CARVER COUNTY COMMUNITY DEVELOPMENT AGENCY

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Carver County CCCDA Artificial Intelligence (AI) Governance and Responsible Use Policy

Adopted: **Resolution No.:**

The Carver County Community Development Agency (CCCDA) believes that responsible adoption of AI should enable employees not to replace them and should strengthen public service while preserving accountability, transparency, and human oversight.

Purpose:

The purpose of this policy is to establish clear standards for the responsible use and governance of Artificial Intelligence (AI) in support of CCCDA business operations.

This policy is intended to:

- Promote the responsible, ethical, and secure use of AI;
- Protect sensitive information and maintain public trust;
- Encourage innovation while appropriately managing organizational risk;
- Ensure compliance with applicable laws, regulations, and CCCDA policies; and
- Reinforce that AI is intended to support not replace professional judgment, critical thinking, or human decision making.

Employees and Members of the Board of Commissioners remain fully responsible and accountable for all work products, communications, recommendations, and decisions developed with the assistance of AI.

Scope:

This policy applies to all employees, Members of the Board of Commissioners, consultants, contractors, volunteers, interns, and other authorized individuals who access, use, manage, procure, develop, administer, or otherwise interact with Artificial Intelligence (AI) in connection with CCCDA business, operations, or services.

This policy applies regardless of:

- Whether AI functionality is embedded within CCCDA approved software, applications, systems, or technology resources;
- Whether AI is accessed through approved enterprise AI platforms, publicly available or web based AI applications, or future AI technologies;
- Whether AI is accessed through CCCDA owned devices, systems, networks, accounts, third party platforms, or personal devices used to conduct CCCDA business; or
- How AI is used to support or assist CCCDA operations, communications, research, administrative functions, resident services, analysis, decision making, or other organizational activities.

CARVER COUNTY COMMUNITY DEVELOPMENT AGENCY

Responsible AI Governance

Data Protection: To protect CCCDA information while supporting the responsible use of Artificial Intelligence, employees and Members of the Board of Commissioners must exercise sound judgment and follow the requirements below when using AI.

The following standards apply to all AI use conducted on behalf of CCCDA:

- Sensitive Data must not be entered, uploaded, shared, stored, or processed within any AI system unless the platform has been formally approved by CCCDA for that purpose and appropriate security, privacy, and contractual safeguards are in place.
- AI capabilities embedded within CCCDA approved software and approved AI applications may be used for legitimate CCCDA business purposes, provided they are used in accordance with this policy, the application's licensing terms, and all applicable security, privacy, and records management requirements.
- Publicly available, personally obtained, or otherwise unapproved AI platforms must be treated as external systems. CCCDA business information, Sensitive Data, confidential information, or internal work product must not be entered, uploaded, shared, stored, or processed within these platforms unless they have been formally approved by CCCDA.
- Employees and Members of the Board of Commissioners are responsible for exercising professional judgment when determining whether information is appropriate for use within an AI system and should use only the minimum amount of information necessary to accomplish the intended business purpose.
- When uncertainty exists regarding whether information is considered Sensitive Data or whether an AI platform has been approved for organizational use, employees and Members of the Board of Commissioners must not proceed until guidance has been obtained from the Executive Director, Information Technology staff, or another designated leadership representative.
- The availability of AI functionality within a software application does not automatically authorize the use of external AI platforms or the sharing of CCCDA information outside of approved systems.

Compliance with Laws and Regulations: To ensure AI is used in a lawful, ethical, and responsible manner, employees and Members of the Board of Commissioners must comply with all applicable laws, regulations, contractual obligations, licensing requirements, and CCCDA policies when using Artificial Intelligence (AI).

The following standards apply to all AI use conducted on behalf of CCCDA:

- AI must be used in compliance with all applicable federal, state, and local laws; data privacy and security requirements; records retention obligations; intellectual property rights; licensing agreements; contractual obligations; and other applicable legal or regulatory requirements.
- All AI use must comply with CCCDA policies, including but not limited to the Employee Handbook, Code of Ethics, Standards of Conduct, procurement requirements, records management requirements, and other applicable organizational policies and procedures.
- Employees and Members of the Board of Commissioners must not use AI in a manner that violates copyright laws, confidentiality obligations, licensing agreements, procurement requirements, or applicable professional or ethical standards.

