

Presbyterian Church (U.S.A.), A Corporation

ARTIFICIAL INTELLIGENCE GUIDELINES

Artificial Intelligence (AI) systems and technologies are relatively new and becoming popular and people are using this new tool in all facets of life and business. AI accesses data on the internet to produce research and content from a variety of sources, some reliable, some less than dependable, some biased, some protected by copyright. AI tools are rapidly evolving, even those who oversee development of AI admit there are risks in its use, and we all need to take responsibility for use of AI in our work. We are responsible for the outcomes of the tools we use in our daily work. You are encouraged to seek information from the IT department before you jump into use of AI. These Guidelines serve as an interim resource for employees of the Presbyterian Church (U.S.A.), A Corporation (“A Corp.”), OGA, PMA, and ASG. Our goal is to protect employees, donors, members of the PC(USA), and the A Corp. from harm.

A. Guiding Principles

God creates human beings in God’s image—to love as God loves—to exist in relationships as God exists in the Triune relationship—to create as God creates. Many, perhaps most, human creations contain both the potential to enhance life and the potential to distort and damage life. Care and wisdom are often required in their use.

The General Assembly of the Presbyterian Church (U.S.A.) has long affirmed a positive relationship between faith and theology, science, and technology. “The Dialogue Between Theology and Science, a paper received by the 122nd General Assembly of the Presbyterian Church in the United States, affirms that “Faith gives us hope for survival, survival in the sense not only of life but of an acceptable level of life for everyone, and the motivation to achieve conditions for that kind of survival. Science provides the tools intellectual and material, to get on with what we have to do.” (1982 PCUS minutes, pp. 235-261)

While AI may prove to be a useful tool, it can never replace the intelligence, imagination, and love that a human being, made in God’s image, brings to the creative process. Therefore, we affirm the following guiding principles in the use of AI:

1. We will be guided by the policies and directives of the General Assembly
2. We will center human beings in the oversight and control of AI (See Section E(2))
3. We will be transparent and accountable to one another and the A Corporation in the ethical use of AI (see Section E(2)(d))
4. We will educate our colleagues about the safe, ethical use of AI and about the dangers and risks of its unethical use (See Section E(2))
5. We will learn from and rely upon experts and the best scientific information available about ways to improve the safe, ethical use of AI
6. We will strive not to introduce or reinforce biases or inequities in the use of AI, using policies affirmed by the General Assembly and information learned during DEI trainings
7. We will endeavor to use AI in ways that support and sustain the efforts of the church to follow Jesus faithfully and witness to God’s love and justice

B. Artificial Intelligence Guidelines - Summary

The A Corp.’s IT department develops and delivers solutions that help A Corp. employees in their daily work duties. You must remember that we are entrusted with responsibly stewarding the data of members, donors, and colleagues as well as having a duty to protect A Corp.’s IT systems. AI provides opportunities that may help us deliver good customer service and help fulfill our mission and ministries, but it also has risks that can threaten our systems, responsibilities, the reputation of the A Corp, and individual employee reputations.

The AI field is rapidly evolving, the potential impacts and risks are not fully understood. These AI Guidelines are intended to minimize issues and raise awareness of issues that may arise from the use of AI while additional research and analysis are conducted.

C. Overview

While AI platforms such as ChatGPT, Microsoft Bing Chat and Google Bard can be used to perform a variety of functions, this policy addresses only the use of a web-based interface to ask or "prompt" the chatbot in a conversational manner to find answers to questions or to create or edit written content.

Some examples of what could be created using an AI chatbot include:

- Emails and letters.
- Blog posts, reports, and other publications.
- Sales and advertising copy.
- Policies and job descriptions.
- Spreadsheet calculations.
- Foreign language translations.
- Coding development or debugging.
- Document or information sorting.
- Outlines or summaries of internal or external information.

There are, however, risks in using this technology, including uncertainty about who owns the AI-created content and security/privacy concerns with inputting proprietary company information or sensitive information about an employee, client, customer, etc., when interacting with the chatbot. Additionally, the accuracy of the content created by these technologies cannot be relied upon, as the information may be outdated, misleading or—in some cases—fabricated.

