



Board Letter

Agenda Date: March 17, 2026

Agenda #: 8

Authorization to adopt the CHA Artificial Intelligence Policy.

Presenter: Elizabeth Silas, Interim Chief Legal Officer

Recommendation

The Operating Chairman (“OC”) of the Chicago Housing Authority (“CHA”) recommends that the CHA Board of Commissioners (“Board”) approve the attached CHA Artificial Intelligence (“AI”) Policy.

The requested action complies in all material respects with all applicable federal, state, and local laws, and CHA policies. CHA staff has completed all necessary due diligence to support the submission of this initiative. Policy changes go into effect upon Board approval.

Background

As part of a comprehensive policy review process, CHA has streamlined and updated previous Board-approved policies to comply with current laws, regulations and practices. This policy updates and works in conjunction with CHA’s current Information Security Policy which was adopted in July 2023.

Key information includes:

- Inclusion of definitions applicable to the AI Policy
- Authorizes only CHA approved versions of AI use
- Incorporates a Vetting Committee to review any new AI software for authorization at CHA
- Incorporates the consequences of unauthorized use of AI programs at CHA

Respectfully Submitted:

Matthew Brewer
Operating Chairman



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RESOLUTION NO. 2026-CHA-18

WHEREAS, the Board of Commissioners has reviewed the Board Letter dated March 17, 2026, entitled "Authorization to adopt the CHA Artificial Intelligence ("AI") Policy;

THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE CHICAGO HOUSING AUTHORITY:

THAT, the Board of Commissioners approves the attached, CHA AI Policy and authorizes the Operating Chairman, or his designee, to implement the CHA AI Policy on March 17, 2026. This CHA AI Policy shall supersede all prior policies regarding the same subject matter.




James Matanky
Vice Chairman
Chicago Housing Authority



ARTIFICIAL INTELLIGENCE POLICY

Responsible CHA Department(s): ITS/OGC

Policy No. 102.6

Effective Date: March 17, 2026

Approved on 3/17/2026 by CHA Board of Commissioners
Resolution No. 2026CHA18

I. Purpose.

The way in which the world obtains and processes information has evolved now with the utilization of Artificial Intelligence (AI). In line with the CHA finding new innovative ways to serve our over 65,000 families, the CHA will begin using AI in its work functions. The goal of implementing AI into our work is to better serve our families, to assist in faster processing of documents, and to heighten efficiency within the Authority.

This Policy provides a definition for AI, a brief description of what is allowed within the CHA, and an overview of compliance to federal laws/regulations. This AI Policy references the Information Technology Services (ITS) Security Procedures which addresses what AI tools staff may use, what is authorized and unauthorized use of AI tools, and how AI tools will be approved for use by the CHA.

II. General Provisions.

A. Definitions.

1. "Artificial Intelligence" "Artificial Intelligence (AI)" means a machine-based system that can, for a given set of human-defined objectives, make predictions, recommendations or decisions influencing real or virtual environments. AI platforms use machine and human-based inputs to (A) perceive real and virtual environments; (B) abstract such perceptions into models through analysis in an automated manner; and (C) use model inference to formulate options for information or action. A common use of AI is Generative AI, which includes a class of AI models that emulate the structure and characteristics of input data in order to generate derived synthetic content. This can include images, videos, audio, text, and other digital content.
2. "AI tools," as defined by the ITS Security Procedure is any software or system that uses artificial intelligence techniques to perform tasks that would typically require human intelligence. These tools include generative platforms like ChatGPT, Google Gemini, and Microsoft Copilot; voice and image recognition tools like Google Lens and facial recognition software; code generation tools like GitHub

Copilot and Amazon Q Developer; and AI-powered writing or summarization aids such as Notion AI.

3. "Sensitive Information" means information that can cause substantial harm, including financial loss and/reputational risks for CHA if it is not properly protected. Sensitive Information includes but is not limited to: Personally Identifiable Information (PII), Protected Health Information (PHI), Financial Information, and Confidential Business Information.
4. "Personally Identifiable Information (PII)" means and includes social security numbers, medical or credit reports, personal references, employment records, criminal records, and the information acquired by the CHA from applicants, tenants, their family members, or any third-party concerning the CHA applicants or tenants.

B. Applicability.

This Policy applies to all CHA Officers and Employees, including but not limited to temporary personnel and interns, as well as CHA Contractors and Subcontractors. All officers, employees, and contractors shall read this Policy, familiarize themselves with its contents, and attend CHA's training prior to using approved AI tools. This Policy shall apply to all AI tools, as defined herein, except to the extent those tools are governed by conflicting provisions of state, federal, or local laws or regulations.

All CHA contracts shall include a provision requiring compliance with this Policy. Any officer, employee, or contractor who violates this Policy may be subject to sanctions, up to and including immediate removal from office, termination of employment, or cancellation of a contract and debarment from future contracts.

