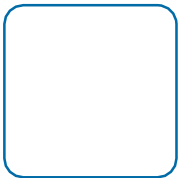


Auditing Artificial Intelligence

CAITLIN HOLLERAN, CHIEF COMPLIANCE OFFICER
CHASE FRANZEN, CHIEF INFORMATION SECURITY OFFICER
SHARP HEALTHCARE

CASEY KACERIK, SENIOR MANAGER
DELOITTE

Meeting with you today



Casey
Kacerik



Chase
Franzen



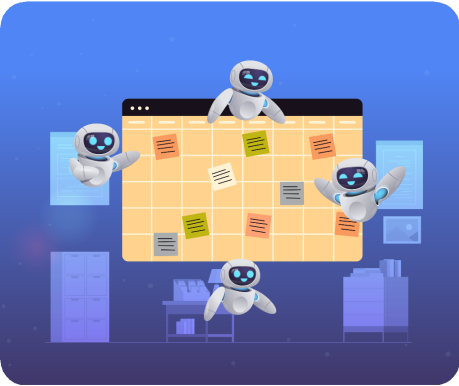
Caitlin
Holleran



Sharp GPT



Agenda & Objectives



AI Landscape

AI in Healthcare

Health System AI

AI Risk Domains

AI Governance & Best Practices – IA Specific View

Discussion, Q&A

By the end of this session, you should:

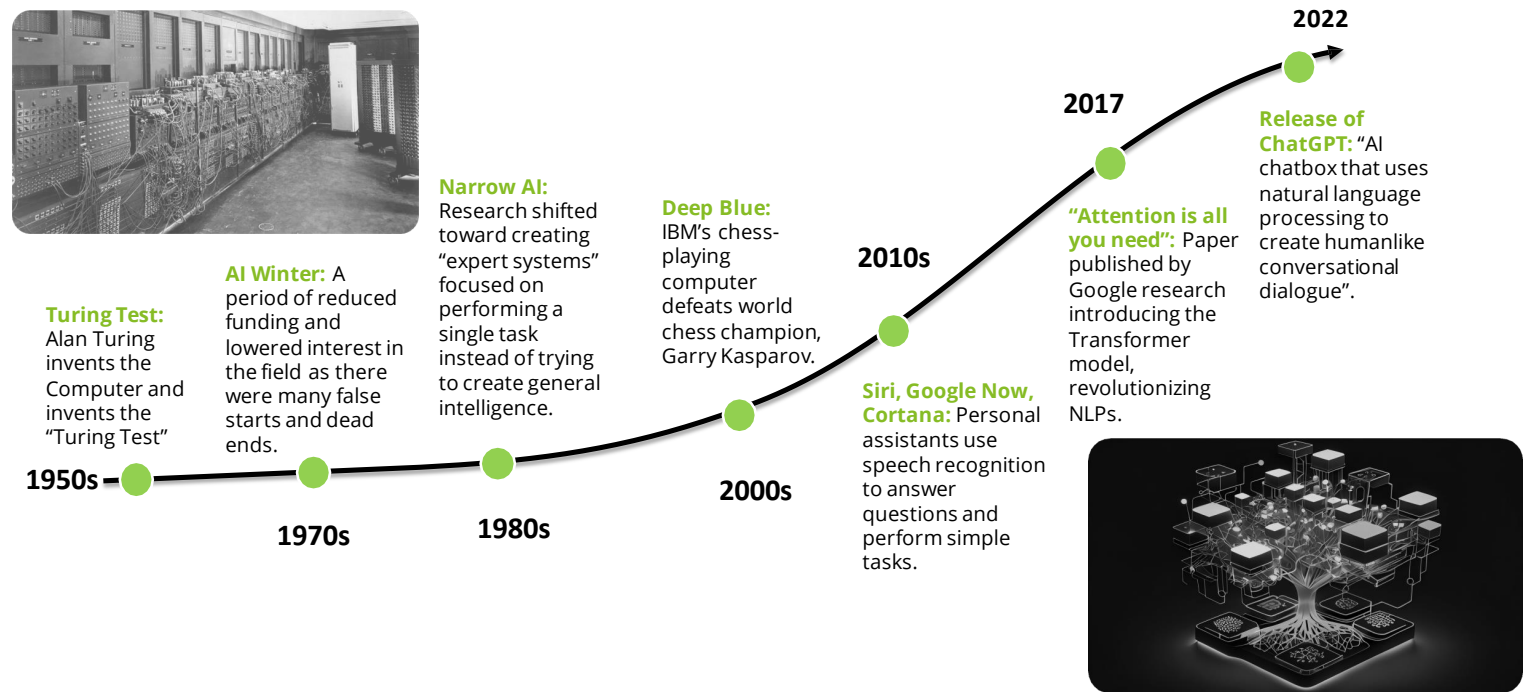
- ✓ Develop a comprehensive understanding of the AI landscape, including its definition, significance, and current state.
- ✓ Demystify the development and applications of AI, enabling participants to grasp the process and identify common uses.
- ✓ Recognize the specific applications of AI in the healthcare industry and understand their benefits and challenges.
- ✓ Gain awareness of the various risk domains associated with AI and understand the importance of AI Governance and best practices.
- ✓ Equip internal auditors with the skills to effectively assess AI-related risks within the organization by learning appropriate questioning techniques.

AI Landscape



Brief History of AI

Timeline demonstrating the advances in artificial intelligence and how it continues to revolutionize various industries.



AI is inherently about augmenting humans with machines to reach greater heights

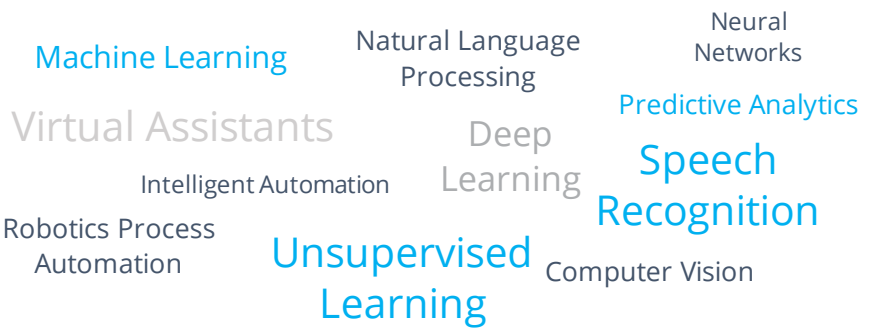
AI mimics the way humans perceive information, devise insights based on experience, and make decisions accordingly



OXFORD DICTIONARY DEFINITION :

ARTIFICIAL INTELLIGENCE (AI) is the theory and development of computer systems able to perform tasks normally requiring human intelligence

AI encompasses many technologies that work together to build innovative solutions that transform society and business...



Unlocking the Power of Language: Understanding Generative AI

WHAT is Generative AI | artificial intelligence that creates **original content across various modalities** (e.g., text, images, audio, code, voice, video) that would have previously taken human skill and expertise to create

HOW does it work | Generative AI is powered by **foundation models** such as OpenAI's GPT-4, NVIDIA's Megatron, and Google's PaLM, which are trained on **vast amounts of data and computation** to perform a broad range of downstream tasks

WHY now | innovations in **machine learning** and the **cloud tech stack**, coupled with the **viral popularity** of publicly released applications have propelled Generative AI into the zeitgeist

WHO is involved | **Big Tech** is building—and enabling access to—foundation models; **start-ups** are developing user applications on these underlying models; and **companies** are beginning to adopt

POTENTIAL BUSINESS IMPACT | the **marginal cost of producing initial versions of knowledge-intensive content**—such as IT code, marketing copy, and creative design—**can decrease significantly**

EXAMPLE MODALITIES

Text Generation

Prompt: *Explain my colleagues the business impact of generative AI in 50 words*

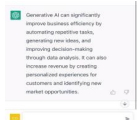


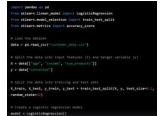
Image Generation

Prompt: *A bowl of soup that is a portal to another dimension as digital art*



Code Generation

Prompt: *In python, code a program that predicts the likelihood of customer conversion*



Video Generation

Prompt: *A teddy bear painting a portrait*



Audio Generation

Prompt: *Play 'we have to reduce the number of plastic bags' in a sleepy tone*



Generative AI comes with risks and limitations

There are several limitations to consider when using Generative AI

Bias in; bias out. If the training data is biased (e.g., over/under-representation of a population cohort, sexism, racism), then outputs generated could exhibit biases as well. Bias reductions in the training data and/or human supervision during model training is needed

Bias



Foundation Models generally offer a pay-as-you-go billing mechanism, and the cost per use of sophisticated models is materially significant. Fine tuning the biggest model and running large documents through several times could easily run up a bill of tens of US \$1000s

Cost



Is the AI being used in a manner consistent with the purpose of the overall exercise? Is a human being brought into the loop to decide whether the AI's suggestion needs adjustment before actual use? Submitting an AI-generated essay for a high-school assignment may not be ethical

Ethical Use



Models might output facts that are factually false. Sources and citations are unavailable for most models. Users should be conscious that outputs could be inaccurate and should perform due diligence to validate generated content.

