



Meeting Date: August 26, 2025
Agenda Item No. 12
Batch No. 01

UC San Diego

August 25, 2025

Re: Proposed Board Policy A- 140, AI Board Policy

Dear County Supervisors:

In January, we presented to the county issues related to the adoption of new technologies and made recommendations aimed at mitigating common pitfalls associated with these advances. However, we believe that the current AI Policy process is being rushed as evidenced by significant gaps in the proposed document that fail to address key issues necessary for thoughtful and effective implementation.

To ensure that we approach the adoption of technology responsibly, we recommend that the Board hold off on taking action on the AI Policy in its current form. It is crucial that we take the time to develop a robust framework that not only protects the interests and rights of our community but also considers the implications for the county's workforce, including their ability to ensure accurate, fair, and efficient services.

We recommend the following concerns be addressed/incorporated into county policy:

- General
 - Definition of a Substantial AI System: Develop a definition of a “substantial” AI system to determine which potential AI systems are subject to additional assessment, consultation, and inventorying requirements.
 - Worker Consultation: Prior to making the decision to roll out substantial AI systems or major updates to those systems, require consultation with County workers, notify labor organizations of consultation in advance, and include labor representatives in consultations when available.
- Generative AI
 - Right to Opt-Out: Ensure the public has a way to opt out of interacting with GenAI systems to access County services.
- Automated Decision Systems (ADS)
 - Stakeholder consultation: Require consultation with diverse communities, stakeholders, and workers prior to deployment to identify concerns, risks, and potential impacts of substantial ADS use cases.

Labor Center

University of California San Diego • 1100 Market St. • San Diego, California 92101
laborcenter.ucsd.edu

- o Algorithmic impact assessments: Require algorithmic impact assessments to be performed on substantial ADS prior to deployment and periodically audit ADS impacts on an ongoing basis.
- o Right to Appeal: Ensure the public has a way to appeal negative ADS outcomes to County staff empowered to resolve the situation.
- o Right to Override: Create processes and guidelines to allow county workers to override ADS decisions.
- o AI Use Case Inventory: Require the County to inventory and publicly disclose the County's substantial ADS use cases along with plain language explanations.
- Data Privacy
 - o Data Minimization: Limit data collection to data strictly necessary for the specific context. Data should be deleted as soon as it is no longer needed for County purposes or within 30 days.
 - o Third Party Data Sharing: Third party data sharing proposals, including to subcontractors or to external entities, should be noticed to the public and to county workers with a full description of use cases and data types to be shared 60 days in advance and should be brought to vote of Board of Supervisors
 - o Surveillance: Require a Board vote on the adoption of any AI-enhanced technologies intended to observe, collect, retain, analyze, process, or share data that can be used to identify individual or groups, and provide notice to the public and county workers with a full description of proposed use cases, data types, and a draft contract 60 days in advance of vote.

We believe that these recommendations are essential to mitigating some of the risks associated with the adoption and implementation of new technologies and ensuring that the process is inclusive and ethically sound.

Thank you for your attention to these matters.

Sincerely,

A handwritten signature in black ink, appearing to read 'Satomi Rash-Zeigler', with a stylized, flowing script.

Satomi Rash-Zeigler
Executive Director
UCSD Labor Center