Implementation Guide for
Artificial Intelligence Use and Risk Management Policy Template

Introduction

This Guide is for libraries, library systems, and other institutions (with libraries) considering implementing a customized version of the "[INSTITUTION/LIBRARY NAME] Artificial Intelligence Use and Risk Management Policy Template."

AI is a big topic, and the use of AI creates big risks. At the same time, libraries and cultural institutions must be able to assist the public in using AI that is trustworthy.

That is what this Policy Template is for. Rather than create a blanket policy on the use of AI, this Policy Template allows libraries to use existing and evolving frameworks to manage the risks that AI can pose. This positions institutions to be on the cutting edge of this new(ish) technology.

To set this out in human terms, this Guide uses an FAQ format to take your institution's leadership through the phases of implementation. This will of course vary from institution to institution, but the fundamentals are the same: knowing **why** something has to be done, considering the risks and benefits of doing it and making sure it is done sustainably.

This Guide is a living document and your comments on improving it can be sent to info@losapllc.com.

First Step: Considering Use of the Template

1. Why should a library or cultural institutions have a policy regarding use of AI?

There are two primary reasons. First: libraries and cultural institutions are trusted sources of information; failure to competently and confidently use AI is not consistent with this status. Second: Use of AI can bring great benefits but also poses great risks; having a policy helps manage the risks while cultivating the benefits.

2. Does this policy say what to use AI for?

No. This policy creates a process for your institutions to assess AI tools based on how they will be used.

3. Does this policy bar use of AI to replace employees?

No, although for institutions that must follow civil service law, that is illegal (see New York State Labor Law Section 80). This policy is based on the idea that employees may need to work with trustworthy AI as part of their routine duties.

4. Does our insurance carrier care about our AI policy?

They might! It is a good idea to talk to your insurance agent or carrier rep to see if there are incentives and resources for managing the risks of AI.

5. Can't we trust the director (or other position) to make sure the institution uses AI safely?

This policy gives the director and other workers guidance on the standards the board expects the institution to uphold. Making sure the policy is followed is the director's responsibility.

6. What "standards" does this uphold?

This template policy uses the standards of the National Institute of Security and Technology ("NIST"), but your institution can decide to apply the standards of another organization.

7. How would we use other standards?

Your board, a committee, or your institution's leadership could identify other standards to replace the standards in yellow in the template policy that accompanies this Guide.

8. Should our lawyer help with this?

If your institution has a lawyer, it is wise to involve them in this process.

9. How can our institution decide to customize and adopt this Template Policy?

There are many ways, but most libraries initiate policy changes through a board resolution, such as:

> WHEREAS the use of Artificial Intelligence (AI) in information services is growing worldwide;
>
> WHEREAS the [name of institution/library] is a source of information services and a resource to the community;

WHEREAS it is well-documented that use of AI without appropriate risk management can lead to damage to people, institutions, and the planet;

BE IT RESOLVED that the board directs [names] to form a committee to explore the modification of the Artificial Intelligence Use and Risk Management Policy Template for use by this [institution/library], and

BE IT FURTHER RESOLVED that a draft of such policy shall be considered at the [DATE] board meeting; and

BE IT FURTHER RESOLVED that until such a policy is implemented, the Director is charged with using identified best practices to govern use of AI by employees for institutional services and operation, while recognizing the fiduciary role of the board in confirming the standards to apply.

Your institution can customize this model resolution as needed.

10. What should a committee or group asked to modify this Template Policy look at?

The group should:
- Identify how your institution might use AI;
- Consider the use of NIST risk management standards or if other standards are a better fit;
- Determine if institutional leadership and certain employees need additional training to fill out the assessment forms and if that training requires a budget;
- If there is internal IT, include or talk with the head of IT to assess when AI may be used as part of IT operations; and
- If the library/institution has sustainability or green commitments, ensure that the final policy requires consideration of an AI product's environmental impacts (the Template Policy prompts this assessment).

The group should present the final version of the Policy with a short report showing that the group considered which risk assessment standards to apply, the institution's frequent uses of AI, the need for ongoing training, sustainability commitments, and budget.

11. What if the group finds out the institution isn't using AI?

That is likely not going to happen, because at the very least, use of AI is widespread.

Second Step: Customizing the Template

12. We change the parts highlighted in yellow, right?

Your institution can modify any aspect you need; the Policy Template is there to provide a framework for discussion.

13. Should the end result say when we use AI and when we don't?

This policy is to ensure AI is evaluated on a product-by-product and use-by-use basis, not to simply rule use of AI in or out.

14. Wouldn't it be easier to just say when we can and can't use AI?

It might be easier, but it wouldn't address the risks of AI or ensure that the institution has found a particular AI tool to be appropriate for a particular purpose.

15. Give an example of how this will work.

If your institution has adopted a version of the policy, it will use the policy to assess use of AI for a particular purpose.

For example, let's say that in a library's served community, a lot of people want to use an AI tool to prepare their tax returns. People are coming to the library to use the computers to access the AI tool, and every so often, they ask a librarian if the AI tool is "good to use." By following the policy (including the framework selected), the librarian can answer the question.

For another example, let's say a library trustee wants a narrative, illustrated timeline of all the programming for the last year, in time for the next board meeting. A worker volunteers to use an AI product to generate a first draft, which the worker and the director can than edit, saving hours of time. The director can use the policy to confirm that the AI is trustworthy for that particular purpose.

For a third example: let's say the library is considering using an AI product on an ongoing basis to monitor employee productivity. The policy would be used to assess the risks of using of the product for generating those reports, including if the reports would violate privacy or had any bias.

Please note: A library or institution can of course choose not to do any of these types of activities, for any number of reasons.

16. You keep saying "trustworthy AI." Why?

Determining that AI is "trustworthy" is what AI risk management is all about.

"Trustworthy" under the NIST risk management framework, means an AI tool is:

- valid and reliable
- safe
- secure and resilient
- accountable and transparent
- explainable and interpretable
- privacy-enhanced
- fair with harmful bias managed.

17. The policy helps us check for all that?

Yes.

18. How does that look in real life?

It means that the institution has verified that that AI tool will not improperly share information, will not run amuck, resists being hacked, can be turned off, generates understandable and reliable results, and has been double-checked for prejudicial impacts.

19. Doesn't this mean we'll spend lots of time assessing the trustworthiness of AI?

It depends! Some institutions will start assessing and realize they are using more AI than they thought. Others will assess and realize they are using very little. The important thing is that the risks of the use are being considered and mitigated.

20. Should we have our lawyer look at the policy before it is adopted?

If there is a lawyer who regularly advises your institutions, yes.

21. Should we include a report with the final version of the policy?

That is not required, but a short summary of what the group reviewed and any other actions and considerations—such as training or budgeting for AI products—can create a good record of the process used to customize the template for use by your institution.

Third Step: Using Your Policy

22. Once the policy is adopted, who makes sure we're following it?

The default person in the Template Policy is the director, but your institution can change that to specify that someone else is responsible for enforcing the policy.

23. What if we realize we need to provide some employees with further training?

A description of the training and its budget can be part of the final report accepted by the board when the policy is adopted.

24. Will ESLN offer more training on AI?

Yes. We are gathering input on necessary training and will offer more as needed.

25. What if we need to assess an AI product and there is no information out there about it?

Then you cannot document that it is trustworthy and should not use it.

26. Are there resources out there for determining trustworthiness?

Yes, although the resources vary based on what AI is used for.

For example, standards for use of AI in governance of organizations is found at: https://www.iso.org/standard/56641.html.

There are also many, many resources created and maintained by librarians and other information professionals. Reach out to your community and share your experience and expertise!