K-12 GENERATIVE AI READINESS CHECKLIST

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A questionnaire designed to guide K-12 school districts in understanding key factors to consider before implementing Gen AI technologies.

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K-12 Generative Artificial Intelligence (Gen AI) Readiness Checklist Questionnaire Introduction

The Council of the Great City Schools (CGCS) and CoSN (Consortium for School Networking) worked in partnership with Amazon Web Services (AWS) to develop a K-12 Generative AI (Gen AI) Readiness Checklist Questionnaire. This questionnaire is designed to guide K-12 school districts in understanding key factors to consider before implementing Gen AI technologies. While not an exhaustive readiness assessment, the checklist serves as a preliminary tool for district leaders—including superintendents, district leaders and technology experts—to evaluate the safety, privacy, security, and ethical implications of using Gen AI. The goal is to help districts prepare adequately, ensuring data privacy and security, and avoiding bias or algorithmic discrimination, while gaining a foundational understanding of the related tactical considerations.

The K-12 Gen AI Readiness Checklist Questionnaire is the first tool that CGCS, CoSN, and AWS are planning to introduce to school districts to help them prepare their organizations for adoption of this transformative technology. Our next phase will build upon the foundational considerations outlined in this checklist. We plan to introduce a more comprehensive tool that will allow districts to self-evaluate their readiness for implementing Gen AI technologies. This rubric will help districts identify their maturity level in terms of Gen AI readiness and pinpoint specific areas that require further attention to ensure safe and secure adoption of this transformative technology.

We hope that school districts will find the K-12 Generative AI (Gen AI) Readiness Checklist Questionnaire both useful and informative. This tool is intended to serve as a starting point for intelligently and thoughtfully implementing AI technologies that align with instructional and operational objectives. We encourage district leaders to adapt this resource to their unique needs. Once the **Creative Commons License** is finalized, districts will have the flexibility to modify and share the tool, further contributing to its value as a community resource.

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1. Executive Leadership Readiness (24 Questions)			
Challenge/Opportunity	**Assessment Criteria**	**Yes**	**No**
1. Strategy	1. Does the use of Generative Artificial Intelligence (Gen AI) align to achieving your district's mission, vision, goals, and values? 2. Are you adequately equipped to leverage Gen AI potential benefits and understand the challenges? 3. Do you have a designated point person or team responsible for overseeing the adoption, procurement, and management of Gen AI within your district? 4. Do you have a cross-functional team (i.e., Technical, Operational, Academic, Financial, Legal, Administration, Communications, Students & Parent Representatives) that provides oversight and guidance on the procurement, adoption, implementation, management of and communication about Gen AI in your district? Is your Team: ○ Exploring the possibilities and pitfalls of AI with an eye toward the future. ○ Responsible for researching and aligning with organizations, including the White House & U.S. Dept. of Education, that are developing best practices for the use of Gen AI in K12 districts? 5. Do you have an adoption strategy that addresses how to manage and govern the allowable uses of Gen AI such as: ○ Instructional ○ Academic achievement ○ Business		

Challenge/Opportunity	Assessment Criteria	Yes	No
	○ Operational ○ Data reporting and analytics 6. Do you have metrics to evaluate the use and or impact of the use of Gen AI in your district? Do you have a process for considering the financial impact and ongoing financial support of Gen AI in your district?		
2. Legislation and Administrative Rules	1. Do your state laws or school district's rules prohibit the use of Gen AI in school districts? 2. Do your state laws or school district's rules specifically allow for the use of Gen AI for instructional use within the districts? 3. Do your state laws or school district's rules specifically allow for the use of Gen AI for business and administrative use within the districts? 4. Do you have a process to educate and keep your School Board informed about the use of Gen AI across K12 education, and the efficacy of using Gen AI in your school district?		
3. Use Policy	1. Have you created and published formal policies, processes, and procedures on the responsible use of Gen AI (Use Policy) in your district that align with the White House Blueprint for an AI Bills of Rights and US Department of Education AI & the Future of Learning report and/or your state department of education's policies around the use of Gen AI? a. Have you added the use of Gen AI to your Use Policy (AUP/RUP)? b. Do you track compliance of your processes, and procedures and have published consequences for noncompliance?		

