

DAGS

DEPLOYMENT AI GOVERNANCE STANDARD

DAGS v1.0 Normative Standard

Non-Substitution Rules

1. Purpose

This document defines the non-substitution rules governing interpretation and application of the Deployment AI Governance Standard (DAGS) v1.0.

Its purpose is to:

- Prevent replacement of DAGS requirements with external artifacts
- Eliminate proxy, equivalence, or “covered elsewhere” claims
- Preserve the autonomy and integrity of the normative standard
- Ensure governance obligations are met explicitly, not indirectly

This document is normative.

2. Principle of Non-Substitution

Each DAGS requirement shall be satisfied directly.

No requirement may be considered met by implication, proxy, analogy, or assumed equivalence.

Where DAGS specifies a requirement, that requirement stands on its own authority.

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3. Framework and Standard Substitution Prohibited

The following substitutions are explicitly prohibited:

- Treating compliance with another framework as satisfaction of DAGS
- Claiming ISO, NIST, SOC, or similar alignment as a substitute
- Importing controls from other standards in place of DAGS requirements

Mapping does not constitute substitution.

4. Tool and Platform Substitution Prohibited

The following substitutions are prohibited:

- Asserting that use of a specific platform or vendor satisfies DAGS
- Treating tooling features as governance controls without documentation
- Relying on automated systems in lieu of assigned accountability

Tools may support governance but do not replace it.

5. Policy and Documentation Substitution Prohibited

The following substitutions are prohibited:

- Policies substituted for operational controls
- Documentation substituted for enforceable authority
- Statements of principle substituted for defined constraints

Documentation must demonstrate governance, not merely describe intent.

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6. Organizational Structure Substitution Prohibited

The following are prohibited:

- Organizational hierarchy substituted for system ownership
- Committees substituted for accountable roles
- Corporate governance substituted for system-level governance

Governance must be system-specific and explicit.

7. Assessment Artifact Substitution Prohibited

The following substitutions are prohibited:

- Assessments substituted for controls
- Scores substituted for evidence
- Diagnostics substituted for normative compliance

Assessment artifacts are derivative and non-authoritative.

8. Partial Substitution Prohibited

Partial substitution is prohibited.

A requirement is either satisfied as written or not satisfied.

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Mitigating factors, compensating controls, or “functional equivalents” are not permitted unless explicitly defined in the normative text.

9. Burden of Demonstration

The burden of demonstrating non-substituted compliance rests with the organization asserting alignment.

Ambiguity shall be resolved against substitution.

10. Authority

This document governs determination of whether a requirement has been improperly substituted.

In the event of dispute, these rules are controlling.

11. Status

This Non-Substitution Rules document is **normative**.

It is binding for DAGS v1.0 and all derivative artifacts unless explicitly superseded.

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