

AI Request and Impact Assessment Form

Complete for any application of artificial intelligence (“AI”) involving:

- Repetitive and ongoing business analysis or operations;
- Content published for [customers, consumers, patients, providers,] or the public;
- Content created for the board or executives;
- Significant coding for software applications [e.g., if more than xx lines of code];
- Design, modification, or deployment of a significant business process;
- Any project involving the input, use, or processing of Confidential or Personal Information, including:
 - Company information, such as trade secrets and other IP, financial information, contracts, and technical system data;
 - Employee data, such as employee demographic data, individual passwords, evaluations, or compensation; and
 - Other information that employees do not have express permission to share;
- Legally significant decisions affecting access to, provision of, or denial of:
 - Employment
 - Credit, lending, or financial products
 - Insurance
 - Education
 - Healthcare
 - Housing
 - Criminal justice, or
 - Basic necessities, such as food and water; and
- Automated processing without human supervision, review, and/or intervention.

Submit to

when complete.

Project Name:	Submitted by:
	Name:
	Title/Role:
	Department:
	Email:
	Date Submitted:

General Purpose

1. What is the business purpose of this project? (Check all that apply.)

- | | |
|---|---|
| <input type="checkbox"/> General research and summaries | <input type="checkbox"/> Customer service |
| <input type="checkbox"/> Draft internal business documents | <input type="checkbox"/> Legal analysis, drafts, or summaries |
| <input type="checkbox"/> Draft content for external publication | <input type="checkbox"/> Software coding |
| <input type="checkbox"/> Speed up or improve internal operations | <input type="checkbox"/> Data analysis |
| <input type="checkbox"/> Employment screening, monitoring, performance analysis or other human resource | <input type="checkbox"/> Other (please describe): |

2. What benefits will this project provide (e.g., how will this project improve current operations)?

AI Platform or Tool

3. What type of output will you produce using AI? (Check all that apply.)

- | | |
|--|--|
| <input type="checkbox"/> Text | <input type="checkbox"/> Risk score |
| <input type="checkbox"/> Graphics or video | <input type="checkbox"/> Automatic selection or result |
| <input type="checkbox"/> Software code | <input type="checkbox"/> Other (please describe): |
| <input type="checkbox"/> Recommendation or ranking | |

4. What AI platform or tool will be used for this project?

a. Publicly available tool:

Text:	Graphics:	Code:
<input type="checkbox"/> OpenAI – ChatGPT	<input type="checkbox"/> OpenAI – DALL-E 3	<input type="checkbox"/> OpenAI – Codex
<input type="checkbox"/> Bing Chat	<input type="checkbox"/> Adobe – Firefly	<input type="checkbox"/> GitHub – CoPilot
<input type="checkbox"/> DeepL Translator	<input type="checkbox"/> Midjourney	<input type="checkbox"/> Amazon – CodeWhisperer
<input type="checkbox"/> Other (please describe):	<input type="checkbox"/> Other (please describe):	<input type="checkbox"/> Other (please describe):

b. Alternative free or commercial tool:

Application name:
Provider name:
Cost:
Contract (please provide a copy or link to terms):
Already company-approved?

Documentation and Validation

5. What is the source of the data used to train the AI tool for this project? (Check all that apply).

- Scraped internet data and other public sources. (Please provide link or excerpt from provider.)
- Content licensed by the AI provider. (Please provide link or excerpt from provider.)
- Content licensed by _____ . (Please explain below.)
- Our organization's own internal data. (Please explain below.)
- Unknown.

Provide vendor claims, contract terms, or description of source data.

6. What documentation has been provided by the AI provider? (Check all that apply.)

- A "model card," "data card," or "data sheet"
- Explanation of AI tool and its purpose
- Access to, description of, learning set used to train the AI model
- Explanation of testing and validation
- Explanation of data ownership and usage rights
- Explanation of pricing and contract terms

Please attach or provide links to relevant contract terms, product description, and documentation.

7. How will AI output be tested for validity and accuracy in this project? (Check all that apply.)

- Accuracy validated for similar purpose by AI vendor. (Please explain below.)
- Program team will review results for accuracy and validity. (Please explain below.)
- Unknown.

Provide vendor claims, contract terms, or explanation of initial and ongoing validation:

8. How will project/AI output be tested for lack of bias or discrimination? (Check all that apply.)

- N/A - Project will not impact individuals and does not rely on personal information.
- Bias already tested by AI vendor. (Please explain below.)
- Program team will test or review results for lack of bias. (Please explain below.)
- Unknown.

