

Policy on the Use of Artificial Intelligence

AA83-01-20231017-P01

Rationale and Scope

Artificial Intelligence (AI) has emerged as a transformative force in higher education, offering unprecedented opportunities for innovation and advancement. However, the ethical use of AI in academia is paramount to ensure fairness, transparency, and equity. This policy outlines guidelines for the responsible use of AI technologies in Fairfax University of America (FXUA). This policy applies to all FXUA faculty, students, researchers, and staff involved in activities involving AI and its subset technologies, including but not limited to machine learning, deep learning, generative AI (Gen AI), and large language models (LLMs).

General Guidelines

FXUA recognizes that AI technologies are becoming prevalent in business, academia, and all areas of life. AI is not a fad; it is here to stay for the long run. Therefore, FXUA encourages embracing AI technologies for faculty and students across disciplines for different learning goals. There is no one-size-fits-all best practice for their use. This policy is meant to provide guidance on what to consider as these AI tools evolve and with strategies for the use of AI in an ethical, responsible manner. The policy also provides specific scenarios where special care and prior authorization from FXUA are required before collecting specific data.

Related Definitions and Abbreviations

Artificial Intelligence (AI): The theory and development of computer systems able to perform tasks that normally require human intelligence, such as visual perception, speech recognition, decision-making, and translation between languages.

Chatbot: A computer program designed to simulate conversations with human users, especially over the internet.

FERPA: Family Educational Rights and Privacy Act, a federal law that affords parents the right to have access to their children's educational records, to seek to have the records amended, and to have some control over the disclosure of personally identifiable information.

Generative AI (GenAI)

The term "generative AI" or "GenAI" refers to AI algorithms and models that can create new content based on the data they are trained on, including audio, code, images, text, and video.

Generative Pre-Trained Transformer (GPT): It is a type of large language model (LLM) and a prominent framework for generative artificial intelligence. It is an artificial neural network that is used in natural language processing tasks.

GDPR: General Data Protection Regulation, a privacy and security law established by the European Union.

HIPPA: Health Insurance Portability and Accountability Act, a federal law that sets a national standard to protect medical records and other personal health information.

PCI-DSS: Payment Card Industry Data Security Standard, an information security standard designed to reduce payment card fraud by increasing security controls around cardholder data.

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Responsible AI: Ensures that AI-based applications are designed, developed, and deployed in a way that respects human values, rights, and dignity.

Policy

This policy reflects FXUA's commitment to harnessing the potential of AI in higher education while upholding ethical principles and promoting responsible and equitable AI use. By adhering to the guidelines, FXUA aims to create a learning environment that fosters innovation, inclusivity, and ethical leadership.

Faculty are encouraged to discuss with students how AI can positively contribute to FXUA programs and the FXUA learning experience.

The following are the FXUA generic AI policy guidelines:

Communication

- **AI's potential:** Most FXUA graduates will live and work in environments where AI is embedded. Their success will depend on their ability to use AI technologies. FXUA's responsibility lies in preparing our students to engage with various AI tools and to prepare them for the challenges and opportunities of the technology.
- **Critical thinking:** The use of AI will not eliminate rather transform critical thinking skills. Students need to learn the skills to recognize disinformation and biased information and to master accurate and factual research.
- **Digital literacy:** The use of AI tools necessitates the development of research and writing skills that enhance students' technical and cognitive abilities to find, evaluate, and communicate information on digital platforms.

Ethical Issues

- **Student privacy:** Protecting student privacy as required by FERPA is of utmost importance. All Personally Identifiable Information (PII) must be removed when using AI tools on student assignments, such as drafting feedback or creating tutoring exercises.
- **Equity and accessibility:** AI tools may not always be accessible by individuals with disabilities. Options for accommodations and support must be offered in such cases.
- **Ensure that data creation, collection, and processing are secure and aligned with all applicable laws and regulations.**
- **Disinformation:** AI tools may generate disinformation or biased information. Users must understand the dangers of relying solely on AI tools for information and learn how to filter AI-generated data. Unfettered fact-checking is prohibited. AI tools are outstanding research assistants but may "hallucinate" and suggest facts and sources that are entirely inaccurate, though they sound plausible. Again, humans must be central to all research, content creation, and review.
- **Lack of regulations:** As generative AI tools are very new, governments have not laid down the necessary regulatory safety net that addresses the ethical issues of AI use. Companies that develop these technologies have little regulatory oversight that keeps them in line. Users must learn to navigate the dangers of the many gray areas currently in existence.