Challenge/Opportunity	Assessment Criteria	Yes	No
	c. Have you updated your Code of Conduct policy to include consequences for violating the *Gen AI use policies, processes, and procedures*? 2. Have you revised your third-party vendor contracts to include clauses on the responsible use of general AI, along with specified consequences for contractors who violate these guidelines? 3. Does the Use Policy consider how vendor Large Language Models (LLM) are trained and what data are they using to train their models? 4. Do you have a designated individual or team coordinating professional development for the responsible use of Gen AI in your district? 5. Do you maintain a schedule for continuous and updated role-specific training (i.e., educators, administrators, communications staff, students, etc.)? Do you track completion of this training? 6. Do you have an onboarding program to train new hires in the Acceptable/Responsible Use of Gen AI policies, processes, and procedures? 7. Does your Use Policy include a requirement that the use of Gen AI be cited in the creation of content by educators, administrators, communications staff, support staff & students?		
4. Equity	1. Does your Acceptable/Responsible Use Policy training address concerns on how Gen AI can propagate existing biases, which are found in the data powered by vast amounts of data stored in AI foundational models? 2. Do you require 3rd party vendors from whom you purchase tools that use Gen AI have algorithmic discrimination protections built in to protect from bias? 3. Do you have processes to override Gen AI models if necessary?		

Challenge/Opportunity	Assessment Criteria	Yes	No
	4. Do you have policies and practices in place to ensure equitable access to district approved Gen AI tools for all students and staff?		

2. Operational Readiness (9 Questions)

Challenge/Opportunity	Assessment Criteria	Yes	No
1. Procurement	1. Do you have procurement standards for the purchase of Gen AI tools that align with the White House Blueprint for an AI Bill of Rights, specifically as it relates to Notice and Explainability of how models are created and the data sources used to train the models, with further consideration for applicable federal and state privacy laws? 2. Do you have controls in place to ensure individuals procuring Gen AI tools are versed in your Gen AI procurement standards and are going through a review and approval process with the Gen AI procurement evaluation and technical teams? 3. Do you have a process in place to evaluate whether purchases, upgrades and renewals of assets include Gen AI capabilities? 4. Do your procurement standards require vendors to proactively notify your district when Gen AI capabilities are added to current assets? 5. Do you ensure contracted AI services are not combining external data (such as data from other school districts or other third-party sources) with your district data without formal written agreement from district?		

Challenge/Opportunity	Assessment Criteria	Yes	No
2. Staffing	1. Do you have staff with the right skillset to evaluate, procure and operate Gen AI? 2. Do you have a process in place, both administratively and through collective bargaining agreements, to modify job descriptions and requirements, or create new roles to support Gen AI? 3. Do you have the availability of funds to support skill development and the creation of roles needed to formally adopt Gen AI? 4. Do you have staff that have the ability to prepare data to share with Gen AI tools?		

3. Data Readiness (25 Questions)

Challenge/Opportunity	Assessment Criteria	Yes	No
1. Data Governance	1. Do you have an assigned Data Steward for your school district? 2. Do you have identified Data Owners for enterprise data sets? 3. Is there a cross-functional team of data owners that sets enforceable data governance policies for the district? a. Do you track compliance with these data governance policies? b. Have you updated your Code of Conduct policy to include consequences for violating these *data governance policies*? 4. Do your contracts with 3rd party vendors include consequences for violating applicable provisions of the district's data governance policies?		