Hallucination



SaaS-AI companies may save some or all of prompt payloads for future training. Therefore, confidential data will be used to train future versions of the base model – how will this affect your organization's competitiveness in the market?

IP Protection



It is critical to proactively minimize risk from malicious behavior on the network to maintain operations and customer trust. For example, a customer service bot revealing confidential information to a hacker either by prompt or unintentionally

Malicious behavior



Foundation Models are comprised of billions of parameters (model size) and trained on petabytes of data. In theory, the larger the model, the better the output. Foundation Models take time to produce outputs, which may limit real-time use cases

Model Performance



SaaS-AI companies require to submit text as a payload to users' API call. The data could be crossing borders. Is this in accordance with data privacy laws and with your company's policies? Many cloud service providers offer market-leading controls to manage data privacy of Foundation Models

Privacy



Models are good at understanding text but struggle when the data are in irregular formats, or when the position of the text on the page (e.g., infographic, PPT presentation slide) is relevant to the context and understanding. Other emphasis generators such as bolded text, font color, etc., don't play a role yet

Text Formatting









Most models have a 2k token size limit. Some larger ones can process 4k tokens in a single call. 2k tokens are approximately 2-2.5 pages. This limit makes it difficult to process larger documents

Token Size Limits



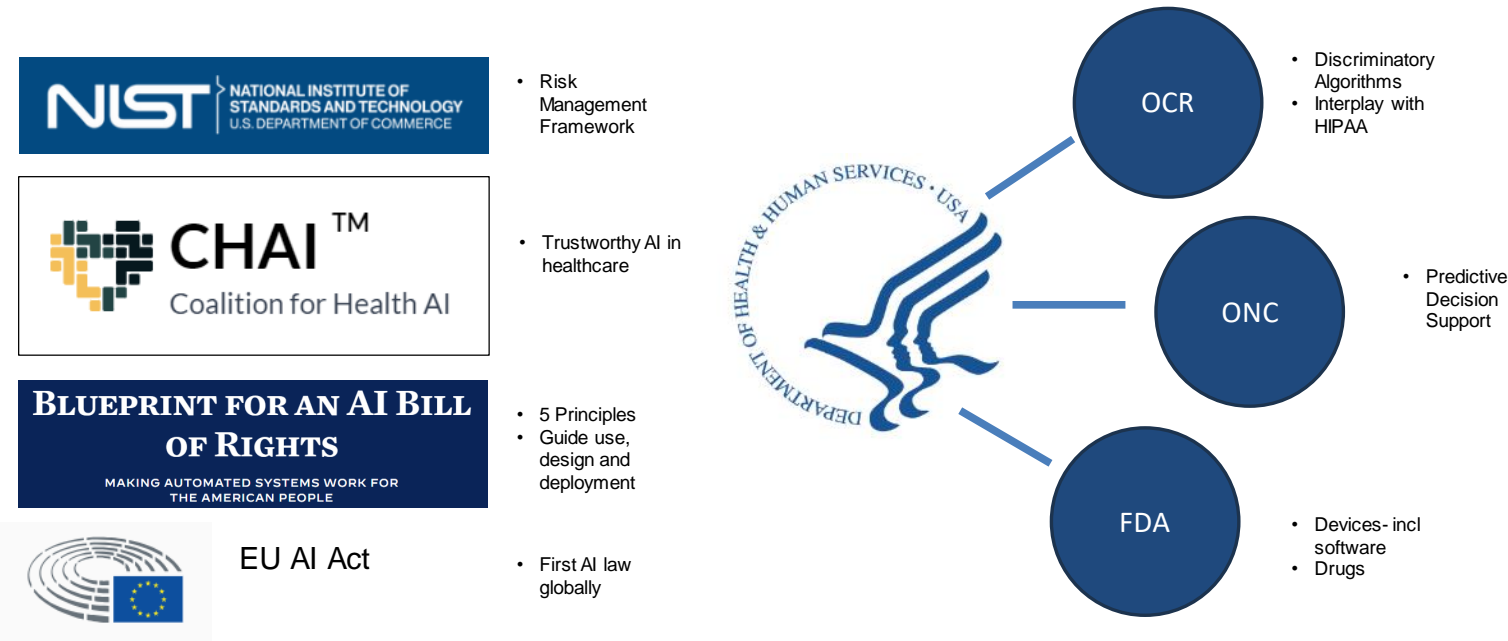
Generative AI Use Cases by function

 SALES & MARKETING	 HUMAN RESOURCES	 SUPPLY CHAIN & PROCUREMENT
1. Video editing and generation	13. Personal onboarding assistant	25. Demand planning (Consumer Sentiment Analysis)
2. Metaverse 3D experience	14. Compensation analysis	26. Inventory analysis
3. Product descriptions and reviews	15. Workforce skill analysis	27. Global trade-logistics analysis
4. Personalized consumer advertisements	16. 3D avatar creation	28. Contract Adherence & Anomaly Detection
5. Recommender systems for e-commerce	17. Metaverse 3D workforce experience	29. Scenario simulation
6. Chatbot / virtual assistant dialogue generation	18. Metaverse 3D workforce upskilling	30. Language translation for global trade
 GOVERNANCE & OPERATIONS	 INFORMATION TECHNOLOGY	 FINANCE & ACCOUNTING
7. Intranet search (knowledge management)	19. Code generation across languages/frameworks/CSFs	31. Fraud, waste, and abuse prevention
8. Process analysis	20. Development lifecycle documentation	32. Regulation and oversight analysis
9. Training for new team members	21. Test automation and test scenario creation	33. Financial report analysis
10. Document inventory analysis	22. Training on new technologies	34. Proactive value opportunity identification
11. News and media summaries	23. Peer review for optimized code writing	35. Budget and ROI analysis
12. Sentiment Analysis for Workforce	24. Legacy code summarization & translation	35. Divestment recommendations

Emerging AI Regulatory Framework



Emerging Regulatory Environment



Federal Regulations

Topic	Agency	Summary	Public comments requested	Deadline to Respond			
US Senate/White House	US Senate	SAFE Innovation Framework Policy, Proposed bipartisan policy by Sen. Chuck Schumer June 21, 2023	N/A	N/A			
AI Governance Guidelines and Policy Framework	Sen. Schumer, D.	The SAFE Innovation Framework was developed around the two pillars of 1)					
Topic	Agency	Summary	Public comments requested	Deadline to Respond			
AI Risk Management Framework	NIST	In collaboration with the private and public sectors, NIST has developed a	01/26/23	N/A			
AI Risk Management	Topic	Agency	Summary	Public comments requested	Deadline to Respond		
	US Senate AI Leadership To Enable Accountable Deployment Act	US Senate, Sen. Gary Peters, D-MI	S.2293 - AI LEAD Act, proposed 07/13/23 To establish the Chief Artificial Intelligence Officers Council, Chief Artificial	N/A	N/A		
US House Healthy Technology	S. 2293	Topic	Agency	Summary	Public comments requested	Deadline to Respond	
HR 206	S. 2293	US Senate	US Senate, Sen. Brian Schatz, D-HI	S. 2691 AI Labeling Act, introduced 07/27/23	N/A	N/A	
National AI Cor	H.R. 206	S.2691 - AI Labeling Act of 2023	A proposed bill to require disclosures for AI-generated content. Every generative artificial intelligence system used in interstate or foreign commerce, that produces image, video, audio, or multimedia or text AI-				
Topic	Agency	Summary	Public comments requested	Deadline to Respond			
Blueprint for an AI Bill of Rights	US Congress	US House: Proposed by Rep. Adriano Espaillat, D-NY	H.Res.649 introduced 08/08/23	N/A	N/A		
Blueprint for an AI Bill of Rights OSTP The White House		H. Res.649	Proposed resolution to achieve a regional artificial intelligence strategy in the US to promote inclusive artificial intelligence systems and combat biases within marginalized groups and foster social justice, economic well-being, and democratic values.				
US House Artificial Intelligence Act	US Senate	US Senate	08/08/2023 Referred to the Committee on Foreign Affairs, and in addition to the Committee on Science, Space, and Technology, for a period to be subsequently determined by the Speaker, in each case for consideration of such provisions as fall within the jurisdiction of the committee concerned.				
HR 3369	US House	S.2399					
H.R. 3369	H.R. 3831	S. 2399	US House National Artificial Intelligence Research Resource	US Congress, Rep. Alma Eshoo, D-CA	H.R. 5077 CREATE AI Act of 2023 Creating Resources for Every American To Experiment with Artificial Intelligence Act of 2023, introduced 07/28/23 Identical to S. 27714 CREATE AI Act of 2023 Creating Resources for Every American To Experiment with Artificial Intelligence Act of 2023, introduced 07/27/23	N/A	N/A
	AI Disclosure Act of 2023		HR 5077				
		US House	HR 4704				
			H.R. 4704				

