

New York State Comptroller
THOMAS P. DiNAPOLI

State University of New York

Artificial Intelligence Governance

August 2026 | Report 2024-S-33

Prepared by the Division of State Government Accountability

Audit Highlights

Objective

To assess the State University of New York's progress in establishing an appropriate artificial intelligence (AI) governance structure over the development and use of AI tools and systems. The audit covered the period from January 2019 through October 2025.

About the Program

AI-powered tools have an increasingly significant role in industry operations, including education, agriculture, health care and medicine, manufacturing, transportation, and government, thereby enabling entities to improve their operations. In recent years, the use of AI has rapidly gained popularity among public and private institutions. As the use and sophistication of AI systems have been growing, they have also given rise to a host of unintended consequences.

AI systems pose unique challenges in accountability because their inputs and operations are not always visible. The U.S. Government Accountability Office noted that a lack of transparency reduces effective oversight in identifying errors, misuse, and bias. Additionally, AI systems are frequently complex, making it difficult to detect and respond to these failures when they occur. Therefore, it is essential to establish governance structures over AI to ensure that its use is responsible, transparent, and accurate, and that it does not generate harmful, unintended consequences.

The State University of New York (SUNY) is the largest comprehensive system of public higher education in the nation, comprising 64 institutions, including research universities, academic medical centers, liberal arts colleges, community colleges, and colleges of technology. SUNY's governing arm, SUNY System Administration (SUNY Admin), provides general oversight of operations for State-operated campuses and ensures their compliance with rules and regulations through policies and procedures. SUNY officials explained that SUNY's authority over community colleges is limited to general supervision and the approval of curricula and academic programs. SUNY campuses have adopted AI to support operations, including transcribing clinical notes during patient visits, reading license plates and identifying parking violations in campus parking lots, monitoring campus data to identify students who are at risk of dropping out, and automatically masking personally identifiable information from video evidence.

Key Findings

SUNY Admin does not have an effective AI governance framework, a standard definition of AI, or documented policies and procedures related to the development and use of AI systems. While SUNY Admin's organization-wide Information Technology (IT) policies establish requirements or guidance for IT governance, they do not ensure AI use is identified or specifically address AI

risks, which encompass a broader range of concerns arising from the development and use of AI technologies. AI risks go beyond traditional information security risks and include bias and inaccuracies in AI algorithms and AI-specific governance concerns, such as insufficient human oversight, AI life cycle management, transparency and explainability in AI decision-making, and inventory management that identifies systems with AI capabilities.

Given the speed with which AI technology is evolving, it is critical that SUNY Admin adequately supports campuses in their use of AI systems to protect against the broad range of potential risks. Our sample of four SUNY campuses that have used AI—University at Albany (Albany), Stony Brook University (Stony Brook), Upstate Medical University (Upstate), and Onondaga Community College (Onondaga)—found that AI governance at the four campuses varies significantly. Some campuses have identified key risks and taken steps to address them, while others have not created or updated policies to address risks or taken other steps toward effective AI governance. For example, none of the campuses required or implemented specific procedures to test their AI systems to evaluate whether outputs were accurate or biased.

Several factors contributed to inconsistent and inadequate AI governance, including a lack of guidance for campuses and poor identification of AI technologies. These incomplete approaches to AI governance do not ensure that SUNY's use of AI is accurate, unbiased, and transparent, and that it avoids disparate impacts. Furthermore, SUNY Admin should coordinate with campuses regarding AI governance and applicable requirements.

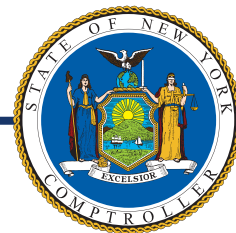
Key Recommendations

To SUNY Admin, Albany, Stony Brook, Upstate, and Onondaga:

- Implement policies to create an effective AI governance structure.
- Provide guidance and oversight as necessary to assist with the governance of AI systems.

To SUNY Admin:

- Coordinate with campuses, as appropriate, to identify relevant requirements and guidance to support the development of AI governance.



**Office of the New York State Comptroller
Division of State Government Accountability**

August 11, 2026

John B. King, Jr.
Chancellor
State University of New York
SUNY System Administration
State University Plaza
353 Broadway
Albany, NY 12246

Warren Hilton, Ed.D.
President
Onondaga Community College
Whitney Applied Technology Center 209
4585 West Seneca Turnpike
Syracuse, NY 13215

Andrea Goldsmith, Ph.D.
President
Stony Brook University
State University of New York
Office of the President
310 Administration Building
Stony Brook, NY 11794-0701

Havidán Rodríguez, Ph.D.
President
SUNY at Albany
University Hall 302
1400 Washington Avenue
Albany, NY 12222

Mantosh J. Dewan, M.D.
President
State University of New York
Upstate Medical University
750 East Adams Street
Syracuse, NY 13210

Dear Chancellor King, President Hilton, President Goldsmith, President Rodríguez, and President Dewan:

The Office of the State Comptroller is committed to helping State agencies, public authorities, and local government agencies manage their resources efficiently and effectively. By so doing, it provides accountability for the tax dollars spent to support government operations. The Comptroller oversees the fiscal affairs of State agencies, public authorities, and local government agencies, as well as their compliance with relevant statutes and their observance of good business practices. This fiscal oversight is accomplished, in part, through our audits, which identify opportunities for improving operations. Audits can also identify strategies for reducing costs and strengthening controls that are intended to safeguard assets.

Following is a report of our audit entitled *Artificial Intelligence Governance*. This audit was performed pursuant to the State Comptroller's authority under Article V, Section 1 of the State Constitution and Article II, Section 8 of the State Finance Law.

This audit's results and recommendations are resources for you to use in effectively managing your operations and in meeting the expectations of taxpayers. If you have any questions about this report, please feel free to contact us.

Respectfully submitted,

Division of State Government Accountability

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Glossary of Terms

Term	Description	Identifier
SUNY	State University of New York	<i>Auditee</i>
AI	Artificial intelligence	<i>Key Term</i>
AI Policy	ITS' Acceptable Use of Artificial Intelligence Technologies policy	<i>Policy</i>
Albany	University at Albany	<i>Key Term</i>
DTP	SUNY Digital Transformation Project	<i>Key Term</i>
GAO	U.S. Government Accountability Office	<i>Federal Entity</i>
GAO AI Framework	<i>GAO's Artificial Intelligence: An Accountability Framework for Federal Agencies and Other Entities</i>	<i>Key Term</i>
ITS	New York State Office of Information Technology Services	<i>Agency</i>
LPR	License Plate Recognition	<i>Key Term</i>
NIST	National Institute of Standards and Technology	<i>Federal Entity</i>
NIST AI Framework	<i>NIST's Artificial Intelligence Risk Management Framework</i>	<i>Key Term</i>
Onondaga	Onondaga Community College	<i>Key Term</i>
Stony Brook	Stony Brook University	<i>Key Term</i>
SUNY Admin	SUNY System Administration	<i>Office</i>
Upstate	Upstate Medical University	<i>Key Term</i>

Background

What Is Artificial Intelligence?

An artificial intelligence (AI) system, as defined by State Technology Law, is 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 use machine and human-based inputs to perceive real and virtual environments, abstract such perceptions into models through analysis in an automated manner, and use model inferences to formulate options for information or action. Machine learning (a technique that gives computers the ability to learn without being programmed by humans) has expanded the potential for AI systems. It encompasses a range of technologies, such as enabling computers to understand the meaning of spoken words (i.e., natural language processing) and deriving meaningful information from images and video (i.e., computer vision). AI is behind everyday technologies such as video games, web searches, spam filtering, and voice recognition. With their ability to process and analyze large amounts of data, AI-powered tools have an increasingly significant role in industry operations, including education, agriculture, health care and medicine, manufacturing, transportation, and government, thereby enabling entities to improve their operations.

As the use and sophistication of AI systems grow, they give rise to a host of unintended consequences. As the U.S. Government Accountability Office (GAO) cautioned in its 2021 report, *Artificial Intelligence: An Accountability Framework for Federal Agencies and Other Entities* (GAO AI Framework), AI is inherently predisposed to reflect the limitations of the data it's trained on and thus "has the potential to amplify existing biases and concerns related to civil liberties, ethics, and social disparities." Distorted results can also have negative consequences for organizations that rely on the accuracy of AI-generated output to support decision-making.