- Plagiarism, misrepresentation, falsification, deceptive practices, or presenting AI generated content as original work without appropriate attribution, when required, is prohibited.
- AI generated content must be reviewed and verified for legal, factual, regulatory, and policy compliance before it is distributed, published, relied upon, or incorporated into organizational decision making.
- AI must not be used to bypass or circumvent established CCCDA review, approval, procurement, legal, compliance, records management, or other governance processes.
- Employees and Members of the Board of Commissioners remain fully responsible and accountable for all communications, analyses, recommendations, decisions, and work products developed with the assistance of AI.

Ethical and Responsible Use: To uphold CCCDA's values, maintain public trust, protect the integrity of organizational operations, and promote the responsible use of Artificial Intelligence (AI), all AI conducted on behalf of CCCDA must be ethical, professional, transparent, and consistent with applicable laws, organizational policies, and the Agency's mission and values.

AI is intended to support not replace human judgment, professional expertise, ethical decision making, or accountability. Employees and Members of the Board of Commissioners remain responsible for all work performed with the assistance of AI.

The following standards apply to all AI use conducted on behalf of CCCDA:

- AI must not be used to generate, distribute, or support content that is misleading, deceptive, discriminatory, offensive, harassing, fraudulent, unlawful, or otherwise inconsistent with CCCDA's mission, values, or professional standards.
- AI must not be used to knowingly create, spread, amplify, or rely upon misinformation or materially inaccurate information.
- AI must not be used in a manner that could result in biased treatment, discriminatory practices, or inequitable outcomes affecting employees, applicants, residents, tenants, vendors, or members of the public.
- AI generated content, recommendations, analyses, and summaries must be reviewed, verified, and evaluated using independent human judgment before being relied upon or incorporated into communications, decisions, or organizational work products.
- AI must not be used as a substitute for professional expertise or to independently interpret laws, regulations, contractual requirements, compliance obligations, or legal guidance. Requests requiring legal, regulatory, or policy interpretation must be directed to the appropriate supervisor, leadership representative, or legal counsel, as applicable.
- AI may assist in gathering, organizing, or analyzing information but must not be used as the sole basis for employment actions, housing eligibility determinations, compliance decisions, procurement decisions, disciplinary actions, or other matters requiring human judgment, due process, or professional discretion.
- Employees and Members of the Board of Commissioners remain responsible and accountable for ensuring that all AI assisted work reflects CCCDA's standards of professionalism, accuracy, fairness, integrity, transparency, and ethical conduct.

Human Centered Decision Making: CCCDA recognizes Artificial Intelligence (AI) as a tool to support employees, improve operational effectiveness, and enhance service delivery when used responsibly. AI is intended to support not replace human judgment, professional expertise, ethical decision making, or accountability.

The following principles apply to all AI use conducted on behalf of CCCDA:

- AI may assist in gathering, organizing, analyzing, or generating information; however, employees and Members of the Board of Commissioners remain responsible and accountable for all decisions, communications, recommendations, and work products developed with the assistance of AI.
- Decisions affecting residents, applicants, employees, vendors, public funds, regulatory compliance, housing related matters, or other organizational responsibilities must remain subject to human review, oversight, and accountability.
- AI generated information, recommendations, analyses, summaries, and other outputs must be independently reviewed, fact checked and validated against other reliable sources before being relied upon for organizational work, communications, or decision making.

Equity, Fair Housing, and Non Discrimination: CCCDA is committed to ensuring that Artificial Intelligence (AI) is used in a manner that promotes fairness, supports equal opportunity, and complies with all applicable federal, state, and local civil rights, fair housing, and nondiscrimination laws. AI must never be used in a way that undermines equitable treatment, due process, or the rights of individuals served by the Agency.

The following standards apply to all AI use conducted on behalf of CCCDA:

- AI must not be used in any manner that could result in discriminatory practices, biased outcomes, unequal treatment, or the unlawful denial of opportunities, services, benefits, or housing.
- AI may assist employees by organizing, summarizing, or analyzing information; however, it must not be used as the sole basis for housing eligibility determinations, applicant screening decisions, compliance determinations, reasonable accommodation decisions, employment actions, procurement decisions, or other matters involving legal rights, protected classes, or the exercise of professional judgment.
- Decisions that may affect an individual's rights, housing opportunities, employment, public benefits, or other protected interests must remain subject to meaningful human review, independent judgment, and accountability.
- Employees and Members of the Board of Commissioners are responsible for reviewing AI assisted work for potential bias, inaccuracies, or unintended discriminatory impacts before relying upon it in organizational work or decision making.