- Frequent additions with federal regulations
- Many agencies are focused on creating frameworks to govern AI, evaluating and reducing risk
- Topics such as trust, security, privacy trend throughout proposed regs
- Some outliers of proposed regs are concerning, H.R. 206

California Regulations

Topic	Agency	Summary	Public comments requested	Deadline to Respond										
California Legislature— Intent Bill. Introduced 09/13/23		Presents framework for California to ensure safe development of AI models within state borders.	N/A	N/A										
California Legislature— 2023–2024 Regular Session– Intent Bill Safety in Artificial Intelligence Act SB 294		<table><tr><th>Topic</th><th>Agency</th><th>Summary</th><th>Public comments requested</th><th>Deadline to Respond</th></tr><tr><td>California Legislature— 2023–2024 Regular Session. Introduced 02/06/23 Bill Text - SB-313 Department of Technology, Office of Artificial Intelligence: state agency public interface: use of AI. (ca.gov)</td><td></td><td>SB 313 proposes the creation of an Office of Artificial Intelligence within the Department of Technology that would oversee the use of artificial intelligence by state agencies and ensure compliance with state and federal laws and regulations.</td><td>SB-313 file notice suspended. 05/18/2023</td><td>N/A</td></tr></table>	Topic	Agency	Summary	Public comments requested	Deadline to Respond	California Legislature— 2023–2024 Regular Session. Introduced 02/06/23 Bill Text - SB-313 Department of Technology, Office of Artificial Intelligence: state agency public interface: use of AI. (ca.gov)		SB 313 proposes the creation of an Office of Artificial Intelligence within the Department of Technology that would oversee the use of artificial intelligence by state agencies and ensure compliance with state and federal laws and regulations.	SB-313 file notice suspended. 05/18/2023	N/A		
Topic	Agency	Summary	Public comments requested	Deadline to Respond										
California Legislature— 2023–2024 Regular Session. Introduced 02/06/23 Bill Text - SB-313 Department of Technology, Office of Artificial Intelligence: state agency public interface: use of AI. (ca.gov)		SB 313 proposes the creation of an Office of Artificial Intelligence within the Department of Technology that would oversee the use of artificial intelligence by state agencies and ensure compliance with state and federal laws and regulations.	SB-313 file notice suspended. 05/18/2023	N/A										
California Executive Order signed 09/06/23 CA Executive Order N-12-23		<table><tr><td>California Legislature— 2023–2024 Regular Session, introduced 02/16/2023 Bill Text - SB-721 California Interagency AI Working Group.</td><td>California Civil Rights Council (CRC)</td><td>SB-721 California Interagency AI Working Group:<ul style="list-style-type: none">SB 721 proposes the creation of a California Interagency AI Working Group to study the implications of the usage of AI and provide the Legislature with a comprehensive report by January 1, 2025 (and every two years thereafter until 2030) regarding AI.</td><td>Majority vote required.</td><td>N/A</td></tr><tr><td>California Legislature— 2023–2024 Regular Session. Introduced 01/30/23 Civil Rights Council Proposed Modifications to Employment Regulations Regarding Automated-Decision Systems Employer AI Use Bill AB 331 Bill Text: CA AB331 2023-2024 Regular Session Amended LegiScan</td><td>California Civil Rights Council (CRC)</td><td>AB 331 Employer Use of Automated Decision Tools<ul style="list-style-type: none">Bill would impose obligations on employers to evaluate the impact of an ADT, provide notice regarding its use, and provide for formation of a governance program. It would prohibit employers from using an ADT in a way that contributes to algorithmic discrimination. Perform an impact assessment on or before Jan. 1, 2025, and annually thereafter, for any ADT that includes:<ul style="list-style-type: none">a summary of the type of data collected from individuals and processed by the ADT.an analysis of the potential adverse impacts on the basis of sex, race, color, ethnicity, religion, age, national origin, limited English proficiency, disability, veteran status, or genetic information.a description of the safeguards that are or will be implemented by the employer to address any reasonably foreseeable risks of algorithmic discrimination arising from the use of the ADT.a description of how the ADT has or will be evaluated for validity or relevance.</td><td>Majority vote required. Joint Rule 62(a), file notice suspended. 05/18/2023</td><td>N/A</td></tr></table>	California Legislature— 2023–2024 Regular Session, introduced 02/16/2023 Bill Text - SB-721 California Interagency AI Working Group.	California Civil Rights Council (CRC)	SB-721 California Interagency AI Working Group: <ul style="list-style-type: none">SB 721 proposes the creation of a California Interagency AI Working Group to study the implications of the usage of AI and provide the Legislature with a comprehensive report by January 1, 2025 (and every two years thereafter until 2030) regarding AI.	Majority vote required.	N/A	California Legislature— 2023–2024 Regular Session. Introduced 01/30/23 Civil Rights Council Proposed Modifications to Employment Regulations Regarding Automated-Decision Systems Employer AI Use Bill AB 331 Bill Text: CA AB331 2023-2024 Regular Session Amended LegiScan	California Civil Rights Council (CRC)	AB 331 Employer Use of Automated Decision Tools <ul style="list-style-type: none">Bill would impose obligations on employers to evaluate the impact of an ADT, provide notice regarding its use, and provide for formation of a governance program. It would prohibit employers from using an ADT in a way that contributes to algorithmic discrimination. Perform an impact assessment on or before Jan. 1, 2025, and annually thereafter, for any ADT that includes:<ul style="list-style-type: none">a summary of the type of data collected from individuals and processed by the ADT.an analysis of the potential adverse impacts on the basis of sex, race, color, ethnicity, religion, age, national origin, limited English proficiency, disability, veteran status, or genetic information.a description of the safeguards that are or will be implemented by the employer to address any reasonably foreseeable risks of algorithmic discrimination arising from the use of the ADT.a description of how the ADT has or will be evaluated for validity or relevance.	Majority vote required. Joint Rule 62(a), file notice suspended. 05/18/2023	N/A		
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- California – home to 36/51 major AI vendors
- State laws can conflict with federal (historical, and with AI framework)
- Some state laws well intentioned but concerning if poorly implemented (SB 294; establishes liability and penalties to damages caused by “foreseeable risk”