Furthermore, AI systems pose unique challenges in accountability because their inputs and operations are not always visible. According to GAO, this lack of transparency reduces effective oversight in identifying errors, misuse, and bias. Additionally, the complexity of AI systems can make it difficult to detect and respond to these failures when they occur. Therefore, it is essential to establish governance structures over AI to ensure that its use is responsible, transparent, and accurate, and that it does not generate harmful, unintended consequences.

As further emphasized by the National Institute of Standards and Technology (NIST) in its *Artificial Intelligence Risk Management Framework* report (NIST AI Framework), conscientious governance is a "continual and intrinsic requirement" for effective AI risk management. According to NIST, creating and documenting governance structures and policies is key to improving transparency, human review processes, and accountability. NIST also assigns responsibility for governance and oversight to the organization's management and senior leadership, as they are the authority for the organization in which the AI system is designed, developed, or deployed.

Responsibility for SUNY's AI Governance

The State University of New York (SUNY) is the largest comprehensive system of public higher education in the nation, comprising 64 institutions, including research universities, academic medical centers, liberal arts colleges, community colleges, and colleges of technology.

SUNY campuses include community colleges and State-operated university centers, academic medical centers, university colleges, and technology colleges. State-operated campuses fall under the governance of the Board of Trustees. However, the Board of Trustees has limited governance over SUNY community colleges because they are distinct legal entities, separate from each other and from SUNY, with their own boards of trustees that independently operate the colleges. SUNY officials explained that SUNY's authority over community colleges is limited to general supervision and the approval of curricula and academic programs.

SUNY's governing arm, SUNY System Administration (SUNY Admin), provides general oversight of operations for State-operated campuses and ensures their compliance with rules and regulations through policies and procedures. In some cases, community colleges may use services contracted by SUNY Admin and would be held to requirements from those contracts.

SUNY Admin maintains oversight of many operational functions and provides guidance to all State-operated campuses; however, each State-operated campus may choose its own software and business solutions provided they comply with SUNY Admin's restrictions. SUNY Admin officials explained that individual campuses are responsible for the design, implementation, use, monitoring, and authorization of their own AI systems.

The impact of classroom AI risks (e.g., academic misconduct) differs significantly from the operational AI risks (e.g., algorithmic bias). Some individual campuses have taken steps to address the use of AI by students, including updates to their student code of conduct, academic dishonesty policies, and plagiarism definitions, as well as developing policies around the use of AI by students in the classroom and in specific academic programs. While both operational and classroom risks are important to address, our audit focuses on operational AI risks at SUNY Admin and for sampled campuses.

Audit Findings and Recommendations

SUNY Admin does not have an effective AI governance framework, a standard definition of AI, or documented policies and procedures related to the development and use of AI systems. While SUNY Admin's organization-wide Information Technology (IT) policies establish requirements or guidance for IT governance, they do not ensure AI use is identified or specifically address AI risks, which encompass a broader range of concerns arising from the development and use of AI technologies. AI risks go beyond traditional information security risks and include bias and inaccuracies in AI algorithms and AI-specific governance concerns, such as insufficient human oversight, AI life cycle management, transparency and explainability in AI decision-making, and inventory management that identifies systems with AI capabilities.

Given the speed with which AI technology is evolving, it is critical that SUNY Admin adequately supports campuses in their use of AI systems to protect against the myriad of potential risks. Further, to assess SUNY's progress in establishing an appropriate AI governance structure over the use and development of AI tools and systems, we selected a judgmental sample of four AI use cases at SUNY campuses: University at Albany (Albany), Stony Brook University (Stony Brook), Upstate Medical University (Upstate), and Onondaga Community College (Onondaga). Our testing at these campuses found that AI governance varied significantly. Some campuses have identified key risks and taken steps to address them, while others have not created or updated policies to address those risks or taken other steps toward effective AI governance. Further, none of the campuses required or implemented specific procedures to test their AI systems to evaluate whether outputs were accurate or biased.

Several factors contributed to inconsistent and inadequate AI governance, including a lack of guidance for campuses and poor identification of AI technologies. These incomplete approaches to AI governance do not ensure that SUNY's use of AI is accurate, unbiased, and transparent, and that it avoids disparate impacts. Furthermore, SUNY Admin should engage with campuses regarding AI governance and applicable requirements as, for example, SUNY Admin and SUNY campuses interpreted State inventory requirements differently.

AI Governance at SUNY Administration

SUNY Admin has not developed an AI governance structure to manage, operate, and oversee the development and use of AI systems at SUNY Admin or across the SUNY system. SUNY Admin does not have a definition for AI, although SUNY Admin officials stated that they are working toward developing a policy that will include a formal definition. Additionally, SUNY Admin does not have documented policies and procedures related to:

- Developing and using AI systems.
- Ensuring AI systems conform to SUNY's stated values and principles and address bias and inaccuracies.

- Involving stakeholders in the development and life cycle of AI systems to mitigate risks.
- Requiring human oversight over SUNY's AI systems, including those in development.
- Monitoring the quality and reliability of data throughout its use.
- Managing SUNY's AI life cycle to ensure the systems perform as intended, including monitoring accuracy and bias over time.

SUNY Admin has issued IT policies requiring SUNY Admin and SUNY campuses to maintain a comprehensive and up-to-date inventory of all systems and their information, monitor security alerts, and establish and maintain a risk management process and governance structure for information security. However, these policies do not ensure AI use is identified or specifically address AI risks, which encompass a broader range of concerns arising from the development and use of AI technologies. Specifically, SUNY Admin has not developed an AI-specific risk management plan. Further, the policies' inventory requirement does not require the identification of tools or systems as AI. AI risks go beyond traditional information security risks and include bias and inaccuracies in AI algorithms or AI-specific governance concerns, such as insufficient human oversight, AI life cycle management, transparency and explainability in AI decision-making, and inventory management that identifies systems with AI capabilities.

SUNY Admin does not maintain a formal inventory of its AI systems. Officials stated that an inventory would likely result from SUNY Admin's digital transformation work. However, it is unclear whether such an inventory would include AI use at individual campuses. In December 2023, SUNY Admin published its Digital Transformation Project (DTP) Governance Plan to establish a comprehensive and cohesive governance structure for the implementation and ongoing oversight of organization-wide IT projects, including an advisory subcommittee on AI. While the DTP Governance Plan establishes governance principles, defines membership roles and responsibilities, and describes internal decision-making processes and communication routes, it has not resulted in an AI system inventory or other formal AI governance structures.

When we initially spoke with SUNY officials, SUNY Admin was in the early stages of implementing organization-wide AI systems, including a large language model and an AI tutor. SUNY Admin followed the DTP governance process for procuring the AI tutor system and provided documentation related to project development and vendor solicitation. An initial request was submitted detailing the business use case and requirements; however, the request forms did not require additional information related to AI risks. SUNY Admin did not provide documentation for the implementation of the large language model. Additionally, SUNY Admin officials stated they do not currently have, or require, metrics to measure the performance of their AI systems.

SUNY Admin officials stated that they provided various types of training to their staff, including AI safety and security training, which provides an overview of AI chatbots and the security and privacy risks associated with their use (e.g., wrongful disclosure of sensitive information). However, the training does not cover all risks associated with AI, such as bias and accuracy. AI literacy classes are also offered by SUNY's Center for Professional Development, and SUNY Admin provides several short modules covering topics related to AI, including AI chatbots, AI scams, AI and sensitive information, and AI foundations.

SUNY Admin’s Campus Guidance

SUNY Admin created optional contract language to be used as needed for any campus-based procurement of AI systems. However, SUNY Admin has provided no additional guidance or policies and procedures regarding AI governance to SUNY campuses.

Although SUNY Admin does not have written policies and procedures, or an AI-specific risk management plan, in May 2023, SUNY Admin, along with campus officials at certain schools, took steps to address AI use in education through the development of SUNY’s Faculty Advisory Council on Teaching and Technology’s (FACT2) AI task group, which created the FACT2 Guide to Optimizing AI in Higher Education. While this guide presents information and suggestions for incorporating AI in an academic environment, it is primarily a tool for educators, and not necessarily for organizations managing operational AI risks. At the time we concluded our fieldwork in October 2025, FACT2 indicated it planned to update the guide.

