K12 Generative Artificial Intelligence (Gen AI) Readiness Checklist Questionnaire

Introduction

The Council of Great City Schools (CGCS) and the Consortium for School Networking (CoSN) worked in partnership with Amazon Web Services (AWS) to develop a K12 Generative AI (Gen AI) Readiness Checklist Questionnaire; a list of questions that K12 school districts can use to build an understanding of the factors they should consider prior to implementing Gen AI technology solutions within their districts. This checklist is not intended to serve as an in-depth Gen AI readiness assessment. It is meant as a tool that districts can use to build a foundational understanding of the tactical considerations necessary to ensure that Gen AI is implemented safely and securely, without bias or algorithmic discrimination, with controls around data privacy, and with an understanding of the sources from which information is being generated.

The K12 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. In our next phase, we will expand upon the considerations in this Checklist to develop a K12 Gen AI Readiness Assessment rubric that school districts can utilize to self-evaluate their Gen AI readiness maturity and identify the specific areas they need to focus on to better prepare their organizations for safe, secure Gen AI implementations.

We hope school districts find this tool useful and informative; as the starting place to intelligently and thoughtfully implement AI solutions that will support the achievement of both your instructional and operational goals.
# I. Executive Leadership Readiness (24 Questions)

<table>
<thead>
<tr>
<th>Challenge/Opportunity</th>
<th>Assessment Criteria</th>
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</table>
| **1. Strategy**        | 1. Does the use of Generative Artificial Intelligence (Gen AI) align to achieving your district’s mission, vision, goals, and values?  
2. Do you have a single-threaded owner for the adoption and management of Gen AI for your district?  
3. Do you have a cross-functional team (i.e. Technical, Operational, Academic, Financial, Legal, Administration, Students & Parent Representatives) that provides oversight and guidance on the implementation and management of Gen AI in your district?  
4. Is your team 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 for how you plan to manage and govern the allowable use of Gen AI across your district?  
6. Do you have metrics to evaluate the efficacy (impact) of the use of Gen AI in your district? If not, do you have a plan to collect data on the use of Gen AI in your district?  
7. Do you have a process for considering the financial impact and ongoing financial support of Gen AI in your district? |
| **2. Acceptable/Responsible Use Policy** | 1. Have you created and published formal policies, processes, and procedures on the Acceptable/Responsible Use of Gen AI 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 policies around the ethical use of Gen AI?  
   a. Have you added the use of Gen AI to your annual Acceptable/Responsible use policy?  
   b. Do you track compliance with your Acceptable/Responsible Use policies, processes, and procedures?  
   c. Have you updated your Code of Conduct policy to include consequences for violating the Gen AI Acceptable/Responsible Use policies, processes, and procedures?  
2. Have you updated your 3rd party vendor contracts to include the Acceptable/Responsible Use of Gen AI, including consequences for violating the policy? |
### 3. Legislation and Administrative Rules

<table>
<thead>
<tr>
<th>Question</th>
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<tbody>
<tr>
<td>1. Do your state law or school district’s rules prohibit the use of Gen AI in school districts?</td>
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<tr>
<td>2. Do your state laws or school district’s rules specifically allow for the use of Gen AI in school districts?</td>
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<tr>
<td>3. 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?</td>
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### 4. Equity

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<th>Question</th>
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<tbody>
<tr>
<td>1. Does your Acceptable/Responsible Use Policy training include information on how Gen AI can amplify bias?</td>
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<tr>
<td>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?</td>
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<tr>
<td>3. Do you have ways to override Gen AI models if necessary?</td>
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<tr>
<td>4. Do you have policies and practices in place to ensure equitable access to district approved Gen AI tools for all students?</td>
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## II. Operational Readiness (9 Questions)

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<thead>
<tr>
<th>Challenge/Opportunity</th>
<th>Assessment Criteria</th>
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<tbody>
<tr>
<td>1. Procurement</td>
<td>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?</td>
</tr>
</tbody>
</table>
2. Is your procurement team versed in your Gen AI procurement standards?
3. Do you have controls in place to ensure individuals procuring Gen AI tools are trained in your Gen AI procurement standards and going through a review and approval process with the Gen AI procurement evaluation and technical teams?
4. Do you have a process in place to evaluate whether purchases, upgrades and renewals of assets include Gen AI capabilities?
5. Do you require vendors to proactively notify your district when Gen AI capabilities are added to current assets?