D. Guidance on How to Use AI More Effectively

Here are guidelines concerning how to use AI more effectively and ethically:

- Be specific in your prompts. The more specific you are, the better AI platforms will be able to understand what you are asking for and generate a relevant response.
- Use clear and concise language. AI platforms are still under development, so it can sometimes misunderstand complex or ambiguous language.
- Avoid asking AI platforms to generate harmful or offensive content. AI platforms are powerful tools but can also be used for malicious purposes. If you are not sure whether a prompt is appropriate, err on the side of caution.
- Be respectful of AI platforms' limitations. AI platforms are not human beings, and it does not have the same understanding of the world as we do. Do not expect it to be able to answer every question perfectly or generate content that is always factually accurate.
- Use AI platforms for educational purposes. AI platforms can be great tools for learning new things or exploring different topics. However, it is important to remember that they are not a substitute for human education.
- Be aware of the potential for bias in AI platform's responses. AI platforms are trained on a massive dataset of text and code, which means that it can reflect the biases that exist in that data. If you are concerned about bias, be sure to cross-check the AI platforms' responses with other sources.
- Use any AI platforms in a private setting. Artificial Intelligence platforms are still under development, so it is not always appropriate to use them in public or professional settings.
- Be aware of the privacy implications of using AI platforms. AI platforms collect data about your interactions with it, so it is important to be aware of how that data is being used. See paragraph E.2(a) below on Data privacy.
- Report any inappropriate or harmful content that you see generated by AI platforms. AI platforms are a powerful tool, but it is important to use them responsibly. If you see any content that you believe is inappropriate or harmful, please report it to the developers.

E. Artificial Intelligence Guidelines – Best Practices in the Use of AI

1. *Cybersecurity* – AI makes it possible for cybercriminals to engage in more sophisticated crimes that involve creation of, for example, phishing emails that are so convincing that they look like emails generated by the A Corp. email system and come from a colleague or supervisor. As IT and Legal have requested in the past, if you get an email that appears to be from a supervisor or colleague and asks you to transfer a large sum of money to an outside account or asks you to share personally identifiable information of employees, donors or members, you should be comfortable contacting the sender by phone or in person to confirm that they did in fact send that email. Supervisors should give grace in answering such inquiries.
2. *Using AI* – Use of AI technology that is incorporated into existing services and products, such as internet search engines, does not require permission to use. However, we need to control AI rather than letting AI control us. AI exists to help us do our work. The following guidelines must be followed both for existing services and products and in ALL use of AI.
 - a. Data privacy. you **must not** submit sensitive, confidential, or any personally identifiable data/information (PII) (ex. social security number, bank account information, date of birth) about members of the PC(USA), donors or colleagues (or others who have entrusted such information to you) to public AI systems. A Corp. does not own or control those systems. AI systems typically have user agreements that provide that the information that users download into their system can be accessed by the AI system owner and shared with third parties. Therefore, any confidential or sensitive information you input into an AI system will likely be shared with others. And that is a violation of our policies and a violation of trust.

REMINDER: Section 108 of the A Corp. Employee Handbook states:

“The protection of confidential information is vital to the interests and the success of you and A Corp.

Confidential information includes, but is not limited to, employee information (including, but not limited to, social security numbers and medical information); vendor information; donor information; computer processes, programs, and passwords; financial information; proprietary information of A Corp; and information of any PC(USA) agency, entity, or organization. You are required to comply with the provisions of the Ethics Policy, which address confidentiality pertaining to A Corp information. This policy should not be interpreted to prohibit you from disclosing and discussing the terms and conditions of your employment.

If you improperly use or disclose confidential information, you may be subject to corrective action up to and including separation from employment (see Section 601), even if you do not actually benefit from the disclosed information. If you have a question about whether certain information is confidential, consult relevant policies, such as A Corp’s Technology Policy (see Section 611).

You are required to protect A Corp records, including all written and/or computerized information created by, entrusted to, shared with, or accessible to you, against unauthorized access, loss, or destruction, including intentional destruction by you. These records include all written and/or computerized information produced by or for A Corp. Particular care must be exercised when confidential documents and information are stored on external storage devices.”

- b. Ethical Use of AI – A Corp. employees must use AI in accordance with all A Corp. policies, including, but not limited to, the Technology and Data Security Policy, the Ethics Policy for Employees, as well as the conduct policies (Section 601), confidential information policies

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(Section 108), and anti-discrimination and anti-harassment policies (Section 615) found in the Employee Handbook.