State AI Requirements

In January 2024, the Office of Information Technology Services (ITS) issued the “Acceptable Use of Artificial Intelligence Technologies” policy (AI Policy) “to establish guidelines for the acceptable use of Artificial Intelligence (AI) technologies by State Entities.” The policy also requires State Entities to report certain AI tools. In addition, in 2025, New York State enacted a law requiring State agencies to report certain AI tools to ITS to publish this information on the New York State Open Data website. SUNY Admin officials stated that ITS policies are not directly applicable to SUNY, but can still be used for guidance. Furthermore, SUNY Admin officials stated that, as a separate educational corporation, SUNY does not meet the definition of a “State agency.” Notwithstanding SUNY Admin’s response, as noted later in this report, one of the sampled campuses had already prepared an AI inventory for submission using ITS’ guidance, and another had indicated that it plans to comply with the State Technology Law. SUNY Admin should coordinate with campuses to clarify applicable requirements and guidance.

AI Governance at Sampled SUNY Campuses

To assess SUNY’s progress in establishing an appropriate AI governance structure over the use and development of AI tools and systems, we selected a judgmental sample of four SUNY campuses that have used AI—Onondaga, Stony Brook, Albany, and Upstate—and developed a standard set of interview questions to determine how each campus governs its use and development of AI tools and systems. We derived our questions from our review of AI governance frameworks, including the GAO and NIST AI frameworks, and asked questions relevant to ITS’ AI Policy.

To assist the campuses in answering some of the interview questions, we identified a sample AI use case (i.e., an AI tool or system) to focus campus responses. In selecting the tool, we considered which campus was using the tool, the type of AI function, and the impact of the use case. We selected the following:

- Onondaga deployed its sampled AI use case in February 2020 after contracting with a vendor. Within the software, machine learning algorithms use Onondaga's historical student data (e.g., grades and graduation data) to build a model that predicts student retention. The predictions are used to rank students based on their need for assistance, with the analytics updated as student data changes. Onondaga officials told us they use this tool as an early alert platform and that they believe it does not use AI. However, based on the developer's model details, the software uses AI to develop its predictions of student outcomes.
- The Stony Brook University Police Department uses body-worn cameras and, in 2022, began using software that has additional AI features that can help manage and analyze video recordings. These features include assistance with report writing, transcription, people detection, translation, video redaction, and policy guidance (a chatbot that generates responses based on a department's uploaded policies). Apart from the redaction feature, which leverages object tracking to support redactions, Stony Brook officials told us they did not currently use any AI features within its software package, although some users have access. Stony Brook did not include this AI tool in its AI inventory, stating that access to the redaction feature is limited and not often utilized.
- Albany uses a mobile license plate recognition (LPR) system to identify parking violations in its parking lots. Albany engaged a vendor and launched the system in June 2025. The LPR technology was developed with a neural network to identify and read license plates. The plate number is read using optical character recognition. The reader scans and processes the license plate information and makes a recommendation for parking enforcement to take action. Despite the underlying technology, Albany officials told us they do not classify license plate readers as an AI product and maintain that the LPR system is an ill fit for AI governance from a risk-based approach.
- Upstate contracted and deployed in December 2019 a speech recognition software. It enables health care providers to dictate patient notes and reports directly into Upstate's electronic health records. The AI tool was developed using an unsupervised learning algorithm that also adapts to the way individuals use vocabulary and their unique diction style. Upstate officials acknowledged that the tool incorporates natural language processing; however, they view its functionality as low risk and outside the scope of AI governance.

SUNY disagreed that the sample use cases utilize AI, and the sampled campuses told us they either do not classify them as AI or consider them as low-risk AI and therefore do not apply AI governance to these tools. While risk prioritization is a critical step in AI governance, none of the campuses that considered their use cases to be low risk provided documentation to support how they assessed risk levels for the sample use cases. Moreover, as discussed further in the findings, most campuses have not developed AI-specific risk management plans or defined what it means to be a low-risk AI system (i.e., established risk thresholds requiring action when exceeded). The sample AI use case for the one campus (Upstate) that established an AI risk identification process did not undergo the process, as its implementation predated the campus's

development of an AI governance function. Documenting AI risk classification is important for guiding management decisions on implementing controls and determining the level of assessment.

Overall, AI governance at these campuses varied significantly. Some campuses are creating AI-specific policies to address AI risks, while others have not created or updated policies specific to AI risks or taken other material steps toward effective AI governance. Officials from the campuses that did not establish AI policies told us that existing policies were sufficient to address AI risks; however, we reviewed these policies and determined that certain AI risks have not been addressed. For example, Onondaga updated its Acceptable and Responsible Use of OCC [Onondaga Community College] Technology and Information Systems policy to include prohibited AI uses; however, the policy does not define AI, which could lead to inconsistent practices across the campus, as employees may not understand which tools are covered. These campuses' timelines for AI adoption also varied, with some adopting AI this past year and others having used it for close to a decade. Several factors contributed to the inconsistent and inadequate AI governance, including a lack of clear guidance, uncertainty about how to effectively govern AI use, and an evolving regulatory landscape.

General AI Policies and Procedures

We asked the sampled campuses about their AI policies and procedures that have been published or are in development.

The four sampled campuses varied in their development of AI governance structures to manage, operate, and oversee the implementation and use of AI systems. Three of the four sampled campuses either updated existing IT policies or processes or drafted new policies to address AI use but have not yet implemented them. Officials at the remaining campus, Albany, informed us that they intended to use existing policies to address AI risks; however, they did not provide evidence that they had reviewed those policies against an AI framework or documented which policies addressed AI risks. Two of the four (Onondaga and Stony Brook) updated existing policies; however, the updates, on their own, were insufficient to address AI risks because they did not address components such as accuracy or mitigating bias.

Onondaga updated its Acceptable and Responsible Use of OCC Technology and Information Systems policy to define permitted and prohibited uses of AI technologies for all employees, students, and vendors with access to Onondaga's computing resources. Despite identifying appropriate uses of AI, Onondaga's policy does not define AI, and Onondaga's process for approving new systems does not explicitly account for the unique challenges of AI. Onondaga's Administrative Systems Oversight Team reviews proposals and makes recommendations to Onondaga's Executive Council related to new information systems. While the proposal process involves listing any potential barriers to successful completion or implementation, it does not include steps to identify AI risks, such as lack of transparency in decision-making. Onondaga officials told us that any new AI systems would undergo this established process; however, they asserted that Onondaga has not onboarded or vetted any AI systems, including the sampled AI use case. Onondaga officials told us that Onondaga has also recently developed an AI

Governance Committee that is actively working to address academic challenges and formulate a campus-wide AI training plan. We requested additional information as to when the committee was established, its members, and its responsibilities, but we have not received any such information.

While Stony Brook currently lacks an AI-specific policy, officials said Stony Brook uses its existing policy framework to govern AI use and has developed additional policies and guidance. In part to encourage appropriate governance, Stony Brook established a cross-campus AI Coordination and Communication Work Group to coordinate and communicate initiatives, practices, and policies on generative AI to campus stakeholders. The group developed an AI integration evaluation questionnaire to assist with identifying policies that need to be modified to address AI, resulting in updates to select policies, including addressing data access. However, these updates do not adequately address AI risks such as accuracy or mitigating bias. Additionally, in April 2025, Stony Brook Medicine published its Acceptable Use of Machine Learning Applications policy; however, it only addresses Stony Brook Medicine, not Stony Brook as a whole.

Upstate has taken steps toward implementing an AI governance structure, including establishing a process for approving AI systems, drafting an AI Acceptable Use and Access Policy, and hiring an AI Governance Lead responsible for supporting the development of AI. Upstate began exploring an AI review process toward the end of 2024, which involves developing two governance bodies: the AI Triage Group and the AI Steering Council. While Upstate's AI policy has not been approved, Upstate officials informed us that they are following this process. In addition to establishing a process for requesting new AI systems, Upstate's AI policy defines standards and principles for the responsible deployment and oversight of AI, delineates responsibilities for use-case oversight, and provides guidance related to other laws and policies governing AI use at Upstate.