The employee or contractor using an AI tool is solely responsible for any output published and used as part of their work. AI tools should be utilized to assist staff in their work for the CHA not to replace human judgment or work product.

III. General Policy.

A. Policy Overview

CHA employees may use approved AI tools, as set forth in the ITS Security Procedure, as part of their day-to-day work. The use of AI is not meant to be a replacement for staff or human decision making but instead, AI is only to be used as a tool to assist in work duties.

Any AI tools CHA employees propose to use must be vetted and approved by the Chief Information Officer and the AI committee prior to being used by CHA employees or contractors. The ITS Security Procedure incorporates the link to the vetting process. If an employee, vendor or contractor is using an approved platform, it must be the CHA internal version and not a publicly available version. This is meant to avoid divulging sensitive information to the public at large.

For information regarding authorized and unauthorized use, staff should refer to the ITS Security Procedure to ensure appropriate usage of AI in CHA work-related duties. In general, staff using AI must review and verify any information provided to and outputted for accuracy and inaccuracies before it is disseminated internally or externally. Presenting and/or copy-and-pasting AI-generated content from external sources or websites as CHA work is prohibited.

Department Chiefs may enforce stricter guidelines than what is stated in this Policy and the ITS Security Procedures for usage based on departmental need.

B. Data Security & Privacy

The CHA is committed to protecting the personal and private information of residents and applicants, as well as CHA's own proprietary information. It is imperative that no PII, or otherwise sensitive information, is collected, stored, or processed in a manner that is inconsistent with the procedures set forth in the ITS Security Procedure. Staff, including vendors and contractors, should familiarize themselves with the various types of PII and sensitive information managed by CHA to avoid inadvertent disclosures when utilizing AI.

Under no circumstances shall staff, or any individual or entity performing work on behalf of CHA share, enter, or upload PII or any of CHA's proprietary information into any approved or non-approved AI system. ITS shall implement robust security measures to prevent unauthorized access, data breaches, and misuse of CHA data when using approved AI tools. Appropriate security measures must be strictly followed by staff, contractors, and agents of the CHA to ensure the protection of personal and private information, through continuous evaluation, testing, and authentication. Each Chief or their designee will be responsible for ensuring safe and secure use of AI.

C. Compliance

The permissible use of AI by the CHA must be done in compliance with all federal regulations, state regulations, city ordinances and authority-wide policies adopted by the CHA Board of Commissioners. Use of non-approved AI tools or actions in disregard of this Policy will result in disciplinary action.

1. Regulations

When using AI tools, there is a great risk of AI output creating discriminatory effects or having an algorithmic bias. In an effort to combat this, while using AI tools, each department must ensure that any data being used is consistent with its objectives and is accurate in both its inputs and outputs to/from an AI platform.

The Fair Housing Act (42 U.S.C. §§ 3601–3619), the Fair Credit Reporting Act (15 U.S.C. § 1681 et seq.), and any other applicable law must be adhered to with any use of AI platforms, to protect from discriminatory effects or bias. Those statutes are described below.

The Fair Housing Act prohibits discrimination in the sale, rental, and financing of dwellings and in other housing-related services because of race, color, religion, sex (including sexual orientation

and gender identity), national origin, disability or familial status (children under eighteen being present, seeking legal custody of minor children, or pregnancy). 42 U.S.C. § 3604. The Act prohibits intentionally discriminatory practices, as well as those with an unjustified discriminatory effect.

Additionally, AI in tenant screening processes can create an undue risk of discrimination or bias. To combat this, the Fair Credit Reporting Act creates the right to dispute information in reports. 15 U.S. Code § 1681i, 16 CFR 660.3. To promote compliance, and to combat any discrimination in AI related tenant screening, applicants must be allowed to dispute whether a record should be included in their file as a potential ground for denial of tenancy even if the record is accurate (e.g., an eviction related to domestic violence).

The CHA and affiliated management agencies in their use of AI tools must continue to maintain objective, clear, and relevant tenant selection criteria for all CHA dwelling units. The CHA and affiliated management agencies should ensure that all screening and applicant review procedures that include AI technology remain narrowed to the consideration of information and/or factors relevant to the likelihood that an applicant will comply with their tenancy obligations and can help ensure that screenings are fair and nondiscriminatory.

2. Incorporated CHA Policies

The AI Policy is not intended to conflict with CHA'S Information Security Policy, Social Security Number and PII Policy, or the Ethics Policy. Rather, this Policy works in conjunction with the policies listed above, in addition to Employee Handbook, which are all incorporated herein. Therefore, any work performed with AI will be subject to the provisions of the applicable policies and the Employee Handbook.

For more information on any of the CHA policies listed above, please follow the following link, <https://www.thecha.org/transparency-action-cha-data-impact-hub/policies/board-approved-policies>.

References: 42 U.S.C. §§ 3601–3619; 15 U.S.C. § 1681 et seq.; 16 CFR 660.3
Policy History: Approved on 3/17/2026 by 2026CHA18