

## Use of Artificial Intelligence (AI) in State of Ohio Solutions – Frequently Asked Questions

The following list of frequently asked questions (FAQs) were developed by the Ohio Department of Administrative Services to provide additional context for the requirements outlined in Ohio Administrative Policy IT-17, “Use of Artificial Intelligence in State of Ohio Solutions.”

### 1. **What are the differences between Conventional and Generative AI?**

Conventional AI systems are usually designed for a specific use case or task and are often trained with data limited to the defined scope. Some examples of conventional AI include chatbots, fraud detection tools, language translation, and interactive voice assistants.

On the other hand, Generative AI uses large quantities of data to generate text, audio, and/or visual content in response to user prompts. It leverages human-generated content and is used for more creative purposes. Due to the nature of the technology and the data sources, there is a higher risk of inaccurate or biased output. To minimize such risks, it is necessary to incorporate human feedback and continuously monitor the output as part of the implementation.

### 2. **Does Ohio Administrative Policy IT-17, “Use of Artificial Intelligence in State of Ohio Solutions,” only apply to Generative AI?**

Ohio Administrative Policy IT-17 applies to Conventional and Generative AI use cases.

For Conventional AI, all the policy requirements apply except for use case approval by the AI Council. Agencies do not need to seek AI Council approval for Conventional AI.

For Generative AI, all the policy requirements apply, including the requirement to seek AI Council approval for use cases.

For additional information on the differences between Conventional and Generative AI, refer to the [AI Comparison Criteria](#) document.

### 3. **Can I use Generative AI for work purposes?**

The use of Generative AI for work purposes must be approved by an agency director or designee and must align with any requirements stipulated by the AI Council.

If Generative AI is used to create a deliverable, then the nature of its use must be disclosed to the authorizing agency. In addition, only data that is considered a public record can be entered into the tool.

The output from a Generative AI tool must be reviewed for accuracy prior to its use.

### 4. **What steps do I need to take if my agency is considering a Generative AI implementation?**

As defined in the Ohio Administrative Policy IT-17, a use case must be defined and provided to an agency executive for review and approval.

After agency executive approval, the use case must be submitted by the agency's chief legal counsel to the AI Council for review and approval via the [AICouncil@das.ohio.gov](mailto:AICouncil@das.ohio.gov) email address. Prior to submission, the agency shall ensure that the information required by the *State of Ohio Generative Artificial Intelligence (AI) Solutions Central Repository* is completed to the fullest extent possible. (Refer to the AI Operations Toolkit that was attached to the policy publication announcement for the repository template.)

AI Council approval is required before an agency can pursue solution development and implementation. The specified approval process is necessary to minimize risks that are inherent in the technology.

#### 5. **What is the governance structure for AI solution development in the State of Ohio?**

The AI Special Interest Group, a team of state government leaders and IT experts that was convened by the Lt. Governor's Office, formulated an AI Governance Framework that includes the Agency Solution Development, Agency Executive Leadership, and AI Council teams. This structure was developed to govern all types of AI solution development; however, the AI Council oversight applies only to Generative AI solutions.

Each of these teams are required to operate in alignment with the AI Principles (fair, accountable, secure, transparent, and ethical) to ensure responsible use of AI.

#### 6. **What are the AI Principles and how do they apply to our agency's AI efforts?**

The AI Principles are foundational to all AI solution development endeavors. Every aspect of the development lifecycle needs to take these core considerations into account to realize a responsible AI implementation.

As defined by Gartner<sup>1</sup>, the core AI Principles include:

- **Fair** so that individuals or groups of individuals are not systematically disadvantaged through AI-driven decisions, while addressing dissolution, isolation, and polarization among users.
- **Accountable** to create channels for recourse and establish rights for individuals.
- **Secure and safe** to protect the interests of organizations and people while they interact with AI systems across different jurisdictions, while maintaining privacy in all stages of maturity.
- **Transparent and explainable** to build trust, confidence and understanding in AI systems.
- **Human-centric and socially beneficial** to serve human goals, manage the AI risks, be ethical and more efficient with automation, and complement AI with a human touch and with common sense.

#### 7. **Are there data governance requirements for AI solutions?**

Data availability, quality, and integrity are critical for AI solutions, since the quality of the output generated is dependent on the quality of the data fed into the system.

Data validation procedures must be put in place to select, analyze, clean, and certify the integrity of the data sources to be used in AI solutions. Agency Data Steward, Data Owner, and Data Custodian roles are responsible for maintaining the quality and integrity of the data

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<sup>1</sup> Choudhary, Farhan, Svetlana Sicular. "A Comprehensive Guide to Responsible AI," Gartner, 28 July 2022, [Gartner: A comprehensive Guide to Responsible AI \(Login required\)](#)

being used in AI solutions.

**8. If an agency is interested in implementing an AI solution, where should they start?**

Evaluate agency business operations to determine where an AI solution may be the best fit and develop a use case.