Quality Assurance and Review: AI generated and AI assisted work must meet the same standards of quality, accuracy, professionalism, and reliability as work developed without the use of AI. The use of AI does not reduce or replace existing review, approval, documentation, or quality assurance requirements.

The following standards apply to all AI assisted work performed on behalf of CCCDA:

- AI generated content must be reviewed to ensure it is factually accurate, complete, contextually appropriate, and aligned with applicable laws, regulations, CCCDA policies, and the intended purpose of the work.
- AI generated content must not be considered authoritative, final, or errorfree and must be independently reviewed and validated prior to distribution, publication, or reliance.
- All AI assisted work products must follow the same review, approval, retention, documentation, and records management requirements applicable to work developed without the use of AI.
- Employees and Members of the Board of Commissioners remain responsible for the quality, accuracy, legality, professionalism, and integrity of all AI assisted work products.
- AI may assist in developing work products but must not replace critical thinking, independent analysis, or professional review.

Responsible Innovation: CCCDA recognizes that Artificial Intelligence (AI) is an evolving technology with the potential to improve organizational effectiveness, enhance service delivery, strengthen communication, increase accessibility, and support informed decision making. The Agency encourages the thoughtful and responsible exploration of AI to improve how work is performed and services are delivered.

Innovation should be pursued in a manner that:

- Aligns with CCCDA's mission, values, and strategic objectives;
- Protects public trust, privacy, security, and confidential information;
- Complies with applicable laws, regulations, and Agency policies;
- Supports human centered decision making and appropriate oversight; and
- Appropriately identifies, evaluates, and manages organizational risk.

Employees are encouraged to identify opportunities where AI may responsibly improve efficiency, productivity, service delivery, accessibility, communication, or other organizational functions, while recognizing that the use of AI must always remain consistent with this policy.

AI Platform Governance

Approval of New AI Platforms: CCCDA may authorize the use of AI platforms that have been evaluated and approved for organizational use and that provide appropriate safeguards related to security, privacy, data ownership, compliance, and contractual protection.

Embedded AI Use: AI capabilities embedded within CCCDA approved software applications may be used for legitimate organizational purposes provided they are used in accordance with this policy, the software vendor's licensing terms, and all applicable CCCDA policies regarding privacy, security, records management, and acceptable use.

Paid AI: Any paid or subscription based AI platform purchased with CCCDA funds, reimbursed by CCCDA, or approved for CCCDA business shall be used solely for legitimate organizational purposes. Personal use of organizational AI subscriptions is prohibited unless otherwise authorized by CCCDA. Employees or Board Members may not use personally obtained AI subscriptions or accounts to process CCCDA information unless the platform has been reviewed and approved for organizational use.

Proposed AI Applications: Any proposed AI application, platform, integration, or service that has not already been approved by CCCDA must undergo an established review and approval process before it may be procured, implemented, connected to CCCDA systems, or used for organizational purposes.

CARVER COUNTY COMMUNITY DEVELOPMENT AGENCY

AI Application Review and Approval Process

Supervisory Review: The supervisor or designated leadership representative will conduct an initial review of the proposed AI application to determine whether the request should proceed for organizational evaluation.

The review should consider whether the proposed application:

- Supports a legitimate business, operational, or service need.
- Aligns with CCCDA's mission, strategic objectives, operational priorities, and commitment to responsible AI use.
- Represents appropriate, effective, and responsible use of organizational resources.
- Provides a demonstrable operational benefit or business value.
- Can be supported within departmental budget and resource constraints.
- Warrants further organizational review.

Supervisors may request additional information, demonstrations, supporting documentation, vendor materials, or clarification before determining whether a request should proceed.

CCCDA Evaluation: Requests approved during the supervisory review will be forwarded to the appropriate CCCDA review authority for a comprehensive organizational evaluation. Depending on the proposed application, this review may include Information Technology, executive leadership, legal counsel, procurement, or other designated staff.

