



AI and Fair Housing Enforcement

“Don’t Bring a Knife to a Gun Fight”

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AI and our Fair Housing Futures

- The Externalities Are Real
 - Data Centers
 - Labor Market
- The Necessity to Use AI Tools in FH Enforcement is Just as Real
 - Doing More With Less
 - Big Tools for Big Problems

How an AI Toolbox Fits into Your FH Processes

- **Complaint Intake**

- Information collection and verification

- **Jurisdiction**

- Analysis and confirmation

- **Respondents**

- Identification and information collection

- **Investigation**

- Investigation Planning
 - Witnesses: Who's relevant, contact, interview outlines, and preservation
 - Document: What's relevant, collection, and preservation

How an AI Toolbox Fits into Your FH Processes

- **Final Investigation Report**
 - Completeness
 - Gap Analysis
- **Cause Determination**
 - Confirmation of applicable Law, Theory, Prima Facia Case
 - Application and analysis of reasonable cause determination criteria
- **Referral**
 - Case File Review for Completeness
- **Reporting**
 - HEMS

Adding FH AI Toolbox: Key Considerations

- **Beware of Off-The-Shelf Solutions**
 - Powerful tools that aren't aligned with FH Investigation or your Agency's mandates
 - Interfaces: Perplexity, CoPilot, Google's AI Mode
 - Direct Queries to LLMs: OpenAI (ChatGPT), Anthropic (Claude), Grok, DeepSeek
- **Key Considerations: What Experience Teaches**

Adding FH AI Toolbox: Key Considerations

- **Data Security**

- AWS S3: Storing Case Information Secure System
- Sandbox your AI Toolbox: Agency-only system unless authorized human override

- **Staff Tool Access**

- Secured web portal
- Staff login assignment

- **Alignment**

- Your Agency's records retention policies
- Your Agency's templates and forms
- Your Agency's procedural regulations

Adding an AI Toolbox: Key Considerations

- **Your Knowledge Base**

- HUD's Title VIII Handbook
- IAHOHRA's Certified Fair Housing Investigator Program (NFHTA)
- Your Agency's substantive FH statutes and regulations

- **Picking your LLM Provider + Subscription**

- Provider: Open AI (ChatGPT) = Anthropic (Claude)
- Subscription
 - *Start by testing:* Individual Max Subscription*
 - *Then deployment:* Enterprise Subscription*
 - *No data retention by provider for AI training
 - Cost containment: Setting token caps for budgeting

Adding an AI Toolbox: Key Considerations

- Capacity to Train for:

- Draft Document Generation for Human Review, Revisions, and Approval
- Document Review for Completeness: Gap Analysis
- Claims and Defenses Analysis
- Investigation Planning
- Criteria Application
- File Review for Completeness
- HEMS Reporting
- Privilege - Identification and Segregation
 - Deliberative
 - Conciliation

Adding an AI Toolbox: Key Considerations

- ***HITL: Human In The Loop***

- All AI Toolbox outputs are deliberative materials: Drafts for human review, revision, and approval.

- Firewalling

- No distribution outside agency of any information that used AI Toolbox output
- ***Unless and Until a Human:***
 - Reviews and approves the output; AND
 - Authorizes distribution/transmission
 - Who has duty? Who has authority?

Adding an AI Toolbox: We're Here To Help

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