

## GENERATIVE ARTIFICIAL INTELLIGENCE POLICY DEVELOPMENT CHECKLIST FOR CHURCHES

*Developed by Heather E. Kimmel, General Counsel for the United Church of Christ, for the Insurance Board  
Webinar: Generative Artificial Intelligence for Churches, June 28, 2024*

**Share this checklist by directing interested individuals to register for the recording of the webinar at [insuranceboard.org](https://insuranceboard.org), where they will be able to download the materials.**

- Review theological beliefs, statements of faith, resolutions, and other statements of witness to determine policy direction and purpose statement. Possible directions may be to prohibit the use of genAI models and genAI-enabled applications (collectively “genAI tools”) by church employees; to proceed cautiously, bounded by strict guidelines set forth in the policy; or to encourage the use of genAI tools in accordance with the policy. *(Note: A policy is recommended even if the church chooses to prohibit use, as employees may already be using genAI tools in their work.)*
- Determine whether state or local laws limiting the use of genAI tools apply to the church. Ensure resulting policy complies with these laws. *(See [National Conference of State Legislatures website on Artificial Intelligence 2024 Legislation](#))*
- Survey employees for current use, familiarity with, concerns about, and interest in genAI tools.
- Develop a review and approval process for the implementation of genAI tools that includes reviewing the data security of the tool. *(Note: This should include, at a minimum, reviewing the terms of service and privacy policy for each tool.)*
- Based on survey results, and using the review process developed above, review genAI tools already in use to assess current risk.
- Prohibit or limit the use of genAI tools that use the church’s data to train the model or that do not provide adequate security safeguards. *(Note: consider whether vendors/independent contractors are subject to these policy provisions or need separate provisions in their contracts to protect church data.)*
- Separately prohibit employees from uploading sensitive data, such as member, donor, and outreach ministry user data, into any genAI tool that has not been approved.
- Prohibit employees from using any genAI tool that has not been approved to create content, works, or materials for the church, including text, music, and imagery.
- Make employees aware of the challenges of registering materials created using genAI with the U.S. Copyright Office, and require employees to give careful consideration/obtain further approval for using genAI tools when creating materials the church plans to register. *(See [Copyright Registration Guidance: Works Containing Material Generated by Artificial Intelligence](#))*
- Require careful human review and ultimate human responsibility for output accuracy, copyright infringement/plagiarism, and compliance with the church’s policies on bias/discrimination and any applicable laws.
- Determine whether employees are required to disclose the use of AI. If the employee is required to disclose the use, is the disclosure internal to church operations only, or external to members and the wider church community?
- Provide prompt engineering training to increase the quality of output.
- Train employees on the policy.
- Update the policy regularly as case and statutory law and regulations develop.