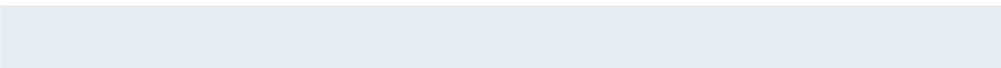# AI Policy at GW

Comparative Analysis and Actionable Takeaways (Draft for Comment)

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January 19, 2026

Contents

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Executive Summary–Actionable Takeaways For GWSB

- GW policies provide a solid base on which GWSB will build.
- GW guidance on approved tools, data, and classroom use should be socialized, e.g.,
  - AI Tools and Services (Approved Tools List).
  - Data Classification Guidelines.
  - Generative Artificial Intelligence (GW Libraries)
- GW and external resources provide models for forthcoming GWSB principles, policies, syllabus statements, or toolkits.
- GWSB-specific policies may need to fill in gaps related to approved tools, policy adherence and enforcement (e.g., AI-specific oversight, honor codes), responsible AI and AI safety, and clarify guidance for researchers.

Summary of GW AI and IT Policies

- AI and IT policies:
  - GW IT policies address best practices, approved tools, security, and data classification.
  - Libraries and Academic Innovation guidance provides resources for teaching, including checklists and tools.
  - Office of Ethics, Compliance, and Risk policies address data privacy, digital identity, and overall responsible technology use.
  - Office of the Provost provides guidelines for academic work.
  - The Privacy Office provides in-depth policies and guidance for privacy.
  - See Slide 10 for links to GW policies.
- Policy alignment and coverage is laudable.
  - Some details are becoming dated, e.g., many documents reference unapproved ChatGPT.
  - See Section 4 for more details on potential gaps and points of interest.
- See **interactive NotebookLM tool** for AI-guided GW policy Q&A. (Faculty and staff, click hyperlinked "tool" to request access.)

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Summary of GW AI and IT Policies–Word Cloud

Figure 1: Top keywords across GW AI and IT policies.

Summary of Considered External Policies

- Judgment-based sample of 12 large, prominent, private and public universities, e.g., Ivy Leagues and UC schools.

- Includes business schools, e.g., Columbia, Harvard, Stanford.

- Includes AI policies, AI resources, legal alerts, research guidance, staff guidance, and teaching guidance.

- See Slide 11 for a complete listing of considered external policies.

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Summary of Considered External AI Policies–Word Cloud

Figure 2: Top keywords across external AI policies.

Summary of Potential Gaps

- Relative to external resources, GW could likely bolster AI policies related to:
  - AI governance processes and procedures.
    - E.g., specific mechanisms for AI policy adherence and enforcement, specific roles for senior leadership, updates to code of integrity.
  - GW-approved tools do not yet include AI APIs or agentic tools.
  - Responsible AI and AI safety.
    - E.g., Specific guidance on high-risk use/misuse (nondiscrimination testing of hiring tools/malicious generation of non-consensual intimate imagery (NCII) with AI tools).
  - Clearer guidance on AI use in research and knowledge generation.
    - See, e.g., USC's Using Generative AI in Research or Columbia's Generative AI Policy (contains 33 mentions of "research").

- Many GW policies and guides reference unapproved tools, e.g., ChatGPT and Claude–example syllabus statements from the Provost may need to be updated.

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Summary of Points of Interest

- AI principles: UC (System)

- AI policies: Columbia (solid focus on research), Columbia Business, Notre Dame (student honor code example), UC Berkeley

- Syllabus statements: Georgetown, GW, Stanford Business, University of Washington

- Toolkits: Classroom Expectations Worksheet (GW Libraries), Can I Use AI? (Prof. Ryan Watkins, GW), Georgetown Center for New Designs in Learning and Scholarship (CNDLS), MIT Teaching + Learning Lab, Student Checklist (GW Libraries)

- Topic model outliers:
  - UC Berkeley AI Risk Subcommittee: Enterprise risk/governance vs. teaching/student guidance; potential model for an AI-specific governance mechanism.
  - Georgetown CNDLS: Holistic, full-featured AI teaching toolkit.

