HousingLink

Artificial Intelligence (AI) Policy

Reviewed and Approved: 1/27/2026

Introduction

The purpose of this policy is to provide organizational guidance for the use of Artificial Intelligence (AI) both broadly and specifically generative AI. Generative AI, including, but not limited to, Large Language Models (LLMs) like ChatGPT, uses massive datasets to create text, images, or other media.
Generative AI can significantly enhance creativity, productivity, and operational efficiency but should not be seen as a replacement for human judgment and expertise.

Summary

This policy covers practices and procedures followed by HousingLink to establish approved and acceptable use of Artificial Intelligence ("AI") and Large Language Models ("LLMs") within the organization and tied to official activities of the organization. This policy applies to all employees, volunteers, board of director members, and other stakeholders tied to the organization.

Ethics and Standards

While AI can be a useful and powerful tool capable of transformative results for the organization, it should only be used alongside human expertise and ingenuity. People have been and will continue to be the core of the organization and our service delivery.

As an organization, we are committed to upholding ethical standards for AI solutions that align with our Values and professional standards, and that foster the trust of our clients, staff members, community, and industry partners and regulators. We are steadfast in our commitment to act in a way that serves the public interest, honors public trust, and demonstrates our commitment to professional excellence.

Approved AI Tools and Permitted Uses

HousingLink has authorized the following AI tools for staff use:

- Claude (Anthropic)
- Gemini (Google)
- Fxyer AI - email tool

Use of any AI tool not on this list requires prior written approval from the President. The approved tools list may be updated at any time; staff will be notified of changes.
Approved uses include drafting internal and external communications, summarizing documents, brainstorming, research assistance, and other productivity tasks consistent with your job duties and this policy.

Policy Application

The organization has outlined the following policy requirements regarding the usage of AI and AI solutions:

- Employees may not knowingly install, use, or otherwise leverage any AI solutions without the prior written approval of a member of the executive leadership team.
- The organization will maintain a list of approved AI solutions and approved uses of AI solutions. The removal of an AI solution from the approved list may occur without prior notice.
- AI solutions may have various levels or degrees of usage or deliverables; for example, search or query functions may not immediately or directly involve the disclosure of sensitive information or the creation of material. The future usage of any information may be undisclosed, unknown, or unpredictable. For this reason, even limited usage of AI solutions may be evaluated with caution.
- Communications, images, and all materials created for external usage or core organizational decisions, internal or external, by or in part created with an AI solution must be reviewed by multiple human staff members, including the executive leadership team member overseeing the department involved.
- When an AI solution is used, employees must ensure no confidential information is transmitted and all compliance and regulatory requirements are met as with any technology tool or vendor. Usage must comply with all relevant laws, regulations, and industry standards.

Data Classification and AI Tools

HousingLink's Data Classification Standard (see Acceptable Use Policy) applies fully to AI tools. Staff must apply the same judgment they would to any technology system:

- Class 1 — Restricted data (client PII, government contract data, MGDPA-governed data, HR records) may never be entered into any AI tool, regardless of which tool is approved or how the request is framed. If you would not paste it into a public email, do not paste it into an AI tool.
- Class 2 — Internal Use Only data (property owner contact records, internal strategy documents, vendor agreements) should be used with caution. When in doubt, consult your supervisor or the President before including it in an AI prompt.
- Class 3 — Public data may be used freely with approved AI tools.

A helpful rule of thumb: *imagine your AI prompt was printed and handed to a stranger on the street. If that would be a problem, don't send it.*

AI and MGDPA Compliance

Because HousingLink operates under government contracts and handles data governed by the Minnesota Government Data Practices Act (Minn. Stat. Ch. 13), staff must treat AI tools as they would any external technology vendor. Private, confidential, or protected nonpublic data under the MGDPA may not be transmitted to any AI tool. This prohibition applies even when the AI tool is listed as approved.

If you are uncertain whether a specific piece of data is permissible to use with an AI tool, contact the President before proceeding.

Human Review Requirement

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AI tools can produce confident, well-written, and incorrect output. All AI-generated content used in the following contexts must be reviewed and verified by a qualified staff member before use:

- Client-facing communications or resources
- Funder or government agency communications
- Grant reports, contract documents, or legal materials
- Board materials or governance documents
- Any content representing HousingLink's official position

For governance and legal documents (board resolutions, grant contracts, contractor agreements), AI may assist in drafting but may not serve as the sole source. A human must own and be accountable for the final version.

Incident Reporting

If a staff member suspects that restricted or government-governed data was transmitted to an AI tool — even accidentally — it must be reported to the President immediately, consistent with HousingLink's data breach reporting requirements outlined in the BYOD Policy (Section 9) and Acceptable Use Policy. Do not wait to be certain; report the concern promptly and let leadership assess.

Training and Acknowledgment

Before using any approved AI tool for HousingLink work, staff must complete a brief AI orientation provided by the organization. This orientation will cover approved tools, data classification as it applies to AI, and incident reporting. Staff must sign an acknowledgment confirming they have read and understood this policy, consistent with the acknowledgment process used for other HousingLink technology policies.

Policy Review

Given the rapid pace of change in AI technology and regulation, this policy will be reviewed at minimum annually, or sooner following a significant AI-related incident, a change in HousingLink's approved tool list, or a material change in applicable law or funder requirements.

Related Policies

This policy should be read alongside:

- Acceptable Use Policy (Information Technology)
- Bring Your Own Device (BYOD) Policy

AI is a new technology and is subject to rapid changes. This policy will likely change and evolve along with the changing AI landscape. Above all, employees, volunteers, board of director members, and other stakeholders must approach the usage of AI solutions with integrity and keeping the mission, purpose, and strategic goals of the organization front and center.

Questions or requests for exceptions should be directed to: Sue Speakman-Gomez, President