### 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 the skills and roles you need to formally adopt Gen AI?
4. Do you have staff that have the ability to prepare data to share with Gen AI tools?

### III. III. Data Readiness (25 Questions)

<table>
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<tr>
<th>Challenge/Opportunity</th>
<th>Assessment Criteria</th>
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</table>
| **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 the district's data governance policies?  
5. Have you documented where all your data sets are stored, 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 life-cycle plan for the retention and destruction of district data as it 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, 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 the district’s Data Privacy policies, processes, and procedures to include the use of Gen AI that aligns with the [White House Blueprint for an AI Bills of Rights](https://www.whitehouse.gov/?)?
2. Have you updated your 3rd party vendor contracts to include data privacy policies, processes, and procedures for the use of Gen AI, including consequences for violating the policy?
   a. Do you track compliance with your Data Privacy policies, processes, and procedures?
   b. Have you updated your Code of Conduct policy to include consequences for violating data privacy policies, processes, and procedures?
3. Do you have role-based training on data privacy? Do you track completion of this training?
4. Do you have an onboarding program to train new hires in the district’s data privacy policies, processes, and procedures?
5. Do you flag the sharing of legally protected data with non-compliant Gen AI tools?
6. Do you de-identify or block the sharing of legally protected data from non-compliant Gen AI tools?
7. Do you have protections in place to identify and prevent district information from being used to train non-compliant Gen AI models?
8. Is age appropriate access being enforced (COPA) for the use of approved Gen AI in your district?

### IV. Technical Readiness (16 Questions)
<table>
<thead>
<tr>
<th>Challenge/Opportunity</th>
<th>Assessment Criteria</th>
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</table>
| **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?  
   a. Do you track compliance with your Data Access control policies, processes, and procedures?  
3. Do you have role-based training about Data Access controls when using Gen AI? Do you track completion of this training?  
4. Do you have an onboarding program to train new hires about Data Access controls when using Gen AI?  
5. 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?  
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 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, include human review of the generated content before use? |
## V. Security Readiness (7 Questions)

<table>
<thead>
<tr>
<th>Challenge/Opportunity</th>
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</table>
| **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, 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? |

## VI. Legal/Risk Management (12 Questions)

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<tr>
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<th>Assessment Criteria</th>
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</table>
| **1. Legal Remediation**   | 1. Have the district’s contract Terms & Conditions been updated to account for the allowable or prohibited use of Gen AI?  
2. Does your legal team have remediations in place in the case of the violation of any of the district’s policies, procedures or processes as they relate to Gen AI?  
3. Do you have a copyright protection policy for district, staff or student created content? |
## 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 3<sup>rd</sup> party vendors and data sharing partners? Do you consistently audit for compliance?
3. Do you have insurance that will cover the intended and unintended consequences of using Gen AI in your district?

## 3. Loss Notification

1. Have you created and published formal policies, processes, and procedures for PII data loss notifications that have been updated to include loss due to the use of Gen AI?
   a. Do you track compliance with your data loss notification policies, processes, and procedures, including when a data loss occurs due to the use of Gen AI?
   b. Have you updated your Code of Conduct policy to include consequences for violating data loss notifications?
2. Have you updated your 3<sup>rd</sup> party vendor contracts to include data loss notifications due to the use of Gen AI, including consequences for violating the policy?
3. Do you have role-based 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

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
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<tbody>
<tr>
<td>1. 3rd party vendors</td>
<td>Organizations that provide products or services to your organization under contract.</td>
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<tr>
<td>2. Algorithmic Discrimination</td>
<td>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.</td>
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<tr>
<td>3. Assets (Operational Readiness - Procurement section)</td>
<td>Hardware and Software purchases</td>
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<tr>
<td>4. Compliant Gen AI tools vs Non-compliant Gen AI tools</td>
<td>Compliance within an individual organization's established policies.</td>
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<tr>
<td>5. Data Classification Model</td>
<td>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.</td>
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<tr>
<td>6. Data Sharing Partners</td>
<td>External partners outside of 3rd party vendors that you contractually working with, such as community partners, non-profits, etc.</td>
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<tr>
<td>7. Data Steward</td>
<td>An oversight role within an organization responsible for ensuring the quality and fitness for purpose of the organization's data assets.</td>
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<td>8. Foundational Model</td>
<td>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.</td>
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<tr>
<td>9. Generated Content</td>
<td>Content generated by Gen AI machine learning systems that are capable of generating text, images, and other types of content.</td>
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### 10. 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.