AI in Healthcare

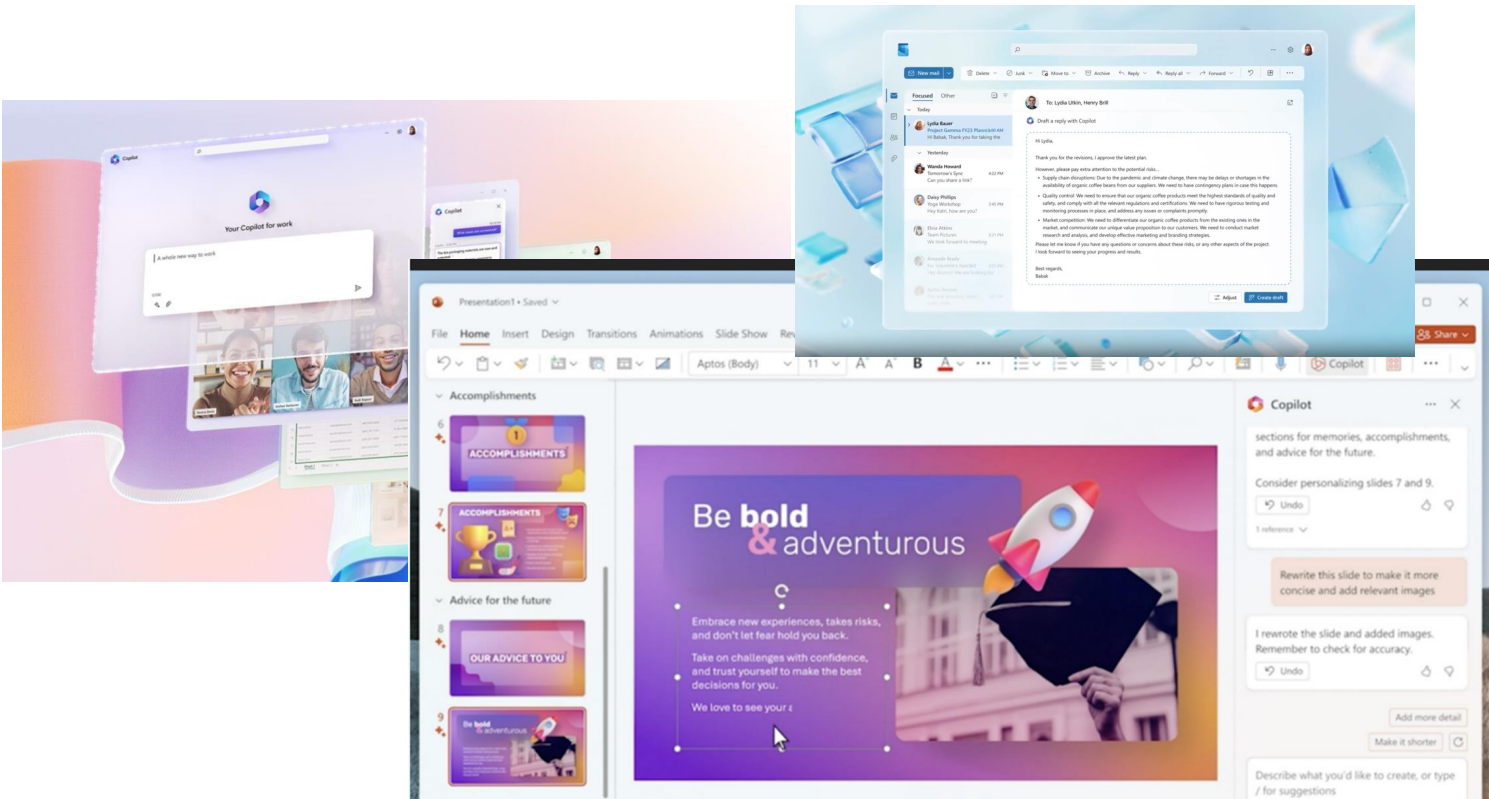


Numerous AI use cases across the industry

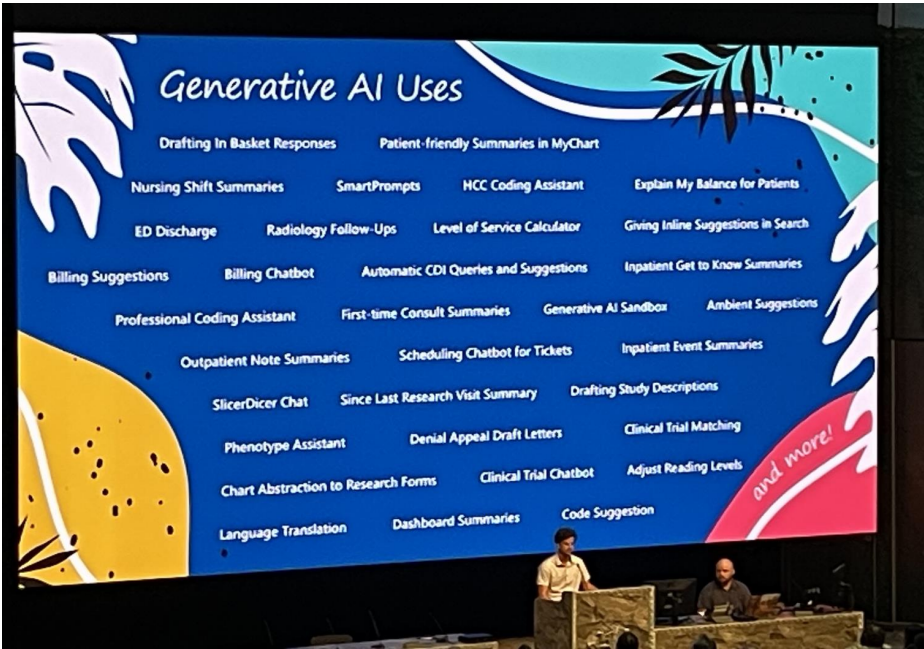
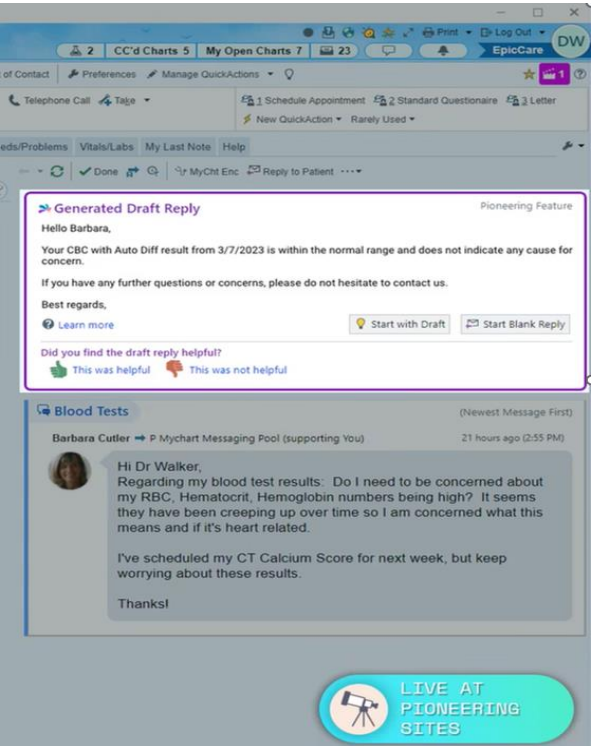
Current use cases include AI to improve patient engagement and health outcomes

