

Statewide Policy

	NUMBER ###-##-###	SUPERSEDES Interim Guidance on Generative AI Usage and Access
	EFFECTIVE DATE	PAGE NUMBER Pages 1 of 5
	REVIEWED DATE	
DIVISION Enterprise Information Services (State CIO)	REFERENCE ORS 276A.206 Statewide Procedure: ###-##-### PR Statewide Policy 107-004-050	
POLICY OWNER Privacy and Artificial Intelligence		
SUBJECT Copilot General Usage Policy	APPROVED SIGNATURE <hr/> Terrence Woods, State Chief Information Officer	

PURPOSE

This policy outlines directives and best practices for the safe, effective use of Microsoft Copilot by state employees.

APPLICABILITY

This policy applies to all state agencies under the purview of the State Chief Information Officer.

FORMS/EXHIBITS/INSTRUCTIONS

Attachment A: Copilot Recommended Use Guidance

DEFINITIONS

Artificial intelligence (AI): a machine-based system that is capable, for a given set of human-defined objectives, of making predictions, recommendations or decisions influencing real or virtual environments and uses machine- or human-based inputs.

Generative artificial intelligence (GenAI): a software system that generates new content, data, or other output, including images, video, audio, and text, autonomously. It uses algorithms and models to create new and original information from patterns and information it learned previously from a given set of data. Large language models and foundation models are both GenAI. GenAI is distinguished from other AI systems by its primary function of creating new content rather than solely classifying, predicting, or recommending from predefined categories.

Human in the loop (HITL): human-in-the-loop refers to a system or process in which a human actively participates in the operation, supervision and decision-making of an automated system. In the context of AI,

HITL means that humans are involved in the AI workflow to ensure accuracy, safety, accountability and ethical decision-making.

Proprietary or protected material: material subject to ownership rights or legal restrictions on use, disclosure, reproduction, or distribution, including copyrighted works, licensed content, and trade secrets, as well as confidential or proprietary business information designated as restricted by the organization.

Public meeting: a convening of the governing body of a public body, for which a quorum is required, to make a decision or deliberate toward a decision on any matter, and that is open to the public. (ORS 192.610(5); ORS 192.630(1))

GENERAL INFORMATION

Copilot is a generative AI tool from Microsoft which is available to most state employees. There are several ways to access Copilot:

- **Copilot Chat** (included with Microsoft 365 license): a conversational tool available to most state employees which is helpful with generating ideas, searching the web, or reviewing single documents.
- **M365 Copilot** (additional license): an enhanced version of Copilot integrated across the Microsoft 365 suite (including Word, Outlook, Excel, PowerPoint, and Teams) and which has direct access to employee data in Teams, Outlook, SharePoint, and OneDrive.
- **Teams Premium** (additional license): an enhanced version of Teams that summarizes meetings, captures action items, and provides deep analysis on meetings when turned on.

Users of Copilot must follow two specific directives:

1. Appropriate data use: Only appropriate data may be input into Copilot.
 - a. Data or information input into Copilot, either as a document attachment or directly-entered text, must be properly classified. Users may not intentionally input content that is or would be classified as level 3 or 4 unless specific permission for their use case is received from Enterprise Information Services (EIS).
 - b. Information that is proprietary, copyrighted, or otherwise protected should not be input into Copilot unless explicit authorization or licensing to do so has been received.
2. Appropriate human review: Copilot outputs require human review, and AI should not take the place of human subject matter expertise. AI-generated content should be considered a “rough draft” and must receive sufficient human review before distribution or further action. The scope of the review should align with the nature of the content and its intended audience. For users, the best way to determine the appropriate level of human review is to consult with their manager. In many cases, existing review processes will be sufficient, but it’s worth having the dialogue to confirm.

General User Responsibilities:

- Review all Copilot output for accuracy and completeness. Users are responsible for the content of materials produced by Copilot that are subsequently used or distributed.

- Use only the enterprise-security approved versions¹ of Copilot Chat and M365 Copilot using their state credentials.
- Complete a state-provided AI training course through Workday before using M365 Copilot.²
- Classify any document used with Copilot in compliance with Statewide Policy 107-004-050³.
- Classify any Copilot output with the same level of sensitivity as the input data.
- Promptly report any anomalies.⁴
- Never use Copilot output:
 - o Without human review. Hitting send on an email or Teams chat containing AI output indicates that human review by the sender has occurred, and that the sender stands behind the content.
 - o As the sole source of reference.
 - o To impersonate individuals or organizations.
 - o To make critical decisions or provide legal or medical advice.
 - o In any way that violates laws, regulations, organizational policies, or contractual obligations
- Users must not input proprietary, copyrighted or otherwise protected material into Copilot unless they have written authorization or licensing to use the materials with generative AI tools.

