

AI Implementation Checklists

Overview

Not all AI implementations are the same. The appropriate level of review, governance, and monitoring depends on how AI is being deployed. This appendix provides checklists for three common scenarios:

- **AI as a Feature:** AI capabilities embedded within existing software you already use
- **AI as a Product:** Standalone AI tools or platforms being procured for specific purposes
- **AI as a Factory:** Custom AI development using institutional infrastructure and data

These checklists are being provided as a guide to help individuals better understand what actions should be taken when deploying AI technologies. These checklists should be used in consultation with IT support. For additional assistance please contact your local IT support and/or your university IT teams.

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AI as a Feature

When AI capabilities are added to software you already use

Many existing platforms (Microsoft 365, Google Workspace, Adobe, Zoom, etc.) are adding AI features. These require awareness and appropriate use but typically do not require new procurement processes.

Checklist

1. Understand what's enabled

- Review vendor communications about new AI features
- Check if features are opt-in or enabled by default
- Understand what data the AI feature can access

2. Review data handling

- Is your data used to train AI models?
- Does the feature comply with existing data agreements?
- Are there options to limit data sharing?

3. Plan for implementation

- Create sandbox for testing
- Develop use case
- Determine if feature can be enabled/turned off

4. Communicate with users

- Inform staff/faculty about new AI capabilities
- Provide guidance on appropriate use
- Update training materials as needed

5. Document decisions

- Record whether features are enabled or disabled
- Note any configuration changes made

6. Plan for ongoing monitoring

- Schedule periodic reviews of feature performance
- Monitor vendor communications for model updates
- Define triggers for re-evaluation (e.g., major version changes)
- Maintain governance of compliance, resiliency, security, privacy, and fiscal risks

AI as a Product

When procuring standalone AI tools or platforms

Acquiring new AI products (chatbots, analytics platforms, specialized tools) requires thorough evaluation beyond typical software procurement.

Checklist

1. **Define the use case**
 - What problem are you solving?
 - What data will the AI access or process?
 - Who will use it and how?
 - What decisions will be informed by AI outputs?
2. **Assess data and privacy requirements**
 - What data classification levels are involved?
 - Are there regulatory requirements (FERPA, HIPAA, export control, international privacy, DOJ bulk data rule)?
 - Where will data be stored and processed?
 - Will vendor use data for model training?
3. **Evaluate the vendor**
 - Security certifications (SOC 2, ISO 27001, etc.)
 - Model transparency and documentation
 - Bias testing and fairness practices
 - Support and incident response
 - Financial stability and market presence
4. **Complete institutional review**
 - IT Security assessment
 - Privacy Office review (if applicable)
 - Procurement/legal contract review
 - Accessibility compliance check
5. **Plan implementation**
 - Pilot with limited user group first
 - Define success metrics
 - Develop continual training and support plan
 - Establish feedback mechanisms
6. **Establish ongoing monitoring and governance**
 - Define performance metrics and acceptable thresholds
 - Schedule regular reviews (quarterly minimum) for drift detection
 - Monitor vendor model updates and assess impact
 - Establish user feedback channels
 - Document triggers for contract re-evaluation or termination
 - Maintain governance of compliance, resiliency, security, privacy, and fiscal risks

AI as a Factory

When building custom AI solutions using institutional resources

Developing AI models internally—whether for research or operations—requires the most comprehensive governance approach.

Checklist

1. Establish project governance

- Identify project owner and accountability
- Define scope and intended use cases
- Establish review and approval processes
- Document ethical considerations

2. Address data requirements

- Inventory training data sources
- Ensure appropriate permissions/consents for data use
- Assess data quality and potential biases
- Plan for data storage and retention

3. Plan infrastructure

- Compute requirements (GPU, cloud, on-premises)
- Security and access controls
- Integration with existing systems
- Scalability considerations

4. Build responsibly

- Document model architecture and training process
- Test for bias and fairness
- Validate performance against defined metrics
- Plan for model versioning and updates

5. Prepare for deployment

- Define deployment environment and access
- Create and maintain user documentation and ongoing training
- Establish support and maintenance plans
- Plan rollback procedures

6. Establish ongoing monitoring

- Implement logging for performance, errors, and usage patterns
- Define data drift and concept drift detection mechanisms
- Schedule regular model performance reviews and retraining cycles
- Establish user feedback channels and incident response procedures
- Maintain governance of compliance, resiliency, security, privacy, and fiscal risks

Sources & References

These checklists were informed by the following frameworks and resources:

Federal Frameworks

- NIST AI Risk Management Framework (AI RMF 1.0)
- FDA Artificial Intelligence/Machine Learning in Software as a Medical Device
- FDA Request for Public Comment on AI Device Performance (October 2025)
- 15 U.S.C. § 9401 (National AI Initiative Act definitions)

Higher Education & Healthcare

- EDUCAUSE Higher Education AI Readiness Assessment (2024)
- AAMC Artificial Intelligence and Academic Medicine resources
- BEME Guide No. 84: Artificial Intelligence in Medical Education (scoping review)

Vendor Evaluation

- Gartner Evaluation Criteria for IT Vendor Selection
- Gartner Peer Community AI vendor evaluation guidance

AI Performance Monitoring

- FDA Methods and Approaches for Postmarket Monitoring of AI-enabled Devices
- MIT Jameel Clinic research on data drift in clinical AI systems
- NSF/FDA joint research on active surveillance frameworks for AI

Note: *These checklists will be refined over time based on implementation experience, regulatory changes, and feedback from across the UI System.*

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