

# **Efficiency and Compliance: *The Intersection of AI and Records Management***



**MISA Fall Conference**  
*AI and Beyond*  
**October 20, 2023**

# Patricia C Franks

PhD, CRM, CA, IGP, CIGO, FAI

Professor Emerita  
San José State University

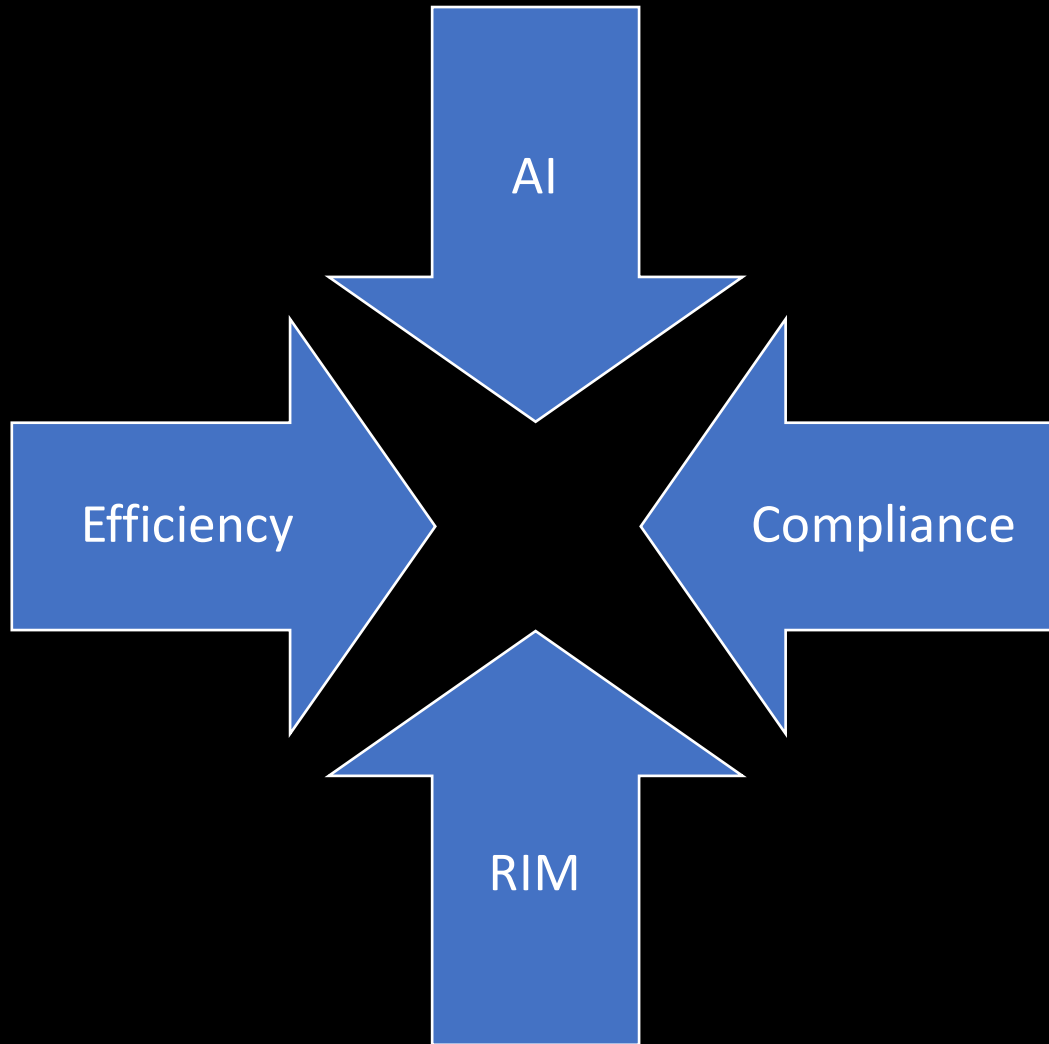
AI Researcher  
InterPARES Trust<sup>AI</sup>

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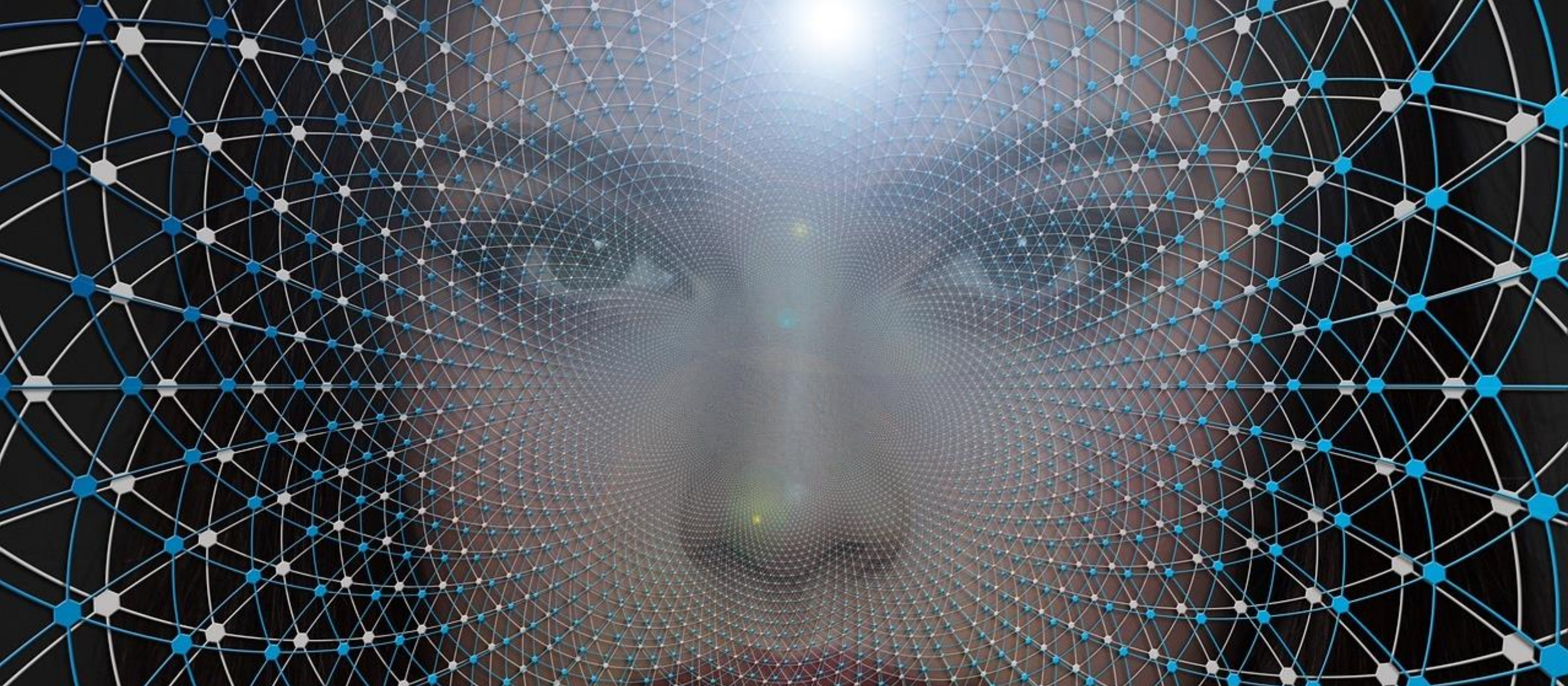




