



May 6, 2026

# AI Governance

**Association of Ohio Health  
Commissioners**

Tatiana Lin, Director of Business  
Strategy and Innovation  
Kansas Health Institute

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# Hello!

## Areas of Expertise:

Health in All Policies, Health Impact Assessments, Qualitative Research, Population Health, Facilitation, Technical Assistance, Artificial Intelligence (AI)

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# Acknowledgment



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**Emma Uridge, M.P.H.**  
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*Kansas Health Institute*



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# Who We Are



**Vision:** Kansas will become the healthiest place to live through evidence-based and innovative strategies, policies and practices.

**Mission:** To improve the health of all Kansans by providing nonpartisan information, convening crucial conversations and facilitating learning that leads to meaningful change.



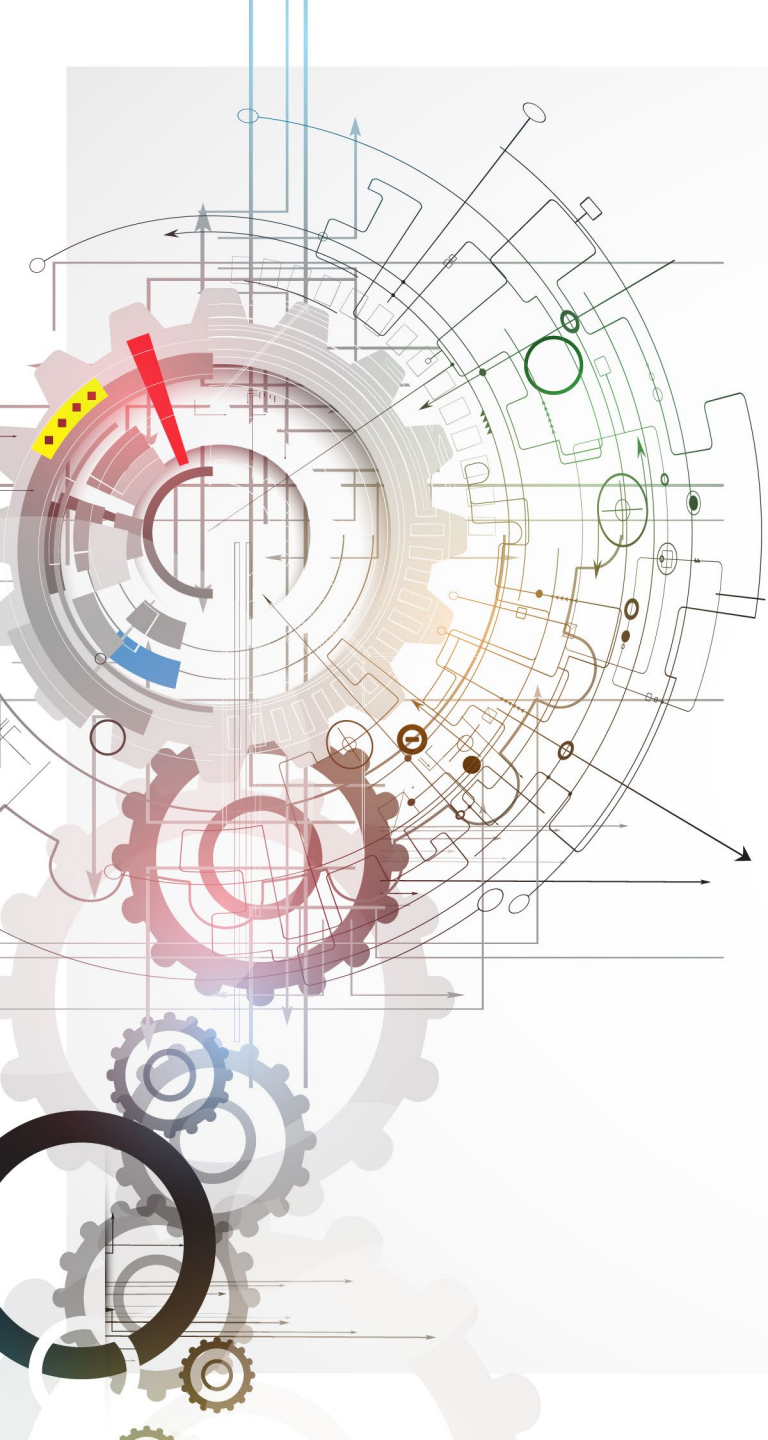
 **khi.org**

# Resource to Develop Your AI Policy



[bit.ly/PublicHealthAIPolicy](https://bit.ly/PublicHealthAIPolicy)





# AI Policy Landscape



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# AI Actions at the Federal Level (2025)