### 11. 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.

### 12. 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.

### 13. Source Systems (Data Readiness - Data Quality section)
Authoritative data source for data elements

### 14. Toxic and inappropriate content
Any content potentially pertaining to sex, nudity, violence, gore, profanity, alcohol, drugs, and/or more.

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### Appendix 2 - Policies

#### Policies

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<thead>
<tr>
<th>Policy</th>
<th>Definition</th>
<th>References</th>
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<tbody>
<tr>
<td>Acceptable/Responsible Use Policy</td>
<td>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.</td>
<td>Executive Leadership, Sections 2 &amp; 4</td>
</tr>
<tr>
<td>Data Governance Policy</td>
<td>A Data Governance Policy is designed to ensure that data is managed and</td>
<td>Data Readiness, Section 1</td>
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protected in a consistent and secure manner. The policy will include the appropriate storage, use and sharing of data that is maintained by the school district. The policy should comply with applicable state and federal laws and include provisions for data security, access controls, quality control and data exchange and reporting.

| 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 is designed to ensure that student and staff data is managed and protected in a consistent and secure manner and covers the collection, use and sharing of the data maintained by the school district. | 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 |
Appendix 3 - PR FAQ

K12 leaders have a new tool to support the implementation of Gen AI in their districts

Washington, DC – (Press Release) – October 1, 2023 – Today, the Consortium for School Networking (CoSN), Council for Great City Schools (CGCS) and Amazon Web Services (AWS) announce the launch of the K12 Generative Artificial Intelligence (Gen AI) Readiness Checklist. This checklist provides district leaders with a list of factors they should consider prior to implementing Gen AI solutions in their school districts. Without a full understanding of the safeguards needed to protect against the negative impacts of Gen AI, and a framework to safely implement this technology, many district leaders feel their only option is to block the use of Gen AI on school issued devices and through the school’s internet. Yet to properly prepare students for a future where Gen AI is a part of daily life, and take advantage of the many efficiencies it can create, leaders need to find a safe way to roll out this cutting-edge technology. With the new K12 Gen AI Readiness Checklist, these leaders have a resource to help them build a foundational understanding of the tactical considerations necessary to implement Gen AI safely, recognizing bias, and with an understanding of the sources from which information is being generated.

As Gen AI tools, like Chat GPT, became available to the public, district leaders found themselves playing catch-up to understand the full implications of using this technology for their districts. To limit potential negative effects of Gen AI, many leaders’ initial response was to block Gen AI on school issued devices and through the school’s internet. In addition, as Gen AI was incorporated into technology tools, including educational technology software used in schools, district leaders realized blocking the use of Gen AI could be detrimental to students in the long-run. By not teaching students how to engage their critical thinking skills to safely use Gen AI, districts weren’t preparing them for a future where Gen AI could be a part of their everyday lives and careers.

The K12 Gen AI Readiness Checklist is the first tool that CoSN, CGCS and AWS are introducing to help school districts prepare for adopting this transformative technology. The initial Checklist is not intended to serve as an in-depth Gen AI readiness assessment. It is meant to create awareness and provide district leaders with a list of questions they should be asking as they create policies, procedures and processes for the safe use of Gen AI, which includes the establishment of an internal process to protect against the bias that are inherent in today’s AI Foundational Models. Whether at the central office, in the classroom, or at home as student’s complete assignments, the K12 AI Readiness Checklist can help district leaders devise implementation strategies across the six focus areas of Executive Leadership, Operations, Data, Technology, Security and Risk Management.
“By simply blocking the use of Gen AI, districts are unintentionally widening the gap between those who have personal access to this tech outside of school, and those who do not,” shared Willie Burroughs, the Director of Management Services at CGCS. “We know the future will include Gen AI in many forms and functions, and we have a responsibility to prepare students for that future. By creating this checklist we hope to provide awareness and understanding among K12 leaders of how they can safely implement Gen AI so every student can learn how to use this transformative technology.”