# Agenda







**AI - Getting on the Same Page!**





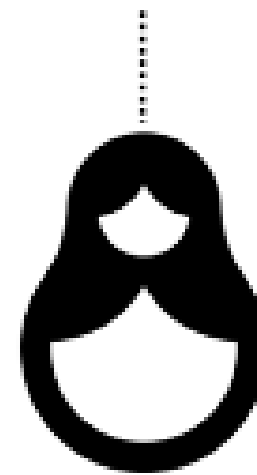
Artificial Intelligence

Machine Learning

Neural Networks

Deep Learning

GPT



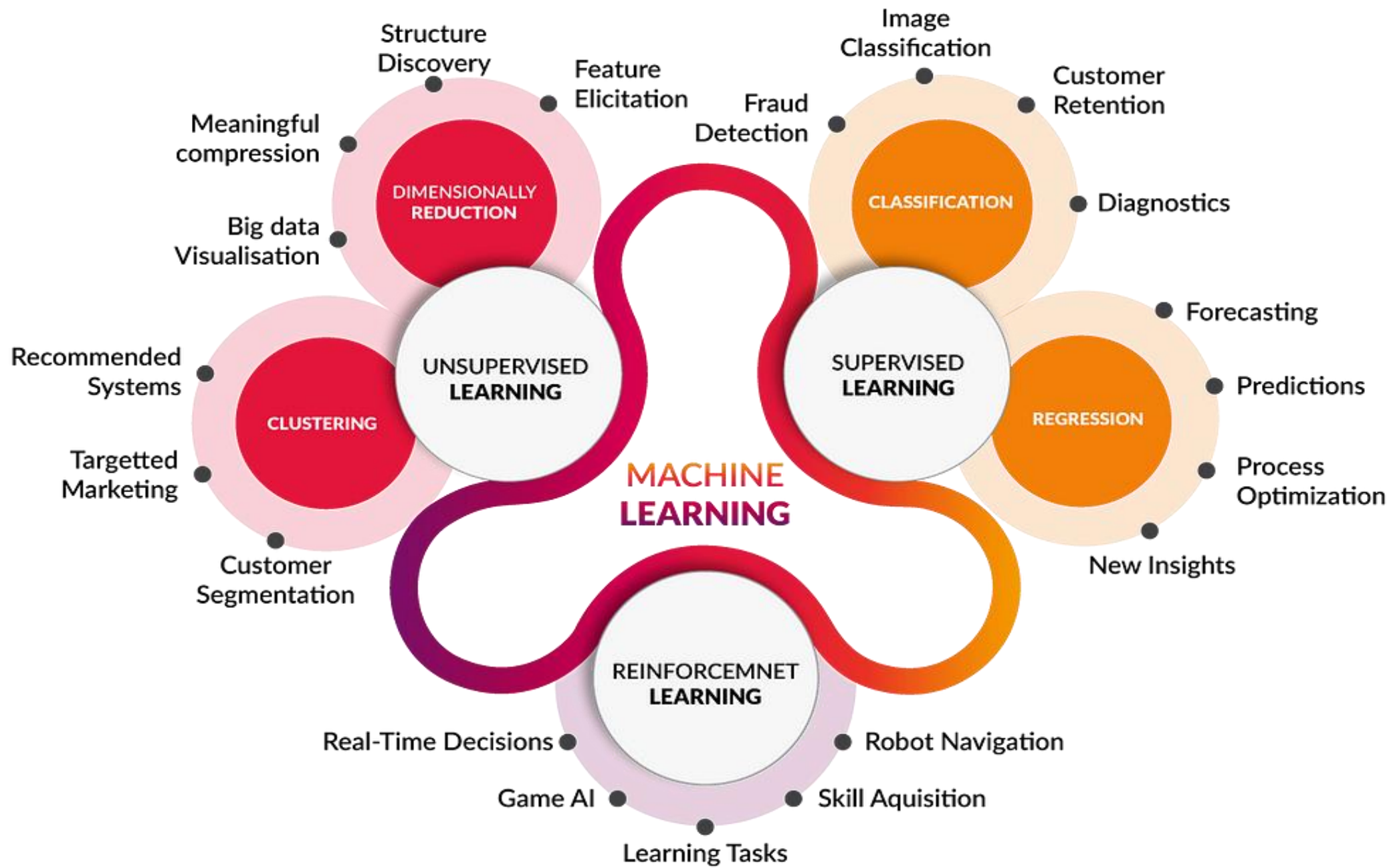
1950s - 1970s

1980s - 2000s

2010

2020s





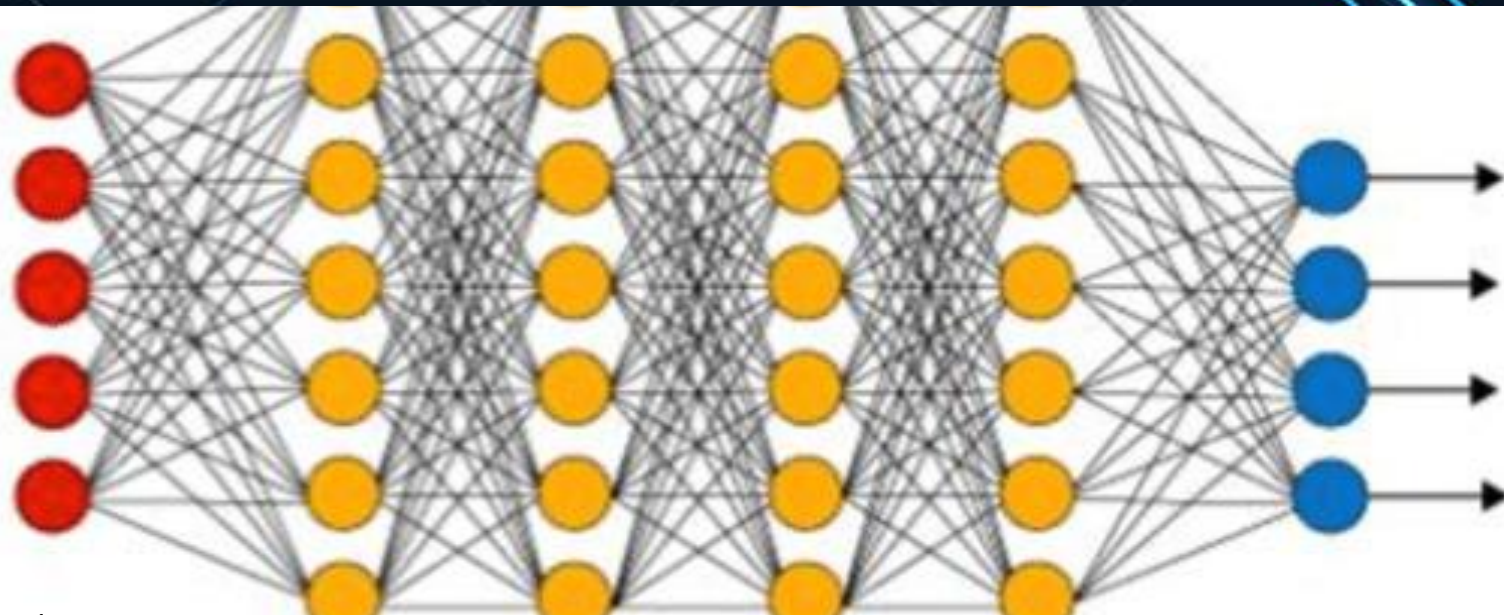
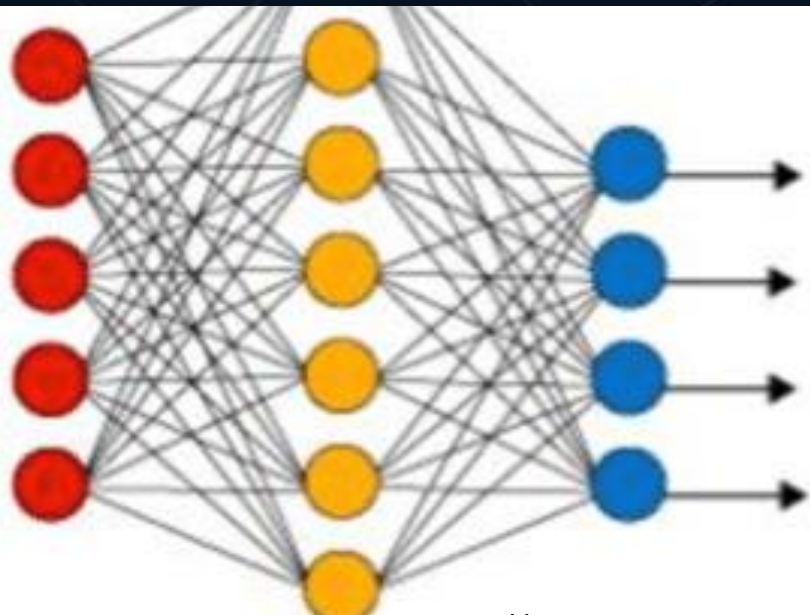
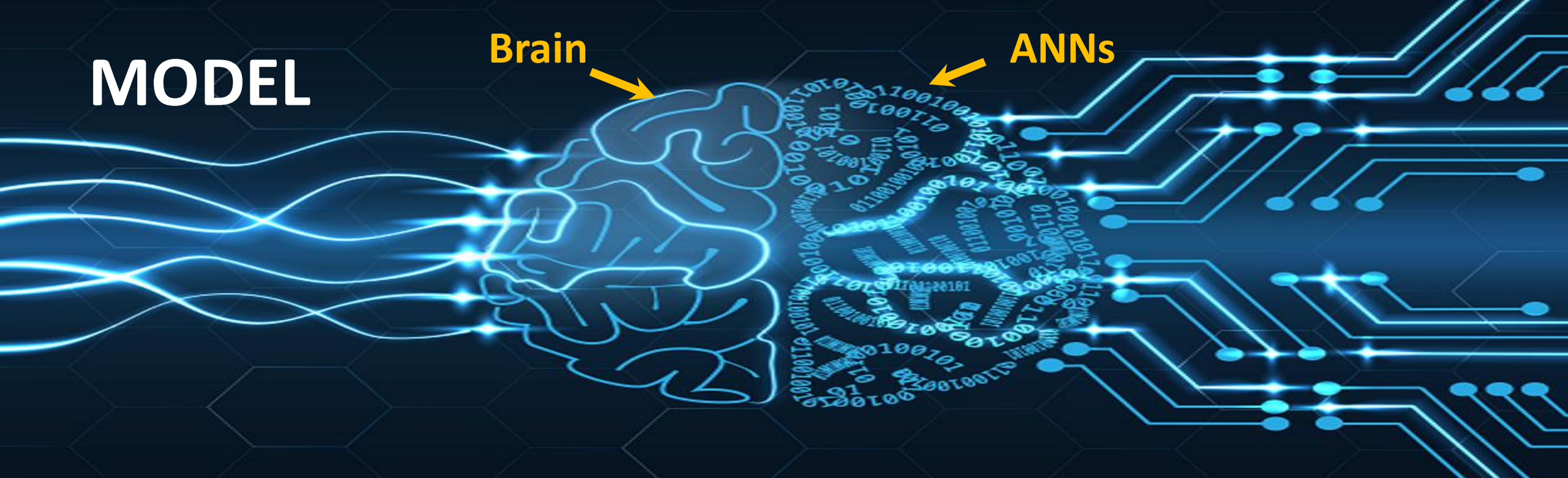
Source: <https://resources.experfy.com/ai-ml/coding-deep-learning-for-beginners-types-of-machine-learning/>



# MODEL

Brain

ANNs



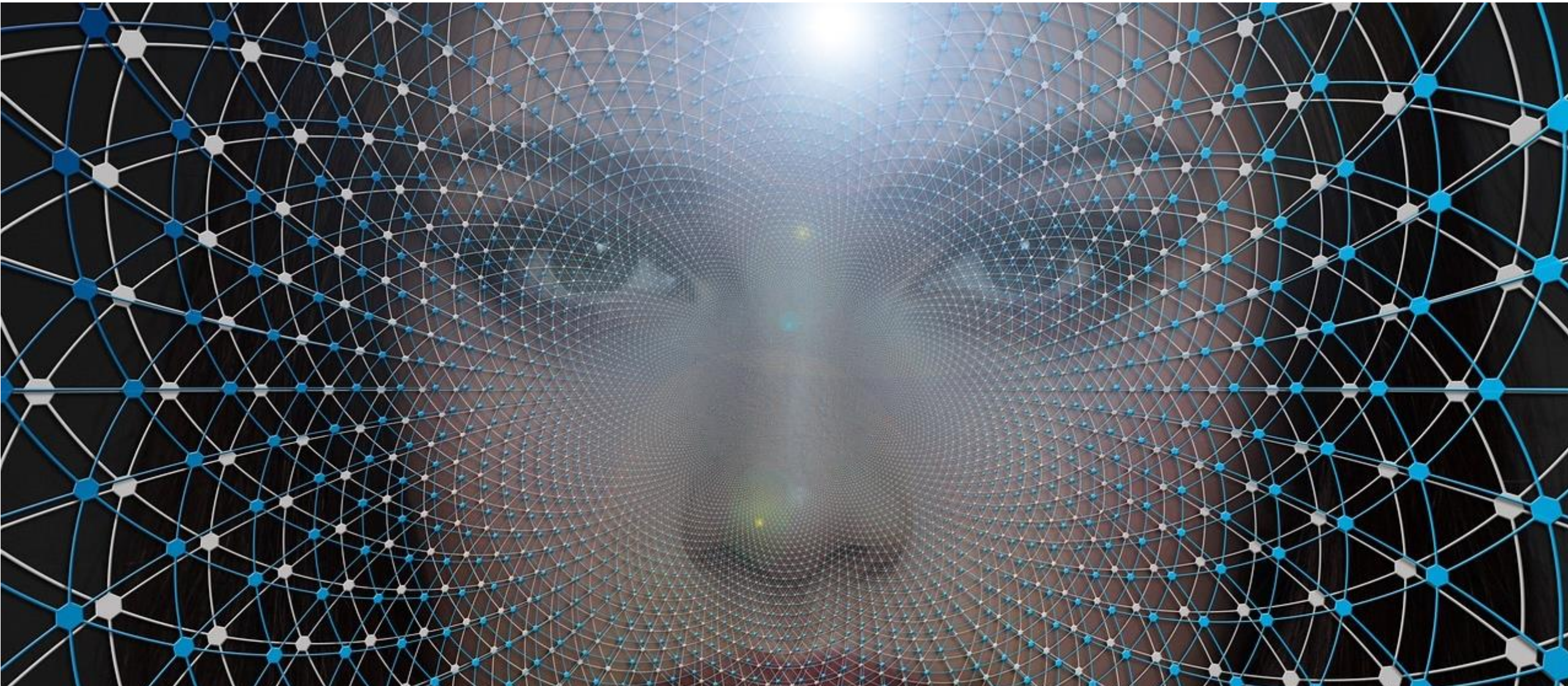
Source: [https://www.researchgate.net/figure/Artificial-Neural-Network-Vs-Deep-Neural-Network-14\\_fig1\\_344056345](https://www.researchgate.net/figure/Artificial-Neural-Network-Vs-Deep-Neural-Network-14_fig1_344056345)

**ChatGPT** is an AI chatbot that uses natural language processing to create humanlike conversational dialogue. The language model can respond to questions and compose various written content, including articles, social media posts, essays, code and emails.

*GPT* stands for "Generative Pre-trained Transformer." Reinforcement learning through human feedback--augments ChatGPT with machine learning to improve future responses.







# AI & Efficiency





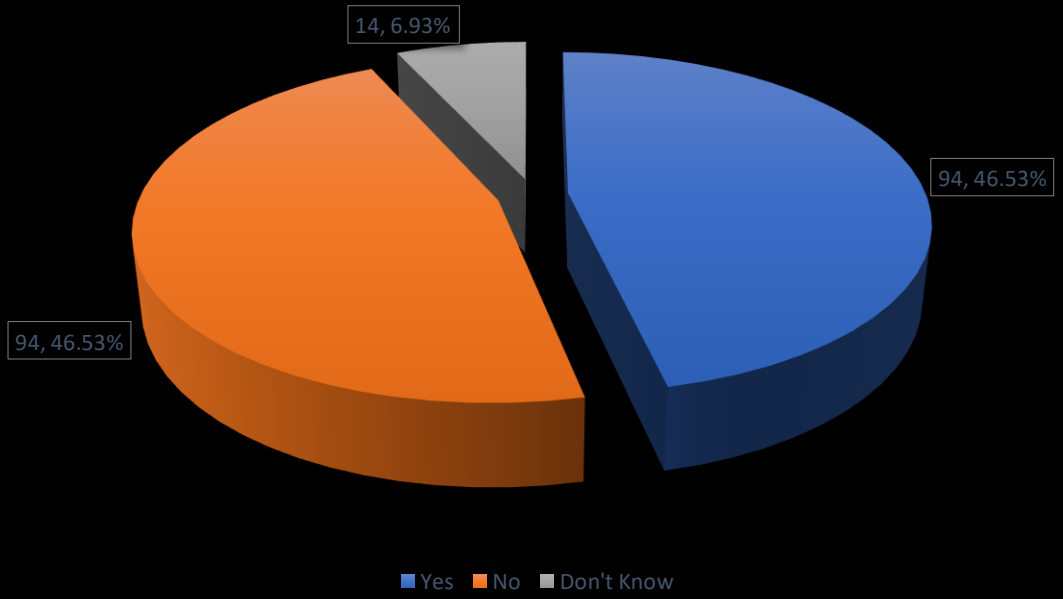
# Benefits of AI in Content/Records Management

- Automates content creation and management
- Reduces time spent content sorting and tagging
- Good at processing large amounts of data and managing repetitive tasks
- Potential use for analyzing and tagging images, as well as keyword metadata enhancement
- Operates 24/7 without interruption or breaks and has no downtime
- Augments the capabilities of differently abled individuals
- Facilitates decision-making by making the process faster and smarter