Challenge/Opportunity	Assessment Criteria	Yes	No
	5. Have you documented where all your data sets are stored, including whether on premise or in the cloud? 6. Do you have a data classification model in place? 7. Are your organization's data attributes (data dictionary, categorization) documented? 8. Do you have a plan that manages assets over their entire life, including the retention and destruction of district data and that pertains to contractors/solutions providers? Is this plan regularly audited?		
2. Data Quality	1. Do you regularly audit the quality of your district's data (i.e. – de-duplication, inaccuracy, missing values, etc.)? 2. Do you have data versioning control? 3. Do you identify source systems for your data sets? 4. Is your data in a machine-readable format that is accessible for use with Gen AI? 5. Do your data sets include sufficient information to produce meaningful results when used with Gen AI?		
3. Data Privacy	1. Have you updated your district's data privacy vetting process to include assessing vendor technology privacy practices as relates to the collection, use, and disclosure of personal information for Gen AI that aligns with requirements under applicable federal and state privacy laws? 2. Does your district's data privacy vetting process include ensuring that Gen AI is only used by individuals who meet the vendor's stated age requirements?		

Challenge/Opportunity	Assessment Criteria	Yes	No
	3. Have you updated the district's Data Security policies, processes, and procedures to include the use of Gen AI that aligns with industry security frameworks such as NIST CSF, NIST SP 800-53, and ISO 27005 or 27001? 4. Have you updated your 3rd party vendor contracts if and as necessary to include data privacy requirements applicable to the use of Gen AI? 5. Does your contract include rights for you to audit third parties for compliance with applicable privacy requirements? 6. Have you updated your Code of Conduct policy to include consequences for violating data privacy policies, processes, and procedures? 7. Do you maintain a schedule for continuous and updated role-based training on data privacy? Do you track completion of this training? 8. Do you have an onboarding program to train new hires in the district's data privacy policies, processes, and procedures? 9. Do you have protections in place to identify and prevent district information from being used to train non-compliant Gen AI models?		

4. Technical Readiness (16 Questions)			
Challenge/Opportunity	**Assessment Criteria**	**Yes**	**No**
1. Identity and Access Management	1. Have you created and published formal policies, processes, and procedures for role-based Data Access controls when using Gen AI so users only have access to the data they are permitted to see? 2. Have you updated your 3rd party vendor contracts to include role-based Data Access controls when using Gen AI, including consequences for violating the policy? 3. Do you track compliance with your Data Access control policies, processes, and procedures? 4. Do you have role-based training about Data Access controls when using Gen AI? Do you track completion of this training? 5. Do you have an onboarding program to train new hires about Data Access controls when using Gen AI? 6. Are your Gen AI tools able to integrate with your district's Multi-Factor Authentication or enterprise Single Sign-On (SSO) solutions?		
2. Tracking & Monitoring	1. Do you have a process in place to keep track of systems that use Gen AI? 2. Do you have controls in place for system owners to track and monitor the usage of compliant Gen AI tools? 3. Do you have processes in place to identify and block the use of non-compliant Gen AI tools?		
3. Technical Controls	1. Are you identifying and evaluating other ancillary architecture that may be needed to adopt Gen AI in your district?		

Challenge/Opportunity	Assessment Criteria	Yes	No
	2. Do you have a review process in place to ensure proper technical controls have been implemented to comply with all Gen AI policies, processes, and procedures? 3. Does your district properly retire hardware and software once it is no longer being updated with the proper security controls and is no longer in compliance?		
4. Hallucinations of inappropriate content	1. Does your organization have a system in place to report/and alert a diverse team to review toxic and inappropriate content generated by both compliant and non-compliant Gen AI tools in your district? 2. Do you require 3rd party vendors for whom you purchase tools that use Gen AI to have moderation guardrails in place to filter toxic and inappropriate content and detect hallucinations? 3. Do your compliant Gen AI tools, whether developed by the district or a 3rd party vendor, ensure human review of the generated content before use?		