January 2025

Removing Barriers to Artificial Intelligence – Executive Order (14179)

May 2025

Make Our Children Healthy Again Report (MAHA Report)

H.R. 1 - One Big Beautiful Bill Act (OBBBA)

September 2025

Make Our Children Healthy Again Strategy Report

Rural Health Transformation Program NOFO

April 2025

Advancing Artificial Intelligence Education for American Youth – Executive Order (14277)

Two AI-Focused Memoranda  
– *Accelerating Use of AI (M-25-21)*  
– *Efficient AI Acquisition in Government (M-25-22)*

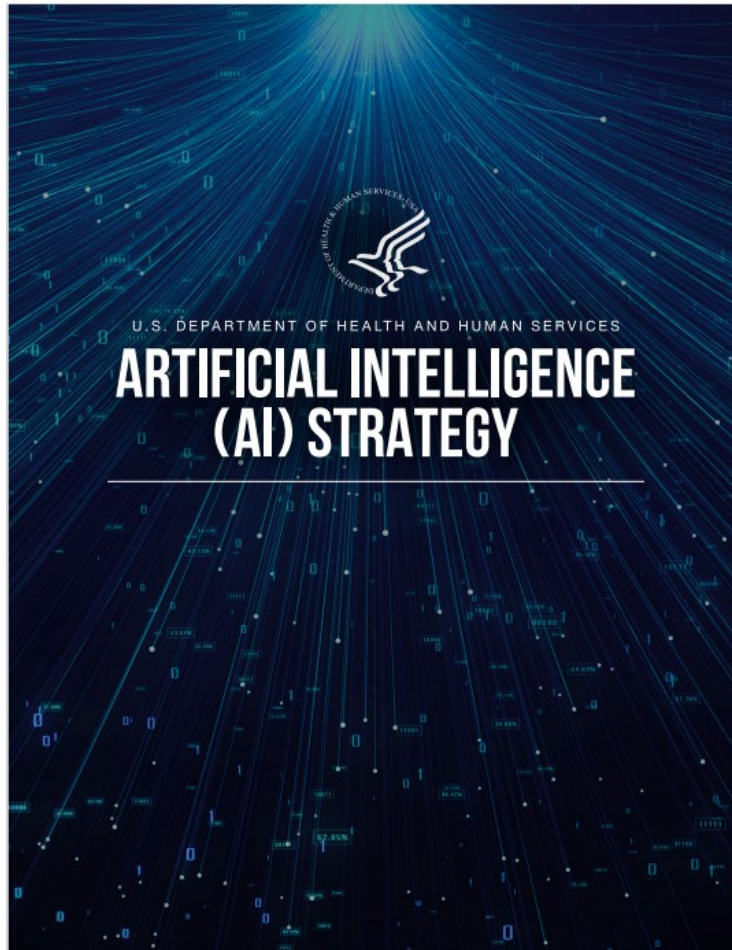
July 2025

America's AI Action Plan

December 2025

Ensuring a National Policy Framework for Artificial Intelligence

# AI Strategy: HHS and CDC



An official website of the United States government [Here's how you know](#) ▼

 Artificial Intelligence

EXPLORE THIS TOPIC ▼

SEARCH

## AI Strategy

For Everyone  
MAR. 13, 2026

**AT A GLANCE**

CDC's AI strategy outlines the agency's blueprint to harness AI to accelerate disease detection, reduce operational burden, and empower innovation through secure data platforms and an AI-ready workforce.




### CDC's AI Strategy (FY 2026 - 2030)

As the nation's premier public health institution, CDC is harnessing artificial intelligence to support its mission of protecting Americans from health threats. By using AI and establishing public private partnerships, CDC is working to accelerate disease detection and response, reduce burden on staff and partners, and drive operational excellence.

**ON THIS PAGE**

- [CDC's AI Strategy \(FY 2026 - 2030\)](#)
- [Pillar 1: Support Public Health with Acceler...](#)
- [Pillar 2: Strengthen AI Governance and Pub...](#)



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# Ohio 2025/2026 AI-Related Bills: A Snapshot



## AI and Mental Health

- Aims to empower the Ohio Attorney General's office to investigate and prosecute anyone who creates AI models that are responsible for creating technology that encourage self-harm. (HB 524)



## AI in Health Care

Seeks to prohibit health insurers from making coverage decisions "solely" from the use of AI.

