## Mock Al Audit

Checklist Item	Questions to ask	Evidence	Status
Data and Privacy Audit	<ol> <li>Is the AI system only accessing the data it is meant to?</li> <li>Have any new data fields been added w/o approval?</li> <li>Are data retention periods being respected?</li> <li>Is data processing still compliant w/ GDPR?</li> <li>If sensitive data is now being used, has a DPIA been completed?</li> </ol>	Contract screenshot     None per DPO 7/22/25     Al Inventory     Assessment Template -     Google Sheets     Security Compliances.     Certifications, and     Validations       Grammarly     DPIA	
Algorithmic Performance Audit	<ol> <li>Spot check sample outputs for quality. Are error rates w/in acceptable boundaries?</li> <li>Have there been any failures or concerns reported by students and staff?</li> <li>For anything related to grading, how often is there a discrepancy between Al grades and teacher grades?</li> </ol>	<ol> <li>Error Log data</li> <li>Al Incident Response         Plan w/ log</li> <li>Al Incident Response         Plan w/ log</li> </ol>	$\searrow$
Fairness and Bias Check	<ol> <li>What do you notice when you check the performance of certain groups? Does the Al system respond equally well or flag proportional numbers of students from different groups?</li> </ol>	1. Al Incident Response Plan w/ log	N
Compliance and Documentation Audit	<ol> <li>Is all required documentation up to date?</li> <li>Do you have the necessary documents from the Al provider?</li> <li>Has the Al system been updated to reflect any new regulations?</li> </ol>	1. Al AUDIT CHECKLIST.pdf  2. Security Compliances. Certifications, and Validations   Grammarly	$\supset$
Human Oversight and Feedback	<ol> <li>How is human oversight working in practice?</li> <li>How is the process of reporting Al-related issues working?</li> <li>Consider interviewing users as part of this process to tell the story of process AND lived experience.</li> </ol>	1. Continuous Improvement Framework Template.pdf  2. Module 8 Notification Process Flowchart Tool.pdf  3. Interview summary of responses	N



# Post Audit Report

## **Executive Summary**

This annual audit evaluated AI systems deployed across 10 schools from July 21, 2024- July 21, 2025 to assess compliance with district AI policies, and applicable legal and ethical frameworks at the national level, and staff adherence to safety protocols.

Overall, the district demonstrates strong commitment to responsible AI use, though several areas require attention to strengthen our risk management framework.

Through the process of this audit we have identified the following needs:

- Inadequate error analysis processes. Current documentation of AI-related incidents lacks clear root causes.
- Incomplete incident response cycles. Gaps have been identified in follow up procedures and retraining efforts as part of our continuous improvement efforts.
- Risk recognition capabilities among school leaders are inconsistent. Training gaps have been identified across the leadership team.

These findings represent moderate risk gaps, and require remediation within the next 90 days to maintain the district's AI governance standards. Additional details are outlined in the sections that follow.

## **Audit Scope and Methodology**

During a three week period in July, 2025, an Al audit was conducted by the district Al Task Force of all district Al tools. Workgroups were tasked with different elements of the audit in order to distribute workload across the group. This audit examined Al systems across four key areas: Data and Privacy, Algorithmic Performance, Fairness and Bias, Compliance and Documentation, and Human Oversight and Feedback.

Al Audit Element	Task Force Members	Key Focus Areas	Methodology	
Data and Privacy Audit	Name, Role Name, Role Name, Role	Student data handling, consent processes, third-party vendor agreements, legal compliance	Convene     workgroups and     assign     responsibilities     Evidence collection     planning and     metrics review     Document review	
Algorithmic Performance Audit	Name, Role Name, Role	System accuracy, error rates, performance		



	Name, Role	metrics	4. Ev	and data gathering Evidence analysis	
Fairness and Bias Check	Name, Role Name, Role Name, Role	Disparate impact analysis, accessibility, bias in outputs or personalized learning paths	5.	and assessment against established criteria 5. Stakeholder interviews to validate findings and gather additional perspectives 6. Cross-workgroup synthesis and review w/ DPO	
Compliance and Documentation Audit	Name, Role Name, Role Name, Role	Policy adherence, vendor contract compliance, policy and practice alignment	6.		
Human Oversight and Feedback	Name, Role Name, Role Name, Role	Teacher override rates, process and procedure evaluation, fidelity of implementation			

## **Key Findings**

Key findings revealed the following opportunities for improvement:

- Inadequate error analysis processes. Current documentation of AI-related incidents lacks clear root causes.
- Incomplete incident response cycles. Gaps have been identified in follow up procedures and retraining efforts as part of our continuous improvement efforts.
- Risk recognition capabilities among school leaders are inconsistent. Training gaps have been identified across the leadership team.

These findings represent moderate risk gaps, and require remediation within the next 90 days to maintain the district's AI governance standards. Additional details are outlined in the sections that follow.

#### Recommendations

**Opportunity 1:** Inadequate error analysis processes.

Recommendations: Implement Root Cause Analysis Framework and Training Program

 Develop mandatory incident documentation template requiring: timeline of events, system/user actions, environmental factors, and categorical root cause identification



- Establish standardized root cause categories (technical failure, user error, policy gap, training deficiency, vendor issue)
  - Framework Timeline: Complete template development by August 30, 2025
- Develop 2-hour training module for incident response teams covering systematic incident response
- Include real case studies and practice scenarios
  - o **Training Timeline:** Training deployment by September 30, 2025

#### **Opportunity 2:** Incomplete incident response cycles

Recommendations: Redesign Incident Response Workflow & Communication Protocols

- Add mandatory "lessons learned" phase with specific improvement actions
- Require 30-day and 90-day follow-up assessments to verify corrective actions
- Implement closure verification by school principal before incident closure
  - o Incident Response Timeline: New workflow operational by September 30, 2025
- Require notification to affected stakeholders when corrective actions are implemented
  - Communication Protocol Timeline: Communication protocol active by October 1, 2025

**Opportunity 3:** Risk recognition capabilities among school leaders are inconsistent.

Recommendations: Develop Al Risk Recognition Competency Framework and Community of Practice

- Create standardized risk assessment criteria for Al implementations
- Establish risk level matrix (low, moderate, high, critical) with specific indicators
- Develop self-assessment tool for principals and assistant principals
  - Competency Framework Timeline: Framework completed by October 30, 2025
- Integrate 30-minute AI risk scenarios into existing monthly administrative meetings
- Rotate through different risk categories (privacy, bias, performance, compliance)
- Use case-based learning with district-specific examples
  - **CoP Timeline:** Training begins September 2025 admin meeting

## **Management Response**

The district's DPO and leadership team accept all audit findings and commit to the recommendations submitted by the AI Task force within the next 90 days. A follow up audit will be conducted in February, 2026 to verify implementation effectiveness and measure improvement in the identified areas. Any issue that is unresolved will trigger additional corrective measures and escalated oversight.



#### Conclusion

Overall, our district is proud of how far it has come since our Al governance journey began a year ago. This report reflects our continued commitment to ongoing Al governance efforts and underscores the need for continuous improvement efforts.

#### Notes from the Author:

This is a mock AI Audit Checklist. Any reference to district personnel or process is fictitious. This is designed to be an example of how districts might document and audit the AI systems in use in their organizations.

Al Disclosure Statement: Anthropic's Claude served as an editing teammate, helping me refine and align my first drafts. All Al-assisted content has been reviewed, edited, and approved by the human author.