The K12 Gen AI Readiness Checklist consists of approximately 90 questions across the six focus areas listed above. Currently, the checklist consists of simple yes/no questions to help IT leaders recognize the steps they may need to take to prepare their districts for Gen AI. In future phases, CoSN, CGCS and AWS plan to expand upon the considerations in the Checklist to develop a K12 Gen AI maturity model that district leaders can use to self-evaluate and score their Gen AI readiness. The maturity model will help districts identify the specific areas they need to focus on to better prepare for safe, secure Gen AI implementations.

“K12 leaders are trying to balance the exuberance of teachers and students, who are excited to use Gen AI, with the fears we are hearing from our colleagues and communities,” said Evangelina Mendoza, Chief Information Technology Officer for the San Antonio Independent School District. “The K12 Gen AI checklist gives district leaders a starting place and framework to tackle the opportunities and challenges Gen AI will bring to our schools. My team is already working through this list and has identified several readiness factors we had yet to consider as we create policies and procedures for the safe implementation of Gen AI across our district.”

To get help preparing your school district for the use of Gen AI, please visit www.CoSN.org/K12GenAI and XXXX (link to CGCS website).
## Appendix 4 - Next Steps

<table>
<thead>
<tr>
<th>Next Steps</th>
<th>Deliverable</th>
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| **1.** Monica send cleaned up copy to AWS team by Friday, September 1<sup>st</sup> | ● Remove duplicates and separate into check-list vs. maturity assessment  
● Draft initial PR for the Why |
| **2.** AWS internal meeting to iterate  
  a. Tuesday, September 5<sup>th</sup> 10:00am EST | ● Review and record comments (not redline/suggestions) before meeting  
● Iterate draft |
| **3.** Send Assessment tool draft to Workgroup & CoSN for review  
  a. Wednesday, September 6th | ● Review and record comments (not redline/suggestions) before September 12<sup>th</sup> meeting |
| **4.** Workgroup meeting  
  a. Tuesday, September 12<sup>th</sup>, 1:30-2:30pm EST | ● Review and record comments (not redline/suggestions) before meeting  
● Iterate draft |
| **5.** Monthly CIO Job alike meeting/Phone call  
  a. Friday, September 15<sup>th</sup> | ● Unveil Assessment tool draft for feedback (survey)  
● Determine how want to collect feedback  
● Deadline to receive feedback Friday, September 22nd |
| **6.** Collect CoSN feedback from small working group | ● Unveil Assessment tool draft for feedback  
● Determine how want to collect feedback  
● Deadline to receive feedback Friday, September 22nd |
| **7.** Formal Press Release and v. 1.0 of Assessment Tool  
  a. TBD: Last week of September for late September (maybe early October release) | ● Draft formal press release  
● Review and get PR approval from CoSN and CGCS |
| **8.** CGCS Fall Conference: 78 large, urban school districts  
  a. October 25 – 28: San Diego | ● District reps present at AI session – Converge on content & format of presentation about Assessment tool and who will facilitate discussion |
| 9. Webinar/Podcast & Blog about Assessment Tool  
  | a. After CGCS October conference  
  | b. CoSN webinar Oct 24 at 1-2pm ET |
|---|---|
| 10. CFO Conference – Procurement, Finance, Risk Management, Internal Audit  
  | a. November 6-9: Phoenix, AZ |
| 11. AASA Conference  
  | a. February 15 – 17: San Diego |
| 12. CoSN conference  
  | a. April 8th – 10th: Miami (AI Readiness Summit on April 9 from 8-10am ET) for district teams |

- Determine length of time to present on topic
- General session presentation – 11/6
- Breakout session with Procurement/topic-specific discussions
- Facilitated discussion on how this readiness assessment has implications for Superintendents
- Provide updated Gen AI 1-pager with info about assessment tool

**FETC – January 23 - 26: Orlando**
**CGCS – CHRO – February 6 - 9: Louisville**
**SXSW EDU – March 4 – 7: Austin**
**CGCS COO Conference: April 2024**
**ASU-GSV – April 14th – 17th: San Diego**
**CGCS CIO – June 4 - 7: Portland, OR**
**ISTE – June 23 – 26: Denver**
**CAO Council Conference:**
**CGCS Conferences:**