If there are multiple AI use cases, you may want to consider utilizing a structured format for prioritization that will assist in presenting the information for executive level review and approval. An optional alternative for agencies is the Gartner framework – *Discover and Prioritize Your Best AI Use Cases with a Gartner Prism (ID G00732696)*. The Gartner Prism assists organizations in measuring the business value and feasibility of AI use cases to assist in prioritization efforts.

Experiment before embarking on a full-scale implementation. Define iterative pilot projects that will allow the agency to test the technology and measure its benefits.

Conduct data quality testing for pilot and full production deployments. Monitor AI generated output on an ongoing basis to validate data bias is not introduced over time.

Ensure proper security and privacy controls are defined and implemented to secure the solution from adversarial attacks.

**9. What security and privacy considerations need to be addressed when implementing an AI solution?**

Conduct a risk assessment for any proposed AI solution and determine the appropriate security controls to mitigate such risk.

In addition, to ensure privacy is considered, state agencies are required to create privacy impact statements in accordance with Section 125.18 and Section 1347.15 of the Ohio Revised Code. Additional guidance, including the Privacy Impact Assessment and Privacy Threshold Analysis templates, is available on the [DAS OIT Office of Information Security and Privacy](#) web page.

Exercise caution not to disclose sensitive data, including personally identifiable information and confidential personal information, to unconstrained Generative AI tools and publicly accessible service or training Models.

**10. What are the procurement requirements surrounding the use of AI?**

All AI software services, even if they are free or part of a pilot or proof-of-concept project, shall be reviewed by the agency to ensure the software meets all necessary security and privacy requirements. This requirement applies to downloadable software, Software as a Service (SaaS), web-based services, browser plug-ins, and smartphone apps.

The following elements must be captured and evaluated for any AI solution during the procurement process:

- i. Technical/design details of the AI system and algorithms
- ii. How the AI system was trained (including personnel and documentation)

- iii. How the AI system works (i.e., what are the inputs and outputs)
- iv. Data sources (documentation of all data sources)
- v. Audit logging
- vi. Change management details and documentation that Impact the AI system algorithms (i.e., decisions, inputs, outputs)
- vii. Testing practices and results
- viii. Timeframe documentation (captures time periods of testing, governance approval, deployment, and other critical milestones the of AI solution)

Agency contracts need to prohibit suppliers from using State of Ohio materials or data in Generative AI solutions, unless such use is explicitly approved by the agency director or designee.

Procuring agencies must ensure that suppliers disclose the utilization of Generative AI when producing works owned by the state or the integration of Generative AI in products used by the state.

Procuring agencies need to perform due diligence to ensure proper licensure of model training data for all Generative AI services using non-state data.

All copyrightable works owned by the state that are created with the involvement of Generative AI must include an accompanying annotation sufficient to meet the requirements of the U.S. Copyright Office for Works Containing Material Generated by Artificial Intelligence (88 FR 16190). The annotation should include at least the Generative AI technology used and a description of how it was used to create the work.

#### 11. Will the state offer AI training to employees?

The state's Learning on Demand platform vendor, Skillsoft, is developing AI trainings for the following tracks listed below:

- a) General AI training for all state employees.
- b) Technically focused AI training for state employees that will be designing, developing, implementing, and maintaining solutions.

#### 12. If an agency identifies multiple AI use cases, how should they be prioritized?

Evaluate each use case and assess the potential business and service value to the agency and its customers and balance that against the cost and feasibility of developing and implementing the AI technology. This would help in the use case approval process.

To assist in the executive leadership review and approval process, you may want to consider following a structured format for prioritization. An optional alternative for agencies is the Gartner framework – *Discover and Prioritize Your Best AI Use Cases with a Gartner Prism (ID G00732696)*. The Gartner Prism assists organizations in measuring the business value and feasibility of AI use cases to assist in prioritization efforts.

#### 13. What resources are available for the state agencies to assist in AI efforts?

- a) State of Ohio Learning on Demand AI Training Resources

- b) United States AI Website: [AI.Gov - President Trump's AI Strategy and Action Plan](#)
- c) IT Modernization Centers of Excellence AI Guide for Government: [Introduction to the AI Guide for Government - GSA - IT Modernization Centers of Excellence](#)
- d) National Institute of Standards and Technology (NIST) Trustworthy & Responsible AI Resource Center: [National Institute of Standards and Technology - Home](#)
- e) NIST AI Risk Assessment Framework: [AI Risk Management Framework FAQs - NIST](#)

**14. Who should I contact with additional questions regarding State of Ohio AI Solutions development?**

If you have a potential use case for AI, contact your agency leadership for further guidance on the next steps. They will facilitate the review process with other statewide AI resources, as necessary.

For questions on Ohio Administrative Policy IT-17, "Use of Artificial Intelligence in State of Ohio Solutions," send an email to: [DAS.State.ITPolicy.Manager@das.ohio.gov](mailto:DAS.State.ITPolicy.Manager@das.ohio.gov).