Guidance on
Generative Artificial Intelligence (GenAI)

Introduction

If used responsibly, Generative Artificial Intelligence (GenAI) has the potential to enhance the productivity and performance of ETF staff in administering retirement and insurance benefits. GenAI learns from vast sets of data and can produce content that mimics human creativity. However, there are risks with using this rapidly evolving technology. **Confidential information must never be entered into a public GenAI**, as it is not secure. Additionally, the **content produced by GenAI tools must be carefully reviewed**, as it can be inaccurate, outdated, biased, or could violate copyright laws. This Guidance is intended to assist you with understanding how to minimize these risks and to comply with ETF policies, while gaining the benefits of GenAI technology.

Principles

While GenAI has potential to enhance creativity, innovation, and efficiency, the technology also introduces new challenges and risks that require careful navigation. Because GenAI is an emerging technology, ETF's goal at present is to minimize risks associated with the use of GenAI, while allowing staff to first become familiar with the technology and determine GenAI's possible operational benefits. Accordingly, ETF will observe the following principles in using GenAI technology:

- **Risk Management:** Embrace responsible use of Generative AI, adhering to legal standards and prioritizing privacy and security. Proactively assess risks ahead of time for improved efficiency, communication, and service.
- **Privacy and Security:** Consider the impact of every GenAI tool on security and customer privacy. Confidential information should never be entered into a publicly available GenAI tool as the information could be incorporated into the GenAI tool for use by others.
- **Empowerment for Efficiency:** The use of GenAI should empower our workforce to deliver improved and more efficient services to our customers, relying on staff's adherence to these guidelines on the use of GenAI tools.
- **Ethical Usage:** Identify and address biases, aiming for fairness, transparency, and accountability to avoid unintended consequences and uphold ethical GenAI usage practices.
- **Transparency and Accountability:** Share information responsibly, disclose the use of GenAI appropriately, and verify the accuracy of GenAI created content.

> **What is Generative AI?**
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> Generative AI (GenAI) refers to software tools that can produce human-like text, images, audio, and video based on an input (also called a "prompt") by the user. Common generative AI applications include ChatGPT, Google Gemini, and Dall-E. These tools use machine-learning algorithms that have been trained on large sets of text and image data from the Internet. The tools use the data to generate a human-like response to questions.
>
> GenAI tools have recently become widely accessible on the Internet via websites, and for downloading as locally installable applications and browser plug-ins. GenAI software is increasingly being integrated into widely used software, such as Microsoft's Office365 and SharePoint (CoPilot AI).

Guidance for Using Generative AI at Work

This Guidance is preliminary. This is a first step in what will likely be a long process to understand and evaluate the use of GenAI within the Wisconsin public sector and at ETF. Please be mindful of the following for any work-related use of GenAI:

- ✓ As with any activity using state equipment, use of GenAI should be professional, lawful, and comply with workplace conduct policies and rules (applicable policies and rules are listed at the bottom of this Guidance).

- ✓ Similar to all software, don't download or install GenAI software (including Internet browser plugins) without consulting ETF's Technical Architecture Review Committee (TARC). You may need to fill out a New Technology Request form. If you are unsure, contact the ETF Help Desk.

- ✓ For ETF staff who manage vendor relationships, work with existing vendors as appropriate to understand and provide feedback on the inclusion of GenAI capabilities in their solutions using the standard ETF terms and conditions as applicable. Work with the Bureau of Contracts and Procurement (BCAP) and/or the Office of Legal Services (OLS) to get contracts modified as appropriate if GenAI is being included in the vendor solution.

- ✓ If existing software that is used by ETF newly incorporates Gen AI functionality, please work with TARC to determine if those features and capabilities are appropriate for ETF to use. TARC will work with OLS and BCAP as appropriate to determine if and how to use Gen AI functionality in the existing software.

- ✓ Use your ETF e-mail address for registration and account creation when using GenAI tools. Do not use a personal email address. The GenAI account associated with a user's ETF e-mail address should be used solely for ETF business purposes. Personal use of a GenAI system from an account using an ETF managed identity or e-mail is prohibited.

- ✓ GenAI should only be used to streamline early stages of work tasks, such as idea-generation, outlining, and rough drafts. Any final work product should have human review.

- ✓ Never enter Restricted or Protected Information (Personally Identifiable Information, Protected Health Information, Operational Materials (as defined in the Acceptable Use Policy), or any other non-public information) into a GenAI tool. Information you enter can be viewed by the company that made the GenAI tool, and there is a risk the information could become public. See Information Classification Policy; Acceptable Use Policy.

- ✓ When using GenAI to generate emails or correspondence to members human review is required.

- ✓ Fact check AI-generated content. You are responsible for what you create with GenAI.