Defining AI

Agreeing upon a clear definition of what constitutes AI is a crucial first step in establishing the scope and applicability of an AI governance structure. It is a primary prerequisite for mapping all existing and planned AI systems and establishing standardized risk management practices. Defining AI and other key terms and concepts related to AI is necessary for campuses to build a foundation for responsible AI use. Two of the four campuses (Albany and Onondaga) have not established a specific definition of AI. Onondaga officials stated that there are formally recognized definitions of AI from various sources that are all similar; however, rather than defining what is already formally recognized, Onondaga's Acceptable and Responsible Use of OCC Technology and Information Systems policy highlights examples of AI but does not define it.

Upstate and Stony Brook have developed definitions for AI. Upstate defines AI on its AI guidance webpage, which is also referenced in Upstate's draft AI Acceptable Use and Access Policy. Although Stony Brook Medicine defined AI and published the definition in its Acceptable Use of Machine Learning Applications policy, this definition does not apply campus-wide. Stony Brook's AI Coordination and Communication Work Group has defined generative AI but not AI in general (i.e., traditional AI). Stony Brook officials, citing the advent and availability of commercial large

language models, told us that the AI Coordination and Communications Work Group chose to focus on generative AI because of the new challenges it presents. They stated that Stony Brook's academic and clinical sectors operate within complex regulatory frameworks and must comply with requirements and definitions issued by regulatory agencies, which often differ. For example, Stony Brook officials told us that ITS' definition of AI is not the same as that of the Middle States Commission on Higher Education, Stony Brook's accrediting body. However, these definitions do not appear to contradict one another.

AI Consideration in Academic Policy

At each sampled campus, officials shared steps to address the risks of AI use in regard to academics. At three campuses (Onondaga, Stony Brook, and Upstate), officials shared updated academic policies regarding the appropriate use of AI, including issues around academic dishonesty. Some policies took additional steps; for example, Upstate College of Medicine's Master of Public Health program explicitly required prior approval for the use of generative AI prior to academic use. Albany officials highlighted resources and guidance for instructors on incorporating AI in the classroom, such as information on the risks associated with using AI and tips to discourage students from using AI in academically dishonest ways.

AI Risk Management

We asked each campus questions about its AI risk management plan and how it assessed AI-specific risks. While none of the campuses implemented AI-specific risk management plans, three are developing or updating processes to mitigate AI risks. Stony Brook and Upstate have begun using these processes when procuring AI systems.

Onondaga has not developed an AI-specific risk management plan. Officials told us they are developing an AI risk management process that will add an AI component to their current vendor questionnaire and steps for Onondaga's Administrative Systems Oversight Team if AI is identified in a new information system proposal. It is unclear how Onondaga plans to address AI risks, as opposed to traditional IT risks outlined in Onondaga's current procedures. Furthermore, officials informed us that no AI system has undergone this process, and Onondaga has not identified any of its tools as AI, so we are uncertain of the steps Onondaga will take to identify a tool as AI and begin this process. We requested additional information on when Onondaga plans to begin this AI risk management process and how officials plan to identify AI, but Onondaga did not respond to our request.

Albany's Architecture Review Board reviews all new technology procured at Albany; however, there are currently no AI provisions within this process. Albany officials are developing processes to mitigate AI risks, which they shared with us following our closing conference. Albany developed an "AI tool use risk mitigation plan template" for the end user to complete in conjunction with Albany's existing third-party vendor risk management process. To implement this plan, users will list risks, describe human oversight processes, and specify the metrics and practices to be used to test, verify, and continuously monitor the accuracy of AI outputs. Additionally, Albany is developing a technology review checklist that includes a high-level risk

assessment to establish the extensiveness of the review. Systems identified as using AI will undergo AI reviews; however, these processes have not been finalized, and Albany officials told us they plan to implement them in 2026. Because these AI risk management processes are in development, Albany's Architecture Review Board may not have raised AI-specific questions or assessed AI-specific risks when reviewing AI tools already deployed at Albany, such as its sampled AI use case.

Stony Brook uses the Higher Education Community Vendor Assessment Toolkit, a questionnaire designed to help university professionals measure vendor risk, as part of its procurement process. The questionnaire was updated in February 2025 to include AI-specific questions. Stony Brook Medicine piloted a risk questionnaire for AI applications alongside the release of its Acceptable Use of Machine Learning Applications policy. The questionnaire states that it was designed to provide a comprehensive assessment of potential risks associated with AI applications in health care, helping ensure they are safe, effective, and ethically sound. Among other questions, it asks about measures taken to identify and mitigate biases and techniques to address false positives and negatives. As of June 2025, Stony Brook was determining what would trigger the use of this questionnaire. We reviewed a questionnaire that a vendor completed for one of Stony Brook's AI systems and a risk questionnaire that a vendor completed for a separate Stony Brook Medicine AI system, neither of which included evidence of controls. It is unclear how Stony Brook evaluates the vendor's answers and documentation for accuracy. Additionally, both questionnaires address risk management practices identified solely by vendors. Because these questionnaires are completed only by vendors, they do not apply to AI systems developed in-house.

Upstate hired an AI Governance Lead to establish and oversee its AI governance committee. Managing risks associated with AI use is one of the AI Governance Lead's responsibilities. Upstate also included risk management procedures in its draft AI Acceptable Use and Access Policy. These procedures address risk identification, risk mitigation, and continuous monitoring and begin when a new system, subscription, or AI feature is requested. All system requests will be reviewed by Systems Advisory, which will conduct technical, compliance, and cybersecurity screenings with the vendor. The AI Governance Lead will flag any system with AI functionality, which will then be forwarded to the AI Triage Group for further evaluation. The group will engage with the vendor, perform an AI risk assessment, develop mitigation strategies, and establish monitoring expectations. They will then present a recommendation to Upstate's AI Steering Council, which will ultimately approve the request, approve it with contingencies, or deny it. Upstate officials told us that, while this process has not been approved, Upstate has been following it and personnel understand their roles within it. Upstate officials informed us that the AI reviews were integrated into the Systems Advisory workflow sometime in late 2024 or early 2025. Legacy AI systems have not undergone this review process; however, officials told us that they plan to re-evaluate existing systems under the updated process. After the closing conference, Upstate officials shared example documentation, including an AI governance risk-mitigation summary generated during an AI Triage Group review, to illustrate the process.

Inventory of AI Systems and Tools

We asked the sampled campuses questions related to developing an inventory of AI systems and tools. In addition to identifying the AI systems, identifying the context and the data used by the AI systems are important components to understand the risks in the relevant contexts.

Three of the four sampled campuses (Albany, Onondaga, and Upstate) do not maintain formal inventories of AI systems or of the data sources used by their AI systems. Albany officials stated that, while they do not have a formal AI inventory, they intend to change this going forward and inventory the tools they have already procured. Onondaga officials stated they do not currently have an AI inventory because they have not yet implemented any AI tools or systems. Upstate has begun taking steps to identify AI tools and systems, including developing targeted questions specific to AI and machine learning functionality as part of draft improvements to its system review process. The questions are designed to assist in identifying systems that may incorporate AI and developing an AI-aware systems inventory; however, Upstate does not currently have an inventory of its AI tools.

Stony Brook maintains an AI inventory that was first produced in August 2025. Stony Brook officials told us they developed the inventory due to their understanding that Stony Brook was required to submit an AI inventory to ITS based on the requirements listed in the State Technology Law. The inventory lists AI tools in use at Stony Brook, including Stony Brook Medicine; however, it does not include all AI tools used by Stony Brook, such as its sampled AI use case. The State Technology Law specifically defines certain AI uses that must be reported annually, which would not necessarily include all AI use cases that should be governed.

Human Oversight

We asked each campus about the need for human oversight of its use of AI systems. Only Onondaga has established a written requirement for human oversight (i.e., human in the loop) of AI processes.