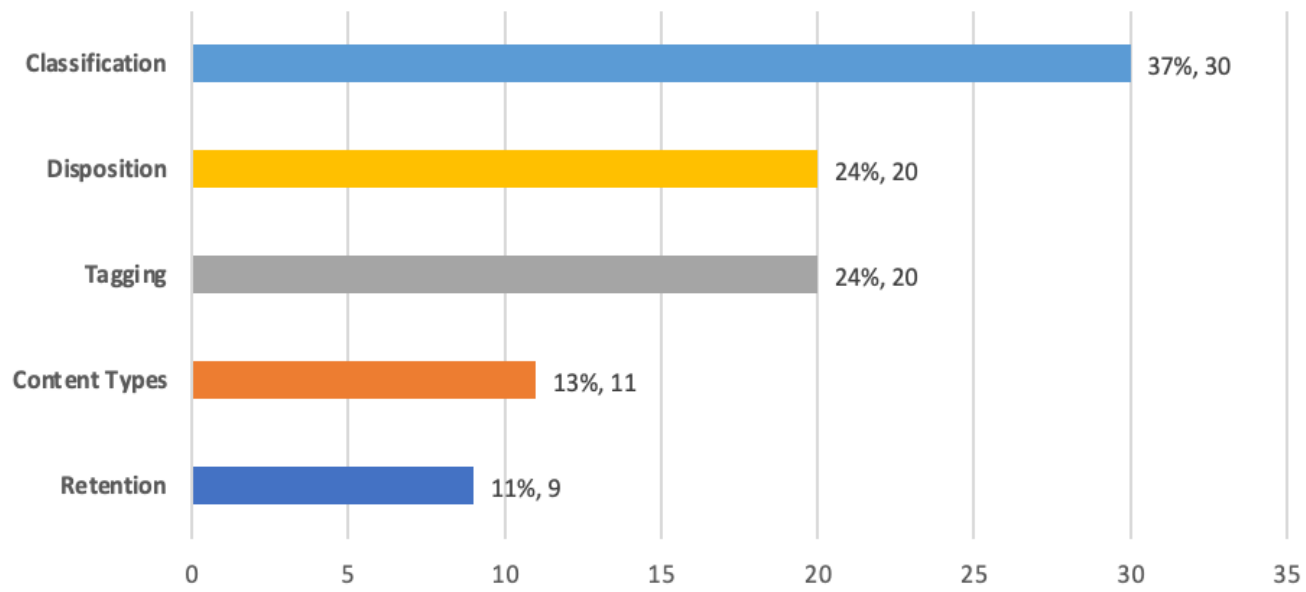




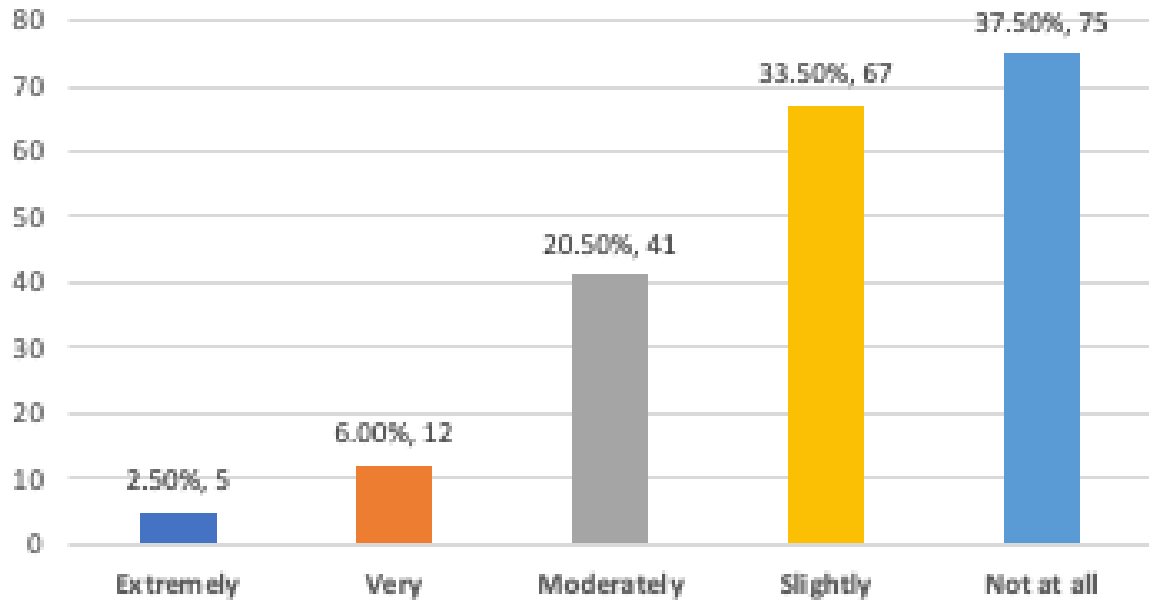
### Employ Recordkeeping Automation



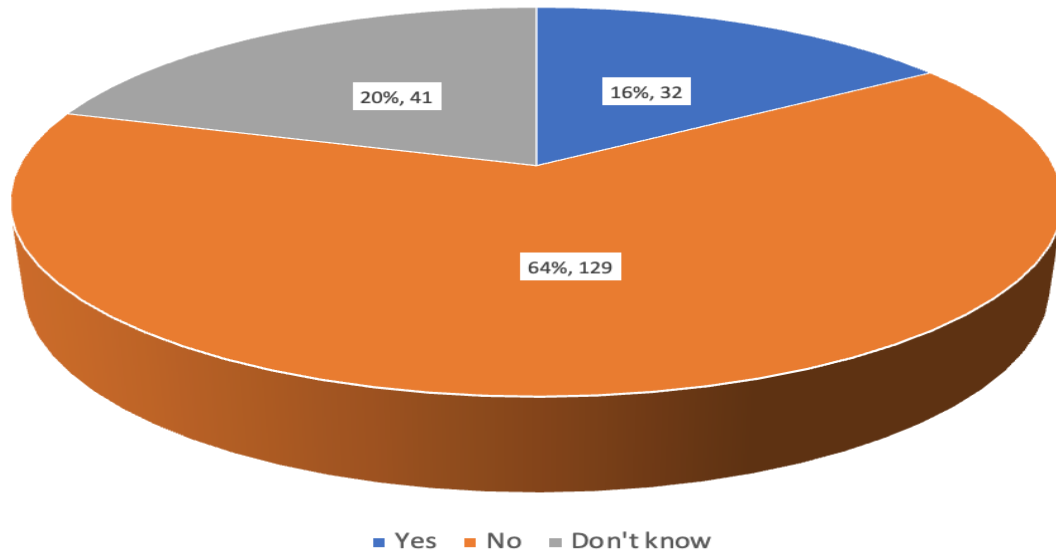
### Automated Recordkeeping Features



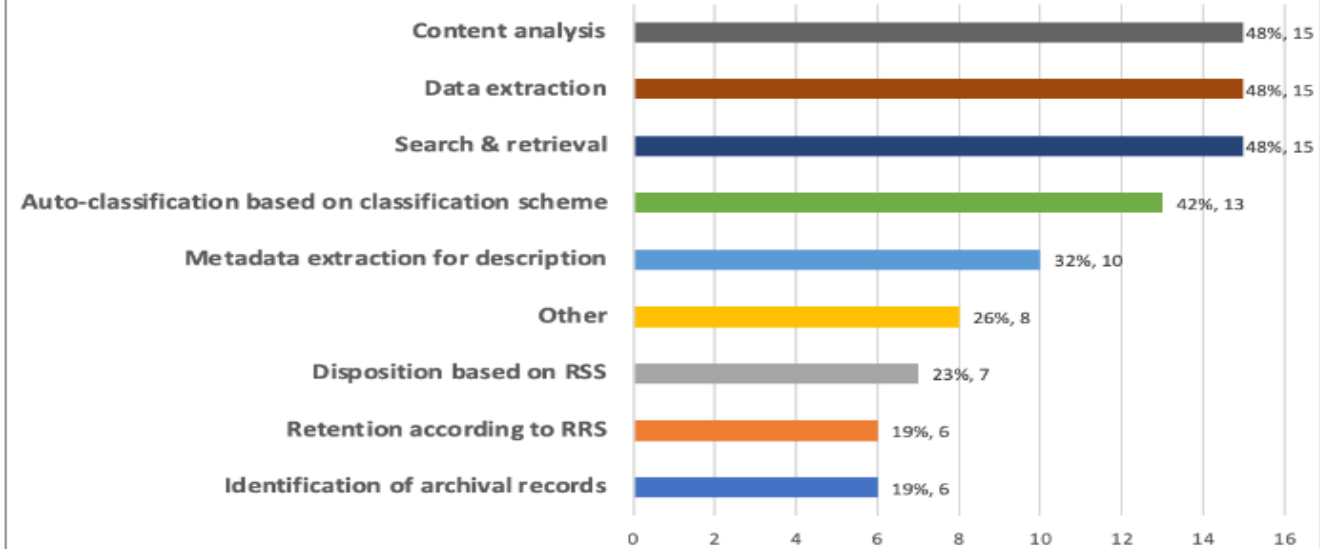
## Familiarity with AI Applied to Recordkeeping



## AI Use within Organization to Manage Digital Content



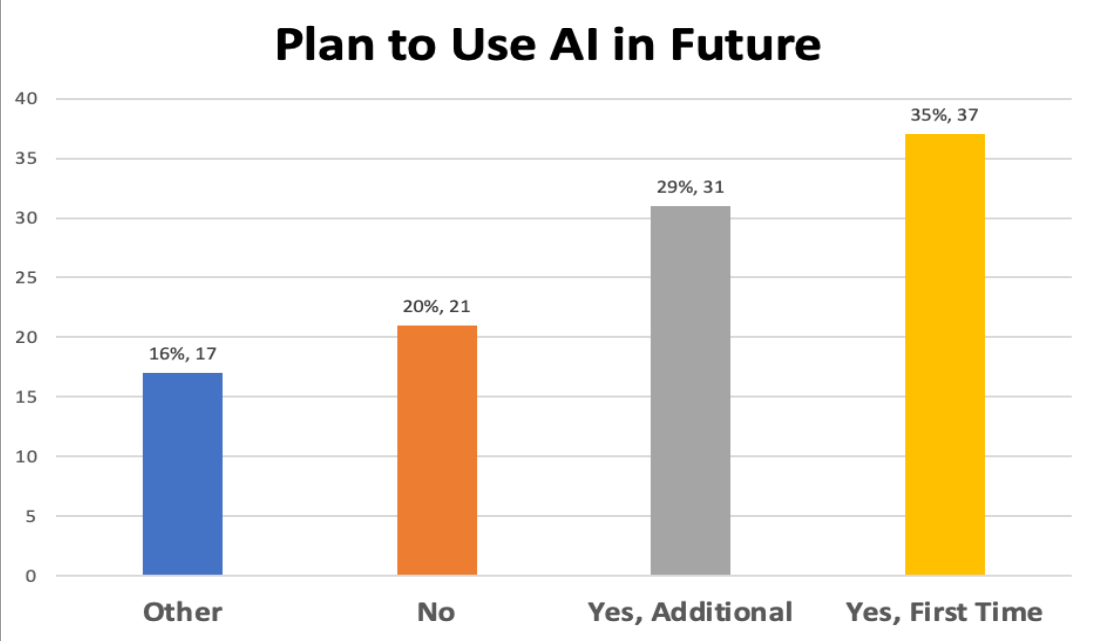
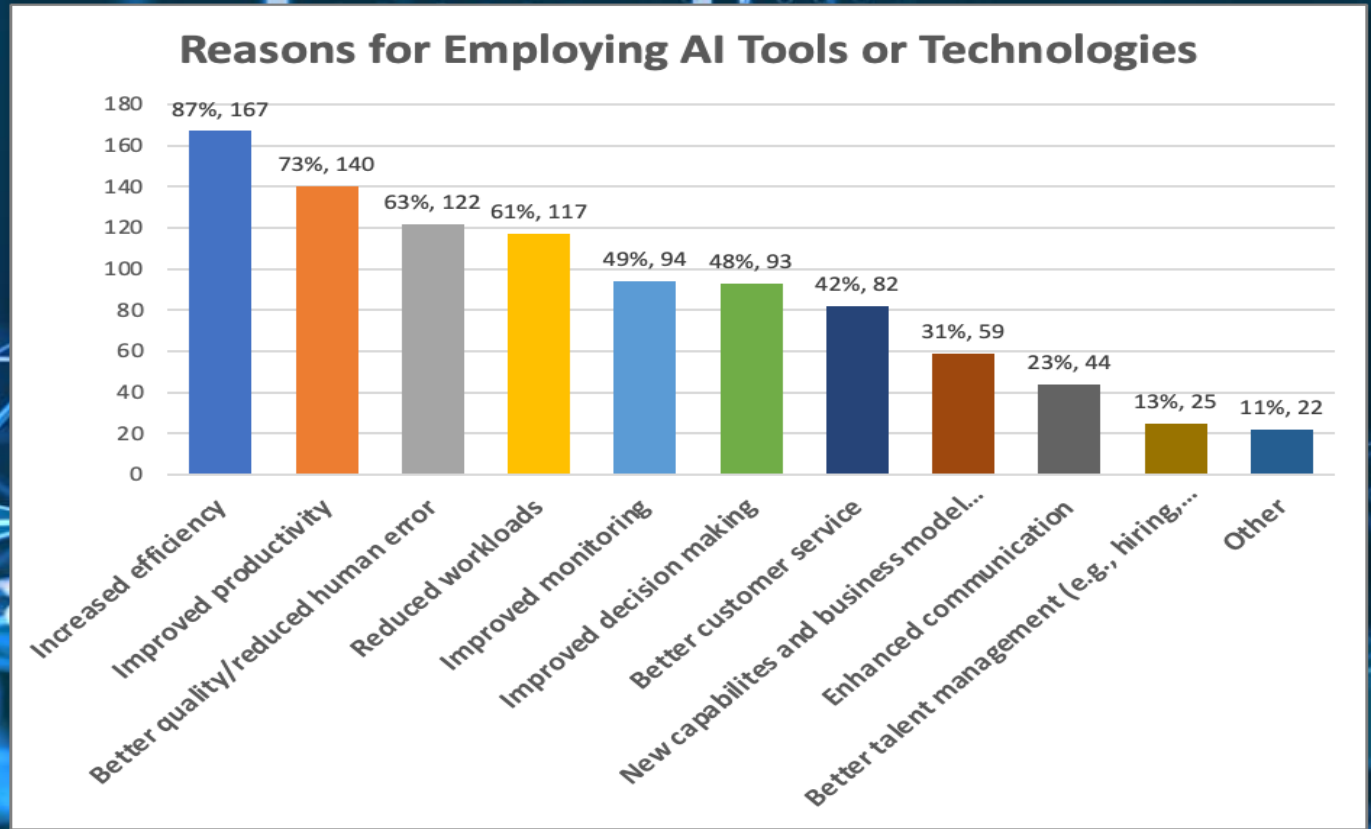
## AI Uses within Organization







# Future Plans & Reasons



- ### Other Reasons to Employ AI
- Data Analysis/Research (2)
  - Innovation/Improved Quality of Services (3)
  - Data Management/Records Management (4)
  - Improved Compliance (5)

# 3 Easy Ways to get started with AI for Content/Records Management

ROT + PII + Auto-classification



# Efficient Records Management?

Efficient record management controls your files' entire lifecycles — from the moment they are created through their destruction. Business users are notified when documents are no longer required to be stored in the system and should be properly disposed of according to compliance.