- Track GW AI tool evaluation status.

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Appendix A: GW Policy References

Information Technology
- Data Classification Guidelines
- Data Protection Guidelines
- Generative Artificial Intelligence
  - AI Guidance and Best Practices
  - AI Tools and Services (Approved Tools List)
  - AI Evaluation and Status

Libraries and Academic Innovation
- Generative Artificial Intelligence (GenAI)
- Communicating GenAI Expectations to Students (May 2025)
- Deciding on Appropriate Use of GenAI in Classes (May 2025)
- Teaching with Generative AI

Office of Ethics, Compliance, and Risk
- Acceptable Use of IT Resources Policy (Sept. 2023)
- Cybersecurity Risk Policy (Oct. 2023)
- Identity and Access Management (IAM) Policy (Oct. 2023)

Office of the Provost
- Guidelines for Using GenAI in Academic Work (Apr. 2023)
  - GenAI Guidelines (PDF) (Apr. 2023)
  - Additional GenAI Guidance (PDF) (Aug. 2023)

Privacy Office
- Privacy Guidance for Use of AI
- Privacy Considerations for Virtual Platforms

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Appendix B: External Policy References

Columbia University
- Columbia Business School, Generative AI Policy
- Considerations for AI Tools in the Classroom
- Generative AI Policy

Georgetown University
- Artificial Intelligence and Homework Support Policies
- Artificial Intelligence (Generative) Resources
- Artificial Intelligence (AI) Toolkit (CNDLS)

Harvard University
- Harvard Business School (HBS): Using ChatGPT and AI Tools
- Harvard Graduate School of Education (HGSE) AI Policy
- Guidelines for Using ChatGPT and Other Generative AI Tools

MIT
- Guidance for Use of Generative AI Tools
- Generative AI and Your Course

Stanford University
- Stanford Graduate School of Business (GSB): Course Policies on Generative AI Use
- Artificial Intelligence Teaching Guide
- Creating Your Course Policy on AI
- Generative AI Policy Guidance
- Responsible AI at Stanford

University of California (System)
- AI Governance and Transparency
- Applicable Law and UC Policy
- Legal Alert: Artificial Intelligence Tools

UC Berkeley
- AI at UC Berkeley

UC Irvine
- Generative AI for Teaching and Learning

Appendix B: External Policy References (cont.)

UCLA
- Artificial Intelligence (AI)
- Teaching Guidance for ChatGPT and Related AI Developments

University of Notre Dame
- AI Recommendations for Instructors
- AI@ND Policies and Guidelines
- Generative AI Policy for Students

USC
- Using Generative AI in Research

University of Washington
- AI+Teaching
- Sample AI Syllabus Statements

Yale University
- AI at Yale
- AI Guidelines
- AI Guidelines for Staff
- Guidelines for the Use of Generative AI Tools

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Appendix C: Methodological References

This analysis combines qualitative review with topic modeling to surface structural similarities and gaps. Methodological references include:

Lee, Daniel D., and H. Sebastian Seung. 1999. "Learning the Parts of Objects by Non-negative Matrix Factorization." *Nature* 401 (6755): 788–791. https://www.nature.com/articles/44565.

Lewis, Patrick, Ethan Perez, Aleksandra Piktus, et al. 2020. "Retrieval-augmented Generation for Knowledge-intensive NLP Tasks." In *Advances in Neural Information Processing Systems,* 33:9459–9474. https://proceedings.neurips.cc/paper_files/paper/2020/file/6b493230205f780e1bc26945df7481e5-Paper.pdf.

OpenAI. 2022. "New and Improved Embedding Model." Blog post. https://openai.com/blog/new-and-improved-embedding-model.

