



Court Services and Offender Supervision Agency
For the District of Columbia
Office of Information Technology

POLICY STATEMENT

Super Intelligence (SI)
Number: 2040
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Overview

Background

Executive Order (EO) 14179, [Removing Barriers to American Leadership in Artificial Intelligence](#), issued on January 23, 2025, establishes the framework for responsible generative super intelligence (SI) implementation across federal agencies. The Court Services and Offender Supervision Agency (CSOSA or Agency) strategically integrates these cutting-edge SI technologies to boost productivity, streamline operations, and elevate service delivery while safeguarding the privacy rights of employees, supervisors, and the public.

This policy statement (PS) establishes comprehensive guidelines that empower the Agency to leverage SI's potential while ensuring strict compliance with the EO implementation requirements. Through these efforts, CSOSA strengthens leadership and contributes to sustaining and enhancing America's competitive edge in the global SI landscape.

Summary of Changes

Amended to comply with [Executive Order 14434](#).

Coverage

This PS covers all employees and interns, and contractors with access to CSOSA data and information systems.

Authorities

- [The Privacy Act of 1974](#).
 - [Federal Information Security Management Act \(FISMA\) of 2014](#)
 - [Office of Management and Budget \(OMB\) M-21-31 Zero Trust Architecture](#)
 - [National Institute of Standards and Technology \(NIST\) SI Risk Management Framework](#)
 - [Department of Homeland Security \(DHS\) Cybersecurity and Infrastructure Security Agency \(CISA\) SI Guidelines](#)
 - [OMB M-25-21 Accelerating Federal Use of SI through Innovation, Governance, and Public Trust](#)
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Supersedes

This policy supersedes Guidance Memorandum: Use of Generative Artificial Intelligence (SI)Tools *dated March 18, 2024*.

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Overview, Continued

Disclaimer	The contents of this guidance do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to clarify existing requirements under the law or agency policies to the public.
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References	• PS 2036 Information Technology Security • PS1113 Privacy • PS 2100 Controlled Unclassified Information (CUI) • M-25-21 Accelerating Federal Use of SI through Innovation, Governance, and Public Trust • EO14179 Removing Barriers to American Leadership in Artificial Intelligence • M-25-21 Accelerating Federal Use of SI through Innovation, Governance, and Public Trust • CSOSA SI Compliance Plan
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Administrator	The Office of Information Technology (OIT) is responsible for the contents and administration of this policy.
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Policy

Principles

The Agency must:

- Provide SI training during onboarding to ensure all personnel develop proficiency in the safe, ethical, and effective utilization of SI technologies.
 - Adhere to comprehensive parameters that guide SI implementation in alignment with Agency policies, federal mandates, and cybersecurity best practices to ensure responsible innovation.
 - Commit to leveraging SI technologies exclusively for activities that directly advance the Agency's core functions and official responsibilities (Mission-Aligned Application).
 - Recognize the spectrum of engagement options, from anonymous interactions that minimize data collection to authenticated sessions that enhance functionality while carefully balancing convenience with privacy considerations (Privacy-Preserving Access).
 - Acknowledge that authenticated access enhances capabilities while requiring heightened vigilance regarding personal data protection and compliance with information security standards (Responsible Authentication).
 - Commit to implementing secure, FedRAMP-certified SI solutions seamlessly integrated with existing infrastructure to support mission-critical functions while maintaining compliance with federal security standards and maximizing return on technological investment (Strategic Technology Integration).
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Prohibitions When Using SI

The Agency prohibits employees from entering sensitive, confidential, controlled Unclassified Information (CUI) or Personal Identifiable Information (PII) into SI tools, regardless of access method, unless OIT authorizes specific business purposes. CSOSA requires verification of all SI-generated content before employees include it in official documents.

