

Artificial Intelligence (AI) Policy

Effective May 2026



Purpose

This policy establishes mandatory requirements governing the use of artificial intelligence (AI) tools by all Greater Houston Community Foundation full-time and part-time employees as well as third-party interns conducting Community Foundation business.

Greater Houston Community Foundation uses AI tools to support our mission, improve efficiency, and enhance the quality of our work. Because our work is rooted in donor trust and involves confidential information and decisions that impact the community, **AI must be used with care, judgment, and accountability. While AI can be a powerful assistant, it does not replace professional expertise or human judgment.**

This policy supplements but does not replace existing Community Foundation policies on data protection, confidentiality, employment, and ethics. Where a conflict exists, the more restrictive requirement applies.

Scope

This policy applies to:

- All full-time and part-time Community Foundation employees as well as third-party interns conducting Community Foundation business.
- All AI tools used for Community Foundation work, whether organization-licensed, third-party, or publicly available.
- All Community Foundation devices, networks, and accounts, including personal devices used for Community Foundation business.

Approved AI Platforms

The paid version of Microsoft 365 Copilot is the Community Foundation's primary approved AI platform. It operates within the Community Foundation's secure Microsoft 365 tenant and may be used for work-related tasks, including those involving Community Foundation data, subject to this policy. **It is not the same as the free version of Microsoft Copilot or the version of Copilot available through personal Microsoft accounts.** The free version does not carry the same data protection and must not be used for Community Foundation business or with any Community Foundation data.

Employees and third-party interns must be signed into their Community Foundation-issued work account when using the paid Microsoft 365 Copilot. If unsure which version is in use, employees and third-party interns must contact the Technology team before proceeding. If AI-generated output reveals content the user would not reasonably expect to see, the content must not be used or shared, and the Technology team must be notified immediately. For unexpected but non-problematic output, employees and third-party interns should consult their supervisor or colleague, as appropriate.

Permitted Use of Microsoft 365 Copilot

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Microsoft 365 Copilot may be used to support a wide range of Community Foundation work tasks, including but not limited to:

- **Communications and Correspondence:** Drafting, editing, summarizing, and proofreading emails, internal communications, and meeting follow-ups.
- **Document and Content Creation:** Drafting reports, memos, proposals, and presentations, summarizing documents, and creating templates or outlines.
- **Meetings and Collaboration:** Generating meeting summaries, notes, and action items via Teams, and summarizing recorded transcripts for internal reference.
- **Data and Analysis:** Summarizing and organizing data, identifying trends, and generating draft charts or data summaries for internal review.
- **Donor and Relationship Management:** Drafting donor correspondence, summarizing interaction history, and preparing briefing notes for donor meetings.
- **Operational and Administrative Tasks:** Generating process documentation, summarizing policies, and creating training or onboarding materials.
- **Strategy and Planning:** Brainstorming options, drafting strategy briefs, summarizing complex inputs, and preparing decision points/trade-offs for discussions.

Limited Use of Other Publicly Available AI Tools

Publicly available AI tools such as ChatGPT, Google Gemini, Grammarly, DALL-E, Microsoft Copilot (free version), Claude, and similar generative AI platforms may be used in a limited capacity for general tasks such as research, brainstorming, ideation, or personal productivity, **provided no Community Foundation data is involved**. Employees and third-party interns must assume that anything entered into these tools could become public, regardless of vendor privacy settings or assurances. Community Foundation data, donor information, personnel records, or any confidential or proprietary information must never be entered into these tools. These tools must not be integrated with Community Foundation systems without prior written approval from the Technology team.

Employee and Third-Party Intern Accountability and Responsibilities

Responsibility of Work Product

Employees and third-party interns are fully responsible for all work products they submit, share, or act upon, regardless of whether AI was used in its creation. **Work performed as part of employment represents the Community Foundation, and all content reflects the organization. Employees and third-party interns must verify that all information is accurate before use or distribution.**

Mandatory Review

AI-generated content must be reviewed and verified before use. Review must confirm that:

- Facts, figures, names, and dates are accurate
- Content is free of hallucinated, fabricated, or outdated information
- Tone and substance are consistent with Community Foundation standards and values
- Confidential information has not been inadvertently included

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- The content reflects the employee's or third-party intern's actual intent

Skimming does not constitute review. Responsibility for accuracy cannot be delegated to an AI system.

Existing Approval Processes Remain in Effect

AI does not bypass existing approval workflows. If a deliverable requires review by Marketing and Communications, Legal, or any other function prior to distribution, that requirement applies regardless of whether AI was used.

Mandatory Onboarding Training

Completion of Community Foundation–required AI onboarding training is required before employees and third-party interns may access any approved AI platform. The Technology team is responsible for administering and tracking training completion.

Licensing and Ongoing Use

Microsoft 365 Copilot is an enterprise tool with a significant per-user cost. The Community Foundation provides Microsoft 365 Copilot to support employees and third-party interns' effectiveness, learning, and quality of work.

Licenses are granted with the expectation that **employees and third-party interns will actively explore and use Microsoft 365 Copilot in ways that align with their role and responsibilities.** The Community Foundation may periodically review Copilot usage to assess adoption, value, and cost effectiveness.