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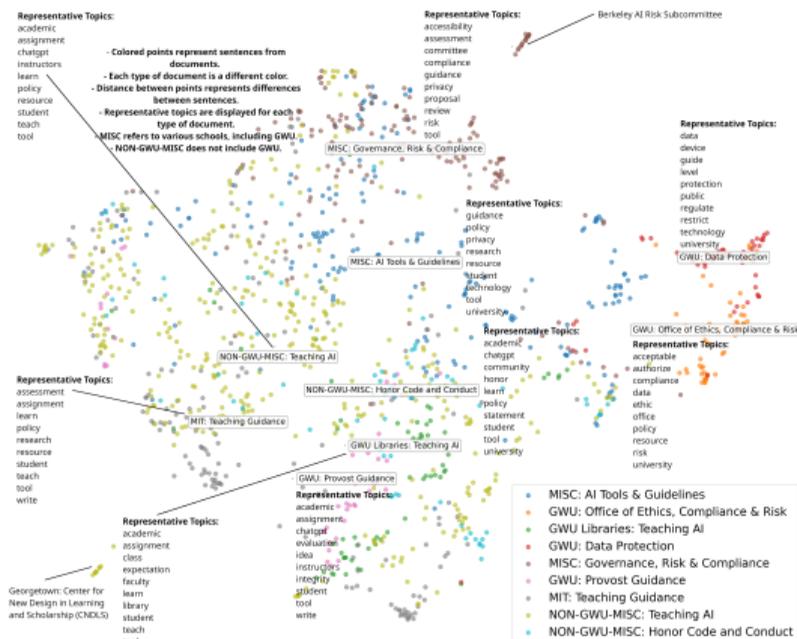Appendix D: Summary of GW AI and IT Policies–Visual Map of GW Policies
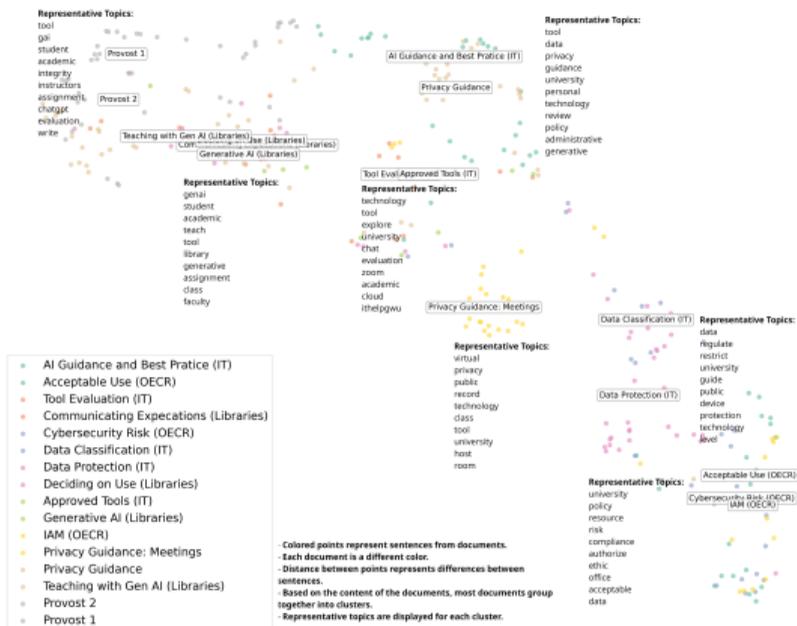
Figure 3: Document clusters and their representative topics for GW AI and IT policies. Large image available upon request.

