificial Intelligence (AI) – Computer systems able to perform tasks that normally require human intelligence, such as visual perceptions, speech recognition, decision-making, and language translation.

Criminal Justice Information Services (CJIS) – Criminal justice data provided by the FBI’s Criminal Justice Information Services division, including fingerprints, criminal histories, and other law enforcement records. This information is subject to strict security standards outlined in the CJIS Security Policy, which governs the handling, transmission, and storage of sensitive data.

HIPAA – Health Insurance Portability and Accountability Act, a US law designed to provide privacy standards to protect patients’ medical records and other health information.

Members of Team Garland (Team Members) – A City of Garland full, part-time, or temporary employee.

Personally Identifiable Information (PII) – Any data that could potentially identify a specific individual.

Signature



Judson Rex, City Manager