AI Use Cases					
LIFE SCIENCES	Robotic-Assisted Therapy and Surgery <i>Use robotics and AI to assist patients in their recovery, leveraging digital algorithms to detect motions that patients can't execute during therapy and guide them through execution</i>	Drug Discovery <i>Create machine learning powered models to process massive datasets to identify and validate targets, design molecules and test in silico</i>	Digital Data Flow for Clinical Trials <i>Utilize cognitive automation to integrate trial data from multiple systems, create standardized digital elements, and generate trial artifacts</i>	Precision Medicine <i>Use AI to analyze genomic and phenotypic data to design individualized pharmacological treatments</i>	Drug Manufacturing Intelligence <i>Leverage sensor data and algorithmic models to predict manufacturing deviations and maximize factory yield and productivity</i>
	Self Healing Supply Chain <i>Apply AI to automate the analysis and aggregation of data to forecast supply and demand, and recommend the next best action to supply chain operators and autonomously perform activities</i>	Drug Marketing Omnichannel Engagement <i>Develop ML models based on promotional and longitudinal data to predict how, when, and with what message type to best engage with patients & HCPs, as well as optimize marketing spend across media mix channels</i>	Voice of the Patient Insight <i>Analyze patient social media feedback, complaints, and adverse events to identify insights that can improve product design, packaging, and educational materials</i>	Proactive Risk and Compliance <i>Apply AI to automate the analysis and aggregation of data to identify risk and compliance items, and recommend the next best action along with mitigation techniques</i>	IT Quality / Data Integrity <i>Apply AI to automate the analysis and aggregation of data to identify quality and data integrity issues, and recommend corrective and preventative actions to address gaps/control failures/non-conformances</i>
HEALTH CARE	Patient Engagement <i>Provide patient access to medical records, efficient appointment scheduling, and direct communication with staff and care coordination teams</i>	Real-Time Monitoring of Regulations/Policy Impacting LS/HC Industry <i>Use machine learning to assess real-time policy changes, and associated impact to HC providers</i>	Precision Medicine/Personalized Health <i>Leverage predictive insights to diagnose, prevent and treat a future illness based on an individual's lifestyle, real-world environment, biometric data and genomics</i>	Hospital Management <i>Forecast based on predictive insights, surges/lows in patient volumes, to support hospitals in staffing appropriately</i>	Computer Assisted Diagnosis <i>Leverage deep neural nets, machine learning and categorization technology to obtain a more efficient/accurate evaluation of imaging studies</i>
	Clinical Decision Support <i>Use complex clinical algorithms to aid and drive clinical decisions that will streamline, improve, and standardize medical practices</i>	Care Claim Revenue Cycle Optimization and Efficiency <i>Automate pre-care, day of care, and post-care claims submission and payment activities</i>	Virtual Personal Health Assistants <i>Use augmented reality, cognitive computing, sentiment analysis, and speech and body recognition to create a virtual encounter between a personal health assistant and patient</i>	Provider Supply Chain Management <i>Establish cognitive profiles of physicians and supplies utilized, detect anomalies in behavior patterns and sourcing, understand root causes, and provide recommendations for investigation and resolution</i>	Provider Payment Integrity <i>Detect and prevent fraud, waste, and abuse before it occurs by leveraging AI to increase access to information and uncover insights when analyzing claims, payments, and behavior trends</i>
<div><div> Cost Reduction</div><div> Speed to Execution</div><div> Reduced Complexity</div><div> Transformed Engagement</div><div> Fueled Innovation</div><div> Fortified Trust</div><div> Apt for AI Supercomputing</div><div>Use case where Deloitte is engaged</div></div> <div>Copyright © 2023 Deloitte Development LLC. All rights reserved.</div>					

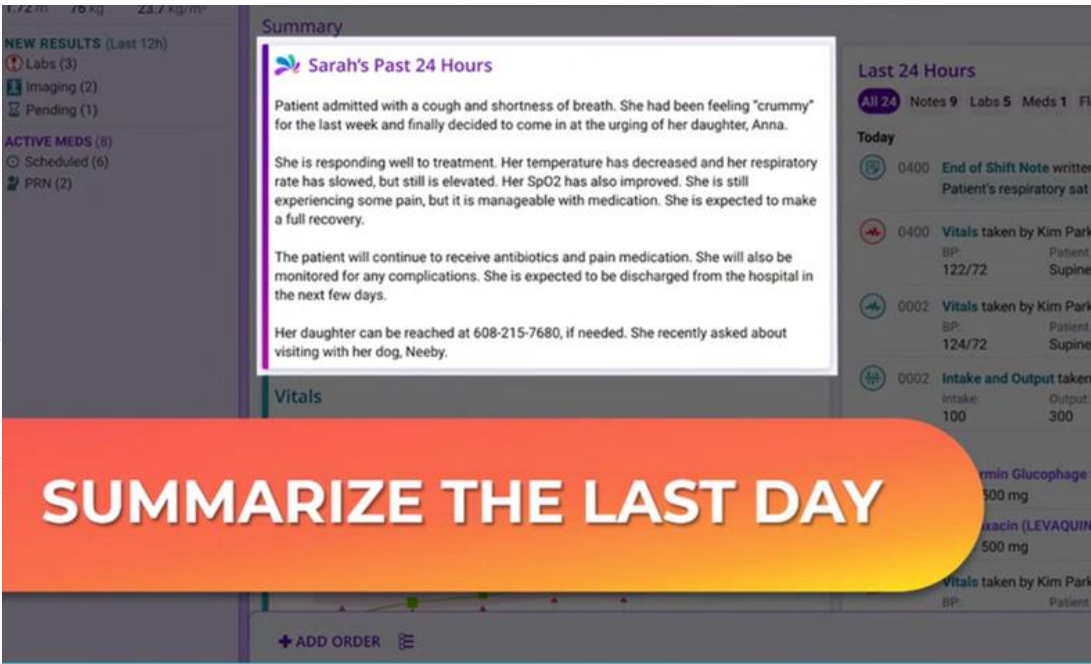
It Is Not Just Clinical - Microsoft 365



EMR Vendors – Epic Generative AI



EMR Vendors – Epic Generative AI

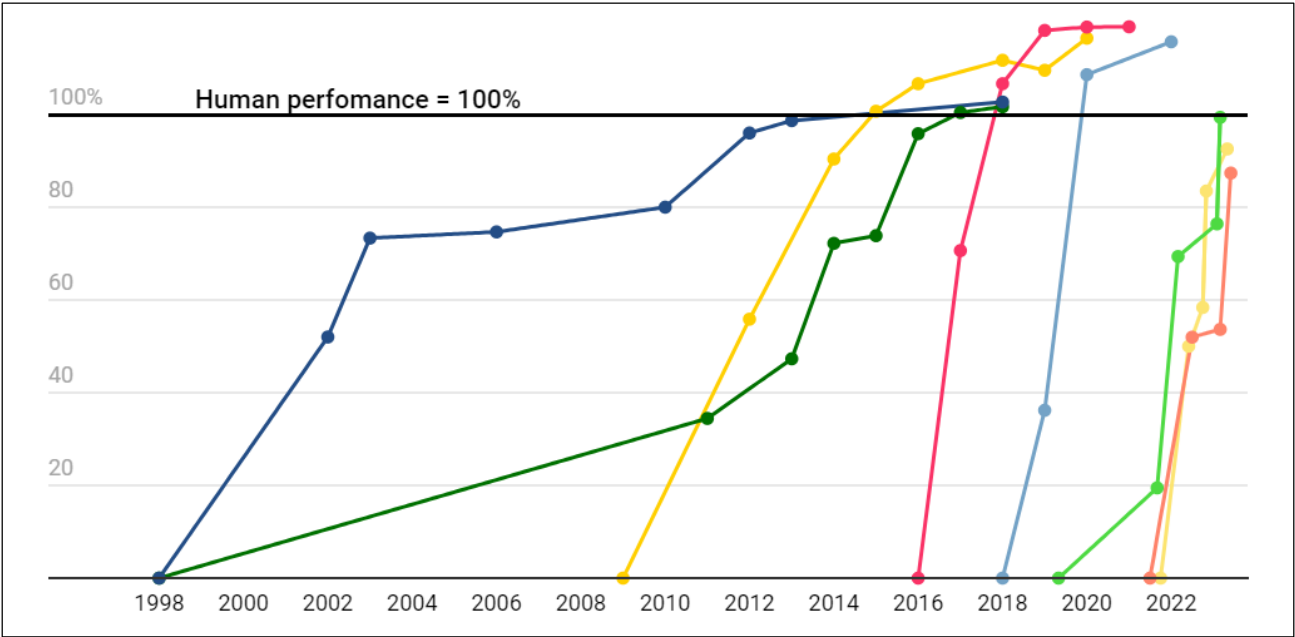


Health System AI



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WHY AI, Why Now?