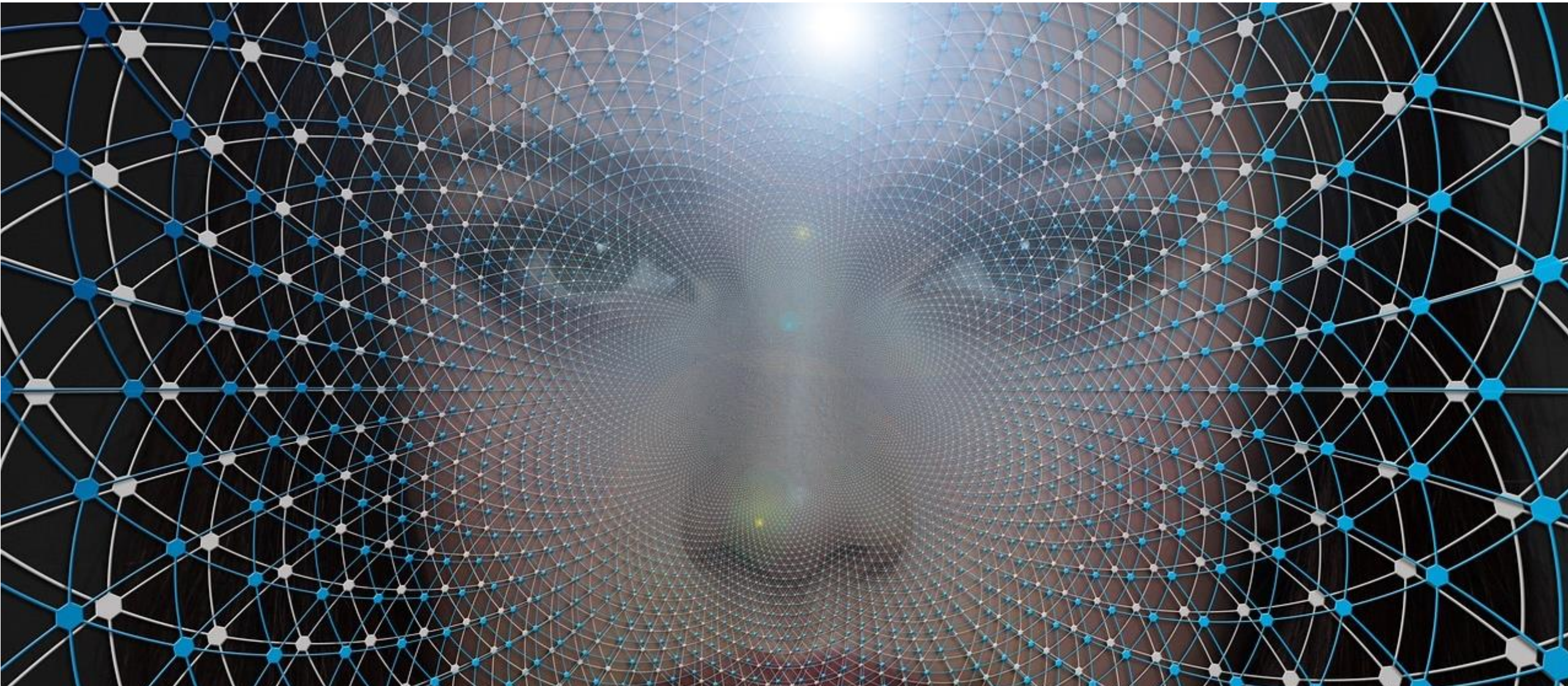
## National Archives discloses planned AI uses for record management

The records agency wants to use AI systems for auto filling metadata and responding to FOIAs, according to an inventory of the technology.

BY MADISON ALDER AND REBECCA HEILWEIL • AUGUST 25, 2023







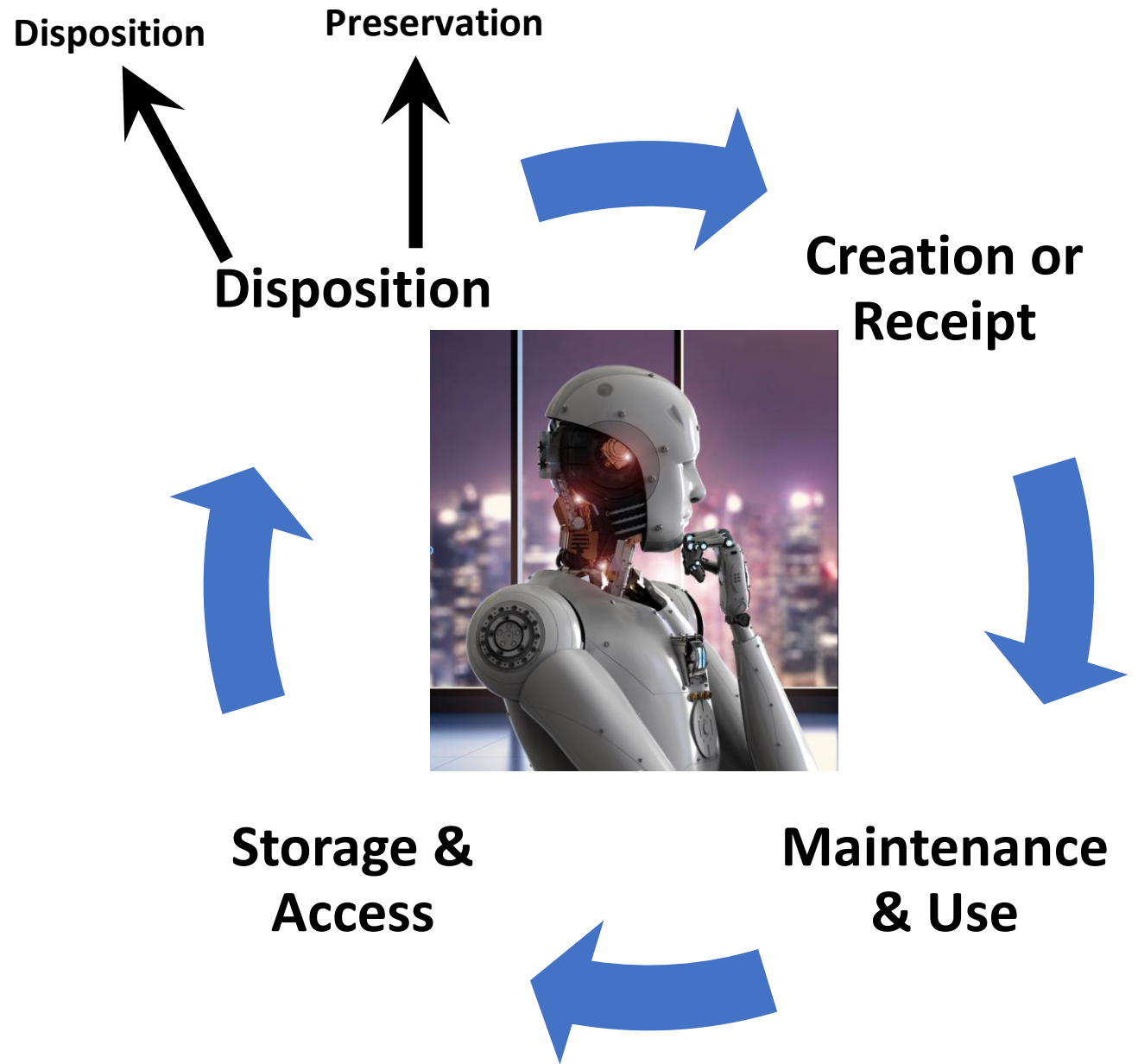
# AI & Records & Information Management





# RIM Lifecycle

How can AI help?



# Content Creation

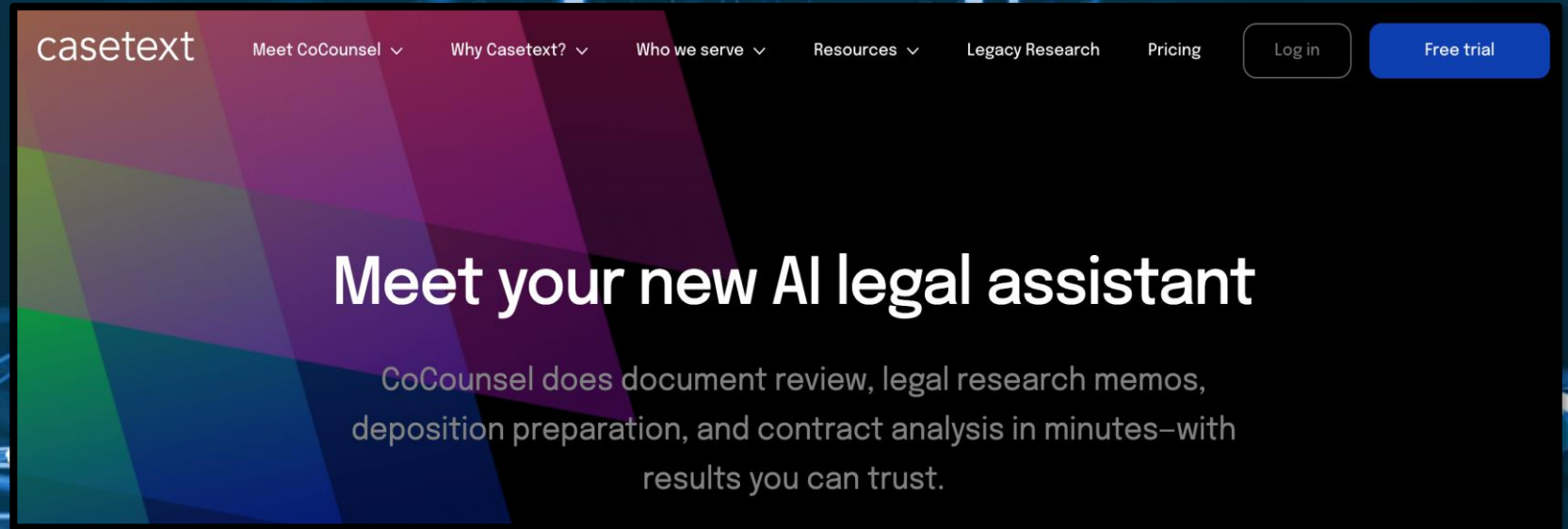
## Example: ChatGPT

- Hallucinations
- Automation Bias
- Societal Biases
- Misinformation
- Privacy Implications