(SB 164)



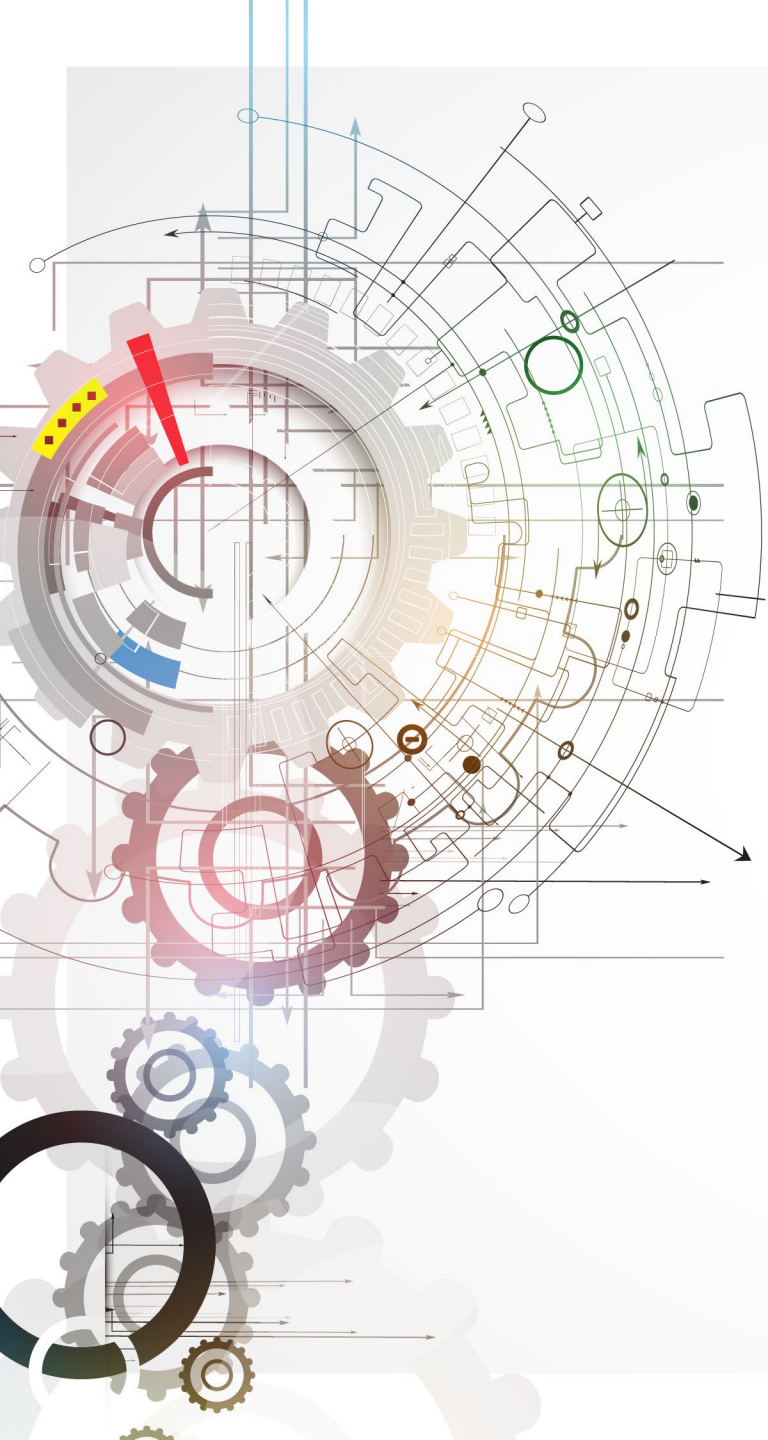
## Algorithmic Pricing

- Regulate pricing algorithms, software that often uses artificial intelligence to adjust prices, rent and wages in order to maximize a company's profits. (HB 665)



## AI Accountability

Declares AI systems nonsentient, prohibits their legal personhood, and assigns liability for AI-caused harm to humans.