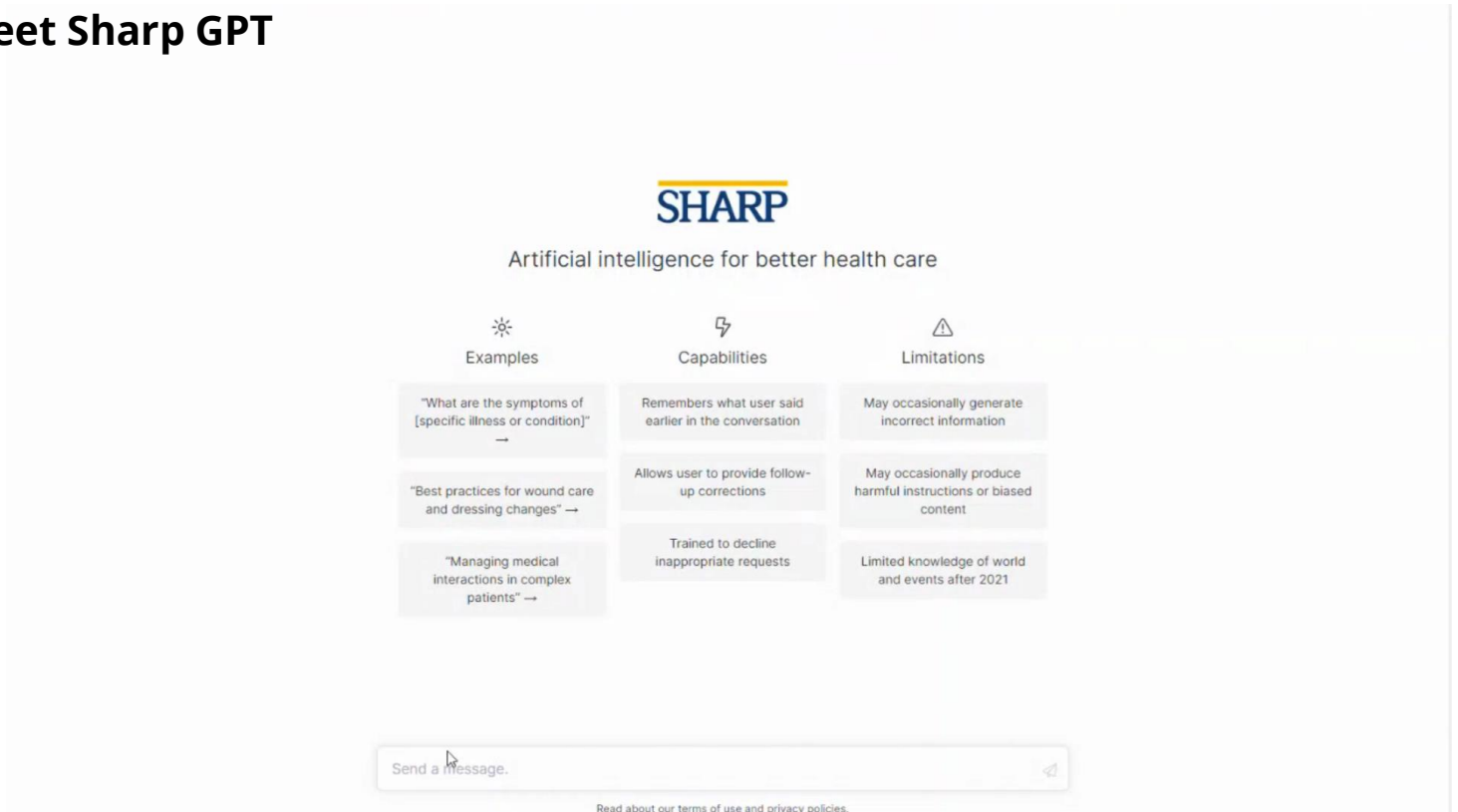


State-of-the-art AI performance on benchmarks, relative to human performance

- Handwriting recognition
- Speech recognition
- Image recognition
- Reading comprehension
- Language understanding
- Common sense completion
- Grade school math
- Code generation

Source: [Why AI Progress Is Unlikely to Slow Down | Time](#)

Meet Sharp GPT

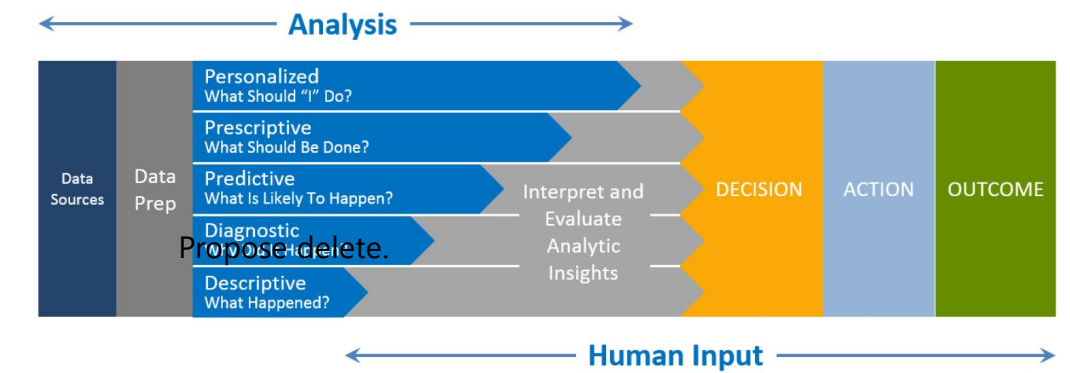


But with Great Technology.... Comes a Need for Great Oversight

A Statement of Purpose – AI Oversight Committee

This Committee will provide oversight of where and how artificial intelligence and data science assets are used within Sharp HealthCare. The Committee is responsible for leveraging individual subject matter expertise to try to anticipate and mitigate unintended consequences of AI. The committee will provide guidance and expertise to develop and implement standards, policies and process around this rapidly evolving discipline of artificial intelligence.

Human AND Machine Together



A Human



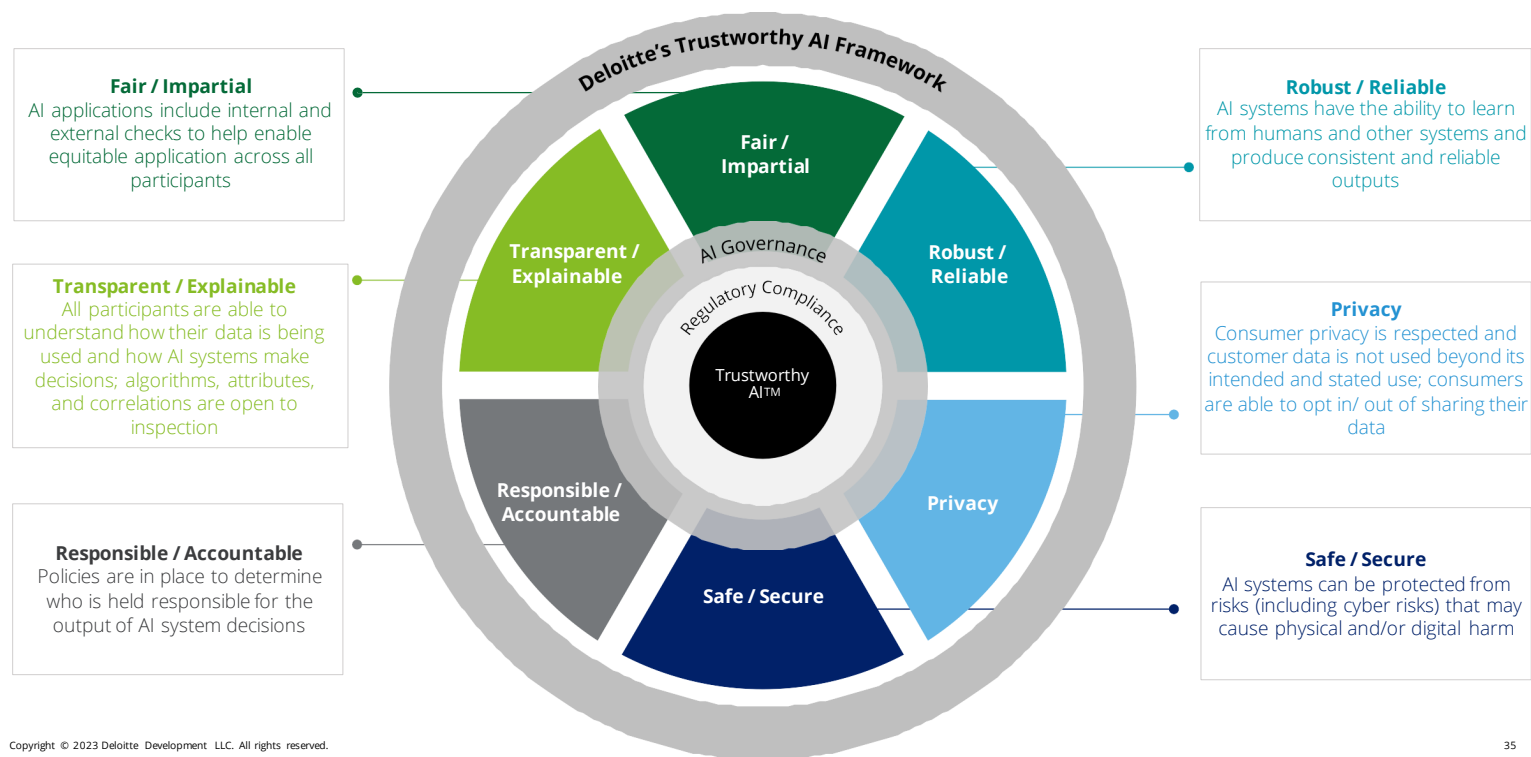
In the Loop ... Always

Combining computer and human analysis to make better decisions and achieve better outcomes.