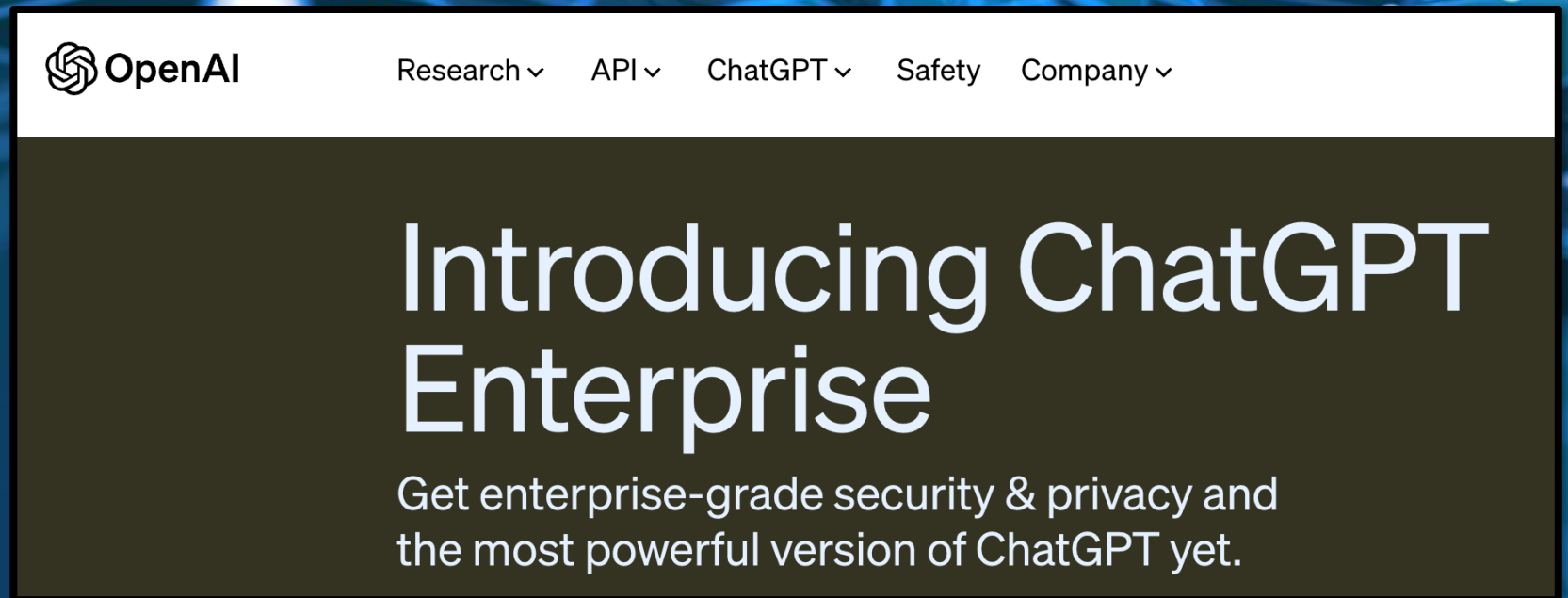




Introducing  
the adults in  
the room 😊



The screenshot shows the top portion of the casetext website. The header is dark with the 'casetext' logo on the left and navigation links: 'Meet CoCounsel', 'Why Casetext?', 'Who we serve', 'Resources', 'Legacy Research', and 'Pricing'. On the right, there are 'Log in' and 'Free trial' buttons. The hero section features a large headline 'Meet your new AI legal assistant' and a sub-headline: 'CoCounsel does document review, legal research memos, deposition preparation, and contract analysis in minutes—with results you can trust.'



The screenshot shows the top portion of the OpenAI website. The header is white with the OpenAI logo on the left and navigation links: 'Research', 'API', 'ChatGPT', 'Safety', and 'Company'. The hero section has a dark background with the headline 'Introducing ChatGPT Enterprise' and a sub-headline: 'Get enterprise-grade security & privacy and the most powerful version of ChatGPT yet.'

# Maintenance & Use

## Example: Intelligent Document Processing

Automatically extract and classify unstructured and structured data using AI technologies like computer vision, machine learning, and natural language processing.





# Hyland Alfresco CSP & AWS



## Document Analysis Amazon Textract

Automatically extract  
text and data from documents



## Advanced Text Analytics Amazon Comprehend

Use natural language  
processing to extract insights  
and relationships from  
unstructured text.



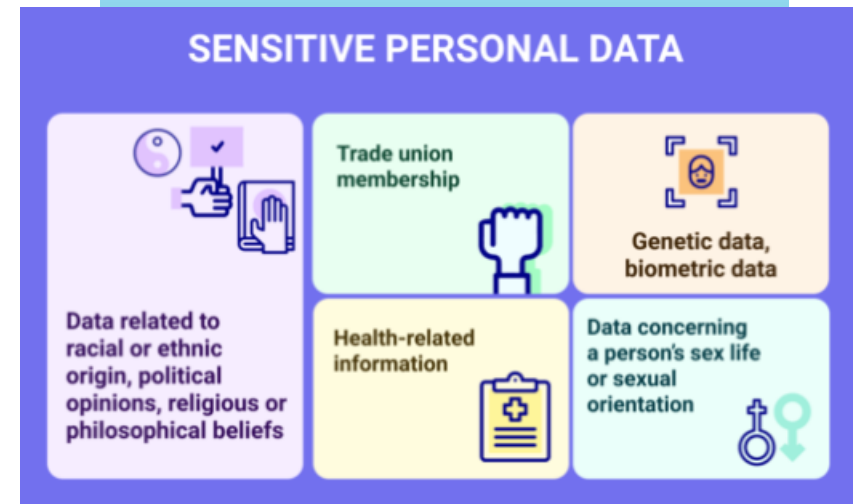
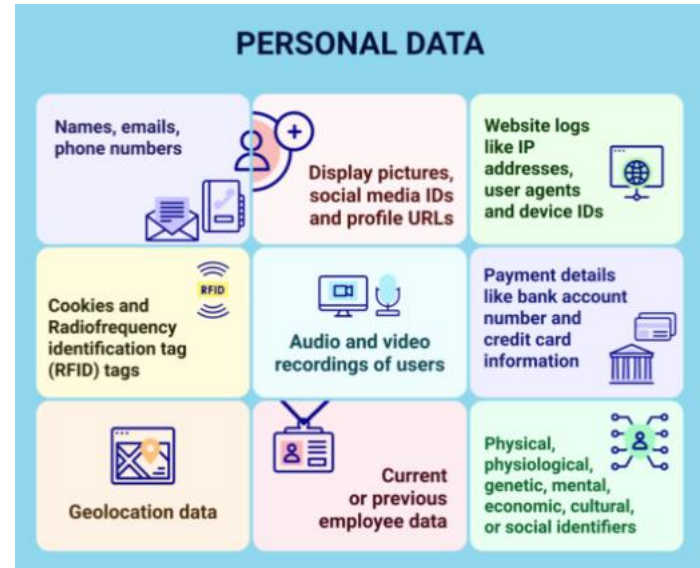
## Image and Video Analysis Amazon Rekognition

Video and image analysis to  
applications to catalog assets,  
automate media workflows  
and  
extract meaning.

# Storage

## Example: Sensitive Data

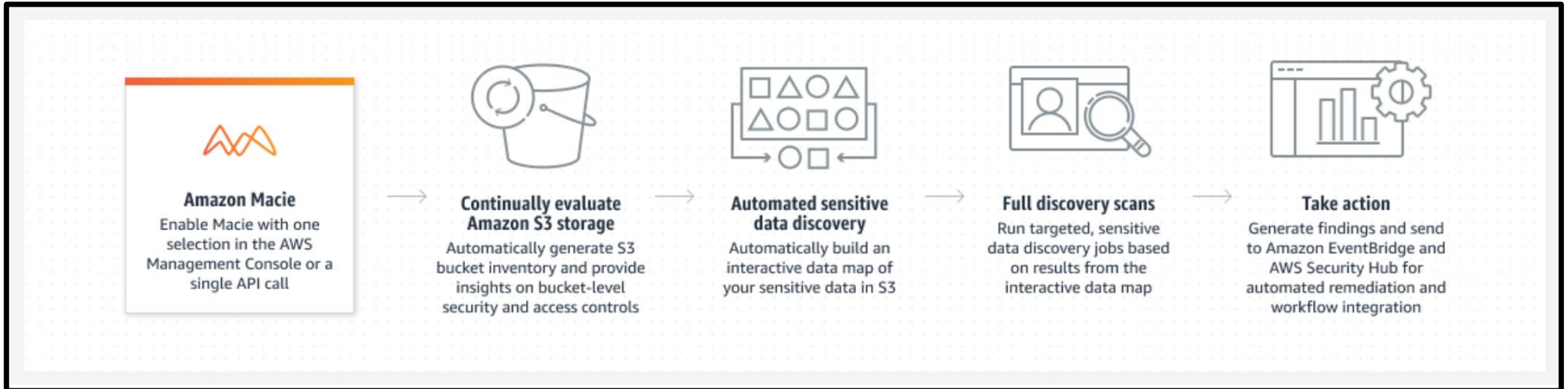
- PII - personally identifiable information
- PD - personal data (GDPR)
- PHI - protected health information
- PCI - payment card industry





# What about sensitive data in Amazon S3 Storage?

**Amazon Macie** - a data security service that uses machine learning (ML) and pattern matching to discover and help protect your sensitive data.



# Retention & Disposition

## 2 Examples

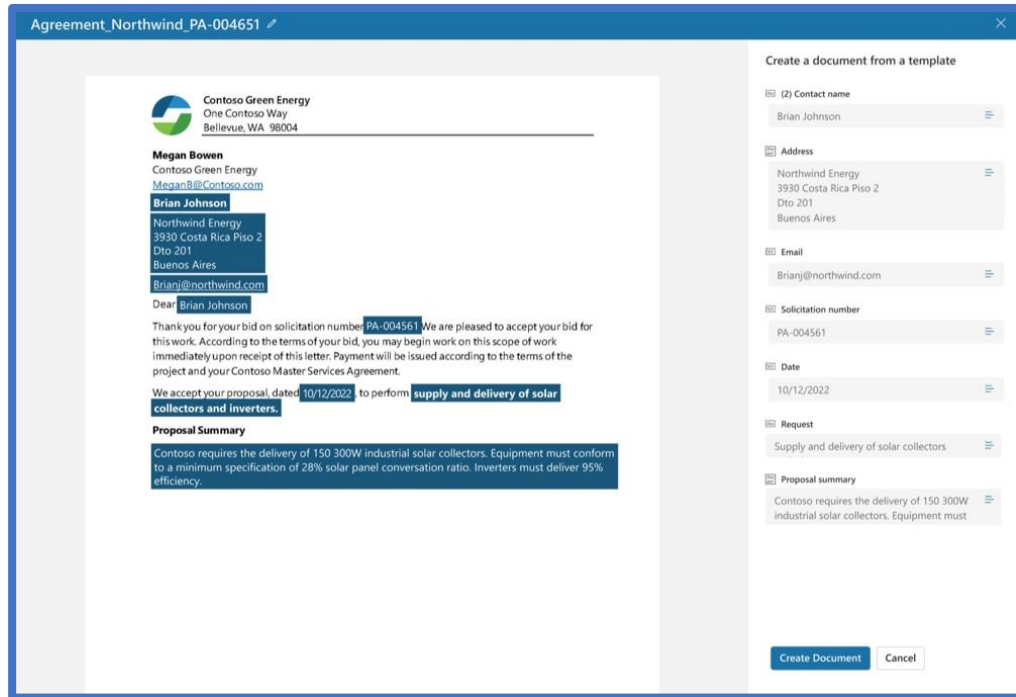
- Integrated into the workflow
- Lifecycle approach to AI-enabled RIM Solution



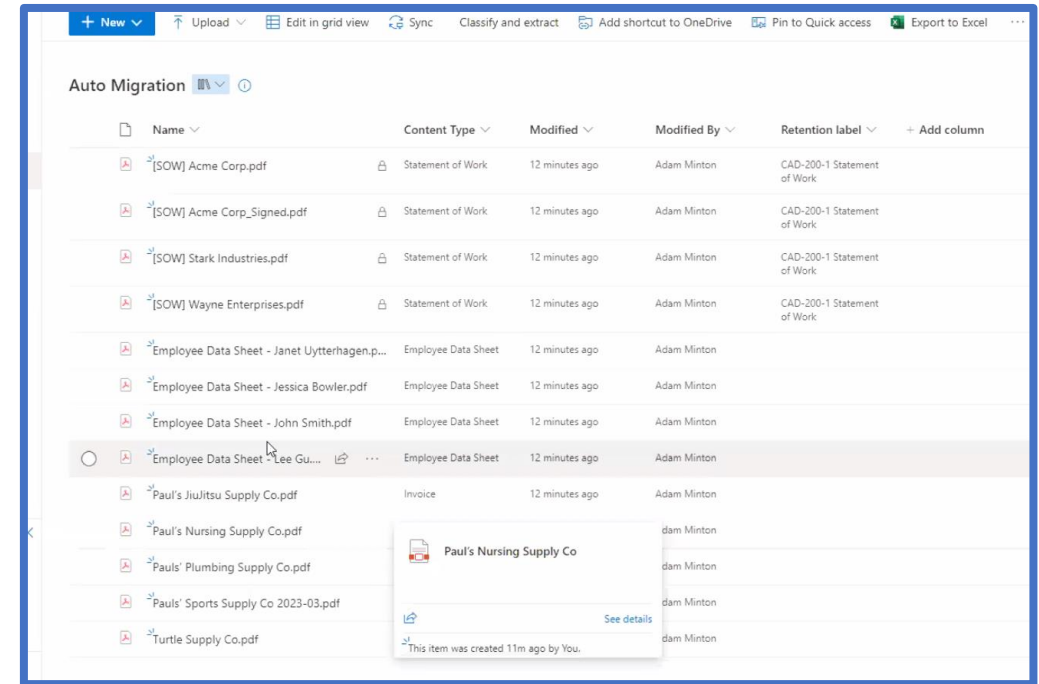


# Microsoft Syntex

## Content AI integrated in the flow of work



**Content Assembly:** Understand and assemble content with AI powered summarization, translation, auto-assembly, and annotations integrated into Microsoft 365 and Teams.



**Retention:** Link content type to retention labels. One test produced 97% accuracy for government content using 5 different content models.