Onondaga's Acceptable and Responsible Use of OCC Technology and Information Systems policy requires users to review and verify the accuracy and appropriateness of AI-generated content before using, submitting, or distributing it. Upstate's draft AI Acceptable Use and Access Policy states that human responsibility for decisions and outcomes remains paramount, but does not specifically require active human oversight. While Stony Brook does not have a written requirement, it instructs users of its generative AI tools that AI output can be incorrect and to review the generated content. Stony Brook Medicine has a written requirement for the clinical side of the campus.

Three campuses' (Albany, Onondaga, and Upstate) sampled AI use cases feature a human-in-the-loop process. Each campus's tool either makes a recommendation or produces an output that requires human review. For example, parking tickets can't be produced without the user actively issuing one, and medical providers are responsible for approving transcribed notes. In Onondaga's sampled AI use case, the model ranks students based on its analysis of at-risk

students. However, Onondaga's staff could select any student from the list, not necessarily what the model ranked as the most at-risk student.

Monitoring of AI Systems

We asked officials at the sampled campuses how they monitor the use of each AI system to ensure it is accurate, free of bias, and meets its intended objectives. None of the campuses have conducted periodic audits or reviews of their AI systems to ensure they are accurate and performing appropriately. Apart from Stony Brook Medicine, none of the campuses require such reviews. Upstate's draft AI policy requires a monitoring plan for AI systems; however, the AI policy has not been approved.

There was no campus monitoring of AI use to ensure that the sampled use cases were performing appropriately and their results were accurate. Albany, Onondaga, Stony Brook, and Upstate received or had access to programmatic metrics but not metrics related to the performance of the AI tool and systems.

While Onondaga tracked academic advisement metrics, such as the number of students who received outreach, it lacked metrics to assess whether the AI was performing appropriately (e.g., whether the model accurately predicted the most at-risk students). Despite the developer creating a report on the model's performance (i.e., sensitivity, calibration), Onondaga's officials have not received it. In response, Onondaga's officials clarified that they do not monitor the use of predictive analytics in the sampled AI use case because they do not use them and do not consider the software to use AI.

Albany similarly monitored programmatic metrics, including the number of parking violations issued and violations appealed, but not whether the AI system issued tickets appropriately or whether all potential parking violations were accurately identified (i.e., the number of false negatives). While Albany acknowledges that LPR outputs may contain errors, the campus lacks metrics to measure the performance of its AI systems, including error rates for LPRs.

Upstate receives monthly reports from its vendor, but the only metric listed within the report is Upstate's adoption rate (i.e., the number of individuals using the software). The vendor stated that it can track the rate of corrections made in transcribing; however, no documentation was provided to support these correction rates, and it's unclear whether these rates are shared with Upstate.

Stony Brook officials told us that even though AI tools are available in the software of its sampled AI use case, they do not use them. Additionally, while Stony Brook has conducted an internal audit of body-worn cameras, the audit only consisted of a review of unauthorized access to the software.

Training

We asked campus officials whether they provided training to staff on the risks of AI. Campuses ranged from providing required training courses on general AI risks to voluntary training on implementing AI in the classroom.

Stony Brook offers training on the risks of AI to its staff and students. While Stony Brook Medicine requires this training for its staff, it is not otherwise mandatory for staff at Stony Brook. Stony Brook provides staff with a training document outlining the fundamentals of AI, risks associated with AI, and best practices for safely using AI. Additionally, Stony Brook offers AI workshops designed to help educators incorporate AI in the classroom. Stony Brook Medicine hospital staff are required to complete training modules on using AI in a work environment and understanding the risks and limitations of AI as part of their annual training recertification. Stony Brook Medicine also trains its staff in the use and governance of AI.

While Albany has not trained staff on the general risks of AI, it did provide guidance to all faculty and staff on one of its campus-wide AI use cases. Officials stated that staff have been trained on the AI use case we sampled. This training covered using the system, manually reviewing the license plate against the optical character recognition result, and issuing a citation to the vehicle. However, the training does not address potential risks associated with using AI.

Upstate officials stated that Upstate provides AI training to staff through its Information Management and Technology AI Discovery user group meetings, its Office of Faculty Affairs and Faculty Development's AI sessions, and various AI-focused conferences and training courses. Officials also stated that there have been a series of voluntary faculty development programs, and the campus has planned a series of webinars and live sessions on the use of AI on both the clinical and educational sides. However, no documentation was provided for these training courses, so we cannot determine if staff are trained on the risks of AI. Upstate officials stated they plan to centralize records of AI training sessions, including the materials presented and rosters of attendees.

Onondaga did not provide general AI risk training to all staff and faculty. Onondaga's library provided a faculty workshop on the new SUNY general education information literacy core competency, which included basic information on AI such as definitions, limitations of the technology, and ethical implications, including bias and discrimination, privacy and data security, misinformation and accuracy, and transparency and accountability.

Data Use Agreements

We asked the sampled campuses questions related to whether campuses had data use agreements over the data created and collected by the sampled AI systems and found a significant range in how campuses allow data to be used. With its third-party vendors, SUNY uses a combination of data use agreements and contract language to address appropriate use of data, including the handling of confidential information. However, because of the unique considerations related to AI, such as whether the collected data can be used for future model development, additional language can clarify appropriate use. Initially, none of the campuses required contract language for how their data could be used with AI. In late 2024, Stony Brook developed standardized AI contract language to incorporate into its contracts, which officials stated has been done ever since. Furthermore, while each of the four contracts for the sampled use cases contained limitations on data use, none explicitly prohibited the vendor from using campus data to develop or improve AI models. Two of the campuses' contracts (Upstate and

Stony Brook) appear to permit the vendors to use campus data to improve the vendors' products. Stony Brook officials disagreed that the contract allowed for such use of Stony Brook's data.

Onondaga does not require certain terms addressing AI risks regarding data use. However, for the sampled AI use case, the contract states that the data is owned by SUNY and that the vendor may only use the data to the extent authorized, such as fulfilling its duties under the contract, and may not share or disclose the data. In addition, Onondaga has internal policies regarding the handling of data, which defines how institutional data is classified and handled. While this policy applies to any agents or affiliates authorized to access Onondaga's data, it does not contain specific procedures for handling data within AI systems, such as how the data can be used to train other AI systems. Onondaga's Acceptable and Responsible Use of OCC Technology and Information Systems policy prohibits inputting any restricted or private institutional data into public or unapproved AI systems. The policy is applicable to all users of Onondaga's computing resources, including students, employees, and vendors.

Albany does not have required data use agreements or contract language specific to AI. The contract for its sampled AI use tool has a "least access required" policy, which restricts access to customer data to personnel providing direct support. The contract also specifies that Albany owns the data within the LPR software. Once the contract expires, all data collected or generated by the vendor and/or provided by Albany is expected to be erased or destroyed by the vendor.

Upstate does not have required data use agreements or contract language specific to AI. However, the contract for the sampled use case had addressed data use regarding model development. While Upstate owns the data used by the speech recognition software, the contract allows the vendor and its third parties to use, compile, and analyze data to develop, train, tune, enhance, and improve the speech recognition functionality. Though Upstate may benefit from those improvements, such development, training, tuning, and improvement may also benefit other customers. Upstate officials stated that future contracts will include enhanced AI-data use provisions, and they are engaging vendors to expand available performance metrics.

Stony Brook did not have a requirement for specific contract language at the onset of the audit but implemented a standardized AI contract clause in late 2024. The sampled AI use contract, beginning in April 2022, appears to allow the vendor to use Stony Brook data to develop and improve its products and services as part of its customer experience improvement program. The vendor's website explains that the program uses data that has been aggregated, transformed, or de-identified through privacy-preserving techniques. The vendor's representatives told us that customers can opt out of sharing this data at any time; however, it's unclear whether any alternative program participation options were discussed with Stony Brook officials during contract negotiations and whether Stony Brook ultimately opted out. Stony Brook officials told us that Stony Brook did not sign or execute this clause, and there seem to be discrepancies between Stony Brook and vendor's understanding of the agreement. These discrepancies underscore the value of standardized contract language that addresses AI risk, such as the language subsequently created by Stony Brook.

Recommendations

To SUNY Admin, Albany, Stony Brook, Upstate, and Onondaga:

1. Implement policies to create an effective AI governance structure.
2. Provide guidance and oversight as necessary to assist with the governance of AI systems.

