

Dothan City Schools

AI (Artificial Intelligence) Guidelines

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1. Executive Summary

The rapid advancements in technology have led to an exponential increase in data creation. This data deluge has enabled companies with access to large volumes of data, funding, and computing power to accelerate the development of Artificial Intelligence (AI) tools.

AI's integration into daily life—through technologies such as Generative Pre-Transformers (GPTs), Reinforcement Learning (RL), and Large Language Models (LLMs)—has resulted in sophisticated AI systems, including conversational tools, becoming widely accessible since November 2022.

The primary goal of Dothan City Schools is to integrate AI into K-12 education in a way that responsibly maximizes its benefits while mitigating risks. AI should serve to enhance teaching and learning, encourage critical thinking, and support problem-solving, while equipping students and educators to contribute positively to society.

AI Pillars created and utilized in this guideline serve as benchmarks for integrating AI without replacing the human element so critical in education. These pillars place students and educators at the center, **ensuring that AI tools are a supplement to, not a replacement for, human instruction and decision making.**

2. Terminology

Artificial Intelligence: 15 U.S. Code § 9401 defines Artificial Intelligence (AI) as “a machine-based system that can, for a given set of human-defined objectives, make predictions, recommendations, or decisions influencing real or virtual environments.”

AI Systems: AI Systems are defined as software programs that have AI built into them, or software programs that are fully AI, or an AI product, model, algorithm, or any similar computational construct. This includes Generative AI.

Contractor: Contractor is defined as the contractor providing AI Systems, including any of its partners or affiliates.

Users: Users are defined as parents/guardians, students, educators, administrators, and management.

3. Purpose

The purpose of this document is to establish clear guidelines for the use of Artificial Intelligence (AI) within Dothan City Schools. This document ensures that AI use supports educational goals, protects student data privacy, complies with applicable laws (including FERPA and COPPA), and safeguards against inappropriate or unsafe AI use.

Generative AI can offer benefits in education when properly reviewed and implemented.

However, unregulated use may introduce risks including exposure to harmful content, bias, privacy violations, and misinformation. Therefore, the District will regulate and restrict AI use to ensure it is used responsibly, ethically, and in a manner that supports, not replaces, the role of educators. The district will focus on:

- Governance, accountability, safety, procurement, and implementation
- Data privacy, security, and quality
- Bias reduction, transparency, and equitable access
- Efficacy, AI literacy, and training for all users

4. AI Strategy

The district's AI Strategy aligns with its overall education and technology vision. It will:

- Articulate Goals & Alignment
 - tools will supplement, not replace, classroom instruction, administrative work, and professional development.
 - AI use will align with district curriculum standards, instructional strategies, and technology plans.
- Communication
 - Publish guidelines and approved tools list on the district website.
 - Provide regular updates to staff, students, and parents through meetings and district communications.
- Monitoring & Review
 - Annually review approved AI tools for performance, compliance, and emerging risks.
 - Update guidelines based on technology changes, feedback, and evolving best practices.
 - The District Technology Review Committee (TRC) will publish and maintain the Approved AI Tools List, review it annually, and archive prior versions for audit and transparency.

5. AI Governance

The governance of all Artificial Intelligence (AI) platforms, tools, and services within the District shall be the responsibility of the District Technology Review Committee (TRC). This committee serves as the sole body authorized to review, evaluate, approve, and monitor AI technologies for use by students, staff, or on district-owned accounts, networks, and devices.

All AI systems—whether instructional, administrative, or operational—must undergo the district’s established technology vetting process before deployment. Approval will be granted only if the AI system:

- Meets Children’s Internet Protection Act (CIPA), Children’s Online Privacy Protection Act (COPPA), Family Educational Rights and Privacy Act (FERPA), Health Insurance Portability and Accountability Act (HIPAA), Protection of Pupil Rights Amendment (PPRA), The Alabama Data Breach Notification Act of 2018, Alabama data-governance requirements, and district policy.
- Demonstrates appropriateness for K-12 educational use.
- Aligns with district instructional goals and security standards.

