**Generative Artificial Intelligence**

# Purpose

This policy outlines guidelines and principles for the responsible and ethical use of Generative Artificial Intelligence (AI) within the Wyoming Statewide Longitudinal Educational Data System (SLEDS). The objective is to ensure that the utilization of Generative AI in SLEDS promotes transparency, fairness, privacy, and accountability while enhancing data analysis capabilities.

# Scope

This Policy applies to the SLEDS Environment, SLEDS Information, Participating Entities, and other parties authorized or responsible for carrying out SLEDS Policies.

# Applicable Standards and Regulations

* Federal Education Rights and Privacy Act (FERPA), [§20 U.S.C. § 1232g; 34 CFR Part 99](https://www.law.cornell.edu/uscode/text/20/1232g).
* [Unemployment Insurance Program Letter, No. 14-17](https://wdr.doleta.gov/directives/attach/UIPL/UIPL_14-17.pdf) (dated March 23, 2017) regarding States' Responsibilities for Internal Security in the UI Program
* Federal and State privacy and security rules and regulations governing SLEDS Information including, but not limited to CFR [§§ 99.1 - 99.67](https://www.ecfr.gov/cgi-bin/text-idx?SID=21a8457a1789d118dcdce055ca195995&mc=true&tpl=/ecfrbrowse/Title34/34cfr99_main_02.tpl)
* [NIST (SP) 800-171, Rev. 2](https://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.800-171r2.pdf) requirements and corresponding International Organization for Standardization/ International Electrotechnical Commission (ISO/ IEC) 27001 Security Controls
* State of Wyoming Information Technology Policies and Standards, including but not limited to:
  + [General Policies and Standards](http://ets.wyo.gov/resources/policies-and-standards/10000-general)
  + [09400-P170 Policy User Access Management](https://docs.google.com/document/d/1HCc-7_pc917TzgJr_RHLqvsDw1cEgLqViOEWHZ1JisI/edit)
  + [09400-S170 Password Standards](https://drive.google.com/file/d/0B_YE8dWRQWQAY0hKTm5yNzkwTEU/view)
  + [Security and Privacy Policies and Standards](http://ets.wyo.gov/resources/policies-and-standards/09000-security)
  + [Information Management and Control, Document Management Policies and Standards](http://ets.wyo.gov/resources/policies-and-standards/08000-documents)
  + [Facilities, Logistics, Natural Resources and Environmental Policies and Standards](http://ets.wyo.gov/resources/policies-and-standards/04000-facilities)
  + [Plans and Operations; Research and Development Policies](http://ets.wyo.gov/resources/policies-and-standards/03000-plans)
  + [Manpower and Personnel Policies and Standards](http://ets.wyo.gov/resources/policies-and-standards)
* SLEDS High Availability Data MOU (HADS)

# Policy Statements

The State of Wyoming’s technology policies and standards are the minimum control requirements. More restrictive controls shall apply to the SLEDS Environment as provided in this Policy.

| 1 | Data Privacy:  Use of AI tools to further SLEDS initiatives is allowed.  Only publicly accessible SLEDS data can be used with public/cloud based AI tools. |
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| 2 | Data Quality:  Only high-quality and relevant data should be used for training generative AI models. The data should accurately represent the population it intends to model and be regularly updated to reflect changes in demographics or other relevant factors. |
| 7 | Human Oversight:  Human experts should have an active role in the oversight of generative AI models. Their expertise should be utilized to interpret and validate the outputs, address potential biases, and ensure ethical considerations are met. |
| 10 | Continuous Monitoring and Evaluation:  Model Performance: The performance and impact of generative AI models should be continuously monitored and evaluated. Feedback mechanisms should be established to collect user experiences and address any concerns or issues promptly.  Algorithmic Bias: Regular assessments should be conducted to identify and address any unintended biases that may arise from the generative AI models. Mitigation strategies should be implemented to ensure fair and unbiased outputs. |
| 11 | Compliance and Regulation  Legal Compliance: All activities involving generative AI within the SLEDS should comply with relevant laws, regulations, and policies, including data protection, privacy, and intellectual property rights.  Ethical Guidelines: This policy should align with broader ethical guidelines and principles for AI development and usage, such as those outlined by professional organizations, regulatory bodies, and international standards. |
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# Additional Information

Additional and supporting information can be found using the following resources:

* [SLEDS Glossary of Defined Terms](https://docs.google.com/document/d/1_Im9iujOTJ_kIkbDNMfBABWkPYysFLustW4ia0mLoHs/edit#)
* [SLEDS Policy and Procedure Inventory](https://docs.google.com/spreadsheets/d/1_rOCVJux4kfzYjs6963l2MYuLN3iSF0hYZH01BmvYbU/edit#gid=1266995384)
* [SLEDS Data Research Request Process](https://docs.google.com/document/d/1JuZsHks1hhexjJwbSd4gwmUvMYGzYoTha6E1BJkYTZI/edit)
* [U.S. Department of Education FERPA Guidance](https://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html)
* [PTAC Guidance on Integrated Data Systems](https://studentprivacy.ed.gov/resources/integrated-data-systems-and-student-privacy)
* [PTAC Summary of FERPA Exceptions](https://studentprivacy.ed.gov/sites/default/files/resource_document/file/FERPA%20Exceptions_HANDOUT_portrait.pdf)

For questions or concerns related to this Policy, please contact the Wyoming Community College Commission Chief Technology Officer (CTO) at (307) 777-7763.

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## Revision History

| **Revision #** | **Revision Date** | **Summary of Changes** | **Changes marked** |
| --- | --- | --- | --- |
| 1.0 | N/A | Policy Draft | N/A |
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## Approvals

This policy requires the following approvals:

| **Name** | **Date Approved** |
| --- | --- |
| Security Subcommittee | v 1.0 - |
| Data Governance Committee | v 1.0 - |