# Pre-Work: AI Policy

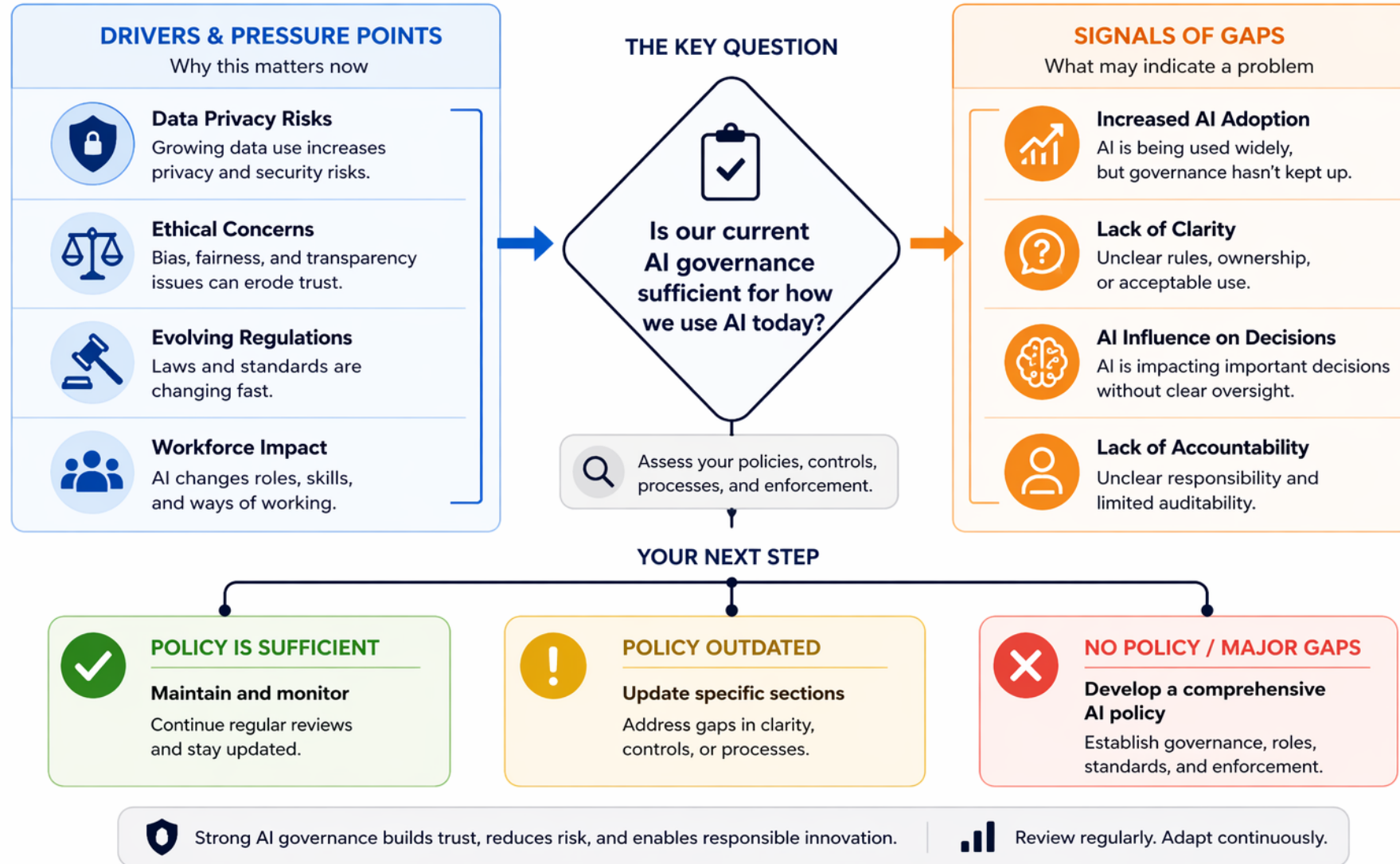


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# Do You Need an AI Policy—or a Better One?

Use these signals to evaluate your current AI governance and decide your next step.



# Laying the Groundwork Before Developing AI Policy

- 1 **Establish** an AI working group
- 2 **Review** relevant laws, policies and standards
- 3 **Clarify** purpose and organizational rationale for using AI
- 4 **Assess** AI literacy and organizational readiness
- 5 **Examine** governance and risk management capacity

