



Northeast Ohio Regional Sewer District

Northeast Ohio Regional Sewer District Artificial Intelligence (AI) Acceptable Use Policy

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Revision Record

Effective Date	Author	Version	Approver	Change Reference
	Initiator	0.0		Initial Policy Developed
6/1/2026	IT Department Legal Department	1.0	See C-Level Signature Page	Initial release of policy

Revision Record - Table 1

Introduction

“Sewer District” refers to the Northeast Ohio Regional Sewer District.

This policy applies to the business and control networks.

This policy expands on Section 2 of the **Written Information Security Program (WISP)**.

This policy has been approved by the Sewer District’s Executive Team, which is committed to achieving the objectives set forth in this policy.

Exceptions to this policy may be requested on a case-by-case basis in accordance with the **Information Security Exception Policy**.

Definitions

- “AI systems” refers to any software, application, or service that uses artificial intelligence, machine learning, or related technologies to simulate or support human cognitive functions, decision-making, or work-related tasks (e.g., coding, data analysis, content creation, automation)
- “Work related tasks” and/or “Deliverables” mean work performed for or on behalf of the Sewer District.

1. Purpose

This Policy establishes the rules for the appropriate and ethical use of AI systems in conducting the business of the Sewer District. Its purpose is to ensure the responsible use of AI while protecting the Sewer District from misuse, unethical outcomes, potential biases, inaccuracies, and information security risks.

As this technology is rapidly changing, this policy will be updated to align with applicable regulations and best practices.

2. Scope

This Policy applies to all Sewer District employees (Employees) as well as contractors, consultants, temporary workers, and other individuals or entities performing services for the Sewer District (Non-Employees). All Employees and Non-Employees (Users) are expected to use AI systems in a productive, ethical, and lawful manner consistent with this Policy.

AI systems include, but are not limited to, third-party and publicly available generative AI tools, whether cloud-based, hosted off-site, or deployed locally on-premises, and whether developed internally or provided by third parties.

3. Roles and Responsibilities

Role	Responsibilities
Chief Financial Officer (CFO)	• As owner of the business network, the CFO is the final decision maker for technical and operational aspects of the business network.
Chief Operating Officer (COO)	• As owner of the process control and automation network, the COO is the final decision maker for technical and operational aspects of the process control and automation network.
Information Security Officer	• Periodically monitors and has duty to act and notify if compliance or adherence to this policy is not met by end users and system administrators.

Role	Responsibilities
	Convenes the Executive Steering Committee.
Executive Steering Committee	Comprised of the C-Level and establishes AI Governance and sets the strategic direction on the use of AI technologies at the Sewer District.
Director of Information Technology	Vets and Approves use of AI systems.
Employees and Non-Employees	- Referenced as “users” - Comply with the policy.

4. Policy

4.1. Prohibited Uses of AI

- 4.1.1. Users must not input, upload, or otherwise submit Sewer District information or data, or any employee, customer, or third-party confidential, proprietary, or security-related information, into any AI system unless that system has been vetted and approved by the Director of Information Technology in accordance with this Policy.
- 4.1.2. Users must not use unapproved AI systems to perform, support, or assist with any Sewer District work, tasks, or business activities. Additionally, even when an AI system has been approved for District use, users must not submit Sewer District data classified as non-Public Records (according to the Data Classification Standards) into that system unless the Director of Information Technology has specifically approved the system for processing that classification level of data.
- 4.1.3. As part of the vetting and approval process required by Section 4.1.1, the Director of Information Technology must assess and document whether enterprise AI systems contain Personally Identifiable Information (PII) or other non-Public Records, and the classification level of data the system is approved to process.
- 4.1.4. All use of AI systems must comply with applicable laws, regulations, and Sewer District policies, including anti-discrimination laws, fair employment practices statutes, and the Sewer District’s Equal Employment Opportunity Statement.
- 4.1.5. AI systems must not be used to:
 - 4.1.5.1. conduct or promote illegal activities.
 - 4.1.5.2. engage in offensive, biased, or unethical practices.
 - 4.1.5.3. infringe on intellectual property or privacy rights; or
 - 4.1.5.4. interfere with job performance.
- 4.1.6. Use of AI systems is subject to monitoring.