AI Risk Domains

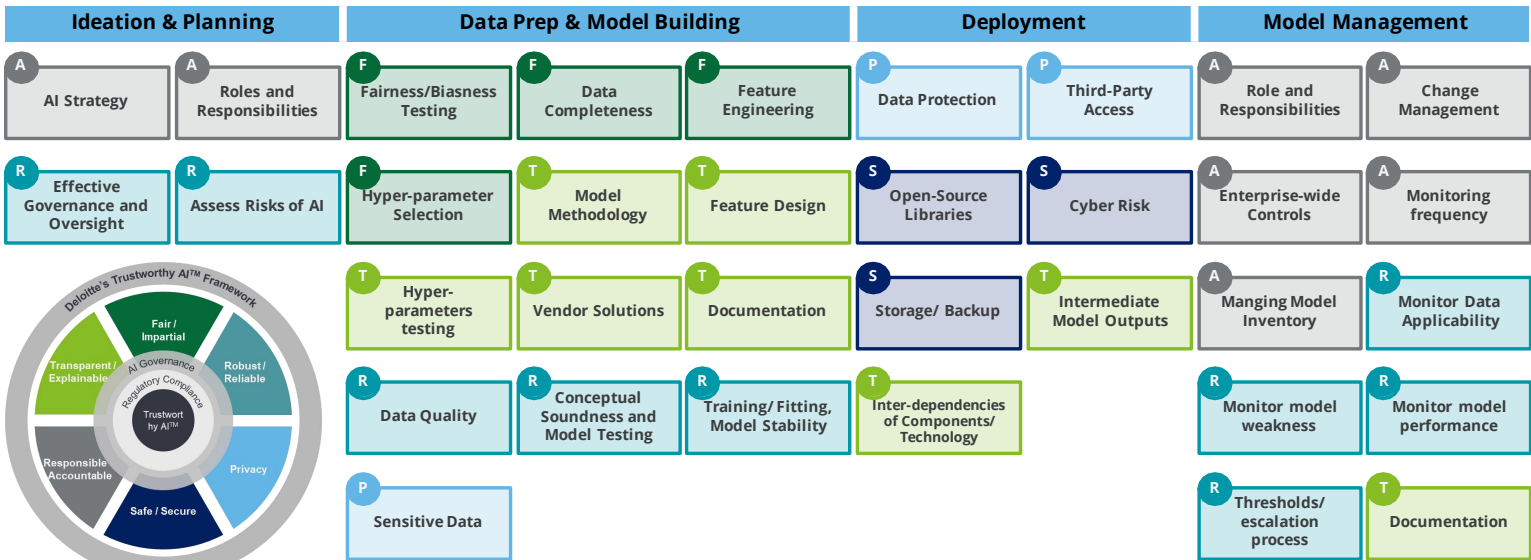


Deloitte's Trustworthy AI framework



Deloitte's Trustworthy AI™ Framework

Below are example areas that our team has identified for Digital Program Assurance and Trustworthy AI™ assessments.



AI Governance and Best Practices

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Internal Audit Considerations throughout the AI lifecycle

Governance

- Are there defined goals and objectives that articulate the purpose of deploying models and an AI program?
- Does the entity have a values or ethics statement applicable to the AI program?
- Are the roles and responsibilities for personnel involved with the governance, development, deployment, management and monitoring of AI programs defined?
- Is there an inventory of AI models and procedure for tracking and maintaining AI implementations?



Design Process

- Has a business case evaluation been performed (i.e., a broader group weighed in on the need, and pros and cons, for the AI application)?
- Have potential sources of risks (e.g., bias) been identified and addressed/mitigated?
- Is there a process or procedure in place that monitors current and emerging regulations and their applicability to AI implementations?



Data

- Is there a process for how data streams are selected and evaluated?
- Is bias and potential bias with AI implementations, reviewed, evaluated, and documented?
- Are data sets validated to ensure they are representative of the underlying populations and operational environment?



Development & Implementation

- Is the complexity of the model commensurate with the use case and benefits of the model?
- Are assumptions and limitations for AI models evaluated?
- Are models testing to ensure they are consistent with goals and objectives set forth in the business case as well as principles to foster public trust?



Validation & Review

- Are the test cases comprehensive, with appropriate pass/fail criteria, and is there appropriate statistical or other quantitative/qualitative testing of the modeled results performed by relevant stakeholders with appropriate expertise?
- Is the applicability and relevance of model policy, procedures and standards reviewed on a regular basis to ensure they are up to date and reflect evolving regulations and corporate requirements?

How Can Internal Audit Support AI?

Ways that Internal Audit can engage with operations in this space



AI strategy, governance and operating model

Provide a strategic cross-functional governance, roadmap and operating model for an effective AI risk management program.

- *Design and implement an AI strategy and framework to be supported by processes and controls over governance, deployment, and monitoring of AI based on our Trustworthy AI framework*
- *Design and implement a strategy for compliance with AI regulations*

Establishing an AI risk program and operational constructs in alignment with your business strategy and operations



AI data governance

Establish a data governance and risk management framework to safeguard for the security, privacy, integrity and ethics of data used for AI throughout its lifecycle.

- *Provide recommendations for remediation of data and controls over AI based on Trustworthy AI framework*
- *Assist stakeholders in the development, design and implementation of controls to address AI-specific risks*

Implementing a data-centric risk approach and framework for managing risks throughout the AI lifecycle



AI risk management operations

Build trust and resiliency in AI systems against anomalous activities that could compromise the data, models or outcomes. Develop robust and resilient infrastructure, operations and model development processes.

- *Provide independent testing on the design and operating effectiveness of AI controls, findings, and recommendations for deficiencies in the AI environment*
- *Conduct independent testing of AI models and related datasets for potential adverse outcomes*

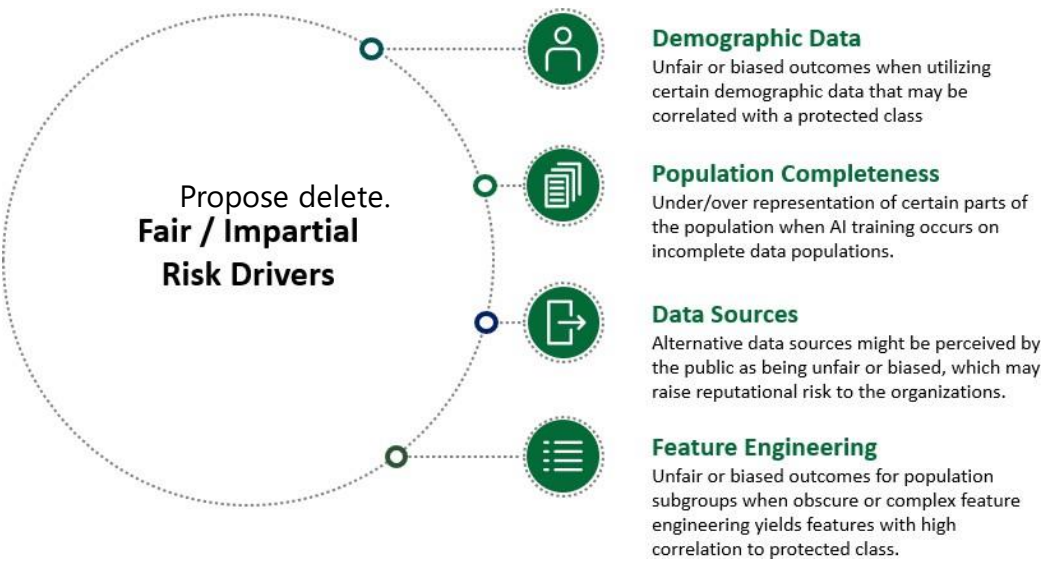
Analyzing and improving AI technology and related processes, to promote organizational trust for your AI solutions

Questions?