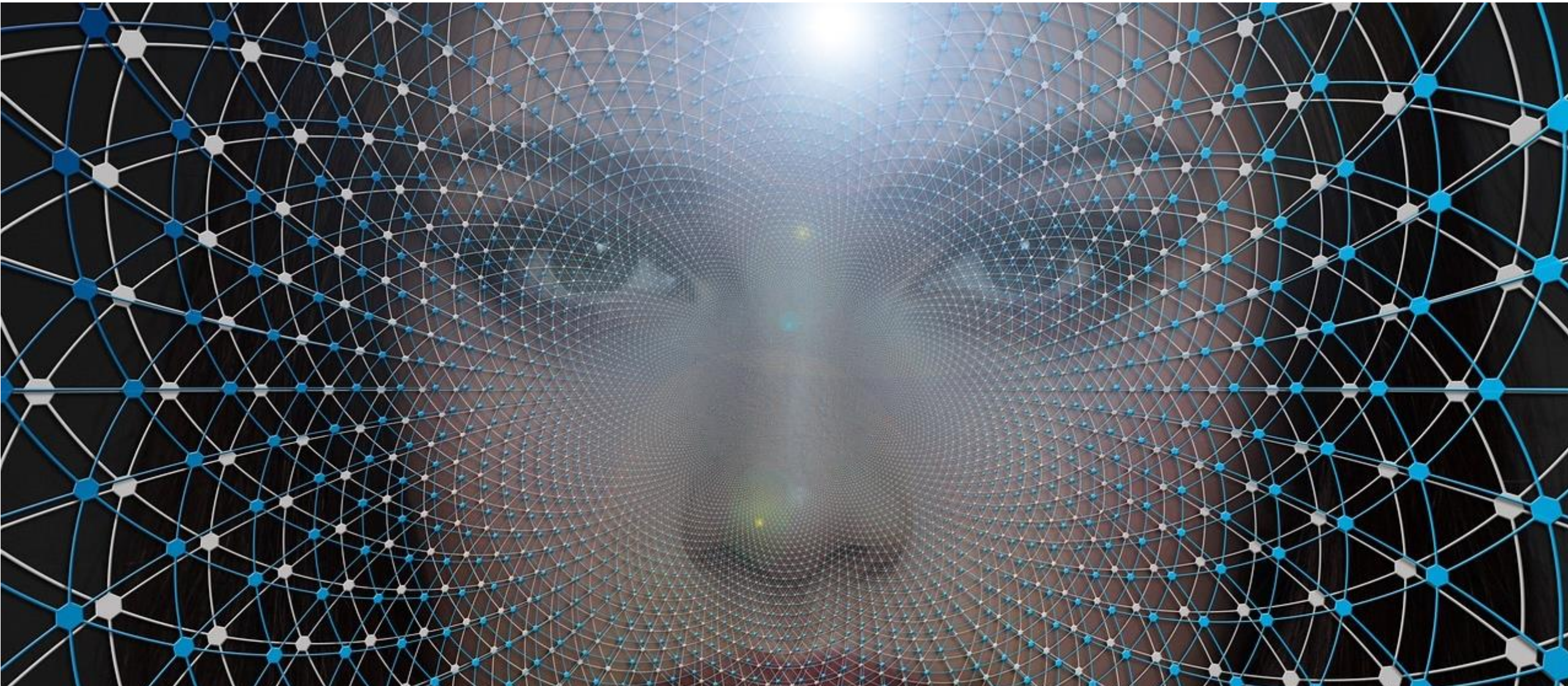
# Records365

## Automatic & Compliant RM Solution

- **Intelligent data classification** using custom rules and machine learning to train the model.
- **AI and ML to automatically analyze and classify records** then flag for secure retention, disposition, or holds based on content in files and records.
- **Sensitive data signaling** to screen and locate sensitive data including Personally Identifiable Information (PII) and Payment and Information (PCI).







# AI & Compliance





# Compliance

Ensuring that your records management policy is being followed, and that you are in line with any retention schedules required by law.



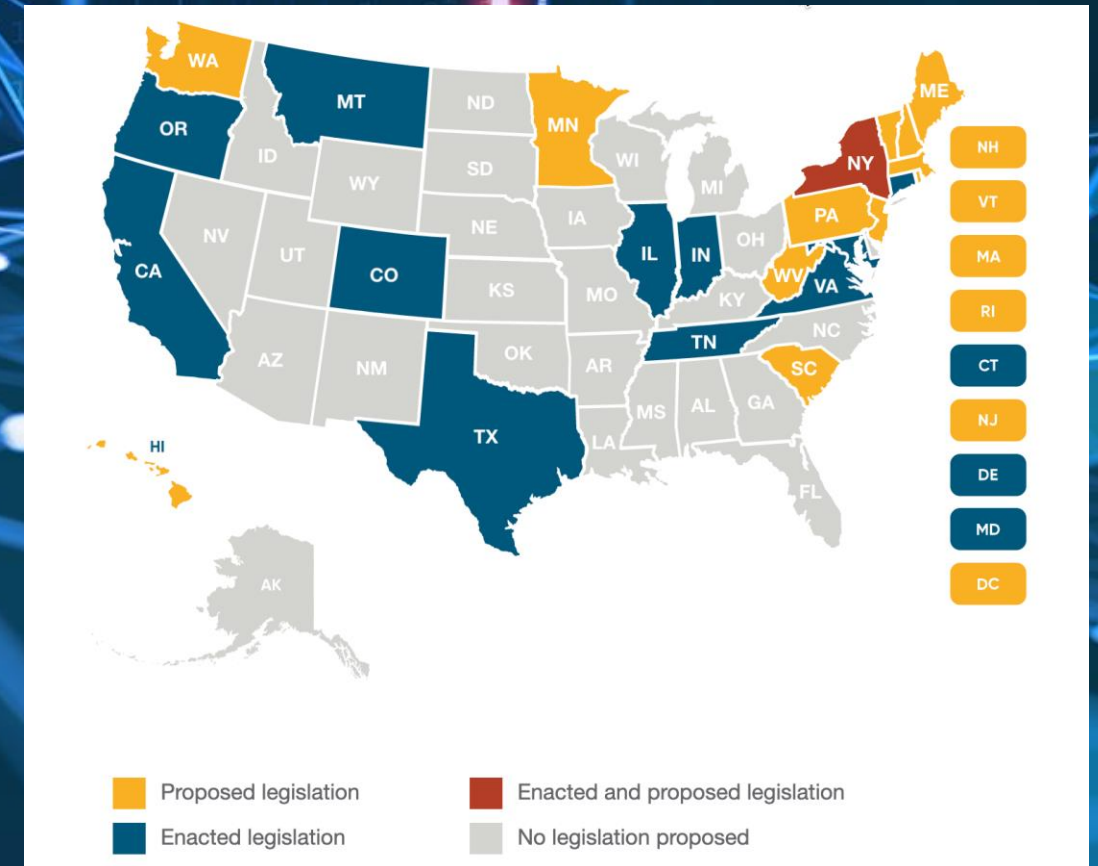


# Example on State Level -- New York

- Automated employment decision tools

## Law #: 2021/144

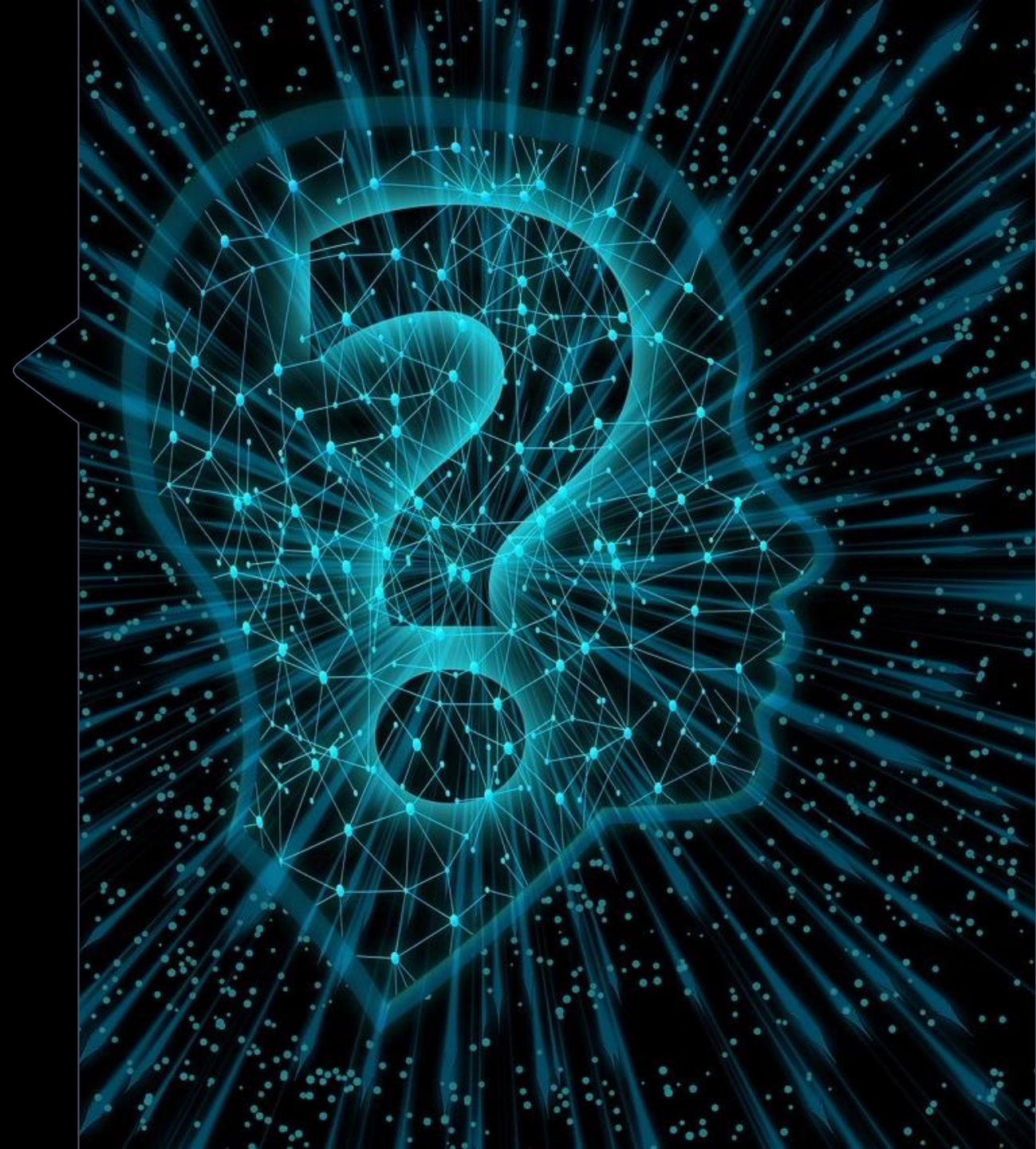
- Requires that a bias audit be conducted on an automated employment decision tool prior to the use of said tool.
- Candidates or employees that reside in the city be notified about the use of such tools in the assessment or evaluation for hire or promotion, as well as, be notified about the job qualifications and characteristics that will be used by the automated employment decision tool.
- Violations of the provisions of the bill would be subject to a civil penalty.



US State-by-State AI Legislation Snapshot

# AI Policies

AI policies provide your company's employees with a clear understanding of their rights and responsibilities when it comes to Artificial Intelligence (AI). Your policies should cover data privacy, bias, transparency, and accountability. They should also provide guidance on how to handle potential ethical dilemmas.





Boston's interim guidelines on generative AI emphasize responsible experimentation. The policy encourages city staff to fact-check AI-generated content, disclose AI use in public-facing content and written reports, and avoid the sharing of sensitive information with AI systems.

2 recommended uses:

- Writing a memo
- Writing a job description



## City of Boston Interim Guidelines for Using Generative AI

City of Boston

These guidelines apply to all City agencies and departments with the exception of Boston Public Schools.

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Because of their impact and potential usefulness, as well as the risks and dangers, these guidelines serve as an interim resource for employees of the City of Boston.