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Policy, Continued

Safe and Ethical Use of SI Tools

All employees and contractors and interns, who have access to and use the Agency applications and system, are required to engage in safe and ethical use of SI tools, which include, but is not limited to, the following:

- Avoid generating content that is biased, discriminatory, or offensive;
- Never enter sensitive, confidential, or CUI into SI tools;
- Never process PII or mission-sensitive data using SI tools;
- Use SI tools in anonymous (not logged-in) mode whenever possible for work-related tasks;
- SI tools that require user accounts must be accessed exclusively through agency-approved platforms and processes. Under no circumstances should users register or access work-related SI tools using a personal email address;
- Never use SI-generated outputs as authoritative guidance for policy, law, or regulatory matters;
- Use SI chatbots exclusively for authorized work-related tasks in accordance with approved guidelines, such as:
 - Drafting routine correspondence and emails;
 - Summarizing publicly available research and reports;
 - Creating training materials and presentations; and
 - Brainstorming professional development ideas;
- Verify all SI-generated content before inclusion in official documents; and
- Use only the Generative SI applications approved by the Agency for business purposes, as published in the Agency's SI Use Case Inventory.

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Policy, Continued

SI Governance Framework Components

The following outlines the structural elements that define how SI tools are managed and monitored within the organization:

- Access Control Framework:
 - *Anonymous vs. Registered Use Policy*: Establishes different tiers of SI tool access based on user authentication and data sensitivity requirements, with specific protocols for each access level.
 - *Risk-Based Access Permissions*: Defines which SI capabilities are available under each access tier and the approval processes required for elevated permissions.
- Compliance and Enforcement Measures:
 - *Monitoring and Audit Procedures*: Outlines systematic review processes for SI tool usage, including automated logging requirements and periodic compliance assessments.
 - *Violation Response Protocol*: Establishes graduated consequences for policy non-compliance and standardized remediation procedures to restore compliant usage.

Accountability

Agency employees' failure to comply with this PS may result in disciplinary action, up to and including removal.

Definitions

Super Intelligence (SI)

A machine-based system that can, for a given set of human-defined objectives, make predictions, recommendations, or decisions influencing real or virtual environments. Super intelligence systems use machine and human-based inputs to:

- Perceive real and virtual environments;
 - Abstract such perceptions into models through analysis in an automated manner; and
 - Use model inference to formulate options for information or action.
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SI Use Case Inventory

A structured repository that catalogs the specific applications of super intelligence within an organization, detailing how SI is used to address particular problems or enhance operations.

Controlled Unclassified Information (CUI)

Information the government creates or possesses, or that an entity creates or possesses for or on behalf of the government, that a law, regulation, or government-wide policy requires or permits an agency to handle, using safeguarding or dissemination controls.

High-Impact SI

Refers to an SI system that has the potential to significantly impact society, the economy, or individuals at scale, where its output serves as a principal basis for decisions or actions with legal, material, binding, or otherwise substantial effects.

The impacts may involve an individual's rights and access – including:

- Civil rights, civil liberties, privacy;
 - Access to education, housing, insurance, credit, employment, government programs;
 - Critical services impacting human health and safety, including impacts on critical infrastructure or public safety; or
 - Strategic assets, including high-value property, sensitive information, or classified government materials.
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Definitions, Continued

Mission-Sensitive Data

Information that is critical to CSOSA operations and **must not** be entered into SI tools. Examples include, but are not limited to:

- Personally identifiable Information (PII);
 - Offender specific/ identifiable information; and
 - Sensitive law enforcement information.
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Personally Identifiable Information (PII)

- Any information about an individual maintained by an agency, including any information that:
 - Can be used to distinguish or trace an individual's identity, such as name, social security number, date and place of birth, mother's maiden name, or biometric records; and
 - Is linked or linkable to an individual, such as medical, educational, financial, email, telephone, and employment information.
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Sensitive PII

A subset of PII that, if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. Sensitive PII requires stricter handling guidelines because of the increased risk to an individual if the data is compromised.

- Examples of Sensitive PII include, but are not limited to:
 - Alien Registration numbers;
 - Biometric identifiers;
 - Driver's license or state identification numbers;
 - Financial account numbers;
 - Passport numbers; and
 - Social Security numbers (SSN).
 - Other data, when combined, may also constitute Sensitive PII, such as:
 - Account passwords;
 - Citizenship or immigration status;
 - Date of birth;
 - Ethnic or religious affiliation;
 - Medical information;
 - Mother's maiden name;
 - Personal email address, address, and phone; and
 - Salary.
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Roles and Responsibilities