# Pre-Work Strategy: Foundational Staff Assessment



**Knowledge  
and Perception**



**AI Usage  
and Comfort**



**AI Adoption  
Considerations**



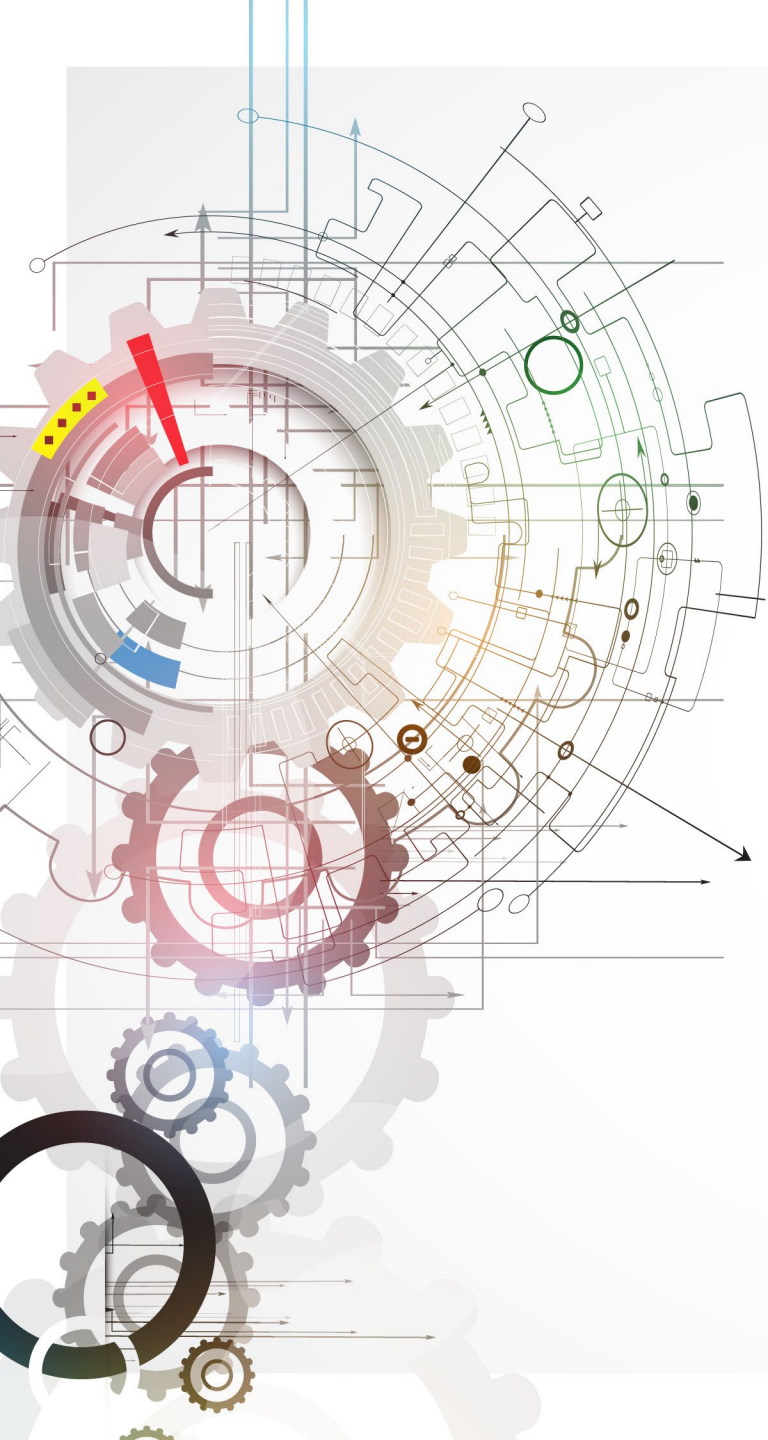
**Learning and  
Development**



**Organizational Policies  
and Strategies**



**Demographics**

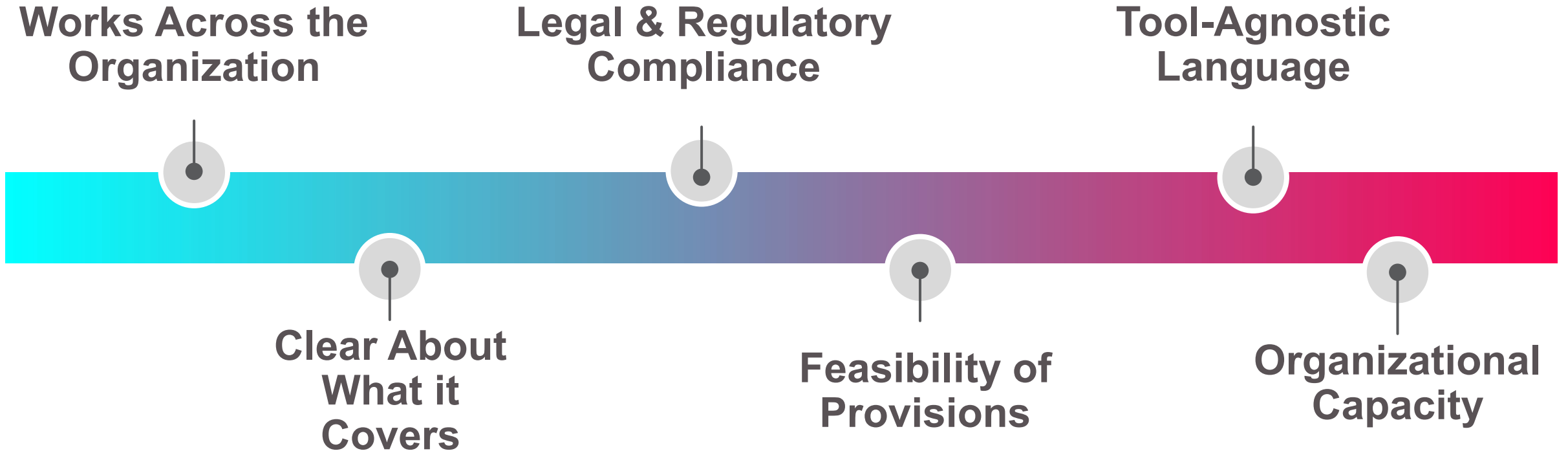


# AI Policy: Key Sections




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# Considerations for AI Policy Development