- i. Technology and Data Security Policy
 - ii. Ethics Policy for Employees
 - iii. A Corporation Employee Handbook
- c. Intellectual property – Content produced by AI systems may include copyrighted material. AI data (text, images, etc.) can be sourced from the internet without regard for copyright or licensing terms. It is extremely difficult to determine the source of AI content and difficult to verify whether AI-generated content is wholly original or only a slight stylization of existing copyrighted material. Nevertheless, you are required to perform due diligence to ensure that no copyrighted material is published by the A Corp. without proper attribution or without obtaining proper rights and permissions (see the Intellectual Property section below under Background for Guidance).

REMINDER: if you find an image through AI that you want to use, there is a good chance it is protected by copyright and was scraped off the internet by the AI program. If you have questions about such images and whether you can use them, contact Andrej Ajanovic in Legal Services (Andrej.ajanovic@pcusa.org) Therefore, if you need a similar image, please avoid copying images from AI or from the internet and instead contact PMA or OGA Communications colleagues for instructions on how to use the DAMS photo collection.

REMINDER: Section 611 of the A Corp. Employee Handbook states:

“A Corp’s systems may not be used for the following purposes:

1. to download unauthorized, protected materials (e.g., copyright protected) from or through A Corp’s system. If you do this, or if you are charged or sued for unauthorized downloads, you may be subject to corrective action up to and including separation from employment (see Section 601) and be responsible for any fines, penalties, interest, legal fees, and judgments found or levied against A Corp.”
- d. Attribution and accountability. If you use AI-generated content, the content should be clearly labeled as having been produced using AI tools. You should also consider including information about how the material was reviewed and edited, and by whom. This allows consumers of the content to understand its authorship and be able to evaluate the content accordingly. You should be transparent regarding the use of AI technology.

Example of Attribution: This description (image/video/music etc.) was generated by an AI platform and checked and edited by (insert your name and job title and agency/entity).

NOTE: If you unknowingly use copyrighted materials found on AI for a sermon or article or information piece, if you try to obtain copyright protection for your “creation,” you are seeking to copyright material that is owned by someone else and is already subject to copyright protection. Ex. you ask AI to create a 15- minute sermon for you on a particular section of Matthew 25. AI finds a copyrighted sermon preached by someone else and presents it to you without attribution. You think that with a little tinkering you will adopt that sermon as your own and seek copyright protection. Sorry, it is already protected and the person who originally obtained protection can seek redress against you for claiming you own it and for preaching it as if it is your own without appropriate permission, attribution and, perhaps, compensation.

- e. Fact Checking. You should fact check information gathered using AI before using it in public communications or as a work product of the A Corp. and its agencies and entities. Do not use AI to create communications regarding sensitive matters, such as responding to a mass shooting or natural disasters.

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- f. Defamation – one flaw of AI is hallucinations, AI generating information that, although it sounds factual, has no basis in reality. You should fact check, as recommended in subsection (e), before publishing information about a person which may turn out to be false. Publishing false information about someone that harms them can lead to a defamation claim.
- g. Plagiarism – You should not plagiarize works created by authors, musicians, and other persons who create original works that AI finds on the internet.
- h. Reduce bias and harm. AI systems can reflect the cultural, economic, and social biases of its source materials. You should carefully review any content generated by AI to ensure that unintended or undesirable instances of bias, or even potentially offensive or harmful material, are changed or removed. Review the language to ensure it is inclusive and respectful.

Background for Artificial Intelligence Guidelines is available on the following pages.

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Background for Artificial Intelligence Guidelines

The federal government is struggling, as it often does with innovative technologies, to keep up with what “guardrails” it needs to enact to protect users, consumers, and copyright holders from harm.

The FTC is investigating whether ChatGPT harms consumers in numerous ways:

- <https://www.washingtonpost.com/technology/2023/07/13/ftc-openai-chatgpt-sam-altman-lina-khan/>¹
- <https://apnews.com/article/openai-chatgpt-investigation-federal-ftc-76c6218c506996942282d7f5d608088e>

The European Union’s Parliament is ahead of Congress in drafting laws to protect its citizens from the challenges of AI, with a comprehensive bill that now goes for review by the European Council.

- <https://www.washingtonpost.com/technology/2023/06/14/eu-parliament-approves-ai-act/>
- <https://www.cnn.com/2023/06/14/eu-lawmakers-pass-landmark-artificial-intelligence-regulation.html>

Terminology

AI uses computer algorithms and large volumes of data to create new digital content, such as text, images, video, or code. AI systems are “trained” using enormous amounts of human-generated data, it can learn patterns in that data, and can generate new output by predicting what a human would likely say or produce given a certain input or “prompt.”