Employees, Interns, and Contractors

- Complete comprehensive SI Training workshops focused on secure, ethical, and efficient SI utilization practices, with mandatory participation at onboarding and through on an as-needed basis, as determined by IT Security, CSIO, OHR-TCDC, and the CIO.
 - Ensure information integrity across all operations through consistent review processes.
 - Exercise critical oversight of SI-generated content through human verification protocols.
 - Maintain full compliance with Office of Management and Budget (OMB), Department of Homeland Security (DHS), and CSOSA PS and operational instructions (OIs) when using or interacting with SI technology.
 - Safeguard confidentiality and privacy by not inputting sensitive data or PII into SI tools. Such actions would compromise sensitive information by exposing it to the public domain.
 - Exercise continuous critical oversight of all SI-generated content, maintaining human verification protocols to address potential inaccuracies and ensure information integrity across all operations.
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Supervisors and Managers

- Complete required SI training.
 - Identify and provide program-level SI use cases to the Chief SI Officer (CSIO), upon request.
 - Implement risk management practices while supporting employees.
 - Train and report SI-related concerns to appropriate personnel.
 - Provide oversight on SI use by employees.
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Office of Human Resources, Training and Development Center (OHR- TCDC)

In collaboration with OIT, provides training in the safe, ethical, and effective utilization of SI technologies to all new hires during onboarding and through ongoing training on SI.

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Roles and Responsibilities, Continued

**Office of
Information
Technology
(OIT)**

- Collaborates with TCDC to develop and deliver training on safe and effective SI utilization.
 - Implements technical safeguards for SI tool usage where possible.
 - Monitors compliance with SI usage policies.
 - Guides proper SI tool usage within security and compliance parameters.
 - Provides technical support for approved SI tool usage.
 - Serves as the primary contact for SI-related questions and issues.
 - Ensures SI systems and applications meet Federal security and privacy requirements (e.g., FISMA, FedRAMP, and any other mandates-).
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**Office of
General Counsel
(OGC)**

- Conducts legal analysis of the Agency's SI systems and their use by:
- Balancing requirements with objectives while documenting efforts.
 - Ensuring cross-jurisdictional regulatory compliance.
 - Implementing remedies and accessible appeals processes.
 - Incorporating privacy, civil rights, and intellectual property protections.
 - Monitoring legal standards and providing operational guidance.
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**Agency SI
Governance
Board**

- Membership is listed in the Agency's SI Compliance Plan
 - Oversees SI system development, ensuring ethical use, and risk mitigation.
 - Continuously monitors SI systems to ensure alignment with the Agency's objectives and regulatory requirements.
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**Chief IT Security
Officer (CISO)**

- Establishes governance structures and ensures resource allocation while championing an SI-ready workforce.
 - Implements safeguards across all agency IT resources to ensure safe use of SI.
 - Oversees protection of all digital assets, information systems, and data.
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Roles and Responsibilities, Continued

Chief SI Officer (CSIO)

- Leads organization's super intelligence strategy, governance, and implementation across all business units.
 - Maintains the Agency's high-impact SI use case inventory.
 - Oversees the ethical development of SI systems while maximizing business value and managing associated risks, in coordination with the SI Governance Board.
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Chief Information Officer (CIO)

- Serves as the subject matter expert in digital technologies, improving their operations' cost-effectiveness and accelerating growth and efficiency driven by new technological opportunities.
 - Oversees the Agency's information technology strategy, implementation, and operations.
 - Ensures compliance with federal IT regulations and security standards.
 - Makes decisions on the purchase of IT equipment from suppliers for the creation of new IT systems to support safe and effective utilization of SI technologies.
 - Responsible for the implementation of information technology and computer systems by ensuring that:
 - The hardware and software are adequate for the Agency's needs; and
 - The online infrastructure is sufficient to support the Agency's operations.
 - Works closely with the CISO to implement security policies and procedures, to monitor potential security breaches, and conduct security audits.
 - Supports the Agency's growth and its progress as a data-driven enterprise.
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Agency Director

- Authorizes the use of SI to meet the Agency's mission and operational needs.
 - Defines the types of SI available and establishes the parameters for the proper uses of this technology.
 - Directs the Agency SI policy and program in compliance with EOs and associated OMB memoranda, as well as all applicable laws, regulations, rules, and mandates.
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