Approvals must be documented and reviewed annually. Vendors seeking to provide AI solutions to the district must supply clear evidence of compliance with these standards prior to consideration.

All AI platforms, tools, and services—instructional, administrative, or operational—must be vetted and approved by the District Technology Review Committee prior to any use by students or staff and prior to connection to district accounts, networks, or devices. The use of any AI platform not reviewed and approved by the District Technology Review Committee is strictly prohibited. Unauthorized use may result in access restrictions, reporting to administration, and disciplinary action in accordance with district policy.

The District Technology Review Committee will conduct periodic audits to ensure only approved AI platforms are in use and will provide regular updates to district leadership on emerging AI technologies and any recommended guideline changes. Approval is documented, time-limited, and reviewed annually for compliance, performance, and risk.

Vendors must provide model/system cards or equivalent documentation describing intended use, limitations, data flows, content safeguards for minors, and human-in-the-loop controls to support educator oversight.

6. Data Privacy and Security

The Dothan City School District is committed to complying with federal, state, and local laws, rules, and regulations, and other entities that provide standards for compliance to ensure data privacy and security are maintained for data used in AI systems. Compliance includes FERPA, COPPA (for students under 13), IDEA/Section 504 confidentiality, applicable Alabama data-governance requirements, and district policy. We will ensure that the Contractor’s AI systems comply with all applicable federal, state, and local laws, rules, and regulations, and other entities that provide standards for compliance.

The Dothan City School District is dedicated to ensuring data to be used in the AI systems will meet the data quality standards established by our Data Governance Policy.

The Dothan City School District will conduct compliance audits that will be done by our Technology Department and/or the Data Governance Committee (DGC). The Technology Department and/or the Data Governance Committee will submit a copy of the audit to our leadership and the respective Contractor(s). We will also ensure that the Contractor(s) provide a Corrective Action Plan (CAP) based on the findings in the audit report that will include the steps the Contractor(s) plan to take to mitigate the findings, and the timeline by which they will be mitigated. Vendors must attest to reasonable administrative, technical, and physical safeguards aligned to recognized frameworks (e.g., NIST) and provide breach notification within 72 hours of discovery to the district's designated contact.

The Dothan City School District will include in our procurement and contract document(s) verbiage (Appendix A), which the Contractor shall attest when submitting their proposals and any contract executed to perform the work. There shall be no use of district data for training new products without prior written DCS approval and documented scope. No AI vendor may access district data without an executed DCS Data Processing & Security Agreement and adherence to district data minimization and deletion schedules.

7. AI Procurement

The Dothan City School Technology Review Committee will conduct a detailed needs and capability assessment before procuring an AI system. They will evaluate the AI system for its effectiveness, ease of use, and compatibility with existing systems. In the procurement process, the following will be considered:

cost, data privacy, security, human-in-the-loop development, algorithm bias, model cards, system cards, interoperability, service-level agreements, key performance indicators, customizability, configurability, scalability, legal compliance, and contractor support.

The Dothan City School District will obtain a written statement from the contractor that:

- The AI model(s) have been pretrained, and no data is being used to train a model to be used in the development of a new product;
- The contractor has been responsible for the development of the AI systems by using human-in-the-loop during model development;
- The contractor has taken steps to minimize bias to the extent possible in the data selection process and the algorithm development, and the results have met the expected outcomes.

8. AI Implementation

The Dothan City School District will account for change management, establish performance metrics to evaluate the AI system, implement monitoring and accuracy checks appropriate to the tool's risk, require human review of AI outputs used for instruction, grading, or student support, and provide a clear issue-reporting path for staff.

Access to AI on student personal devices during the instructional day will align with applicable Alabama device-use laws and district policy (e.g., the FOCUS Act).

9. AI Competency Development

The Dothan City School District will develop an education and training program that is focused on approved tools, data privacy for minors, disclosure of AI assistance, and how to identify/report unapproved AI use. The program will also ensure users understand how AI works, including grasping the underlying fundamentals in fields such as computer science, mathematics, social studies, sciences, and know how to use approved AI tools safely, effectively, and responsibly.