The evaluation may include consideration of:

- Information security and cybersecurity protections.
- Data privacy, confidentiality, and information governance safeguards.
- Compliance with applicable laws, regulations, licensing agreements, contracts, and CCCDA policies.
- Technical compatibility, integration requirements, and operational impact.
- Vendor reputation, reliability, support, and long term viability.
- Records management, retention, and data ownership considerations.
- Ethical implications, potential bias, reputational risks, and organizational impacts.
- Overall suitability for organizational use.

Additional review by executive leadership, legal counsel, or other subject matter experts may be required based on the complexity, scope, sensitivity, or risk associated with the proposed AI application.

Decision: Following review, the Executive Director or designated approving authority will either approve or deny the request.

If approved:

- The AI application becomes a approved organizational technology.
- The application may be made available to employees whose job responsibilities and operational needs support its use.

- Approval does not automatically grant access to every employee and may be subject to licensing, budget, training, security, or operational considerations.

If denied:

- The requesting employee and supervisor will be notified of the decision.
- CCCDA may reconsider future requests if organizational needs, technology, or security considerations change.

Final Approval: Formal approval from CCCDA's designated approving authority is required before any AI application may be:

- Procured or licensed;
- Implemented or integrated with CCCDA systems;
- Connected to CCCDA technology resources; or
- Used for organizational purposes.

CCCDA reserves the right to approve, deny, restrict, suspend, reevaluate, or revoke authorization for any AI application that does not meet organizational, operational, security, legal, ethical, or compliance requirements.

Roles and Responsibilities

Responsibilities of Employees and Members of the Board of Commissioners:
Employees and Members of the Board of Commissioners are responsible for:

- Understanding and complying with this policy and all other applicable CCCDA policies, procedures, security requirements, and legal obligations related to the use of Artificial Intelligence (AI).
- Exercising sound professional judgment and maintaining meaningful human oversight when using AI to support organizational work.
- Protecting Sensitive Data and ensuring confidential, private, or nonpublic information is only used within approved AI platforms and in accordance with this policy.
- Reviewing, fact checking, validating, and taking responsibility for all AI assisted work products, communications, analyses, recommendations, and decisions before they are relied upon, distributed, or implemented.
- Using AI in a manner that reflects CCCDA's values, promotes fairness, maintains public trust, and supports ethical and responsible decision making.
- Identifying opportunities where approved AI technologies may responsibly improve organizational effectiveness, service delivery, accessibility, communication, or operational efficiency while remaining consistent with this policy.
- Promptly reporting suspected misuse, security concerns, policy violations, or AI related incidents.

Responsibilities of Supervisors and Managers:
Supervisors and managers are responsible for:

- Promoting awareness, understanding, and consistent application of this policy within their departments and teams.

- Leading by example and fostering a culture of responsible, ethical, and secure AI use that aligns with CCCDA's mission, values, and organizational objectives.
- Supporting employees in the appropriate exploration and use of approved AI technologies while ensuring meaningful human oversight, professional judgment, and accountability remain central to all work performed.
- Providing guidance regarding approved AI use, helping employees evaluate appropriate use cases, and escalating questions or concerns when additional review or expertise is needed.
- Reviewing requests for new AI applications to determine whether they support legitimate operational needs, align departmental priorities, and warrant further organizational evaluation.
- Ensuring employees comply with applicable laws, regulations, CCCDA policies, security requirements, and governance standards related to AI use.
- Encouraging continuous learning and responsible identification of opportunities where AI may improve organizational effectiveness, service delivery, communication, accessibility, or operational efficiency.
- Promptly addressing suspected misuse, security concerns, policy violations, or AI related incidents and coordinating with appropriate leadership or Information Technology staff as necessary.

Responsibilities of Information Technology:

Information Technology staff are responsible for:

- Establishing, maintaining, and continuously improving the security, access, and governance controls necessary to support the responsible use of Artificial Intelligence (AI) within CCCDA.
- Reviewing and evaluating proposed AI applications, integrations, embedded AI capabilities, and emerging technologies to determine their suitability for organizational use.
- Assessing proposed AI technologies for security, privacy, data protection, technical compatibility, regulatory compliance, and organizational risk in coordination with appropriate leadership and subject matter experts.
- Maintaining and communicating an inventory of approved AI platforms, embedded AI capabilities, and other authorized AI technologies available for organizational use.
- Support organizational awareness, employee education, and implementation efforts related to the responsible use of AI.
- Monitoring emerging AI technologies, cybersecurity risks, applicable laws, regulations, and industry best practices to help ensure CCCDA's AI governance framework remains effective and current.
- Recommending updates to this policy and related procedures as technology, regulatory requirements, organizational needs, and operational practices evolve.