To SUNY Admin:

3. Coordinate with campuses, as appropriate, to identify relevant requirements and guidance to support the development of AI governance.

Audit Objective, Scope, and Methodology

The objective of our audit was to assess SUNY's progress in establishing an appropriate AI governance structure over the development and use of AI tools and systems. The audit covered the period from January 2019 through October 2025.

To accomplish our objective and assess related internal controls, we interviewed SUNY Admin and campus personnel about the development and implementation of SUNY AI governance, and reviewed relevant SUNY policies and procedures, guidelines, strategic plans, and supporting documentation. We interviewed officials from the sampled campuses to gain an understanding of each campus's AI governance structure. We asked additional questions to determine how each campus's sampled use case functions within that governance structure. To formulate our survey questions, we reviewed AI governance frameworks, including the NIST and GAO AI frameworks, to identify key practices to help ensure accountability and responsible AI use. For each sampled use case, we interviewed the vendor about the underlying technology and either observed demonstrations of the tool or participated in walkthroughs of its functionality. We also requested and reviewed documentation to support campus responses.

We used a non-statistical sampling approach to provide conclusions on our audit objective and to test internal controls and compliance. We selected judgmental samples. However, because we used a non-statistical sampling approach for our tests, we cannot project the results to the respective populations. Our samples, which are discussed in detail in the body of our report, include:

- A judgmental sample of four of all SUNY campuses that had contracts within Open Book and/or payments in the Statewide Financial System, based on whether an AI tool was in use and the type of AI tool, to test whether AI governance existed at our sampled agencies.
- A judgmental sample of one AI use case from each of the sampled campuses to identify key practices to ensure accountability and responsible AI use. We selected cases that were actively in use, had public impact, and covered different functions throughout SUNY.

We obtained data from the Statewide Financial System directly and through Open Book New York. The Statewide Financial System is reviewed by KPMG during its annual audit of the State's annual comprehensive financial report. Based on its work, we have determined that the data from this system is sufficiently reliable for the purposes of this report.

Statutory Requirements

Authority

The audit was performed pursuant to the State Comptroller's authority as set forth in Article V, Section 1 of the State Constitution and Article II, Section 8 of the State Finance Law.

We conducted our performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

In addition to being the State Auditor, the Comptroller performs certain other constitutionally and statutorily mandated duties as the chief fiscal officer of New York State. These include operating the State's accounting system; preparing the State's financial statements; and approving State contracts, refunds, and other payments. These duties could be considered management functions for the purposes of evaluating organizational independence under generally accepted government auditing standards. In our professional judgment, these duties do not affect our ability to conduct this independent performance audit of SUNY's oversight and administration of AI governance.

Reporting Requirements

We provided a draft copy of this report to SUNY officials at SUNY Admin, Albany, Stony Brook, Upstate, and Onondaga for their review and formal written comments. We considered their comments in preparing this final report and have included them in their entirety at the end of the report. SUNY officials generally agreed with the recommendations and have indicated actions they have taken or plan to take to address them. Our responses to certain campus remarks are included in the report's State Comptroller's Comment, which is embedded in Onondaga's response.

Within 180 days after final release of this report, as required by Section 170 of the Executive Law, the Chancellor of the State University of New York and the Presidents of Albany, Upstate, Stony Brook, and Onondaga shall report to the Governor, the State Comptroller, and the leaders of the Legislature and fiscal committees, advising what steps were taken to implement the recommendations contained herein, and where recommendations were not implemented, the reasons why.

SUNY Response



Anne Bink

Senior Vice Chancellor for Operations and Management & Chief Operating Officer

anne.bink@suny.edu
518-320-1887

suny.edu

May 29, 2026

Kenrick Sifontes
Audit Director
Office of the State Comptroller
110 State Street, 11th Floor
Albany, New York 12236

Dear Kenrick,

Thank you for the opportunity to respond to the Office of the State Comptroller's (OSC) Draft Report related to the Oversight of Artificial Intelligence (AI) at the State University of New York (SUNY). SUNY works to responsibly embrace new technologies. As noted in your report, the regulatory landscape related to AI is evolving.

AI is increasingly used across higher education and is integrated into many tools that support instruction, research workflows, and administrative operations. Current SUNY leadership in this area includes:

- Adopting a Systemwide Artificial Intelligence Policy Framework (AI Policy) that establishes a common systemwide definition of AI and requires each SUNY institution to publish an institutional AI Policy and/or update relevant existing policies no later than December 31, 2026.
- Naming the inaugural SUNY [AI for the Public Good Fellows](#), made up of 20 SUNY faculty and staff across disciplines ranging from health sciences to sustainable resources management. The Fellows serve as a resource to colleagues working to update courses and learning activities to incorporate AI literacy, including the effective and ethical use of AI and teaching students to critically evaluate AI-generated content.
- Updating SUNY's General Education Framework [core competency in information literacy](#) in order to reflect the rise of emerging technologies and AI. As a result of this change, all students will develop skills to evaluate information from a variety of sources, with an awareness of authority, validity, bias, and origin, and demonstrate an understanding of the ethical dimensions of information use, creation, and dissemination.

- Hosting Governor Hochul's [Empire AI consortium](#), which provides supercomputer access to researchers working to advance the public good. Empire AI is housed at the State University of New York at Buffalo and includes the State University of New York at Albany, Binghamton, and Stony Brook, along with the state's other leading research institutions.
- Establishing [Empire AI campus partnerships](#) between SUNY's University Centers, university colleges, technology colleges, and community colleges to advance AI research and education for the public good. The partnerships leverage Empire AI to increase research experiences, professional development, and other opportunities for SUNY students and faculty.
- Launching the nation's [first independent AI research center](#) at a public university. The Center for AI Responsibility and Research at the State University of New York at Binghamton will be the nation's premier academic hub for creating the science and engineering of responsible, repeatable, and transparent artificial intelligence.
- Launching [Departments and Centers of AI & Society](#) across eight SUNY institutions – which foster collaboration across disciplines to provide inclusive AI research, address ethical concerns in the use of AI, and advance responsible data use.

While SUNY has to date deployed limited AI tools at System Administration and the campuses, we believe there are significant potential additional benefits from the responsible use of AI for research, operations, and teaching and learning in support of faculty. SUNY's planned utilization of AI will be purposeful and value added for our constituents and aligned with thoughtful and established guidance. To that end, SUNY has adopted a Systemwide Artificial Intelligence Policy Framework (AI Policy). The AI Policy establishes a common systemwide definition of AI, describes a risk-based governance model under which AI systems that can control or meaningfully influence outcomes affecting the safety, rights, or well-being of individuals warrant heightened scrutiny, and adopts principles addressing accountability, bias mitigation, transparency, privacy, security, and education. It requires each SUNY institution to publish an institutional AI Policy and/or update relevant existing policies no later than December 31, 2026. The institutional policies must address roles and responsibilities, procurement, domain-specific governance, training, fairness, privacy, security, risk-based governance, and regular review. These requirements are intended to provide the systemwide governance baseline that OSC found lacking, while preserving the flexibility necessary for campuses operating in different academic, research, healthcare, administrative, and regulatory contexts. SUNY's policy has been in development throughout the 2025-26 academic year; it was presented in draft form to the Audit Committee of the SUNY Board of Trustees in February 2026, followed by a comment period to receive feedback and suggestions from SUNY's campus leaders, faculty, staff, and researchers; and revised to reflect this input and adopted by the SUNY Board of Trustees in April 2026.

SUNY campuses and affiliates each have autonomy and systems customized to their needs. Because of this, SUNY will continue with thoughtful planning and actions to adopt AI technologies through our shared governance practices as appropriate. We appreciate that OSC has acknowledged the many steps SUNY has taken related to the use of AI tools, and as we have previously discussed, SUNY has adopted an AI Policy. As AI develops and evolves at SUNY, additional AI specific governance structure and policies and procedures will continue to be developed.

Recommendations

To SUNY Admin, Albany, Stony Brook, Upstate, and Onondaga:

1. Implement policies to create an effective AI governance structure.

SUNY System has implemented a systemwide AI policy.