If an employee or third-party intern is not meaningfully using Copilot, or if the tool is not providing sufficient benefit relative to its cost, the Community Foundation may reassign or discontinue the individual's Microsoft 365 Copilot license as part of routine license management.

AI Use in Meetings and Transcription

Transparency and Consent

All participants must be informed when AI is in use during Community Foundation-hosted meetings. The following disclosure must be provided at the start of any such meeting:

"This meeting may be recorded and transcribed using Community Foundation-approved AI tools for note-taking and summarization. Please let us know if you have any concerns or wish to opt out."

Texas state law permits one-party consent for recordings. If participants join from jurisdictions with stricter consent requirements, which would exceed Texas law, employees and third-party interns must ensure all applicable legal requirements are satisfied before recording.

When attending meetings hosted by external organizations, employees and third-party interns must not enable AI recording or transcription tools unless the host has provided appropriate disclosure and

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obtained required consent. If an external party initiates AI transcription, employees and third-party interns must ensure adequate notice has been provided and raise any concerns or opt out as appropriate.

Restrictions

AI tools must not be used in meetings involving Governing Board or Committee Meetings, HR matters, legal discussions, disciplinary proceedings, or executive-level confidential matters without prior written approval from the Technology team and relevant leadership. Recording external client, Governing Board, or donor meetings requires consent from all parties. Nothing in this policy is intended to restrict or interfere with employees' or interns' rights under applicable labor laws, including protected concerted activity under the National Labor Relations Act.

Accuracy and Review

AI-generated meeting notes are a supplement to, not a substitute for, participant review. Notes must be verified by a human participant before being treated as an official record.

Storage and Retention

Recordings and summaries must not be stored on personal devices or unapproved cloud services. Employees or interns may not make covert recordings in work areas where there is a legitimate expectation of privacy or where recordings would disclose confidential or proprietary business information. Nothing in this policy is intended to restrict employees' or interns' rights under the National Labor Relations Act.

Prohibited Use

The following uses of AI are prohibited unless explicitly approved as stated below:

- **Sharing Credentials or Authentication Information:** Employees and third-party interns must never enter passwords, credentials, or authentication tokens into any AI tool, including Microsoft 365 Copilot. This applies regardless of whether the tool is approved or unapproved.
- **Employment Decisions:** AI must not be used to make, inform, or justify decisions related to recruitment, hiring, performance evaluation, compensation, discipline, demotion, or termination of any individual.
- **Attribution of Statements:** AI must not be used as the sole source to attribute quotes, opinions, or positions to real individuals. Any such content must be independently verified through reliable sources before use or distribution.
- **Unauthorized System Integration:** AI tools must not be integrated with Community Foundation systems, databases, or software without prior written approval from the employee's supervisor or third-party intern's onsite coordinator and the Technology team. Unauthorized integrations pose significant security risks, including potential data exfiltration.
- **Misrepresentation of Authorship:** Employees and third-party interns must not represent AI-generated content as entirely their own original work in contexts where authorship or originality is material, including grant applications, legal documents, or externally published content, unless such

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use is permitted and the content is reviewed and approved by a subject matter expert or process owner.

- **Circumventing Access Controls:** AI must not be used in a manner intended to access, aggregate, or surface information beyond what the employee and third-party intern is authorized to access through normal organizational channels.
- **Primary Decision Making Without Approval:** AI must not serve as the primary decision maker in any organizational process unless that specific use has been reviewed and explicitly approved in writing by the Technology team and relevant leadership.

Requesting Approval for Additional AI Tools

Employees and third-party interns who wish to use an AI tool not currently approved by the Community Foundation for work purposes must obtain prior approval from the Technology team, except for AI Task Force-led evaluations and pilots conducted under the oversight of the Technology team and within a defined scope. Requests will be evaluated for security, data privacy, and compliance considerations. Approved tools will be documented and communicated to the relevant employee or third-party intern.

Unapproved use of non-sanctioned tools with Community Foundation data is a policy violation subject to disciplinary action, up to and including termination of employment.

To submit an approval request, email the Technology team.

Violations and Enforcement

Violations of this policy may result in disciplinary action, up to and including termination of employment, and may result in legal action where applicable. Specific consequences include:

- Immediate revocation of access to approved AI platforms
- Disciplinary action, up to and including termination
- Legal consequences in cases of regulatory violations
- Incident response procedures in cases involving unauthorized disclosure of confidential data

Violations involving confidential data will be treated as potential data security incidents and may trigger the Community Foundation's incident response and breach notification procedures.

If you believe this policy has been violated by yourself or another individual, you are encouraged to report the concern to the Technology team or your supervisor. Reports may be made in good faith without fear of retaliation. Retaliation against any individual who reports concerns in good faith or participates in an investigation is strictly prohibited. Nothing in this policy prohibits employees or interns from exercising rights protected under applicable law, including the National Labor Relations Act.

Policy Review, Feedback, and Continuous Improvement

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This policy will be reviewed annually by the Technology team, or sooner if prompted by significant changes in AI tools, law, or Community Foundation operations. Employees or third-party interns will be notified of all material changes.

Employees or third-party interns are encouraged to submit feedback and questions on AI tools, use cases, and policy by emailing the Technology team.