Academic Integrity

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- Plagiarism: AI tools are trained on previously created content. Users must keep in mind that AI-generated content is based on human-generated information. Copying and pasting responses that the AI tool provides may plagiarize ideas of others. Also, running text through multiple AI tools to avoid detection is a highly questionable method.
- Lack of proper citation of sources: AI tools are not trained to provide the sources the information comes from.
- Inaccurate, misleading, biased, false, or limited information: The reliability of information depends on the reliability of sources the AI tool was trained on. Users must exercise caution when using AI-generated content.

The following are the FXUA specific AI policy guidelines:

Espionage

- AI should not be used for espionage purposes to pose any risk or threat to FXUA, its affiliates, and the critical national infrastructure.

Risk Analysis/Assess the usage of AI

- Users must consider FXUA values, objectives, and culture before embracing any new AI technology-based solution. Any technology stack used must not negatively impact FXUA in any way.
- Coordinate with the FXUA AI committee to assess any potential impact on human values, race, gender, or discrimination.
- Design AI-based applications that do not potentially impact society and the environment.
- Disclosure of personally identifiable information (PII) without prior permission from the FXUA AI committee must not put the subject at risk of financial, civil, or criminal charges.
- AI tools should not be used in any way that would violate existing university standards or policies. For example, creating false communication, spamming/phishing, or manipulating data to create a deceitful impression.

Data Collection and Management

- Data collection from universities, corporations, businesses, etc., must be approved by the data owners and the FXUA AI committee to analyze or train AI-based models.
- Collection of personally identifiable information (PII), including but not limited to social security numbers (SSN), student identification number, date of birth, financial information, proprietary information, credit card data, and healthcare records, must be approved by the FXUA AI committee.
- It is the responsibility of the person (not FXUA) collecting and processing data to comply with
 - FXUA ethical standards, and
 - Local, state, and federal data protection laws and regulations included but are not limited to FERPA, GDPR, HIPPA, and PCI-DSS.
- PII data retention criteria and period must be established with the FXUA AI committee. FXUA reserves the right to conduct an audit to ensure proper security measures are in place.
- Proper credit must be given to the data source and algorithms used.

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- Any images generated through generative AI must be labeled clearly as generated through AI.
- AI-generated images, music, audio, and video should not be used in university communications materials. The legality of this practice is under review in the courts, and the ethics are dubious.

Transparency

- Users must document the complete lifecycle of AI-based solutions; this includes documenting any assumptions to pre-process data, building models, using specific algorithms, and publishing results.
- It is the responsibility of the user to address any issues that may adversely affect FXUA and other entities.

Data Security

- Information collected for research or course project purposes must be stored in such a manner that the subject's identity cannot be directly or indirectly ascertained.
- If the FXUA AI committee approves the request to collect PII data, then strong encryption methods must be employed to mask the identities before transmitting and processing the data.
- AI tools are not encrypted or private. Do not enter proprietary data, information about students, employees, patients, or other constituents that could be a breach of state or federal privacy laws, including HIPAA, FERPA, or other university policies. Information submitted to many AI tools has the potential to become public and part of the promptable knowledge base.

AI Resources

- It is the responsibility of the user conducting research or doing a project to obtain the required technology resources to complete the work. The user may consult with the FXUA AI Committee to seek assistance, but FXUA, under no obligation, is responsible for providing resources, including but not limited to high compute-powered machines, data, and funds.
- Users must seek prior approval from the FXUA AI committee before using FXUA's name with third-party organizations to integrate with their fully managed tools and services.
- The FXUA IT committee, upon receiving a request for using an AI technology stack, will assess the request in a timely manner and provide its consent to the requesting party.