2. Provide guidance and oversight as necessary to assist with the governance of AI systems.

The SUNY Board of Trustees resolution adopting the systemwide AI policy also includes reference to the expectation that SUNY will “develop, issue, and implement procedures, guidance, templates, and other supporting resources necessary to carry out and operationalize the System-wide AI Policy.” SUNY System will continue to provide guidance and oversight as necessary.

To SUNY Admin:

3. Coordinate with campuses, as appropriate, to identify relevant requirements and guidance to support the development of AI governance.

The SUNY Board of Trustees resolution adopting the systemwide AI policy also includes reference to the expectation that SUNY will “develop, issue, and implement procedures, guidance, templates, and other supporting resources necessary to carry out and operationalize the System-wide AI Policy.” SUNY System will continue to coordinate with campuses, as appropriate, to identify relevant requirements and guidance to support the development of AI governance.

Sincerely,



Anne Bink

Senior Vice Chancellor for Operations and Management & Chief Operating Officer

CC: Chancellor King, Amy Montalbano

Onondaga Response and State Comptroller's Comment



A College of the State University of New York

4585 West Seneca Turnpike, Syracuse, New York 13215-4585

(315) 498-2214 www.sunyocc.edu

May 29, 2026

Kenrick Sifontes, Audit Director
Office of the State Comptroller
110 State Street, 11th Floor
Albany, New York 12236

Dear Mr. Kenrick,

Attached please find Onondaga Community College's AI Audit Draft Report Response.
Should you have any questions or comments, please do not hesitate to contact me.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Warren Hilton', with a stylized flourish at the end.

Dr. Warren Hilton
President

Onondaga Community College

AI Audit Draft Report Response

The SUNY Board of Trustees adopted a Systemwide Artificial Intelligence Policy on April 20, 2026. Onondaga Community College (OCC) plans to apply the SUNY Systemwide Artificial Intelligence Policy as recommended by the SUNY Board of Trustees. As such, Onondaga Community College governance committees, including but not limited to, the Generative AI Advisory Committee and the Administrative Systems Oversight Team, along with key administrative leaders, will be charged at the beginning of the 2026-2027 Academic Year to utilize the subject-specific guidance to institutions, and templates provided by SUNY to develop updated policies and implement risk management practices. Utilizing the SUNY Systemwide Artificial Intelligence Policy addresses the concerns noted in the AI Audit Draft Report as it relates to defining AI in policies. Additionally, there is good work, some of which is noted below, related to AI occurring at OCC.

The College has an AI Committee that was started as an ad-hoc committee by the OCC Faculty Senate in the 2024-2025 Academic Year (3/10/25). That committee is, as of the Fall 2025 semester (10/20/25), a standing committee within the OCC Governance Structure, entitled the Generative AI Advisory Committee. The committee's charges are:

- Develop and maintain a faculty AI Strategic Plan on responsible and ethical AI use, AI literacy, student data privacy, bias mitigation, and transparency.
- Identify emerging challenges related to AI affecting faculty and investigate guidance on the responsible use of AI in teaching and research, including considerations for ethical practices regarding bias, intellectual property, and copyright.
- Advise Scholastic Standards Committee on AI related challenges as they arise.
- Advise the Center for Teaching and Learning Innovation (CTLI) committee and Coulter Library as needed, reporting on technology development, curricular guides, and assessment tools for faculty and students to build AI and digital literacy and ethical awareness.
- Review and recommend ongoing professional development opportunities to build and sustain faculty adoption, adaptation, and/or exclusion of AI technologies in the classroom.
- Maintain and recommend ongoing evaluation mechanisms to review AI technologies used in the classroom by students and faculty, and establish channels for evaluation and oversight in partnership with Academic Technology Coordinating Committee (ATTC), Coulter Library, and/or Academic Technology Specialist.
- Establish feedback and survey structures to collect student and faculty perspectives such as listening sessions, open forums, or additional avenues for open dialogue.
- Coordinate with the college and other administrative bodies, including SUNY, on AI initiatives, integration, and policies that impact faculty.

- Support and advise department level discussion regarding AI in understanding how AI is impacting their industries and possible curricula revisions.

Additionally, the College has an AI Community of Practice consisting of faculty and staff including a SUNY AI Fellow. The charges for that group are:

- **Engage in Professional Development:** Develop professional development opportunities for both faculty and staff to help them become better educated on the use of AI.
- **Implement AI in Education:** Utilize AI tools and strategies to enhance student learning.
- **Foster Ethical Innovation:** Promote responsible AI integration while maintaining academic integrity and ethical considerations in education.

The group is currently conducting an AI needs assessment (Spring/Summer 2026) to determine what are the employee identified needs related to AI. The group implemented a campus-wide AI training on April 10, 2026. The AI Community of Practice has also proposed a training plan for the 2026-2027 academic year that includes six AI training sessions led by various faculty and staff AI experts:

- Samuel Abramovich, PhD, is Associate Dean of Academic Affairs in the Graduate School of Education at the University at Buffalo and serves as the UB Micro-Credential Faculty Fellow. He holds a dual appointment as Associate Professor in the Department of Learning and Instruction and the Department of Information Science. He is also a SUNY AI for the Public Good Fellow, where his work focuses on advancing responsible and effective AI integration in education. His research examines assessment in non-traditional and emerging learning environments, with particular attention to micro-credentials, AI-enhanced learning systems, Open Educational Resources, and makerspaces. Grounded in the Learning Sciences, his scholarship appears in leading education and technology journals, including *Educational Technology Research and Development*, *Library and Information Science Research*, and *The Internet and Higher Education*, and at major conferences such as the International Conference of the Learning Sciences and Play Make Learn. He has secured over \$1 million in external research funding.
- Stephen Aguilar is Associate Professor at the USC Rossier School of Education and leads USC's Center for Generative AI and Society. His research focuses on how emerging technologies and Generative AI influence teaching, learning, and motivation globally. His work on digital equity has shaped state-level policies, helping over one million families access high-speed internet. His book, *Authenticating Intelligence: Preventing AI from Hijacking Education* focuses on how educators, parents, and policy makers should navigate the changing landscape of AI and Education.
- Melanie Hibbert is the Director of Academic Technology & Learning Innovation Services (ATLIS) and the Sloate Media Center at Barnard College, Columbia University. She is deeply interested in how technology and media impact learning, literacy, and education; in new and emerging technologies; and how people experience technology.

- Allison Hosier is the Head of Information Literacy Department and Subject Librarian for Sociology at University of Albany. She has been providing professional development on the role of generative AI in teaching and learning to librarians, non-library faculty, and instructional designers since 2023.
- Emily Laird is the AI Integration Technologist at the University of Wisconsin-Stout, where she works to advance AI literacy and integrate emerging technologies into the curriculum. In addition, Emily leads efforts across the Universities of Wisconsin to support the adoption of AI throughout the state. Emily is also an industry consultant and co-director of the Center for Advanced Manufacturing and Artificial Intelligence, offering insights to enhance AI literacy and explore practical applications of AI and Generative AI in various sectors. Emily hosts the podcast Generative AI 101 and the global AI Weekly Meetup sharing accessible insights into AI tools and their potential.

Regarding vendor risk management and AI vetting processes, OCC has identified the need to revisit our vendor risk management process. Rather than patch our existing structure, OCC's AVP for Information Technology Services is working with our Virtual Chief Information Security Officer (vCISO) and AVP of Management Services to conduct a thorough rebuild of our procedures with AI vetting included in the scope of work. Additionally, OCC's AVP for Information Technology Services is in early discussion with OCC's vCISO and cybersecurity vendor, DeepSeas, to plan AI risk training.

While policies at OCC do not yet include a specific definition of AI, examples of common AI tools are included in OCC's Acceptable Use Policy. A formalized risk management process will be developed, and it is clear that OCC staff have risk mitigation in mind as evident by the response staff had to AI features of the early alert platform. As noted in the AI Audit Draft Report, OCC has already taken steps to update policies related to AI use. While not documented yet, staff have reviewed AI features, as identified per the use case highlighted in the report, as low risk. Furthermore, as it relates to the use case for OCC and its early alert platform, OCC employees DO NOT utilize the predictive analytics features that are noted in the report as using "AI to develop its predictions of student outcomes." Additionally, EAB introduced AI features into the early alert platform which staff promptly assessed and swiftly requested that those features be disabled. Therefore, it should be concluded there is no risk related to AI and the early alert platform.