# Key Components of AI Policy Development

- 1 Select Policy Structure
- 2 Include Sections 
- 3 Plan how the policy will be implemented
- 4 Define how the policy will be monitored, evaluated and updated over time

- Purpose
- Scope
- Applicability
- Guiding Principles
- Definitions
- Governance
- Risk and Security Framework
- Prohibited Use
- Ethical Considerations
- Other

# Building Your AI Policy

**Purpose  
Statement**

Applicability

Guiding  
Principles

Governance

Risk and  
Security  
Framework

Prohibited  
Use and  
Misuse



# Purpose Statement: Formula

Establishes the intent and authority of the AI policy, clarifying why it exists and setting the overarching values and direction.

## Formula:

- Authority / Establishment Clause
- Scope of Action
- Subject Matter
- Organizational Reach
- Functional Intent
- Alignment with Mission

This policy establishes the requirements and standards for the responsible and ethical use of artificial intelligence (AI) across **[Entity Name]**. It provides a framework to guide AI use in ways that align with public health functions, support operational needs, and promote safe and compliant innovation, while upholding transparency, accountability, human oversight, privacy, security, accessibility and equity.

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# Applicability



Who must comply (all staff, contractors, grantees)?



What requirements should apply to contractors and vendors?



How to approach existing contracts or those in progress?

## Existing Contracts: Transition Rules

- **Applies prospectively** – does not change existing contracts retroactively.
- **Disclosure required:** vendors must report any AI use during the transition period.
- Full compliance required after adoption:
  - New contracts – immediately.
  - Existing contracts – within transition period or upon renewal/amendment.
- **Standard transition:** 6 months (extensions up to 12 months for complex systems).
- **Non-compliance** may impact renewal, extensions, or future eligibility.



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# Contractors and Third Parties

## Applicability

- Applies to all contractors, vendors, consultants and third parties
- Covers any AI used to deliver services, produce deliverables, or support contracted work
- Vendors must comply with applicable technology, data protection and AI use policies

## Disclosure

- Disclose whether AI tools will be used
- Describe how AI supports tasks or deliverables
- Explain safeguards for privacy, security, bias mitigation, IP protection and compliance
- Submit required documentation in prescribed format

## Contractual Controls

Contracts should include:

- AI Use Notification clause
- Requirement to comply with agency AI policy
- Requirement for prior written approval before deploying AI
- Right of the agency to reject unacceptable AI use

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# Guiding Principles

Empowerment

Bias Awareness  
and Mitigation

Explainability and  
Interpretability

Intent and  
Responsibility

Workforce  
Sustainability

Environmental  
Responsibility

Innovation and  
Risk Management

Data Privacy  
and Security

Transparency

# Guiding Principles Formula

## Formula:

- Value
- Main Intention (Mission Alignment)
- Risk Recognition\*
- Human Accountability\*
- Protection of People or Values
- Real-World Application\*

[Value] – AI should be used to [main intention], while [acknowledging key risks], ensuring [human accountability], and protecting [people or values] through [real-world application].

\* Identifies areas that could be complementary but might not be included in every guiding principle statement.

# Sample Guiding Principles

## Environmental Responsibility

When information is available, [Organization] will consider environmental impacts and energy use in the procurement and deployment of AI systems.

## Workforce Sustainability

[Organization] is committed to using AI to strengthen and support the workforce by enhancing capacity, improving efficiency and reducing administrative burden, while ensuring that AI does not replace essential staff roles or professional judgment.

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# What to Consider Before Building Your AI Governance Framework



## Authority and Decision Rights

- Who has final authority over AI decisions?
- Who can block or suspend a tool?
- How centralized should AI oversight be?



## Operations and Sustainability

- How does AI review integrate with procurement and IT processes?
- Who monitors day-to-day compliance?
- What reporting is realistic?



## Risk and Accountability

- What level of AI risk are we managing?
- What triggers formal review or escalation?
- Who is accountable if something goes wrong?
- How will misuse or policy violations be handled?



## Transparency and Trust

- How will we document AI decisions and approvals?
- What information should be transparent internally?
- What should be transparent externally?