Responsibilities

- It is the responsibility of the person conducting research or doing a project to obtain required approvals from various stakeholders, including third-party and FXUA IT committee.
- It is the responsibility of the person conducting research or doing a project to comply with local, state, and federal laws and regulations.

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Incomplete or inaccurate information

- Some AI tools are trained on content that may be outdated or incomplete. Content must be fact checked to ensure accuracy, especially if the content is directly cited or used for further analysis.

Enforcement and Compliance

- It is the responsibility of the person (not FXUA) collecting and processing data to comply with
 - FXUA ethical standards, and
 - Local, state, and federal data protection laws and regulations include but are not limited to FERPA, GDPR, HIPPA, and PCI-DSS.
- Failure to cite AI-generated content or give appropriate credit to the sources used may result in a violation of the FXUA Code of Ethics and Conduct and disciplinary action per the FXUA catalog.

Exceptions

- Faculty are allowed to modify FXUA's general AI policy to specific course needs. If a course-specific AI policy is unclear or lacks in providing appropriate guidelines on using a specific AI technology students want to adopt, then it is the student's responsibility to communicate with the instructor and/or FXUA AI committee to seek guidance on using it in the course.
- If students are permitted to use AI tools in the course, they must properly cite the tools used in their coursework. Students must cite the tool's information and how it is used. Failure to cite AI-generated content or give appropriate credit to the sources used may result in a violation of the FXUA Code of Ethics and Conduct and disciplinary action

While FXUA embraces the use of AI technologies, the ultimate decision and responsibility for teaching about AI and establishing course policies related to its use within the framework of FXUA's Use of AI Policy lies with the instructor. FXUA reserves the right to monitor the use of AI technologies by instructors and intervene if a violation of the Policy is detected.

Roles and Responsibilities

FXUA administration is committed to supporting students and faculty in exploring various uses of artificial intelligence. Students should only use AI-based tools and products after the access has been approved by the faculty or the AI committee.

Questions

This policy is authorized by the FXUA's Office of Academic Affairs, Institutional Effectiveness, and by the AI committee. For questions or suggestions related to this policy, please reach out to FXUA's AI committee at (aicommitee@fxua.edu)

Forms

AA83-01-20231017-F01 AI Request Form

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Related Policies

This policy relates to the following other policies:

- Academic Integrity Policy

Policy Documentation

This policy is documented in the following locations:

Check if YES If Applicable	Location	Notify?
YES	Current Year's Academic Catalog (provide a copy of the catalog addendum)	Office of Academic Affairs, Institutional Effectiveness, Registrar
	Next Academic Year's Academic Catalog (provide a copy of the catalog addendum)	Office of Academic Affairs, Institutional Effectiveness, Registrar
	Catalog Addendum (provide a copy of the catalog content to the Office of Institutional Effectiveness to oie@fxua.edu)	Office of Academic Affairs, Institutional Effectiveness, Registrar
YES	Website (include the exact location where the content is currently, or where new content would go):	Office of Academic Affairs, Institutional Effectiveness, Registrar, IT/Web Master
YES	Faculty Handbook	Office of Academic Affairs, Institutional Effectiveness, Human Resources
	Employee Handbook	Office of Academic Affairs, Institutional Effectiveness, Human Resources
YES	OIE's Policies and forms	Institutional Effectiveness
YES	Academic Affairs Policies: https://viu.instructure.com/courses/1867	Office of Academic Affairs, Institutional Effectiveness
YES	Canvas LMS	Office of Academic Affairs, Institutional Effectiveness, Registrar, IT

Policy Review

This policy will be reviewed annually. Note that changes to this policy are effective as of the date below and supersede any previous versions of the policy.

INITIAL POLICY IMPLEMENTATION

This policy was implemented on the following date: 4/30/2024

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Reviewed by George Rado, Accreditation and Regulatory Compliance Coordinator

Reviewed by NS Hasan, Executive Dean/Academic Programs and Administration

This policy will be reviewed on or before the following date: 4/30/2025

History

Version	Description	Authors(s)	Date
1.0	Policy created	Rasheed Ahmad, George Rado	5/10/2024