Provide vendor claims, contract terms, or explanation of initial and ongoing bias testing:

Data Ownership and Usage Rights, and Retention

9. Will the AI provider have the right to own, retain, or use our data inputs to train or improve its model?

- Yes
 No

If yes, please describe the data ownership and usage rights.

10. Will the provider have any right to own, retain, or use the output or results from this AI project?

- Yes
 No

If yes, please describe the data ownership and usage rights.

11. Where will training data, data inputs, and results for this project be stored (e.g., vendor name or internal system)?

12. How long will results for this project be retained?

Confidential or Personal Information

13. How much confidential business information or personal data will you collect, analyze, or process for this project?

Estimated number of records to process:

14. What types of confidential business information or personal data will you collect, analyze, or process for this project?

- Confidential business data

Please describe:

- Personal data (Check all types that apply.)

Generally regarding:

- | | | |
|-------------------------------------|---|--|
| <input type="checkbox"/> Applicants | <input type="checkbox"/> Patients | <input type="checkbox"/> Vendors |
| <input type="checkbox"/> Employees | <input type="checkbox"/> Business customers | <input type="checkbox"/> Others (list) |
| <input type="checkbox"/> Consumer | <input type="checkbox"/> Site visitors | |

Specific data types:

Basic Demographic Information	Government-Issued IDs or Documents
<ul style="list-style-type: none"> <input type="checkbox"/> First name or initial <input type="checkbox"/> Last name <input type="checkbox"/> Gender <input type="checkbox"/> Age <input type="checkbox"/> Street address <input type="checkbox"/> Email address <input type="checkbox"/> Phone number <input type="checkbox"/> Place of birth <input type="checkbox"/> Date of birth <input type="checkbox"/> Maiden name or mother's maiden name 	<ul style="list-style-type: none"> <input type="checkbox"/> Social Security number (SSN) <input type="checkbox"/> Individual tax ID number <input type="checkbox"/> State driver's license or ID card <input type="checkbox"/> Passport or visa <input type="checkbox"/> Military ID <input type="checkbox"/> Tribal ID <input type="checkbox"/> Birth certificate <input type="checkbox"/> Marriage certificate
Account Information	Health or Biometric Information
<ul style="list-style-type: none"> <input type="checkbox"/> Credit or debit card number <input type="checkbox"/> Bank account number <input type="checkbox"/> Other financial account number <input type="checkbox"/> Any code allowing use of financial account (e.g., expiration date, password, security Q/A) <input type="checkbox"/> Other financial information <input type="checkbox"/> Username/password for any online account (e.g., email account or member login) 	<ul style="list-style-type: none"> <input type="checkbox"/> Health or medical information (e.g., diagnosis, treatment, insurance or billing data) <input type="checkbox"/> Provider name <input type="checkbox"/> Individual health insurance number <input type="checkbox"/> Claims history <input type="checkbox"/> DNA or other genetic data <input type="checkbox"/> Fingerprint data <input type="checkbox"/> Facial recognition data <input type="checkbox"/> Retinal or eye scan <input type="checkbox"/> Voice print
Communications	Real-World Presence
<ul style="list-style-type: none"> <input type="checkbox"/> Content of email messages <input type="checkbox"/> Voice communications or recordings <input type="checkbox"/> Text messages <input type="checkbox"/> Chatbot interactions <input type="checkbox"/> Social media posts <input type="checkbox"/> Product or service reviews 	<ul style="list-style-type: none"> <input type="checkbox"/> Brick-and-mortar store purchases <input type="checkbox"/> Real estate, property, or business records <input type="checkbox"/> Personal physical traits (e.g., height, weight, eye color) <input type="checkbox"/> Photos of individuals
Online Activity	Education or Employment Information
<ul style="list-style-type: none"> <input type="checkbox"/> IP address <input type="checkbox"/> Geo-location <input type="checkbox"/> Advertising pixel, cookie, other unique ID <input type="checkbox"/> Device number or information <input type="checkbox"/> Digitized electronic signature <input type="checkbox"/> Account logins, session times, or duration <input type="checkbox"/> Online shopping or purchases <input type="checkbox"/> Web session captures or replays <input type="checkbox"/> Video viewing <input type="checkbox"/> Other mobile app or web-surfing activity <input type="checkbox"/> Inferences about preferences or behavior 	<ul style="list-style-type: none"> <input type="checkbox"/> Schools, degrees, or grades <input type="checkbox"/> Student ID <input type="checkbox"/> Student financial aid or loan information <input type="checkbox"/> Past employment <input type="checkbox"/> Citizenship or work-eligibility status <input type="checkbox"/> Current job position, salary, or benefits <input type="checkbox"/> Job performance evaluations <input type="checkbox"/> Employee ID