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✓ Review GenAI-generated content for copyrighted material, especially output that is intended for external use, such as documents posted to the ETF website. Do not use GenAI content with copyrighted material unless proper attribution is given.

✓ When the option is available within the GenAI tool, opt out so that prompts are not used to train the GenAI system.

✓ Don't generate material that is sexual in nature or otherwise inappropriate.

Permissible Uses of GenAI

Carefully consider the potential impacts of the information you enter into a GenAI tool. Once entered, it cannot be removed, and may be viewed by the developers of the GenAI application or possibly by other users. Therefore, never enter information into a GenAI tool that could cause harm if that information was made available to the public. If in doubt, don't enter the information into the GenAI tool.

While personally identifiable information is an obvious prohibited category of information to enter into a GenAI tool, consider that some types of internal information, even if non-personal, could be exploited by a bad actor or are not appropriate for an external audience. For example, scoring of contract bids, drafts of departmental determinations, privacy/security policies and procedures, systems information, and continuity of operations or disaster response should not be entered into a GenAI tool.

The following outlines some examples of currently permissible uses of GenAI, which will likely evolve as we gain familiarity with the technology. This is not a comprehensive list of the permitted uses, but rather illustrates some common, approved use cases that are lower risk.

- Documentation (GenAI should only be used to streamline early stages of work tasks and rough drafts of Governance Documents, Position Descriptions, Policies, Procedures, Standards, Presentations, Agendas). Drafts of scripts and other materials for trainings.
- Summarizing Long Tracts of Text
- Generating images
- Analysis of Publicly Available Data (for example, public pension funding levels).
- If you have questions regarding the use of GenAI that is not covered above, please reach out to etfsmbinformationsecurity@etf.wi.gov and include your supervisor on the communication.

Examples of Currently Restricted Use Cases

Using GenAI tools that need to be installed on a computer is currently prohibited as is any use that involves ETF customer or proprietary data that isn't available to the public.

Risks of Using Generative AI

- **Data Entered into GenAI as Prompts Causes Privacy/Security Issues:** All data, including any confidential data, entered into publicly accessible GenAI tools can be viewed by the companies that make the tool, and in some cases, the public. Sensitive data entered into GenAI is a disclosure of the data.

- **GenAI Provides Outdated Information:** GenAI learns from vast sets of Internet data, but not in real time. GenAI output will not reflect information available after the latest AI "training" cycle.

> **Top Tips for Using GenAI**
>
> ✓ *Check Your Facts.* GenAI makes mistakes. Have a subject matter expert confirm the GenAI-generated content before using.
>
> ✓ *Don't Share Sensitive Info.* Never enter Restricted or Protected Information (PII, PHI, Operational Information or any other non-public information) into a GenAI tool, such as ChatGPT.
>
> ✓ *Questions?* Start with your supervisor.

- **GenAI Provides Inaccurate Information:** Content created by GenAI often appears polished and credible but can be incorrect. Without a subject matter expert to confirm the accuracy, GenAI has the potential to mislead. At the extreme, GenAI can produce confident responses that are false (sometimes referred to as a GenAI "hallucination.").

- **GenAI Provides Biased Information:** Because GenAI ingests large amounts of data from many Internet sources, and not always vetted, outputs may contain inaccurate assumptions or stereotypes. Users of GenAI must carefully review GenAI output for bias, which could be subtle.

- **GenAI Provides Content that Violates Copyright Laws:** GenAI tools ingest information for training purposes, including information that may be subject to copyright. Copyrighted information could be inappropriately included in any output generated by the GenAI system, creating intellectual property risks.

- **GenAI Provides Confidential or Non-Public Information:** GenAI outputs may inadvertently contain confidential or other sensitive information.

Definitions

Artificial Intelligence (AI) is a general term for any theory, computer system, or software that is developed to allow machines to perform tasks that normally require human intelligence. The virtual assistant software on your cellphone is an example of artificial intelligence.

Gemini is an AI Chatbot marketed by Google.

ChatGPT is an AI chatbot launched in November 2022 by OpenAI that uses generative AI and natural language processing to simulate human-like conversations in a chat window where the user can ask the bot to help with a variety of tasks, including drafting emails, essays, code, and more.

CoPilot is a chatbot integrated into Microsoft systems (Windows 11, Office365). It is currently not included in the governmental version of Office365 used at ETF.

DALL-E is a text-to-image model developed by OpenAI using deep learning methodologies to generate digital images from natural language descriptions, called "prompts." As of October 2023, DALL-E is integrated into ChatGPT and available for pay versions of ChatGPT.

Generative AI (GenAI) is a type of AI system capable of generating text, images, or other media in response to prompts.