Reporting and Enforcement: To protect CCCDA information, systems, operations, and public trust, employees and Members of the Board of Commissioners are expected to promptly report any known or suspected misuse of Artificial Intelligence (AI), security concerns, policy violations, or other AI related incidents. Timely reporting supports responsible AI governance, protects organizational resources, and helps mitigate potential risks.

The following standards apply:

- Any known or suspected misuse of AI, unauthorized access, security incident, data exposure, policy violation, or other concern must be reported promptly to a supervisor, the Executive Director, Information Technology staff, or another designated leadership representative.
- Employees and Members of the Board of Commissioners are expected to cooperate fully with any review,

investigation, corrective action, or risk mitigation activities related to AI use or AI related incidents.

- Violations of this policy may result in corrective or disciplinary action, up to and including revocation of access to AI technologies, disciplinary action, termination of employment or contractual relationships, legal action, or other remedies deemed appropriate by CCCDA and consistent with applicable laws, policies, and contractual obligations.
- CCCDA reserves the right to monitor, review, restrict, suspend, revoke, or audit access to approved AI technologies, systems, applications, and related organizational resources to ensure compliance with this policy, applicable laws, security requirements, and operational standards.
- Retaliation against any individual who, in good faith, reports a suspected violation, security concern, or AI related incident, or participates in an investigation under this policy, is prohibited.

Policy Review: Artificial Intelligence (AI) technologies, applicable laws, regulations, and industry best practices continue to evolve. To ensure this policy remains effective, relevant, and aligned with CCCDA's mission, operational needs, and legal obligations, the Agency will periodically review and update this policy as necessary.

CCCDA may modify, interpret, or revise this policy to address changes in technology, security risks, legal or regulatory requirements, organizational priorities, or operational practices. Employees and Members of the Board of Commissioners are expected to comply with the most current version of this policy.

Appendix A – AI Quick Reference Guide

Definitions:

- **Artificial intelligence (AI):** Technologies, systems, or software designed to perform tasks that typically require human intelligence, including but not limited to language processing, pattern recognition, data analysis, predictive analytics, content generation, decision support, or machine learning
- **Generative AI:** A category of AI systems capable of creating or generating original content, including text, images, audio, video, code, summaries, or other materials based on user prompts or existing data.
- **AI Systems:** Any software, platform, service, application, tool that uses artificial intelligence to analyze data, generate content, automate tasks, provide recommendations, support decision making, or produce outputs such as text, images, summaries, predictions, or analytics
- **Sensitive Data:** Any information that is classified as private, confidential, nonpublic, protected, or otherwise restricted by law, regulation, contract, or CCCDA policy.
- **Personally Identifiable Information:** Information that can be used to identify, contact, or locate an individual, either directly or indirectly, including but not limited to names, addresses, Social Security numbers, dates of birth, financial account information, or government issued identification numbers.
- **Embedded AI Functionality:** Artificial Intelligence features or capabilities that are integrated into software, applications, or platforms that have been approved, licensed, or procured by CCCDA. Embedded AI functionality is subject to the same security, privacy, governance, and acceptable use requirements as the underlying application.
- **Approved AI Applications**: AI platforms, tools, or services that have been formally reviewed, approved, licensed, procured, or authorized by CCCDA for organizational use.
- **Public AI Platforms**: Publicly available or personally obtained AI platforms or services that have not been approved, licensed, managed, or monitored by CCCDA.
- **Human Oversight:** The requirement that employees and Board Members of the Board of Commissioners actively review, evaluate, and take responsibility for decisions, communications, and work products developed with the assistance of AI systems. AI tools may support operational processes but may not replace human judgment or accountability.
- **Approved AI Use:** The authorized use of AI tools for legitimate CCCDA business purposes in a manner consistent with this policy, applicable laws, security requirements, ethical standards, and organizational values.
- **Automated Decision Making:** The use of AI systems to make, recommend, or substantially influence decisions affecting individuals, operations, compliance, eligibility, housing related determinations, or organizational actions.