15. Will you use additional sensitive personal information for this project, as shown below? (Check all that apply.)

- Race, color, ethnicity, or national origin
- Disability
- Sex (including pregnancy, childbirth, and related medical conditions; gender identity; intersex status; and sexual orientation) or information about an individual's sex life
- Religious, philosophical, or political beliefs
- Data about children
- Veteran status
- Union membership
- Criminal history
- Health issues related to substance abuse, HIV diagnosis or treatment, abortion, reproductive health care, or gender affirming care
- Other (please describe):

Protective Measures

16. What measures will protect personal and confidential business data included in AI inputs or outputs during this project? (Check all that apply.)

- Encryption of confidential or personal information
- Full anonymization of confidential or personal information
- De-identification or pseudonymization of personal information
- Limited role-based access to project data based on job function and needs
- Technical controls on access to AI tool and data (e.g., passwords, multifactor authentication)
- Disclosures to third parties or the public are limited to aggregated data
- Restricted access to inputs and outputs by AI provider
- Backups of project results
- Employee training, specific to this program data and its risks
- Contract terms - covering confidentiality, privacy, and cybersecurity
- Contract terms - covering data ownership and usage rights related to AI training data, inputs, and outputs
- Other (please describe):

Provide description of measures and relevant vendor documents or contracts:

Thank you. Please submit this form to

for review.

Assessment of AI Benefits and Risks

With the information provided above, the AI team shall assess the AI project based on its overall benefits and risks. It will then approve or decline the project, or approve based on needed mitigation or protection measures.

Benefits

1. What benefits will this project provide?

Risks

2. What risks does this project pose? (Check all that apply.)

Risk Factors	Potential Impact	Likelihood of Impact	Overall Risk
Accuracy: <input type="checkbox"/> Learning model may be incomplete, be out of date, or contain errors. <input type="checkbox"/> AI tool may “hallucinate” or produce inaccurate results. <input type="checkbox"/> Project team lacks a plan to verify results.	<input type="checkbox"/> Severe <input type="checkbox"/> Moderate <input type="checkbox"/> Minimal	<input type="checkbox"/> Probable <input type="checkbox"/> Possible <input type="checkbox"/> Unlikely	<input type="checkbox"/> High <input type="checkbox"/> Moderate <input type="checkbox"/> Low
Privacy: <input type="checkbox"/> AI tool may ingest personal information (including PHI) and use results for itself. <input type="checkbox"/> Project may reveal personal information to the public or third parties. <input type="checkbox"/> AI vendor contract lacks privacy protections. <input type="checkbox"/> Project’s use of personal information is not covered by our current policies or notices. <input type="checkbox"/> Project requires updated notices to members, customers, or employees, or individual consent.	<input type="checkbox"/> Severe <input type="checkbox"/> Moderate <input type="checkbox"/> Minimal	<input type="checkbox"/> Probable <input type="checkbox"/> Possible <input type="checkbox"/> Unlikely	<input type="checkbox"/> High <input type="checkbox"/> Moderate <input type="checkbox"/> Low
Confidentiality: <input type="checkbox"/> AI tool may ingest confidential business information and use results for itself. <input type="checkbox"/> Project may reveal confidential business information (e.g., contract terms, marketing plans, rates) to the public or third parties. <input type="checkbox"/> Project may violate existing contract(s).	<input type="checkbox"/> Severe <input type="checkbox"/> Moderate <input type="checkbox"/> Minimal	<input type="checkbox"/> Probable <input type="checkbox"/> Possible <input type="checkbox"/> Unlikely	<input type="checkbox"/> High <input type="checkbox"/> Moderate <input type="checkbox"/> Low