4.2. AI Output Verification and Usage

- 4.2.1. All AI-generated outputs must be reviewed with reasonable human judgment before use, distribution, or reliance.
- 4.2.2. AI-generated outputs must:
 - 4.2.2.1. be verified against trusted and verifiable sources for factual accuracy;
 - 4.2.2.2. be free from biased, offensive, or discriminatory content;
 - 4.2.2.3. avoid improper use or disclosure of personal, confidential, or non-Public Records data; and
 - 4.2.2.4. comply with all Sewer District policies.
- 4.2.3. All intellectual property rights in authorized work, deliverables, and other work-related outputs shall be owned exclusively by the Sewer District.
- 4.2.4. Users remain fully responsible for the accuracy, appropriateness, and compliance of any work products or deliverables that include AI-generated content.
- 4.2.5. Authorized uses of AI include, but are not limited to:
 - 4.2.5.1. data analysis;
 - 4.2.5.2. meeting transcription and note-taking;
 - 4.2.5.3. drafting emails, letters, memoranda, and presentations; and

4.2.5.4. conducting generalized research.

- 4.2.6. Users must understand to a reasonable degree how AI systems work, their limitations, and their terms of use—recognizing that AI outputs may be inaccurate, misleading, or fabricated (hallucinations). Any factual statement must be verified against trusted sources.

4.3. Procurement and Development of AI Systems and Tools

- 4.3.1. A list of all approved AI systems and tools will be maintained in the ***Approved AI Systems and Tools*** list.
- 4.3.2. Requests to add an AI system or tool must include:
- 4.3.2.1. written approval from the Director of Information Technology before acquiring, implementing, or using any AI system or tool (including free or open-source tools);
 - 4.3.2.2. documentation of intended use, system requirements, data usage, security controls, and risk assessments; and
 - 4.3.2.3. compliance with applicable data protection standards.
- 4.3.3. The Sewer District will evaluate each AI system's objectives, benefits, risks, data usage, and security safeguards before approval.
- 4.3.4. Approved AI systems must:
- 4.3.4.1. include protections to prevent data from being transmitted to external entities or used for model training.
 - 4.3.4.2. ensure District data is not sold, reused, or processed beyond agreed purposes;
 - 4.3.4.3. provide security assurances (e.g., SOC 2 Type 2 certification);
 - 4.3.4.4. allow for deletion of District data after processing; and
 - 4.3.4.5. include access controls for authentication and authorization.
- 4.3.5. Procurement of AI systems must comply with the Sewer District's vendor management and procurement policies.
- 4.3.6. AI systems developed or procured by the Sewer District will be documented in system inventories, network diagrams, and data flow diagrams.
- 4.3.7. AI systems will be configured, managed, and maintained in compliance with related Information Security policies.

4.4. Notification and Documentation of AI Usage

- 4.4.1. Users must provide notice when work products, deliverables, or other outputs are created wholly or substantially using AI systems. "Substantially" means AI contributed materially to the content, structure, analysis, or recommendations in the output, beyond mere formatting, grammar checking, or generating a basic template structure. These outputs shall be tagged with "Developed Using AI"
- 4.4.2. Where reasonable, documentation of AI usage should be maintained in work outputs and deliverables.
- 4.4.3. Meeting participants must be notified if AI notetakers or transcription services are used by the District to record audio, with the purpose and intended use explained.
- 4.4.4. Manager Notification: Employees must inform their managers when they are using AI for work processes or outputs. Managers may prohibit or restrict use if risks are identified or if such use would violate this Policy.