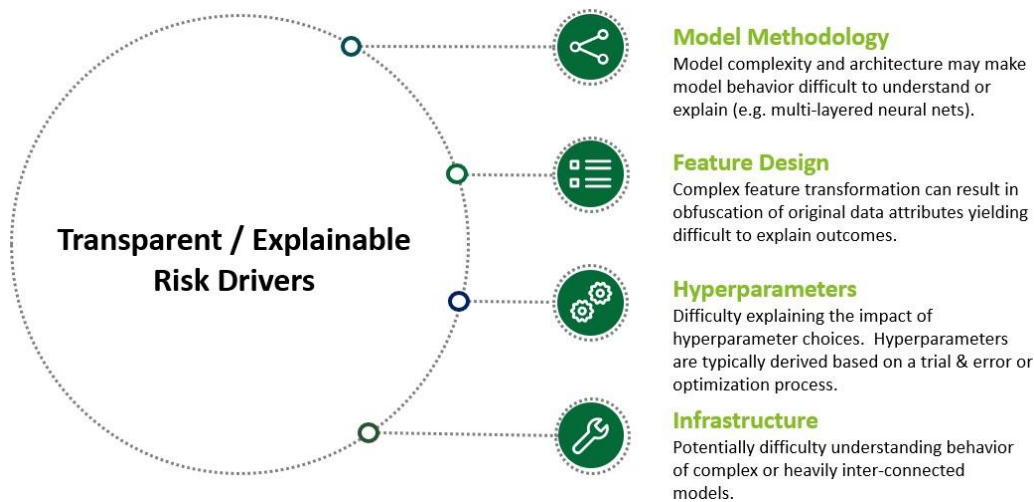
Fair / Impartial

The risk of producing discriminatory bias, or the perception thereof, towards certain subgroups of the populations and thus against the organization’s ethical value.



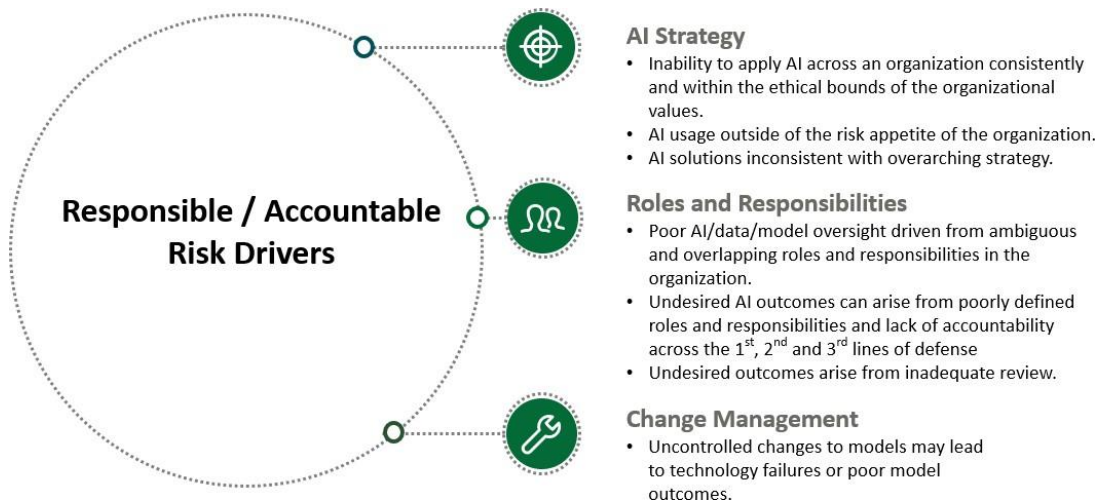
Transparent / Explainable

The lack of ability to explain a particular behavior of the AI system due to model complexity or feature inexplicability.



Responsible / Accountable

Lack of responsibility or accountability at each stage of AI use can lead to increased risk, including regulatory and operational risks.



Safe / Secure

The internal and external threats that arise due to lack of consistent and cohesive security of AI systems can lead to multiple risks including loss of business, customers’ and regulators’ trust.



Open-Source Libraries

- Usage open-source packages or beta versions may pose inherent security risks.
- Open sources packages may transmit data to third party servers (e.g.: Plottly or Dash can transmit data to plot graphs on cloud)

Cyber Risks

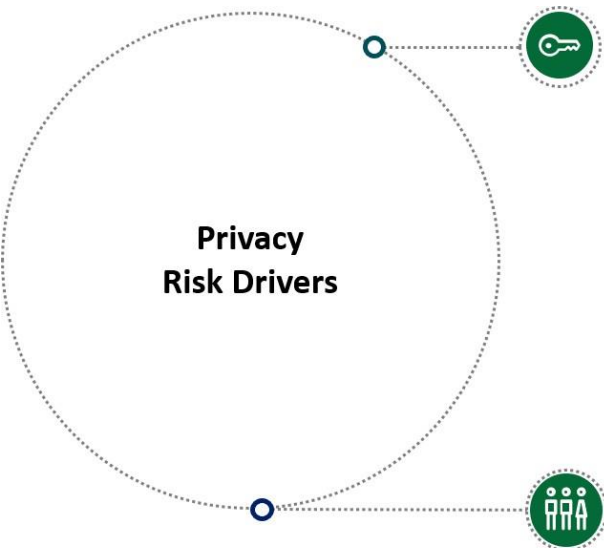
- Prototype code on unofficial infrastructure may be vulnerable to cyber attacks resulting in loss of IP.
- Automated systems may expose upstream/downstream AI/IT systems to security threats.
- Fragmented learning systems may be exploited to spread viral/malware infections throughout the AI network.

Storage/Backup

- Large-scale AI systems can take up to weeks of training. Any disruption during the training can lead to loss to critical training and compute time.
- Valuable training data collated from years of business experience may accidentally get deleted/lost.
- Lack of formalized storage infrastructure to maintain data and trained models (i.e. desktop storage)

Privacy

The risk in partial or complete failure to maintain privacy of data used or created within/by the AI systems or non-compliance to internal/external data protection rules.



Data Protection

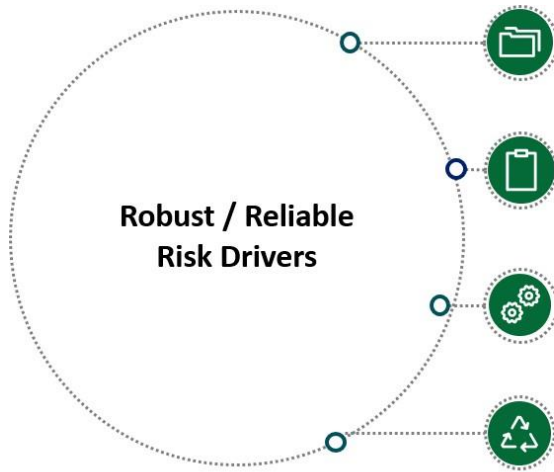
- Non-compliance to local/international data privacy rules (e.g. : GDPR) can lead to:
 - Prohibition of model usage leading to business risks.
 - Regulatory Penalties
 - Market Cap/ Reputation loss.
- Unauthorized usage of data in AI systems may lead to legal risks (e.g., usage of data beyond permissible/consented time period/applications may be perceived as unauthorized)
- Unapproved sensitive data used in ML pipelines.
- Lack of data privacy governance in AI strategy may lead to potential sensitive data risks
- Potential privacy risks when working with unstructured data as documents may include various elements of sensitive data.

Third Party Access

- Un-intended usage of data by third party vendors can lead to financial, regulatory and reputational risks.
- Lack of virtual boundaries in cloud infrastructure may leak sensitive data from one AI application into another.

Robust / Reliable

The risk that AI systems are not functioning as designed, resulting in unintended consequences over time or on new data sets.



Data Quality

- Data noise can mislead machine learning algorithms and cause inaccurate generalizations, while live data drift can degrade the accuracy of AI algorithms over time.

Methodology/ Approach

- If an AI model is poorly designed, inadequately justified, or not well understood in terms of its limitations, it can lead to unreliable outcomes.

Training/ Fitting

- Issues with overfitting or underfitting the data can lead to unreliable AI outputs, which may also be unstable if the model inputs or parameters are changed.

Continuous Learning

- Changing data structure can degrade AI models, resulting in poor outcomes, and technological breakdowns can disrupt the continuous learning pipeline.