**Generative AI is a tool. We are responsible for the outcomes of our tools. For example, if autocorrect unintentionally changes a word - changing the meaning of something we wrote, we are still responsible for the text. Technology enables our work, it does not excuse our judgment nor our accountability.**

These guidelines should be replaced in the future with policies and standards. **But we want to encourage responsible experimentation and we encourage you to try these tools for yourselves to understand their potential.** The Department of Innovation and Technology will support events and workshops that can support people and teams interested in learning more about these technologies. For the time being we encourage you to watch this video from Innovate.US about how to get started with generative AI in government:

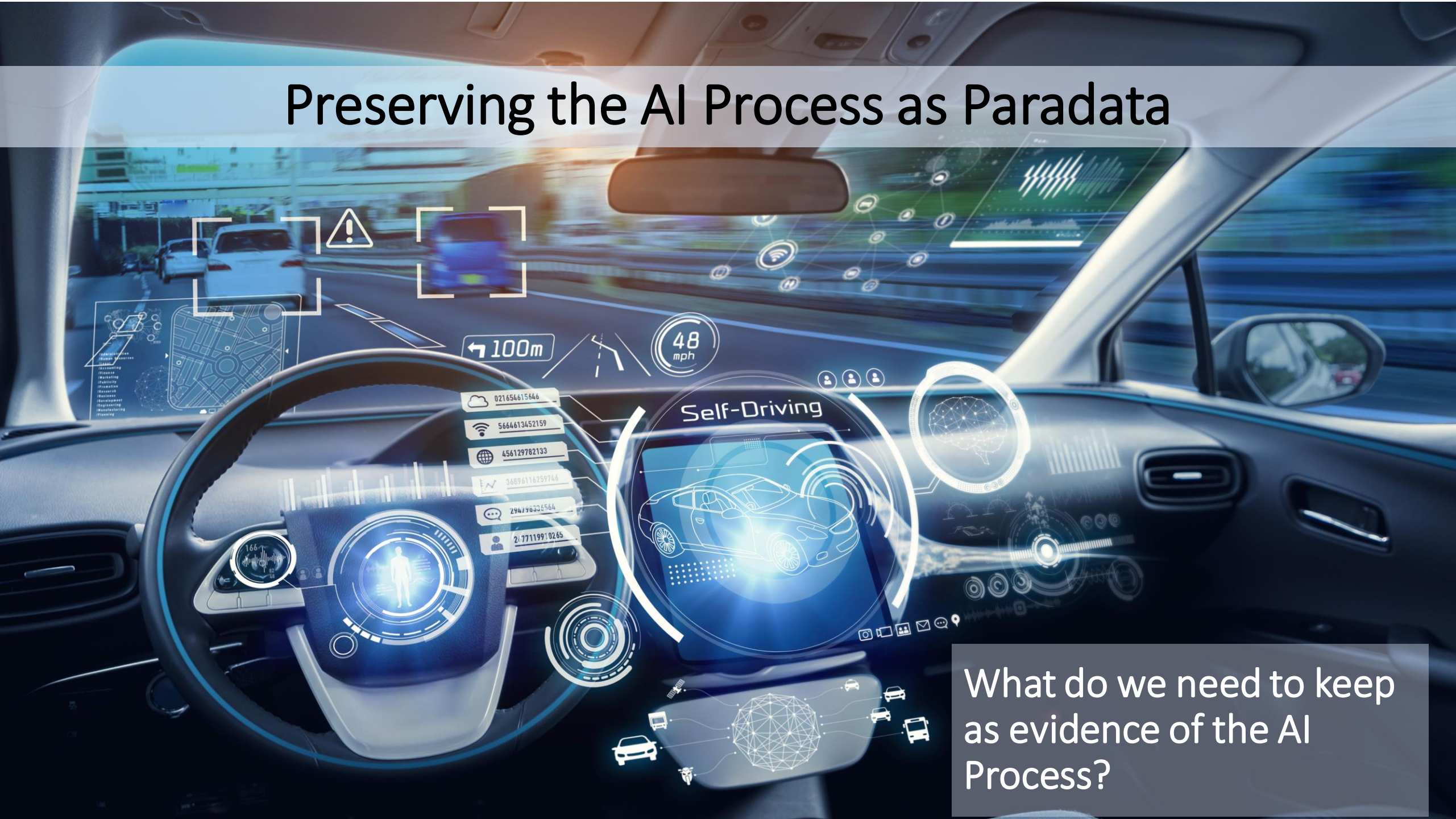
[https:// bit.ly/ InnovateUSAI](https://bit.ly/InnovateUSAI)

You can also share your experiences, thoughts, and concerns via this online form:

[https:// forms.gle/ BptUcVhRdnTwHdxJ7](https://forms.gle/BptUcVhRdnTwHdxJ7)



# Preserving the AI Process as Paradata



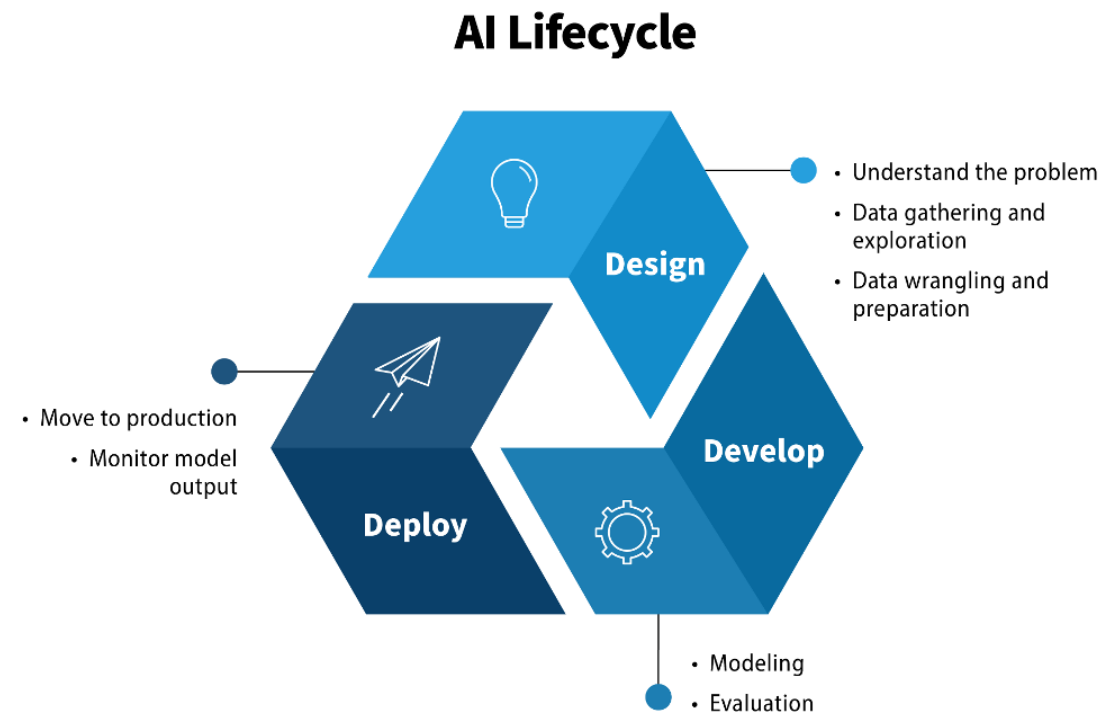
What do we need to keep as evidence of the AI Process?



# Paradata: Documentation of the AI Process

Paradata is **the information about the procedure(s) and tools** used to create and process information resources, along with **information about the persons** carrying out those procedures.

*~ITrustAI working definition*



**AI Lifecycle.** Source: *AI Guide for Government: A Living and Evolving Guide to the Application of Artificial Intelligence for the U.S. Federal Government*, GSA, Centers of Excellence. <https://coe.gsa.gov/coe/ai-guide-for-government/understanding-managing-ai-lifecycle/index.html>  
[Understanding and managing the AI lifecycle | GSA](#)

# Metadata & Paradata -- relationships + purpose

Metadata

about



**The Information Resource**

For the purposes of documenting, describing, preserving or managing that resource.

Paradata

about



**The AI Process**

Enables processual insight, transparency, accountability.



# Examples of Paradata

## Technical Paradata

- AI Model (tested & selected)
- Evaluation & performance metrics
- Logs generated
- Model training data set
- Training parameters for model
- Vendor documentation
- Versioning information

## Organizational Paradata

- AI policy
- Design plans
- Employee training
- Ethical consideration
- Impact assessments
- Implementing process
- Regulatory requirements

# *Artificial Intelligence Risk Management Framework (AI RMF 1.0)*



January 2023  
US Department of Commerce

Review of AI RMF 1.0 by Pat Franks  
All text and images taken from the Framework

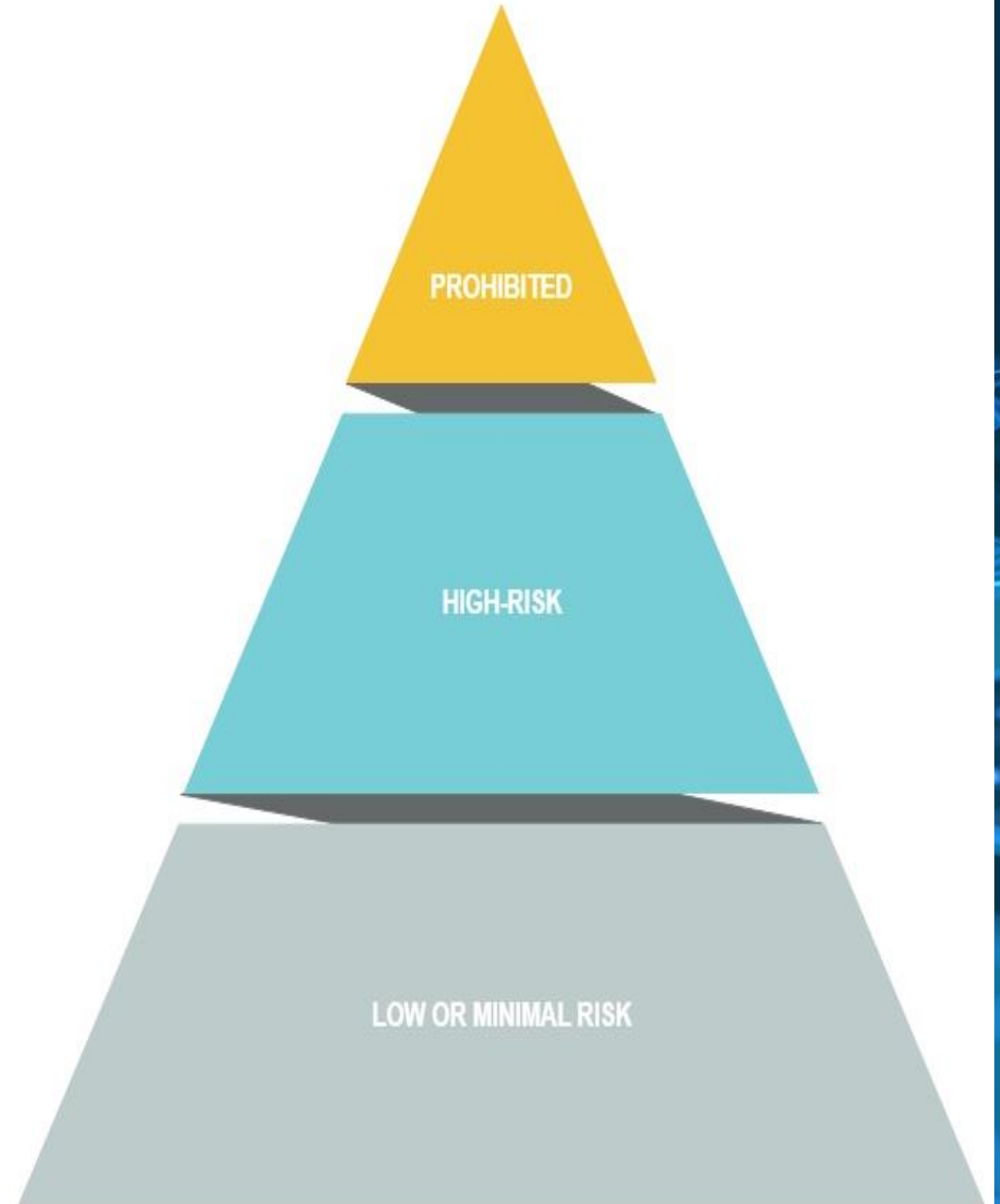
Select a framework  
for Guidance

A new working group at the National Institute of Standards and Technology will build on the NIST AI Risk Management Framework to address generative AI.



The AI RMF refers to an AI system as an engineered or machine-based system that can, for a given set of objectives, generate outputs such as predictions, recommendations, or decisions influencing real or virtual environments. AI systems are designed to operate with varying levels of autonomy (Adapted from: OECD Recommendation on AI:2019; ISO/IEC 22989:2022).

*Addressing, documenting, and managing AI risks and potential negative impacts effectively can lead to more trustworthy AI systems.*





**Govern:** Legal and regulatory requirements involving AI are understood, managed, and documented.

**Map:** Document AI system’s features and capabilities that require **human oversight**. Establish practices for AI oversight in accordance with policies. Develop training materials about AI system performance, context of use, known limitations and negative impacts, and suggest warning labels.

**Measure:** How has the entity documented the AI system’s **data provenance**, including sources, origins, transformations, augmentations, labels, dependencies, constraints, and metadata?

**Manage:** Responses to the **AI risks** deemed high priority as identified by the Map function, are developed, planned, and documented. **Risk response** options can include mitigating, transferring, avoiding, or accepting.

Examples of documentation that may be needed to meet the guidelines in the NIST AI RMF Framework



# Representations & Display to Promote AI Process Transparency

**Microsoft Datasheets for Data Sets** (2018)

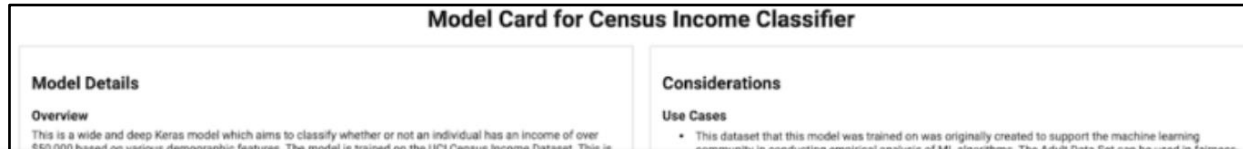
**Aether Data Documentation Template** (2022)

Data creators should document the answers for people considering using the dataset to train or evaluate models; people auditing a model or AI system; stakeholders impacted by model(s) trained or evaluated on the dataset; future you or your own teammates.