“Generative AI” produces new content, chat responses, designs, synthetic data or deepfakes.

“Traditional AI” focuses on detecting patterns, making decisions, honing analytics, classifying data and (maybe) detecting fraud.

Intellectual Property

One of the most popular forms of AI is “Chat GPT,” a language processing tool driven by AI technology that allows you to have human-like conversations and much more with a chatbot. The language model can answer questions and assist you with tasks, such as composing emails, essays, articles, and computer code.

Artists filed a federal lawsuit against AI platforms alleging mass copyright infringement by using the artists' work in generative AI systems.

- <https://www.reuters.com/legal/ai-companies-ask-us-court-dismiss-artists-copyright-lawsuit-2023-04-19/>
- https://www.washingtonpost.com/technology/2023/07/16/ai-programs-training-lawsuits-fair-use/?utm_campaign=wp_todays_headlines&utm_medium=email&utm_source=newsletter&wpisrc=n1_headlines
- <https://www.npr.org/2023/07/17/1187523435/thousands-of-authors-urge-ai-companies-to-stop-using-work-without-permission>

Getty Images filed a suit alleging AI platforms scraped content from Getty’s webpage in violation of its copyrights.

- <https://www.theverge.com/2023/1/17/23558516/ai-art-copyright-stable-diffusion-getty-images-lawsuit>

¹ Links were in effect as of date of the Guidelines – 9/25/2023.
Similar articles located to display content shown behind paywalls.

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Remember, AI systems are only as good as the data it can pull from. In 2022 Meta posted an AI system called Galactica that was supposed to help scientists, researchers, and students, but it was taken down after 3 days due to “tendencies to reproduce prejudice and assert falsehoods as facts.”

- <https://www.technologyreview.com/2022/11/18/1063487/meta-large-language-model-ai-only-survived-three-days-gpt-3-science/>

New chatbots have no guardrails:

- <https://www.nytimes.com/2023/07/02/technology/ai-chatbots-misinformation-free-speech.html>
- <https://www.msnbc.com/opinion/msnbc-opinion/ai-chatbot-misinformation-2024-elections-rcna92378>

George R.R. Martin, John Grisham and other major authors sue OpenAI, alleging "systematic theft"

- <https://www.cbsnews.com/news/openai-lawsuit-george-rr-martin-john-grisham-copyright-infringement/>

Fact Checking

A law firm was chastised by a judge for submitting court papers manufactured by ChatGPT in which the AI platform made up cases that were nonexistent to support legal arguments in the court papers. The lawyers were fined and required to notify the judges to whom the fake case decisions were attributed.

- <https://arstechnica.com/tech-policy/2023/05/lawyer-cited-6-fake-cases-made-up-by-chatgpt-judge-calls-it-unprecedented/>

Vanderbilt University apologized for using ChatGPT to manufacture an email to its students in response to a shooting incident at Michigan State University in which three people were murdered and five more were injured. The email said in its text “Paraphrase from OpenAI’s ChatGPT AI language model, personal communication, February 15, 2023” Students were upset at the University using AI to communicate with them about such a tragedy.

- <https://www.cnn.com/2023/02/22/tech/vanderbilt-chatgpt-shooting-email/index.html>

Defamation

Radio host Mark Walters sued OpenAI for defamation under Georgia law. See Walters v. OpenAI, LLC, No. 1:23-cv-03122 (N.D. Ga.). Walters alleges that OpenAI’s ChatGPT “hallucinated” facts, including allegedly-unfounded statements about past financial improprieties, when a reporter used ChatGPT to research and summarize a legal complaint.

Plagiarism/Copyright

A professor caught students using ChatGPT to create essays and those essays included “well-written misinformation.”

- <https://www.businessinsider.com/chatgpt-essays-college-cheating-professors-caught-students-ai-plagiarism-2023-1>

Microsoft, a subsidiary, and a partner were sued in a potential class action that alleges that AI-powered coding relied on “software piracy on an unprecedented scale.” (Alleged violation of copyright)

- <https://www.theverge.com/2022/11/8/23446821/microsoft-openai-github-copilot-class-action-lawsuit-ai-copyright-violation-training-data>