Risk Factors	Potential Impact	Likelihood of Impact	Overall Risk
Intellectual Property Rights:	<input type="checkbox"/> Severe	<input type="checkbox"/> Probable	<input type="checkbox"/> High
<input type="checkbox"/> AI vendor may have scraped the internet or built tool using protected IP without a license.	<input type="checkbox"/> Moderate	<input type="checkbox"/> Possible	<input type="checkbox"/> Moderate
<input type="checkbox"/> Project may reveal IP (e.g., trade secrets) to the public or third parties.	<input type="checkbox"/> Minimal	<input type="checkbox"/> Unlikely	<input type="checkbox"/> Low
<input type="checkbox"/> AI results may not have value as IP.			
Fairness and Bias:	<input type="checkbox"/> Severe	<input type="checkbox"/> Probable	<input type="checkbox"/> High
<input type="checkbox"/> AI learning model may include inaccurate, incomplete or outdated data or assumptions that cause harmful bias.	<input type="checkbox"/> Moderate	<input type="checkbox"/> Possible	<input type="checkbox"/> Moderate
<input type="checkbox"/> AI tool has not been tested for bias.	<input type="checkbox"/> Minimal	<input type="checkbox"/> Unlikely	<input type="checkbox"/> Low
Ethics:	<input type="checkbox"/> Severe	<input type="checkbox"/> Probable	<input type="checkbox"/> High
<input type="checkbox"/> AI tool may not filter out violent, racist, extremist, sexist, or offensive content.	<input type="checkbox"/> Moderate	<input type="checkbox"/> Possible	<input type="checkbox"/> Moderate
<input type="checkbox"/> AI tool may polarize users, undermine respect for self or others, or promote extremist views.	<input type="checkbox"/> Minimal	<input type="checkbox"/> Unlikely	<input type="checkbox"/> Low
Transparency:	<input type="checkbox"/> Severe	<input type="checkbox"/> Probable	<input type="checkbox"/> High
<input type="checkbox"/> Content/source of AI learning set is unknown.	<input type="checkbox"/> Moderate	<input type="checkbox"/> Possible	<input type="checkbox"/> Moderate
<input type="checkbox"/> AI tool lacks documentation about how it works.	<input type="checkbox"/> Minimal	<input type="checkbox"/> Unlikely	<input type="checkbox"/> Low
<input type="checkbox"/> Project team may not understand results.			
Security:	<input type="checkbox"/> Severe	<input type="checkbox"/> Probable	<input type="checkbox"/> High
<input type="checkbox"/> Our submitted data could be exposed.	<input type="checkbox"/> Moderate	<input type="checkbox"/> Possible	<input type="checkbox"/> Moderate
<input type="checkbox"/> AI tool may contain vulnerabilities.	<input type="checkbox"/> Minimal	<input type="checkbox"/> Unlikely	<input type="checkbox"/> Low
Safety:	<input type="checkbox"/> Severe	<input type="checkbox"/> Probable	<input type="checkbox"/> High
<input type="checkbox"/> Project team may not exercise enough control over AI processing and results.	<input type="checkbox"/> Moderate	<input type="checkbox"/> Possible	<input type="checkbox"/> Moderate
<input type="checkbox"/> Project poses risk to physical health or safety, property, or the environment.	<input type="checkbox"/> Minimal	<input type="checkbox"/> Unlikely	<input type="checkbox"/> Low

Assessment

3. The proposed program meets the following principles of trustworthy AI. (Check all that apply.)

Accurate

Valid – Data results are fit for the intended use and appear accurate based on past and ongoing testing.

Reliable – AI tool appears to be robust and able to perform as expected.

Comment:

- Protective of Privacy and Confidentiality** – Project does not rely on confidential business data or personal information. OR the project complies with applicable privacy laws, privacy notices, and contracts regarding the collection, use, transfer, disclosure, and protection of confidential business data and personal information.

Comment:

- Protective of Intellectual Property Rights** – Project does not rely on learning data and inputs that infringe on IP rights. AI results are valuable, even if they cannot be claimed as protected IP.

Comment:

- Fair and Unbiased** – Project adheres to applicable laws and industry standards to minimize or eliminate potential discrimination and harmful bias.

Comment:

- Ethical** – The project is not expected to polarize users, undermine respect for self or others, promote extremist views, or produce violent, racist, extremist, sexist, or offensive content.

Comment:

- Transparent**

Explainable – Vendor and project documentation adequately describes the AI design, logic, training data, and expected output.

Interpretable – Project team understands the AI tool and results.

Comment:

Secure

Secure – Project data (including personal data) will be protected by appropriate cybersecurity.

Resilient – Data from project can be restored following an adverse event.

Comment:

- Safe** – Project does not pose a physical danger to health or life, property, or the environment. Project will be subject to appropriate testing and human oversight.

Comment:

Approved:

Yes No

Yes, contingent on meeting the following recommendations or conditions:

By: _____

Name

Date: _____

Title