# Risk-Based Oversight Framework

How to tailor oversight and safeguards to the level of impact or harm?



**Low** - Internal, administrative, or analytical uses with no direct impact on employees or public



**Medium** - Uses that inform or support work but do not make or automate decisions.



**High** - Uses that could directly influences eligibility, benefits, services or personnel actions

## Key Focus of Provisions

- Higher-risk applications require greater human oversight, documentation, and approval.
- Framework guides authorization, controls, and mitigation measures.
- Differentiates between procured AI systems and publicly accessible tools.

# Procured vs. Publicly Accessible AI Systems

The level of risk varies depending on the type of AI tool used.



**Procured**



**Publicly Accessible**



**Individually Purchased Tools**

## Key Focus of Provisions

- Publicly accessible tools may only be used for low-risk tasks; sensitive data can only be processed through approved systems.
- Procured tools should be used whenever feasible.
- Individually purchased tools carry the same restrictions as publicly accessible tools.
- High-risk or sensitive use requires prior authorization and must be listed in the approved AI catalog.



# Crosswalk: Tool Security and Task-Level Risks

AI tools may only be used when the tool's security controls meet or exceed the task's assigned risk tier.

Tasks	Tools
High Risk	<ul style="list-style-type: none"><li>• May process PHI, PII or other regulated/sensitive data</li><li>• Includes strong safeguards and documented security controls</li></ul>
Moderate Risk	<ul style="list-style-type: none"><li>• Vendor privacy and security practices formally reviewed</li><li>• Should NOT process PHI, PII or regulated/sensitive data</li><li>• Contractual or documented data protections in place</li><li>• “No-train” or data-protection option enabled</li></ul>
Low Risk	<ul style="list-style-type: none"><li>• Publicly accessible tools</li><li>• No contractual safeguards with organization</li><li>• No verified data protections</li><li>• Outside organizational governance or monitoring</li></ul>

# Prohibited Use and Misuse of AI: Examples

Defines clear boundaries for unacceptable AI use and reinforces protections for clients, staff and public trust.

## Prohibited System Uses

### AI may not be used for:

- Unapproved handling of PHI, PII or confidential data
- Automated clinical, eligibility or service decisions without required review
- High-risk functions in unapproved tools
- HR or personnel decisions without authorization

## Prohibited Personnel Conduct

### Personnel may not:

- Use AI to generate misinformation, impersonation or deceptive content
- Circumvent security, procurement or governance controls
- Upload sensitive or internal information into unapproved or public tools

## Enforcement

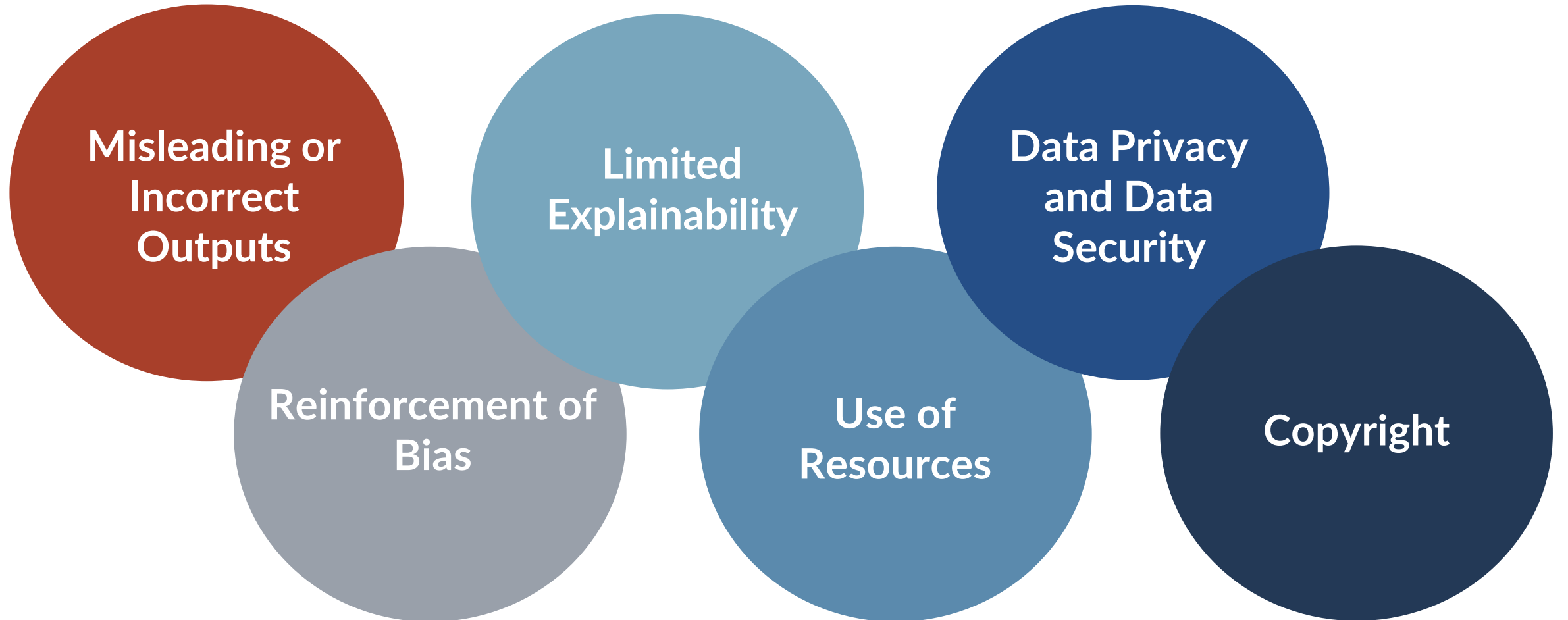
### Report suspected misuse:

Violations may result in:

- Retraining
- Suspension of AI access
- Disciplinary action or contract remedies



# Ethical Considerations





# Human Oversight

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## Sample Provisions

<b>Oversight Processes and Protocols</b>	All AI systems utilized by [Organization] shall operate under meaningful human oversight. AI outputs shall inform, but not replace, human judgment in any context involving health, social services or administrative decision making.
<b>Risk-Based Human Oversight</b>	The level of human oversight shall be proportionate to the risk classification of the AI application. High-risk or sensitive applications require documented review and approval by [Identified Reviewer] prior to use.
<b>AI Content Validation and Review</b>	Personnel are responsible for reviewing and validating AI-assisted outcomes to ensure accuracy, fairness and compliance with applicable standards.



# Data Privacy

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## Sample Provisions

<b>Notification of Use</b>	Individuals shall be informed when their data is used in AI-supported processes. Where required by law or policy, informed consent must be obtained prior to any data use.
<b>Handling Sensitive and Identifying Information</b>	Procured or confidential data shall be subject to strict access controls and handling requirements. Use of this data is permitted only through formal agreements, approved security protocols and privacy safeguards that meet or exceed departmental and legal requirements.
<b>Data Management, Privacy and Security Practices</b>	Whenever feasible, [Organization] shall proactively opt out of vendor data training agreements to prevent third-party use of public data for model development, analytics or commercial purposes.



# Bias Mitigation

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## Sample Provisions

<b>Training/Capacity Building</b>	Staff training on AI shall include guidance on recognizing, interpreting and addressing potential bias in data, outputs and decision making.
<b>Prompt Engineering</b>	[Organization] will create guidance for users to actively reflect on personal assumptions or perspectives that may introduce bias into their prompts.
<b>Bias Identification</b>	[Organization] using AI must periodically review outcomes for unintended bias, disparate impacts or inaccuracies. Findings shall be documented and shared with [Identified leadership] to inform corrective action.
<b>Vendor Guidance</b>	Before AI systems are procured, [Organization] shall require all vendors to provide information on how bias is addressed in their training data, algorithms and expected outputs. If risks cannot be fully mitigated, compensatory safeguards (e.g., additional human review, contextual analysis) shall be implemented.



# Environmental

## Sample Provisions

Responsible Procurement and Vendor Selection	When procuring AI-enabled tools, the organization shall consider vendor sustainability practices, including energy efficiency and data center environmental standards where feasible.
Efficient and Appropriate Use	Staff should avoid unnecessary large-scale data processing, redundant queries or excessive generation of outputs.
Lifecycle and Data Management	[AI-related infrastructure and tools] should be evaluated periodically to determine continued need and efficiency.
Monitoring and Continuous Improvement	The organization shall periodically assess emerging guidance on the environmental impacts of AI technologies

# Next Steps

Establish measures to evaluate how the policy is functioning and identify challenges with implementation.

Identify small pilot projects and apply the policy to assess how it works in practice and what questions or issues emerge.

Pilot the policy for six to nine months and collect feedback.

Capture lessons learned and develop recommended policy revisions.

Conduct staff training on the policy to support understanding and consistent application.

# AI Support

## Knowledge Building and Foundational Work:

- Introduction to AI (AI-101) and related workshops
- Support assessment of AI capacity and literacy among staff
- Support identification of potential use cases
- Support development of risk-based criteria for AI use

## AI Policy:

- AI policy development workshop
- Assist with AI policy development



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# Resources

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