5. Security Readiness (7 Questions)			
Challenge/Opportunity	**Assessment Criteria**	**Yes**	**No**
1. Security Safeguards	1. Do you have a designated individual responsible for cybersecurity within your organization? 2. Do you have a security framework in place? 3. Does your security framework include protections for the use of Gen AI? 4. Does your security framework include safeguards for malicious actors?		
2. Cybersecurity Training	1. Do you have role-based cybersecurity training that has been updated to include the use of Gen AI for educators, administrators, support staff, students, and parents? Do you track completion of this training? 2. Do you have an onboarding program to train new hires on cybersecurity that has been updated to include the use of Gen AI? 3. Do you have a designated individual responsible for creating and delivering cybersecurity training within your organization?		

6. Legal/Risk Management (12 Questions)			
Challenge/Opportunity	**Assessment Criteria**	**Yes**	**No**
1. Legal Remediation	1. Have the terms and conditions of current contracts within the district been updated to specify the allowable or prohibited use of general AI? 2. Has the legal team formally documented the consequences for violations of employee policies, and have these been communicated to all employees?" 3. "Does the legal team have remediation plans in place for instances of violation of the district's policies, procedures, or processes specifically concerning the use of general AI?" 4. Do you have a copyright protection policy for district, staff or student created content using district owned Gen AI tools? 5. Is the district's copyright protection policy ensuring adequate training of 'fair use' for students, staff and contracted resources.		
2. Risk Management	1. Has your district updated relevant audits to include the use of Gen AI? 2. Do your contracts include a data retention and ownership agreement with 3rd party vendors and data sharing partners? Do your vendor contracts provide you with rights to audit for compliance? 3. Is district leadership aware of what your insurance plan will cover for the intended and unintended consequences of using Gen AI in your district?		
3. Loss Notification	1. Have you developed and disseminated formal policies, processes, and procedures specifically for notifying affected parties in the event of a loss of identifiable data?		

Challenge/Opportunity	Assessment Criteria	Yes	No
	2. Do you actively monitor adherence to your formal policies, processes, and procedures regarding data loss notifications, especially in instances where the data loss is attributed to the use of general AI? 3. Do you maintain a schedule for continuous and updated role-specific training about data loss notification due to the use of Gen AI? Do you track completion of this training? 4. Do you have an onboarding program to train new hires in data loss notifications due to the use of Gen AI?		

Appendix 1 - Glossary

Glossary of Terms

Term	Definition
1. **AI Testing Framework for K-12**	Standardization of protocols and procedures established to calibrate the functionality, efficiency, and effectiveness of AI tools in an educational setting. IT must ensure that AI applications are reliable, produce expected outcomes, and align with educational standards. Guarding against hyper or advantaged usage based advanced knowledge or grade level
2. **3rd party vendors**	Organizations that provide products or services to your organization under contract.
3. **Algorithmic Discrimination**	Algorithmic discrimination occurs when automated systems contribute to unjustified different treatment or impacts disfavoring people based on their race, color, ethnicity, sex (including pregnancy, childbirth, and related medical conditions, gender identity, intersex status, and sexual orientation), religion, age, national origin, disability, veteran status, genetic information, or any other classification protected by law.
4. **Assets** **(Operational Readiness - Procurement section)**	Hardware and Software purchases
5. **Compliant Gen AI tools vs Non-compliant Gen AI tools**	Compliance within an individual organization's established policies.
6. **Copyright Protection Policy**	Under the Copyright Act, a copyright owner has the exclusive right to reproduce, adapt, distribute, publicly perform, and publicly display the work (or to authorize others to do so). In the case of sound recordings, the copyright owner has the right to perform the work publicly by means of a digital audio transmission. Note:

	Content created by artificial intelligence without any human input cannot be copyrighted under current U.S. law.
7. **Data Classification Model**	Data classification tags data according to its type, sensitivity, and value to the organization. It helps an organization understand the value of its data, determine whether the data is at risk, and implement controls to mitigate risks.
8. **Data Sharing Partners**	External partners outside of 3rd party vendors that you contractually work with, such as community partners, non-profits, etc.
9. **Data Steward**	An oversight role within an organization responsible for ensuring the quality and fitness for purpose of the organization's data assets.
10. **Foundational Model**	A large machine learning model pre-trained on a vast quantity of data at scale resulting in a model that can be adapted to a wide range of downstream tasks.
11. **Generative AI**	A subset of artificial intelligence that leverages machine learning techniques to generate new content and ideas (conversations, stories, images, videos, music) that resemble your training data.
12. **Generated Content**	Content generated by Gen AI machine learning systems that are capable of generating text, images, and other types of content.
13. **Generative Liability & Insurance Requirements**	Student Accountability: Students who engage in nefarious activities can face disciplinary actions, including suspension, in severe cases, legal consequences. School Liability: If a school fails to monitor, prevent, or address malicious AI usage, it may face reputational harm, legal actions from affected parties, or potential financial consequences. Parental Responsibility: Depending on jurisdiction and the age of the student, parents or guardians may bear some legal or financial responsibility for their child's malicious actions.

	AI Vendor Responsibility: If an AI tool facilitates illegal or harmful actions due to its design or vulnerabilities, the vendor could be held partially responsible, especially if they failed to provide proper safeguards or warnings. Insurance requirements, and parental/caregiving waiver should be STRONGLY considered.
14. **Hallucinations of inappropriate content**	Instances when an AI generates unexpected, untrue results not backed by real-world data, including false content, news, or information about people, events, or facts.
15. **Machine-Readable Format**	A digital representation of data or information in a file that can be imported or read into a computer system for further processing. Content that can be readily processed by computers.
16. **Source Systems (Data Readiness - Data Quality section)**	Authoritative data source for data elements
17. **Toxic and inappropriate content**	Any content potentially pertaining to sex, nudity, violence, gore, profanity, alcohol, drugs, and/or more.

Appendix 2 - Policies

Policies		
Policy	**Definition**	**References**
Acceptable/Responsible Use Policy	An Acceptable/Responsible Use Policy is a written contract listing terms and conditions explaining the acceptable uses of the internet and digital tools within the district, schools, and classrooms.	Executive Leadership, Sections 2 & 4
Data Governance Policy	Data Governance Policy is a formal set of guidelines and procedures established by a school district to ensure the consistent, secure, and lawful management and protection of data. This policy provides explicit directions on the storage, use, and sharing of data maintained by the district. It is designed to be in compliance with applicable state and federal laws, and includes specific provisions covering data security measures, access controls, quality control mechanisms, as well as procedures for secure data exchange and reporting.	Data Readiness, Section 1
Code of Conduct Policy	A Code of Conduct Policy is a set of principles, expectations and/or rules given to staff, students, and parents, which outlines the standards of conduct expected and the consequences for violating those standards.	Executive Leadership, Section 2; Data Readiness, Sections 1 & 3; Legal/Risk Management, Section 3
Data Privacy Policy	A Data Privacy Policy addresses the district's collection, use, and sharing of student and staff personal data in a manner that is consistent with applicable federal and state laws. It should be made available to all individuals whose personal data is covered by the policy.	Data Readiness, Section 3

Data Loss Notification Policy	A Data Loss Notification Policy is a set of guidelines that outlines the procedures for notifying affected parties in the event of a data breach. The policy should cover the notification process, including who should be notified, and what information should be included in the notification. The policy should also specify the roles and responsibilities of those involved in the notification process.	Legal/Risk Management, Section 3
AI RMF	AI Risk Management Framework would be specifically tailored to address the potential risks associated with the integration and use of artificial intelligence tools and technologies in primary and secondary education settings.	Risk Management
Ethical Considerations	AI respects students' rights and doesn't inadvertently harm or disadvantage any group of students.	
Fundamental Data Governance Policies	Check out CoSN's Trusted Learning Environment seal recommended Fundamental Data Governance Policies	Data Readiness

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