



# Procedure Document: *Review of Artificial Intelligence Submissions*

Version: 1.2 (8/2025)

## Contents

1.	Purpose .....	2
2.	Applicability .....	2
3.	Revision History .....	2
4.	Ownership .....	2
5.	Definitions .....	2
6.	Procedure .....	3
7.	References.....	4
8.	Appendix A .....	5



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Version: 1.2 (8/2025)

## 1. Purpose

The purpose of this Procedure is to establish and document the internal review process for submissions received by the OCDO pursuant to the *State of Indiana Policy: Artificial Intelligence* and the associated Standard.

## 2. Applicability

This Procedure is internal to the MPH and is put forth in the context and in furtherance of the *State of Indiana Policy: Artificial Intelligence*.

## 3. Revision History

Version	Date	Name	Revision Description	Supersedes
1	12/2024	J. Cooper T. Cotterill B. Zaczek	n/a	n/a
1.1	03/2025	J. Cooper T. Cotterill	Incorporates IOT infrastructure and data leakage as explicit risk considerations.	1
1.2	07/2025	J. Stark L. Lee	Aligns procedure with implemented process improvements.	1.1

## 4. Ownership

Please direct questions and concerns to the following owner(s) of this Procedure:

1. Responsible Data Team

## 5. Definitions

All defined terms used but not defined in this Procedure may be referenced in the Policy or the Standard.

1. “Broad-context” means a system that operates across diverse domains and/or impacts individuals in unpredictable ways.
2. “Narrow-context” means a system that operates in a specific domain and/or conducts well-defined tasks with limited scope.
3. “OCDO AI Team” means the individuals designated as reviewers under Sec. 6.1 of this Procedure.
4. “Personal Information” has the meaning set forth in IC 4-1-6-1(2).
5. “Policy” means the *State of Indiana Policy: Artificial Intelligence*.
6. “Procedure” means this document (*OCDO Procedure Document: Review of Artificial Intelligence Submissions*).
7. “Standard” means the *State of Indiana Standard: State Agency Artificial Intelligence Systems*.



## Procedure Document: *Review of Artificial Intelligence Submissions*

Version: 1.2 (8/2025)

8. “*Sandbox*” means an AI sandbox that is in a controlled and isolated environment specifically designed for developing, testing, and experimenting with artificial intelligence (AI) systems and models.

## 6. Procedure

On receipt of the Readiness Assessment submitted by the APO or designee of an agency wishing to conduct AI Implementation Activities, an MPH Data Governance Project Manager conducts a cursory review and, if within the scope of the Policy, scores the submission against the MPH AI Scoring matrix, noting the result using the method prescribed for that purpose. The score will determine which risk category (Low-Risk, Moderate-Risk, or High-Risk) the submission falls in. *See Appendix A for the AI Systems Risk Category Definitions.*

1. If the assessment results in a **Low- or Moderate-Risk category**, the risks for the AI technology will be identified, controls for the identified risk will be prescribed, and an exception will be drafted to process the granting of the exception.
  - A. OCDO may conduct a deeper review of any submission even if deemed low or moderate risk due to factors determined by the Responsible Data team.
2. If the assessment results in the **High-Risk category**, the MPH Data Governance Project Manager distributes the submission to the OCDO AI Team made up of the team leads of the following teams: Legal & Privacy (reviewer), Data Science (reviewer), Data Governance (reviewer), Enterprise Solutions (reviewer), and Engagement (courtesy copy).
  - A. Each of the reviewers conducts a review of the submission, considering the following lines of inquiry and provides feedback to the OCDO AI Team using the method prescribed for that purpose.
    - i. Each reviewer considers objectives of the readiness assessment from the Standard:
      - a) Objectives of the proposed AI System.
      - b) Regulatory obligations associated with the proposed AI System, including its training, testing, production input, and production output data.
      - c) Availability of appropriate data, financial, infrastructure, and staffing resources to conduct AI Implementation Activities, pre- and post-deployment.
    - ii. Each reviewer considers the efficacy of the proposed AI Implementation Activities from their unique professional perspective.
    - iii. Each reviewer considers the risk posed by the proposed AI System, considering the above risk classifications and their examples. (If any one of these examples is true for the proposed AI System, it is acceptable for that system to be classified by the highest applicable risk classification.)



## Procedure Document: *Review of Artificial Intelligence Submissions*

Version: 1.2 (8/2025)

- iv. Each reviewer considers the availability of enterprise alternatives offered by the Office of Technology or Management Performance Hub.
- B. The Responsible Data team compiles this feedback and returns it to the requestor, which can take the following forms:
  - i. Request additional clarification from the requestor. (This could include multiple clarification rounds.)
  - ii. Grant of an exception, detailing its scope, to all/part of the Policy.
  - iii. Communicates need to form Project Team, which conducts, or leads a vendor recognized for its expertise in algorithmic auditing, in conducting the pre-deployment maturity assessment. See Standard, Sec. 4.2.
    - a) If a Project Team is formed, the pre-deployment maturity assessment shall be conducted to the extent not excepted. On completion of the maturity assessment, the Project Team will issue its determination in writing, including a description of any necessary remediation activities, pre- and post-deployment.
3. If not excepted under this Procedure, the Responsible Data Team drafts and distributes the appropriate notice for users.

Other items of note:

- There are triggers in the Policy for post-deployment assessments.
- Exceptions must be reevaluated on a periodic basis as prescribed by the Policy.
- OCDO shall require a data catalog scan of the AI System.
- OCDO may audit conformance to the Policy.
- Users wishing to move an AI resource developed in an AI sandbox from the sandbox to a productional state must submit an AI Readiness Assessment as defined in section 6 of this procedure.

## 7. References

1. *State of Indiana Policy: Artificial Intelligence*, <https://www.in.gov/mph/cdo/files/State-of-Indiana-State-Agency-AI-Systems-Policy.pdf>.
2. *State of Indiana Standard: State Agency Artificial Intelligence Systems*, <https://www.in.gov/mph/cdo/files/State-of-Indiana-State-Agency-AI-Systems-Standard.pdf>.



## Procedure Document: *Review of Artificial Intelligence Submissions*

Version: 1.2 (8/2025)

### Appendix A

#### AI System Risk Category Definitions

- Low-Risk System – These are generally systems that have a very limited ability to cause harm and the risks are easily mitigated.
  - Ad blocker
  - Spam filter
  - Writing tool
- Moderate-Risk System – These are generally systems that have narrow applicability or are deployed in less sensitive contexts.
  - Content generation
  - Narrow-context analytics/summarization
  - Narrow-context assistant
  - Narrow-context chatbot
  - Narrow-context image interpretation
- High-Risk System – These are generally systems that may have broad applicability or those that may impact fundamental rights, safety, or critical sectors.
  - Behavioral interpretation/prediction
  - Biometrics
  - Broad-context analytics/summarization
  - Broad-context assistant
  - Broad-context chatbots
  - Broad-context image interpretation
  - Critical Infrastructure
  - Education
  - Employment
  - Financial
  - Health
  - Impacting Minors
  - Judicial
  - Law Enforcement
  - Personal Information Processing
  - Public Benefits
  - Additional attributes that can lead to a high-risk determination in the context of “specific tools” or “post-sandbox” reviews:
    - Data Leakage Risk (e.g., State data trains vendor model)
    - Hosted on infrastructure not owned or licensed by IOT