Example questions:

1. *What mechanisms or procedures were used to collect the data (e.g., hardware apparatus or sensor, manual human curation, software program, software API)?*
2. *Which version of the dataset should be documented (dataset shared with others, dataset used in training/testing)?*

# Representations & Display to Promote AI Process Transparency



**Google Model Cards** (2018) - Once the Model Card Toolkit has populated the

## Salesforce & Model Cards

**Documentation.** Model cards and product documentation provide a wealth of information to customers, sharing key information such as the purpose behind particular AI models, how Salesforce trains AI models, and any potential risks associated with using AI.



Additional information on this example card is a Quantitative Analysis section showing graphics that visualize how the AI performs for data sliced by demographics such as race & sex.



# Representations to Promote AI Process Transparency

## Mortgage Evaluator Governance FactSheet

Created to demonstrate how development and deployment facts of a mortgage evaluation model can be recorded and viewed

Governance

**IBM Fact Sheet** - a collection of relevant information (facts) about the creation and

## Using AI Factsheets for AI Governance

Last updated: Aug 17, 2023

Use a model inventory and AI Factsheets as part of your AI Governance strategy to track the lifecycles of machine learning models from training to production. View factsheets for model assets that track lineage events and facilitate efficient ModelOps governance.

Business Request

Purpose

Predict mortgage approval

Risk Level

High

Model Policy

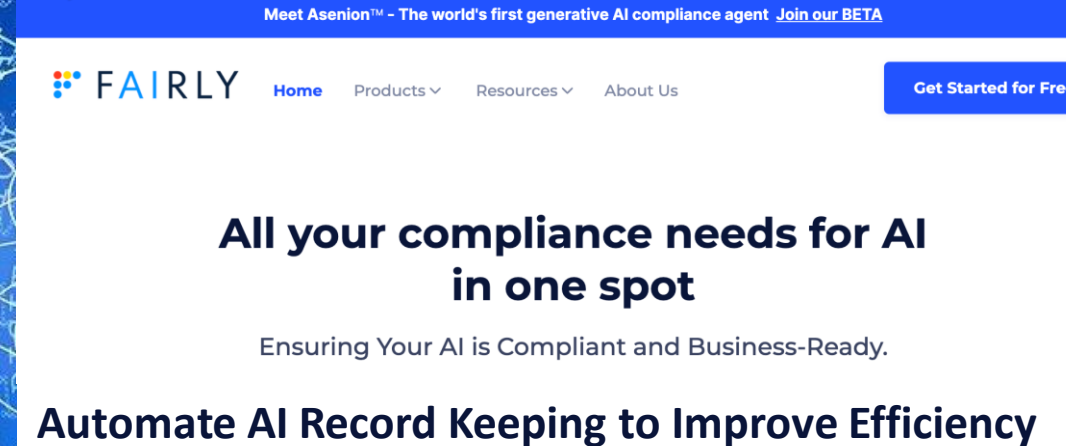
1. Datasets must be approved and in data catalog.
2. Race, ethnicity, and gender of applicant cannot be used in models used to make mortgage related decisions.
3. Model predictive performance metrics must minimally include accuracy, balanced\_accuracy and AUC score.
4. Models must be checked for bias using Disparate Impact.
5. Models must be checked for faithfulness of explanations.
6. Models must be checked for robustness to Adversarial attacks using Empirical Robustness metric.
7. Models must be checked for robustness to dataset shift.

or actions taken during the creation and deployment process of the model or service.

Cookie Preference

# AI Model - 1 Example of AI Documentation

**Documentation is essentially a form of record keeping.** Consistent documentation helps AI model developers and data scientists ensure they follow best practices, policies, and regulations. Documentation also allows developers' QA and compliance counterparts to verify and evaluate risk consistently — ultimately mitigating and reducing risks before they cause financial and reputational harm.

The image shows a screenshot of the FAIRLY website homepage. The background is a blue gradient with a pattern of white lines and dots, resembling a neural network or data flow. The website header is white with a blue navigation bar. The main content area is white with a blue header bar. The text on the page is centered and uses a clean, sans-serif font. The overall design is modern and professional.

Meet Asenion™ - The world's first generative AI compliance agent [Join our BETA](#)

**FAIRLY** [Home](#) [Products](#) [Resources](#) [About Us](#) [Get Started for Free](#)

**All your compliance needs for AI  
in one spot**

Ensuring Your AI is Compliant and Business-Ready.

**Automate AI Record Keeping to Improve Efficiency**



## **EEOC Settles First-Ever AI Discrimination Lawsuit**

By Raeann Burgo and Wendy Hughes © Fisher Phillips

August 17, 2023

The Equal Employment Opportunity Commission's (EEOC) Aug. 9 legal filing in a New York federal court revealed that a tutoring company agreed to pay \$365,000 to resolve charges that its AI-powered hiring selection tool automatically rejected women applicants over 55 and men over 60.

## **A Milton resident's lawsuit against CVS raises questions about the use of AI lie detectors in hiring**

A class-action lawsuit was filed last month in Suffolk Superior Court against CVS Health Corp. by Milton resident Brendan Baker, who failed to get a job at the Rhode Island-based drugstore chain after completing an AI-assisted video interview conducted using the platform HireVue, according to the complaint. ~Boston Globe, May 22, 2023

The screenshot shows the HireVue website landing page. At the top left is a hamburger menu icon. The HireVue logo is in the top center, and a red 'Request Demo' button is in the top right. The main content area features a dark blue background with a white and yellow 'HUMAN POTENTIAL INTELLIGENCE' logo. Below the logo is a paragraph of text: 'Past achievements don't predict future success. But AI-driven tech to measure and unlock the potential of candidates does. Hope is not a hiring strategy. HireVue is.' At the bottom of the main content area are two red buttons: 'Learn More' and 'Watch Now' with a play icon. A small red chat bubble icon is in the bottom right corner.


☰ HireVue [Request Demo](#)

# HUMAN POTENTIAL INTELLIGENCE

Past achievements don't predict future success. But AI-driven tech to measure and unlock the potential of candidates does. Hope is not a hiring strategy. HireVue is.

[Learn More](#)

[Watch Now](#) ▶



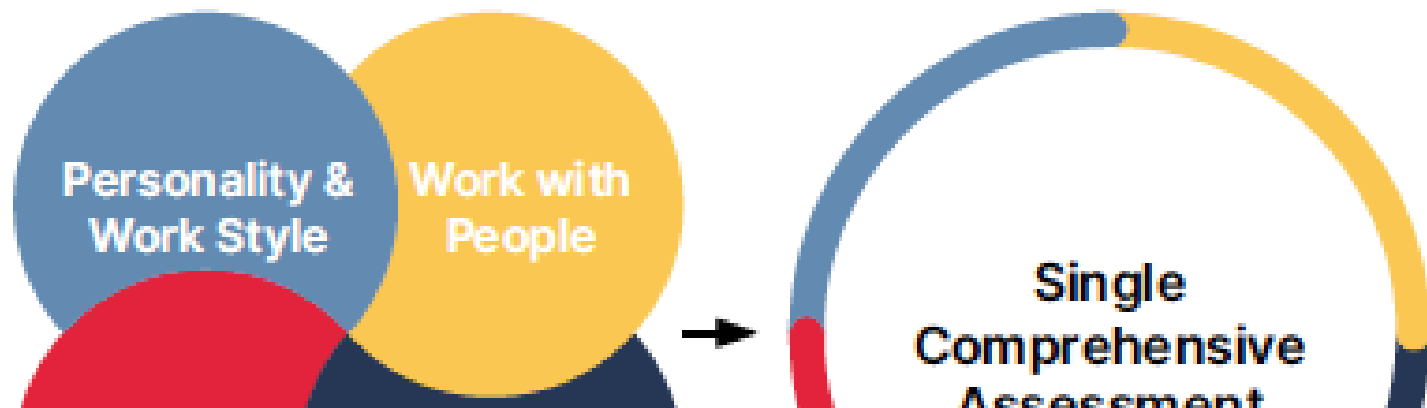
The Salt Lake City-based company said the controversial feature—which used algorithms to assign certain traits and qualities to job applicants' facial expressions in video interviews—was discontinued in March 2020 after [internal research](#) demonstrated that advances in natural language processing had increased the predictive power of language analysis and "visual analysis no longer significantly added value to the assessments."

HireVue's platform has hosted more than 19 million video interviews for over 700 customers worldwide. The product is most often used as an automated screening tool at the start of the hiring process for high-volume employers. The structured interviews are typically based on a customized job analysis of the role and ask job applicants to respond to a series of questions in a recorded video. HireVue's software assesses the applicant's suitability for a role and is meant to reduce individual human interviewers' intrinsic biases when rating candidates. It analyzes various characteristics of the video interview, including applicants' responses, speech and, until last year, facial expressions.

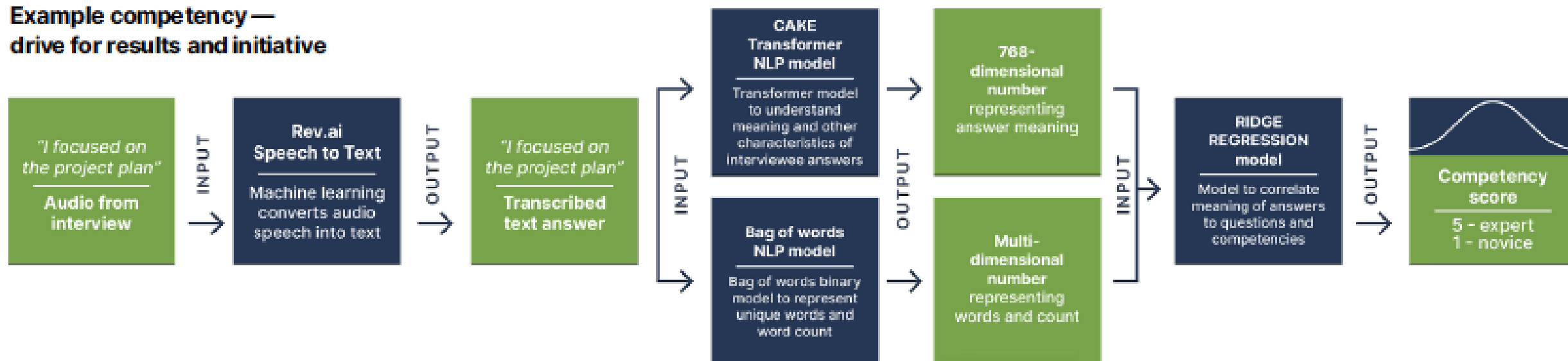
"Over time the visual components contributed less to the assessment to the point where there was so much public concern to everything related to AI that it wasn't worth the concern it was causing people," said HireVue CEO and Chairman Kevin Parker.



# Representations to



## Example competency — drive for results and initiative



document is intended to provide information on how the Artificial Intelligence (AI)-based assessments within our Hiring Experience Platform™ work, including when, how, and why we use this technology to facilitate our customers in making their hiring decisions. It is separate from our privacy policy, which is available [here](#). Please note that this is a 'living document' which will be updated from time to time, based on updates to our systems and processes.

help guide ethical AI Development, HireVue developed this Explainability Statement to explain HireVue's processes and in an effort to assist our customers in fulfilling their obligations as 'data controllers' in compliance with data protection laws including EU / UK General Data Protection Regulation (GDPR).

If you have any queries, we can be contacted at 10876 South River Front Pkwy #500. South Jordan, UT 84095

# AI in Law Enforcement

**Black mom sues city of Detroit claiming she was falsely arrested while 8 months pregnant by officers using facial recognition technology**

**AI used:** Facial Recognition

**Party using it:** Detroit Police Department

**Information produced by AI:** Unreliable facial recognition match

## **Result:**

- False arrest by police
- Lawsuit against police department & detective

## **Contributing factors:**

- Use of photo from 2015 in photo lineup rather than 2021 driver's license photo
- Facial recognition algorithms known to more likely misidentify racial minorities (bias).
- Overreliance on AI by humans.





# What kind of paradata might be useful in this case?

- **AI facial recognition product?**
- **Training dataset?**
- **Accuracy rate of model?**
- **Vendor documentation?**
- **Impact assessments?**
- **Ethical considerations?**
- **Employee training?**



**After the fact:**

**Police Chief says, “it was not an AI failure but an investigative failure.”**

**Police are changing their policy!**

# Be AI Ready!

- Recognize the value of using automated systems to capture, classify, query, aggregate, and secure records at scale
- Be aware of AI-related Risks
- Keep abreast of new AI tools, techniques, and vocabulary
- Understand governing laws and regulations
- Look to AI standards for guidance
- Recognize the value of working as part of a team
- Learn from AI implementations in other domains—good ideas are worth adopting and/or adapting!
- Leverage the work completed through research projects, such as InterPARES Trust AI



# Thank you!

## Dr. Patricia C. Franks

CA, CRM, IGP, CIGO, FAI  
Professor Emerita, SJSU  
Researcher, InterPARES Trust<sup>AI</sup>  
Member, CIGOA Board of Governors

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LinkedIn: <https://www.linkedin.com/in/pat-franks-5a709711/>

X: @patfranks