Additionally:

- Real-time transcription or translation of public meetings using Teams Premium requires written approval from the agency director. For public meetings requiring language translation, agencies should continue to use qualified human interpreters to ensure accuracy and compliance with legal requirements.

The top human resources leader at the agency should review the “Copilot Recommended Use Guidance” attachment to this policy. Agencies are encouraged to supplement it to provide clear direction to employees that supports the responsible use of Microsoft Copilot, including agency-specific standards for human review.

¹ Look for the green shield icon to confirm you are in a secure version of Copilot.

² The current approved course available in Workday is “DAS – EIS [Responsible AI for Public Professionals](#)”.

³ State of Oregon Information Asset Classification Policy “[How do state agencies comply with the policy](#)”.

⁴ Please report to the EIS M365 Support team at M365.Info@das.oregon.gov.

ATTACHMENT A: Copilot Recommended Use Guidance

Below is a matrix of potential Copilot uses across the various stages of content creation. The matrix is intended as a reference tool, as each use of Copilot is different. The matrix organizes potential uses into the following four-part risk spectrum:



Routine Use: Generally safe, routine uses with limited distribution. Human review is still needed.



Appropriate Use, with Documented Human Review: Generally safe, routine uses with broader distribution that should have documented human review.









Use Caution: Higher-risk scenarios that require significant human review due to large or unknown audiences or complex outputs.



Discouraged: Uses that pose significant risk and should not be attempted.

Copilot Use	Audience / Scope		
	Limited / Personal Use	Moderate / Agency Use	Broad / Public Use
Proofread/rewrite (<~25% AI generated)	✓	✓+	⚠
Generate content from detailed human notes or prompts (<~50% AI generated)	✓	✓+	⚠
Generate content from limited human notes or vague prompts (>~75% AI generated)	⚠	⚠	⊘
Summarization of documents or meetings	✓	✓+	⊘
Transcription of voicemail	✓	✓+	⚠
Translation of documents	✓	✓+	⚠
Researching	✓	✓+	⚠
Real-time translation	✓	⚠	⊘


Copilot Use	Audience / Scope		
	Limited / Personal Use	Moderate / Agency Use	Broad / Public Use
Computer Coding			
Working with Level 3 or Level 4 data			

Note: For external documents that incorporate AI-generated output, an explicit disclosure or attribution (e.g. via a footnote or header) is recommended.⁵

Note to Managers:

It is important to talk with your employees about appropriate AI usage in their work, and to come to agreement with them on what constitutes appropriate usage and – in particular – what constitutes appropriate human-in-the-loop (HITL) review of a given document or output that involved the use of AI. Be supportive and be clear in your expectations.

⁵ See Responsible AI Usage Procedure ###-##-###PR, Attachment D: User disclosure for specific guidance.

 Statewide Procedure	NUMBER ###-##-###	SUPERSEDES
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DIVISION Enterprise Information Services (State CIO)	REFERENCE Statewide Policy 107-004-###	
POLICY OWNER Privacy and Artificial Intelligence		
SUBJECT Copilot Usage Procedure	APPROVED SIGNATURE <hr/> Terrence Woods, State Chief Information Officer	



PURPOSE

This procedure establishes the procedure for agencies to implement the General Usage of Microsoft Copilot Policy.

APPLICABILITY

This procedure applies to Executive Branch state agencies, boards, and commissions under the authority of the State Chief Information Officer that implement, acquire, configure, test, pilot, publish, operate, or materially modify artificial intelligence systems or uses in the conduct of state business.

PROCEDURE

RESPONSIBILITY STEP ACTION

Agency human resources leader	1	Review the Copilot General Usage Policy, including the attachment titled Attachment A: Copilot Recommended Use Guidance.
Agency human resources leader	2	Determine if the enterprise Copilot usage policy is sufficient for your agency. If not, develop supplementary policy and/or guidance for your agency.
Agency	3	Communicate Copilot usage policy and/or guidance to your employees and contractors.
Agency	4	Incorporate Copilot usage into your AI Adoption Strategy.