Natural Language Processing is the field of artificial intelligence where computer science meets linguistics to allow computers to understand and process human language.

Publicly Available for purposes of this document refers to information we already share outside of ETF with the public at large.

Prompt refers to natural language text describing the task that an AI should perform. For example, "Can you summarize this report?" or "Please review this email message and make it more succinct without losing its main points."

ETF Policies that Apply to Use of Generative AI

Inappropriate use of Gen AI technologies could result in violation of the policies identified below:

Work Rules & Code of Ethics (Employee Handbook Section 7)

Acceptable Use Policy

Human Resources Security Policy

Information Classification Policy

Information Security Compliance Policy

Public Records Request Policy

Remote Work Policy

System Acquisition, Development & Maintenance Policy

Appendix A: Currently Approved GenAI Tools

Approved Tool	Description
	ChatGPT is an AI chatbot launched in November 2022 by OpenAI that uses generative AI and natural language processing to simulate human-like conversations in a chat window where the user can ask the bot to help with a variety of tasks, including drafting emails, essays, code, and more.
	DALL·E is a text-to-image model developed by OpenAI using deep learning methodologies to generate digital images from natural language descriptions, called "prompts." As of October 2023, DALL-E is integrated into ChatGPT and available for pay versions of ChatGPT.
Fraud.net	**Fraud.net** is a cloud-born platform that helps organizations of all sizes harness AI-driven risk intelligence to detect fraud, streamline their customer onboarding and transaction monitoring workflows, and leverage real-time, actionable insights to make safer, smarter, and more profitable decisions.
	Gemini is an artificial intelligence chatbot marketed by Google.
	Microsoft Copilot is a chatbot developed by Microsoft and launched on February 7, 2023.
OpenAI	**OpenAI** is a U.S.-based artificial intelligence (AI) research organization founded in December 2015, researching artificial intelligence with the goal of developing "safe and beneficial" artificial general intelligence.

Appendix B: Examples of Appropriate Use

	GenAI Use Examples
	Goal/Purpose: Generate ideas for items to include in an Introduction to GenAI training for staff Prompt: Generate GenAI training outline ideas
	Goal/Purpose: Aid in the creation of a position description Prompt: What are responsibilities of a systems analysis for data management and business intelligence?
	Goal/Purpose: Summarize publicly available information Prompt: Could you please provide a 3-5 sentence summary of key U.S. federal health insurance legislation from 1920 to present?
	Goal/Purpose: Generate a DRAFT message to ETF employers regarding upcoming IYC enrollment Prompt: Create a message to ETF employer partners on IYC enrollment timeline using the following URL: https://etf.wi.gov/news/its-your-choice-2022-employer-information-timeline
	Goal/Purpose: Aid in the creation of graphics design for publications, presentations, and other communications Prompt: Generate a series of realistic images depicting the workplace environment and customer service. Capture diversity, equity, and inclusion
	Goal/Purpose: Aid in the creation of educational and informational videos Prompt: Transform this written script into a video format with shot suggestions, intro copy, and a call to action at the end

*Remember to check your facts, don't share sensitive information, and ask your supervisor if you have questions. *

Appendix C: GenAI Decision Tree

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                                    │  Start  │
                                    └────┬────┘
                                         │
                                         ▼
                                   ◇ Is the Gen AI tool
              Yes ─────────────────  approved for use? Gen  ──── No
               │                     AI approved tool list            │
               │                     within the Gen AI                │
               │                     guidelines document ◇            ▼
               │                                              ┌──────────────────┐
               │                                              │ Do NOT use Gen AI│
               ▼                                              │ tool. If tool    │
        ◇ Is the Gen AI tool                                  │ approval is      │
  Author  authoring new content  Edit                        │ desired, follow  │
   │  ──── or editing existing ──┐                           │ the process for  │
   │       content? ◇            │                           │ requesting new   │
   │                             │                           │ software in      │
   ▼                             ▼                           │ Ivanti.          │
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Author vs. Edit Activities:

Edit: Asking a Gen AI tool to edit a piece of material that is already on ETF's website to make it easier to understand.

Author: Asking a Gen AI tool to create an invitation to a retirement webinar for Local employers.

Author →

The tool can be used but non-public ETF information should not be entered into the tool to allow it to author information

Use ETF work email for Gen AI tool account registration

Edit →

Do NOT use Gen AI tool. If tool approval is desired, follow the process for requesting new software in Ivanti.

◇ Is the information being submitted to the Gen AI tool information ETF has shared publicly or information available in the public domain?

ETF confidential information such as PII, PHI, and other sensitive data should not be entered into a Gen AI tool.

Yes → Yes go ahead and use the Gen AI tool

No → Do NOT use the Gen AI tool