10. Risk Management

The Dothan City School District will maintain an AI system inventory and conduct risk reviews using the NIST AI Risk Management Framework, documenting mitigations and responsible owners in the risk register.

The Dothan City School District will provide a report to the LEA leadership and Contractor(s) identifying the risks, risk type, and the timeframe within which the risk needs to be mitigated. The Dothan City School District will make sure that the Contractor provides a Corrective Action Plan that includes, but is not limited to, the mitigation strategies, persons responsible for mitigating the risks, roles, and responsibilities, and the timelines for mitigating the identified risks.

The Dothan City School District is committed to maintaining a risk register that will record AI systems:

- Not in compliance with the NIST framework, federal, state, and local laws, rules, and regulations.
- Risk Levels - Low, Medium, and High Risk.
- Risk status changes from one risk level to another.
- Risk mitigation start date and mitigation end date.
- Person names and roles who are accountable and responsible for mitigating the risks.

11. Utility and Effectiveness

The Dothan City School District will ensure that all users using the approved AI System are using it responsibly and that everyone gets access to the approved AI System. We are committed to using human judgment during the implementation and use of AI systems and will develop a process as to why and when a human will be involved. Our commitment extends to the effective implementation and enforcement of this AI System guideline, which will be achieved by ensuring users' awareness and comprehension of the guideline's provisions.

12. Use of AI Systems

In alignment with Dothan City Schools' commitment to student safety, data privacy, and instructional quality, the use of AI systems by students, staff, and all other district users shall be limited to those platforms that:

- Are purpose-built for K-12 and minors, with age-appropriate safeguards and educator controls.
- Do not expose students to biased, misleading, or age-inappropriate materials
- Have successfully completed the District Technology Review Committee's vetting and approval process, including compliance with all applicable laws, district policies, and data privacy standards.
- Have completed and returned the DCS Data Processing & Security Agreement
- Has training available for teachers and staff to effectively implement the platform

When AI assistance is used in operation, instruction, or student work, the users must disclose the tool and the extent of use.

13. AI Review and Approval Process

To ensure Artificial Intelligence (AI) systems are implemented safely, effectively, and in alignment with district goals, the following restrictions and processes shall apply:

- Instructional AI Platforms
 - The Curriculum and Instruction Department shall review and recommend instructional AI platforms or tools that align with district curriculum, instructional strategies, and educational goals.
 - Only AI tools formally recommended by the Curriculum and Instruction Department will be considered for review by the District Technology Review Committee (TRC).
 - The TRC will evaluate the proposed platform's privacy policy, data security practices, and compliance with applicable laws and district policies before approval.
 - Approved tools will be added to the District Approved AI/Online Tools List, published and maintained annually.
- Privacy and Compliance Review
 - The TRC shall assess each proposed AI tool for compliance with FERPA, COPPA, CIPA, HIPAA, PPRA, the Alabama Data Breach Notification Act, and all applicable district data-governance standards.
 - Any AI tool that does not meet district privacy or security requirements shall not be approved for use until deficiencies are remediated and verified.
- Implementation Support
 - The Technology Department will assist with the implementation, integration, and technical configuration of approved AI systems, ensuring alignment with district networks, security protocols, and access controls.

- The Technology Department may provide staff training or technical documentation as needed for effective and safe deployment.
- Use of Unapproved AI Systems
 - No AI platform, tool, or service may be used on district accounts, devices, or networks unless it has been reviewed and approved through the process above.
 - Unauthorized or unapproved AI system use may result in loss of access privileges or other disciplinary actions consistent with district policy.
- Ongoing Review
 - The TRC shall conduct periodic audits to ensure compliance with these guidelines and review approved tools annually to assess continued performance, safety, and effectiveness.