4.5. Training

- 4.5.1. The District's IT Department shall provide mandatory annual training to all employees on appropriate and ethical use of AI Systems. Training materials shall be reviewed and approved annually by the Legal Department.
- 4.5.2. Users may refer to the FAQs regarding the use of Artificial Intelligence Systems in the Workplace which is incorporated herein by reference.

4.6. Use of AI to Assist in Employment Decisions

- 4.6.1. AI systems may be used as assistive tools to support employment-related processes, including but not limited to: generating job descriptions, sorting or organizing candidate information, conducting preliminary research on employment law or HR concepts, drafting interview questions, summarizing applicant materials, identifying skill gaps for training purposes, and analyzing workforce trends.
- 4.6.2. While AI systems may be used to support and inform employment-related processes, final employment decisions, including but not limited to hiring, termination, promotions, demotions, disciplinary actions, performance evaluations, compensation adjustments, and benefits determinations, must continue to be made by qualified human decision-makers exercising independent judgment in accordance with applicable Sewer District policies. AI systems must not be used as the sole or primary basis for making final employment decisions.
- 4.6.3. Any AI system proposed for use in employment-related processes must be approved by the Director of Information Technology, the Chief Legal officer, and the Director of Human Resources after considering the following:
 - 4.6.3.1. potential bias, fairness, and disparate impact concerns;
 - 4.6.3.2. compliance with applicable employment laws and regulations;
 - 4.6.3.3. transparency and explainability of AI-generated outputs;
 - 4.6.3.4. validation testing and accuracy assessments; and
 - 4.6.3.5. data privacy and security protections for employment-related information.
- 4.6.4. The use of AI in employment processes must comply with all applicable federal, state, and local laws, including but not limited to anti-discrimination laws and fair employment practices statutes.
- 4.6.5. Any records created documenting the use of AI systems in employment decisions, including the nature of human oversight exercised, must be maintained in accordance with the Sewer District's record retention policies and applicable legal requirements.

5. Compliance Requirements

NIST CSF	ID.AM-2
	ID.AM-3
	ID.AM-4
	PR.DS-1
	PR.DS-2
	PR.DS-3
	PR.DS-5
	PR.DS-6
	PR.IP-2

Refers to the NIST Cyber Security Framework subcategories this policy addresses from a compliance requirement.

6. Policy Enforcement

Any employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment. Non-employees found to have violated this policy may be subject to penalties and any other legal remedies available to the Sewer District, up to and including immediate loss of system access, termination of contracts, and potential legal action for damages or injunctive relief. The Sewer District reserves the right to report violations that may constitute criminal conduct to appropriate law enforcement authorities.

7. Related Documents

- 7.1.1. Information Security Exception Policy
- 7.1.2. Data Classification Standards
- 7.1.3. Approved AI Systems and Tools List
- 7.1.4. AI Usage Guidelines

Approved:



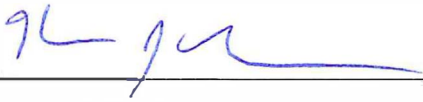
Kyle Dreyfuss-Wells
Chief Executive Officer

Date: 5/4/26



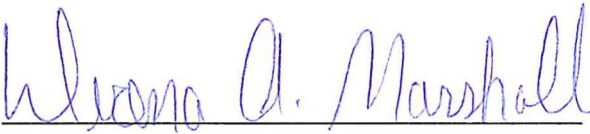
Eric J. Luckage
Chief Legal Officer

Date: 4-30-2026



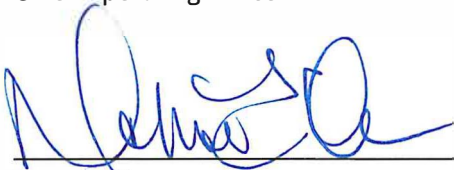
Kenneth J. Duplay
Chief Financial Officer

Date: 05/01/26



Devona A. Marshall
Chief Operating Officer

Date: 5/4/2026



Nichole Oocumma
Chief Administrative Officer

Date: 5/4/26