Appendix D: Summary of GW AI and IT Policies–Visual Map Takeaways

- **Teaching and Student Use (Provost + Libraries):** On the left, Provost and Libraries guidance form a large cluster focused on assignments, tools, integrity, expectations, and instructor–student communication. (Labels: `Provost 1` and `Provost 2`; `Teaching with Gen AI (Libraries)`, `Communicating Expectations (Libraries)`, `Generative AI (Libraries)`, and `Deciding on Use (Libraries)`.)
- **Library AI Toolkit:** Within that region, the Libraries' AI pages cluster tightly together, providing toolkits that link AI to classes, assignments, faculty support, and concrete teaching strategies. (Labels: `Teaching with Gen AI (Libraries)`, `Communicating Expectations (Libraries)`, `Generative AI (Libraries)`, and `Deciding on Use (Libraries)`.)
- **IT AI Guidance, Privacy, and Meetings:** In the upper–central area, AI Guidance and Best Practice and the general Privacy Guidance documents connect AI use to data handling and personal-information protection, while a nearby Meetings cluster concentrates on virtual-meeting platforms. (Labels: `AI Guidance and Best Practice (IT)`, `Privacy Guidance:  Meetings`, and `Privacy Guidance`.)
- **Tool Evaluation and Approved Tools:** Lower down, Tool Evaluation and Approved Tools form an operational cluster about evaluating, approving, and supporting specific tools (e.g., Zoom, chatbots) for academic use. (Labels: `Tool Evaluation (IT)` and `Approved Tools (IT)`.)
- **Baseline IT Risk and Data Governance:** On nearer right, Data Classification and Data Protection policies transition into Acceptable Use, Cybersecurity Risk, and IAM policies on the far right (Office of Ethics, Compliance, and Risk (OECR)), representing GW's underlying data-governance and risk/compliance policies that AI-specific guidance builds upon. (Labels: `Data Classification (IT)` and `Data Protection (IT)`; `Acceptable Use (OECR)`, `Cybersecurity Risk (OECR)`, and `IAM (OECR)`.)

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Appendix D: Summary of Considered External AI Policies–Visual Map of Policies

Figure 4: Document clusters and their representative topics for external AI policies. Large image available upon request.

Appendix D: Summary of Considered External AI Policies–Visual Map Takeaways

- **Governance Mechanisms:** On the upper and right sides of the map, Berkeley's AI Risk Subcommittee and related compliance, cybersecurity, and data-protection documents–including some comparable GW risk/compliance policies–form a governance cluster that represents the most formal and centralized oversight of AI use. (Labels: `MISC: Governance, Risk, & Compliance`, `GWU Data Protection`, `GWU Office of Ethics, Compliance, & Risk`.)

- **AI Tools and Guidance:** AI guidance that focuses on tooling, and includes GW IT guidance, abuts the data protection and governance clusters in a central blob of documents. (Label: `MISC: AI Tools & Guidance`.)

- **Honor/Integrity Codes:** An honor code/conduct cluster captures many schools' student-facing AI rules, while GW's provost and library guidance sits nearby but separate, emphasizing teaching, evaluation, and support rather than misconduct and sanctions. (Labels: `NON-GWU-MISC: Honor Code and Conduct`, `GWU: Provost Guidance`.)

- **Teaching Guidance:** A left-side blob mixes less-actionable teaching and classroom guidance. (Label: `NON-GWU-MISC: Teaching AI`.)

- **Actionable Teaching Tools and Support:** At the teaching-oriented lower side, MIT, Georgetown CNDLS, and GW Libraries cluster around concrete assignments, assessment, and tools, with some overlap with GW Provost documents and CNDLS standing out as the most holistic toolkit. (Labels: `GWU Libraries: Teaching AI`, `GWU: Provost Guidance`, `MIT: Teaching Guidance`.)

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Appendix E: Abbreviations

Abbreviation	Definition
AI	Artificial Intelligence
API	Application Programming Interface
GenAI/Gen AI	Generative Artificial Intelligence
GW/GWU	George Washington University
GWSB	GW School of Business
IT	Information Technology
UC	University of California
UCLA	University of California, Los Angeles
USC	University of Southern California
MIT	Massachusetts Institute of Technology
HBS	Harvard Business School
HGSE	Harvard Graduate School of Education
GSB	Graduate School of Business (Stanford University)
CNDLS	Center for New Designs in Learning and Scholarship (Georgetown University)
IAM	Identity and Access Management
OECR	Office of Ethics, Compliance, and Risk
NCII	Non-consensual Intimate Imagery

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