CARVER COUNTY COMMUNITY DEVELOPMENT AGENCY

AI Platform Categories:

Category	Description	Examples
Embedded AI Functionality	AI features are built into CCCDA approved software. These follow the approval status of the underlying software.	Microsoft 365, Outlook, Word, Excel, Adobe Acrobat, Yardi, Rent Cafe, Maintenance IQ
Approved AI Applications	Standalone AI platforms formally approved by CCCDA for organizational use.	Microsoft Copilot, ChatGPT Enterprise, Claude Enterprise, Gemini Enterprise (or other approved enterprise AI platforms)
Public AI Applications	Publicly available or personally obtained AI platforms that have not been approved by CCCDA.	Free ChatGPT, Free Claude, Free Gemini, or other publicly available AI websites or applications

AI Do's and Don'ts:

Appropriate Uses (Do's):

Employees may use approved AI tools to assist with tasks such as:

- Drafting internal communications
- Brainstorming ideas or policy language
- Summarizing meetings or notes
- Developing outlines, presentations, or project plans
- Improving grammar, readability, or formatting
- Organizing or analyzing nonsensitive information
- Researching general concepts (with independent verification)

Prohibited Uses (Don'ts):

Employees may not use AI to:

- Upload or process resident files, personnel records, or other Sensitive Data in unapproved AI platforms
- Make housing eligibility, screening, compliance, employment, procurement, or disciplinary decisions without meaningful human review
- Create or distribute misleading, deceptive, discriminatory, or fraudulent content
- Share confidential or nonpublic organizational information through unapproved AI platforms
- Bypass established review, approval, legal, compliance, or records management processes
- Publish or rely upon AI generated content without appropriate review, fact checking, and verification

Carver County Community Development Agency

Artificial Intelligence (AI) Application Request Form

Requestor Information: _____
Employee Name: _____
Department: _____
Position: _____
Supervisor: _____
Date Submitted: _____

AI Application Information
Name of AI Application: _____

Vendor/Developer (if known): _____

Website (if applicable): _____

Is this:
☐ New AI Platform
☐ AI Feature Embedded in Existing Software
☐ Upgrade to Existing AI Platform
☐ Other: _____

Business Need
What business problem(s) or operational need(s) will this AI application help solve?
_____
_____
_____

Describe how this AI application will improve CCCDA operations.
(Check all that apply.)
☐ Improve efficiency
☐ Reduce manual work
☐ Improve customer service
☐ Improve communication
☐ Improve document creation
☐ Improve research
☐ Improve reporting
☐ Improve accessibility
☐ Data analysis
☐ Other
Explain if needed:

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_____
_____
_____

Organizational Benefit
Who would benefit from this AI application?
☐ Only my position
☐ My department
☐ Multiple departments
☐ Entire Agency
Explain:
_____
_____
_____

Data & Security Considerations
Will this AI application be used with CCCDA information?
☐ Yes
☐ No
If yes, what type of information?
☐ Public Information
☐ Internal Business Information
☐ Sensitive Data
☐ Unsure
Describe:
_____
_____
_____

Does this AI application require:
☐ User account
☐ Software installation
☐ Internet access
☐ Integration with another system
☐ Unknown

Licensing & Cost
Estimated Cost (if known): _____

License Type (if known): _____
☐ Free
☐ Monthly Subscription
☐ Annual Subscription

☐ Enterprise License
☐ Unknown

Additional Information
Please provide any additional information that may assist in evaluating this request.

_____
_____
_____

Supervisor Review
Supervisor Recommendation:
☐ Recommend Approval
☐ Recommend Denial
Comments:

_____
_____
_____

Supervisor Signature: _____ Date: _____

Executive Director / Designee Review
Decision:
☐ Approved
☐ Denied
Comments:

_____
_____
_____

Signature: _____ Date: _____

Information Technology Review (If applicable)
Security Review Completed
☐ Yes
☐ No
Comments:

_____
_____
_____

Reviewed By: _____ Date: _____

Final Organizational Decision:

☐ Approved for Organizational Use
☐ Approved with Restrictions
☐ Additional Review Required
☐ Denied

If approved:
☐ Available Agency-Wide
☐ Available to Specific Departments
☐ Available Based on Job Duties
☐ Training Required Prior to Use

Additional Comments:
_____
_____
_____