Appendix A

- 1) Data Usage Restriction Clause
 - a) The Contractor hereby attests and agrees that it is expressly prohibited from using any data provided to it by the data providers—either in its raw form or after undergoing any form of processing, aggregation, or transformation—for the purpose of training a new AI System to be used in a new product, model, service, or offering (collectively referred to as the "Product") of the Contractor. The Contractor further attests and agrees that any violation of this clause will be considered a material breach of this RFP and/or Contract to be entered into by the Contractor, and may result in termination of the Contract, legal action, or both, at the sole discretion of the Dothan City School District.
- 2) Notwithstanding the restrictions set forth in Section 1(a) of this Contract, the Contractor may use the data provided by the data providers to:
 - a) Customize the AI System currently in use, which may result in the development of a new AI System.
 - b) Develop a new AI System.
- 3) The customization and development of the AI System is expressly required by the Dothan City School District to meet the specific needs of the School District (the "District-Specific Needs"). Any such use of the data for the district-specific needs shall be subject to prior written approval by the Dothan City School District and shall be carried out in accordance with all applicable laws, regulations, and the terms and conditions of this contract.
- 4) The Dothan City School District shall submit the request in writing for the purpose of Section 1(a). Upon receipt of the request from the Dothan City School District by the Contractor, the Contractor shall submit to the state, in writing, a Request for Approval (RFA) to use the data for AI System training, details of the data use, and a statement of model training completion.
- 5) Request for Data Use for AI System training: The Contractor shall submit an RFA, in writing, to the Dothan City School District to use the data provided by the data providers for AI System training.

- 6) Details of Data Use: The RFA shall include a comprehensive written explanation that outlines the following, but is not limited to:
- a) Purpose of data usage.
 - b) Data elements that will be used for the AI System training.
 - c) Specifics of the AI System.
 - d) Methods of data utilization.
 - e) Expected outcomes.
 - f) Duration of data usage.
 - g) The manner the data providers' data will be stored, processed, and secured.
 - h) Name(s) of the individual(s) who will have access to the data.
 - i) The controls in place to prevent unauthorized use.
 - j) Specific types of data that will be used for model training.
 - k) Description of the model training process.
 - l) Risks associated with using the data for model training and how these risks will be mitigated.
 - m) A risk register contains the following, but is not limited to:
 - n) Level of risk.
 - o) Mitigation strategies.
 - p) Status of the risk(s).
- 7) Statement of Model Training Completion: The statement shall include a comprehensive written explanation that outlines the following, but is not limited to:
- a) A statement that the model training has been completed.
 - b) Summary of the model training, including information specified in the details of data use section above.
 - c) Deletion of training data or training data will be returned by a certain date. If retention is required by law or contract, the vendor must segregate and protect retained data and provide a deletion certificate by the agreed date.
 - d) A statement that no training data has been stored.
 - e) Contact information of the person(s) whom the Dothan City School District can contact for any questions or concerns.
- 8) AI Model Development and Use Attestation Clause
- a) The Contractor hereby provides, in its response to the Procurement Solicitation, a written statement attesting to the following:
- 9) Pretrained AI System: The AI System used in the performance of this Procurement Solicitation and/or Contracts has been pretrained. No data provided under this Procurement Solicitation and/or Contracts are being used to train an AI System to be used in a new product of the Contractor or any of its partners or affiliates.
- 10) Responsibility in AI System Development: The Contractor used all responsible measures needed during the development of the AI System that is used in the performance of this Procurement Solicitation and/or Contract.

- 11) Human-in-the-Loop AI System Training: A human-in-the-loop approach was used in the training of the AI System, ensuring human oversight and intervention were integral parts of the training process.
- 12) Unbiased Data Selection and Algorithm Development: The process of data selection for AI System training was conducted in an unbiased manner, adhering to the principles of fairness and non-discrimination.
- 13) Expected Outcomes: The results produced by the AI System meet the expected outcomes as defined in this Agreement.
- 14) The Contractor further attests and agrees that any violation of this clause will be considered a material breach of this Procurement Solicitation and/or Contract, and may result in its termination, legal action, or both, at the sole discretion of Dothan City School District.