As noted in the AI Audit Draft Report, OCC has already taken steps to update policies related to AI, and while not documented, staff have identified per the use case highlighted, the 'AI features', some of which are 'marketing related' as low-risk. While policies at OCC do not include a specific definition of AI, examples of common AI tools are included in OCC's Acceptable Use Policy. Furthermore, as it relates to the use case for OCC and its early alert platform, OCC employees DO NOT utilize the predictive analytics features that are noted in the report as using "AI to develop its predictions of student outcomes." While a formalized risk management process will be developed, it is clear that OCC staff have risk mitigation in mind based on the response they had to AI features of the early alert platform. Therefore, it should be concluded there is no risk related

to AI and the early alert platform because it is not used based on staff analysis of the tool and its risk albeit low.

State Comptroller's Comment – As noted on page 13 of our report, the developer's documentation indicated that the predictions of student outcomes are a result of machine learning, which is a type of AI technology. Furthermore, while Onondaga stated it requested certain new AI features to be turned off, these features were not the same as those discussed in our report. As predictions of student outcomes are available to Onondaga, the related AI risks still exist and should be managed as appropriate.

In conclusion, in response to the recommendations for Onondaga Community College to:

1. Implement policies to create an effective AI governance structure.

As highlighted, OCC has begun to implement policies to create an effective AI governance structure, and with the adoption of the SUNY systemwide AI policy, OCC will continue to improve its policies.

2. Provide guidance and oversight as necessary to assist with the governance of AI systems.

As noted, OCC will continue, with consultation from SUNY, AI experts, and OCC's vCISO and cybersecurity vendor, DeepSeas, to provide guidance and oversight to assist with governance of AI systems.

Stony Brook Response



OFFICE OF THE PRESIDENT

310 Administration Building
Stony Brook, NY 11794-0701
P 631.632.6265 F 631.632.6621
stonybrook.edu

May 29, 2026

Kenrick Sifontes
Audit Director
Office of the State Comptroller
Division of State Government Accountability
110 State Street, 11th Floor
Albany, New York 12236

Dear Mr. Sifontes:

Thank you for the opportunity to review and respond to the draft audit report on State University of New York (SUNY) Artificial Intelligence (AI) Governance (2024-S-33). Stony Brook University (Stony Brook) is committed to effective governance over the creation and use of AI resources in our operations and in pursuit of our teaching, research, and health care missions. We appreciate your acknowledgement in the draft report of Stony Brook's progress and accomplishments toward this objective, which have continued since the completion of your audit fieldwork, for example:

- The SUNY Board of Trustees adopted a Systemwide AI Policy on April 30, 2026, that requires campuses to publish AI policies and/or update relevant existing policies no later than December 31, 2026. Stony Brook will adhere to this requirement from its governing Board. This will occur through the University's standing process for policy development and shared governance and will consider work previously completed.
- The Stony Brook University Senate developed and adopted a Statement of Principles Guiding Informed and Responsible Adoption and Use of Generative Artificial Intelligence.
- The Stony Brook Provost's Office under the leadership of the Vice Provost for Academic Affairs convened an AI Teaching and Learning Advisory Council composed of faculty, staff, and students to consider and promulgate a Statement of Values on AI in Teaching and Learning.

- Stony Brook explicitly added AI to its responsible use of information technology policy, clarified that users are responsible for their use of all university IT, including AI, and adopted the definition of AI set forth by The National Institute of Standards and Technology (NIST).
- Stony Brook is considering further enhancements to procedures surrounding procurement of AI resources.

Recommendations Addressed to Stony Brook University

Recommendation #1

Implement policies to create an effective AI governance structure.

Stony Brook acknowledges that there appears to be a difference between the development of AI policies between Stony Brook University and Stony Brook Medicine however, Stony Brook emphasizes that the regulatory requirements and impact on patient care require a difference in implementation. Notwithstanding, Stony Brook agrees with the recommendation to continue to develop, and update policies as necessary to support effective AI governance, including but not limited to the adoption of the SUNY Systemwide policy pertaining to AI.

Recommendation #2

Provide guidance and oversight as necessary to assist with the governance of AI systems.

Stony Brook agrees and will continue to provide guidance and oversight, as necessary. Stony Brook further agrees to utilize its governance infrastructure to ensure such guidance and oversight as AI systems continue to evolve.

Sincerely,



Andrea Goldsmith
President

Upstate Response

Office of the President

UPSTATE
MEDICAL UNIVERSITY



May 28, 2026

Kenrick Sifontes
Audit Director
Office of the State Comptroller
110 State Street, 11th Floor
Albany, New York 12236

**RE: Upstate Medical University Response: Artificial Intelligence Governance
2024-S-33**

Dear Mr. Sifontes,

The Artificial Intelligence Governance Audit report prepared by the Office of the State Comptroller has highlighted both the progress and areas for improvement across Upstate Medical University. Upstate Medical University agrees with the findings and recommendations outlined in the report. We are pleased to share that since our last correspondence, Upstate's Artificial Intelligence Acceptable Use and Access Policies, one University Wide and one specific to the College of Graduate Studies, have been formally approved. These important policies directly address the findings in the draft report.

The SUNY Board of Trustees has adopted an AI Policy Framework that requires each campus to develop, maintain, and publish AI policies. Upstate will review this framework to ensure continued compliance and institutional alignment with SUNY guidance.

AI Governance and Human Oversight

The approved University Wide policy formalizes Upstate's three-tiered governance structure (Systems Advisory, AI Triage Group, and AI Steering Council), codifies human accountability as a core guiding principle, and ensures no AI system may be deployed without structured human review and approval.

Monitoring and Periodic Review

All AI systems must have a monitoring plan approved by the AI Steering Council (AISC) as a condition of approval or continued use. This requirement applies to both newly approved tools and systems currently in use, with timelines set by the AISC.

AI Inventory

The University Wide policy formally requires Upstate to maintain an institutional AI inventory. Development of an AI-aware systems inventory is actively underway, supported by targeted AI-specific questions now embedded in the systems review process.

Vendor Contracts, Data Use, and Performance Metrics

No AI-related contract may be executed without AISC review and approval. All AI procurements must now incorporate appropriate data use, liability, security, and privacy provisions. Upstate is also engaging its Office of General Counsel to develop standardized AI-specific contract language and is actively engaging existing vendors to expand performance reporting beyond adoption metrics.

Training Documentation

The policy mandates completion of applicable training for all users. We are developing a centralized mechanism to document training completion and curricula and are exploring external partnerships to support formal AI training programming.

Recommendation

1. Implement policies to create an effective AI governance structure.

Upstate Medical University Response

Upstate Medical University's Artificial Intelligence (AI) Acceptable Use and Access Policies have been formally approved. As reported above, these Policies directly address the findings in the draft report.

Recommendation

2. Provide guidance and oversight as necessary to assist with the governance of AI systems.

Upstate Medical University Response

University wide AI Policy outlines a robust governance structure incorporating systems advisory, AI Triage, AISC and AI system owners. Upstate Medical University guidance for staff is provided through the AI Acceptable Use and Access Policy and other documents including the posting of AI Risk Characteristics found on Upstate's intranet. The site provides an appendix outlining examples of elevated risk characteristics that require AISC review. This appendix outlines risk triggers along with safe uses that do not require additional review and will be maintained and updated by AISC as technology and regulations evolve.

Lastly, the approved University Wide AI Policy explicitly references OSC Advisory Memoranda relevant to technology and AI contracting, reflecting Upstate's intent to align its governance program with SUNY and OSC guidance.

We appreciate the collaborative audit process and guidance in this important area.

Sincerely,

A handwritten signature in dark ink, appearing to read "Mantosh Dewan", with a horizontal line extending from the end of the signature.

Mantosh Dewan, MD
President
Alan and Marlene Norton Presidential Chair
SUNY Distinguished Service Professor
SUNY Upstate Medical University

CC: Amy Montalbano

Albany Response



Office of the Vice President
For Finance and Administration

June 1, 2026

Kenrick Sifontes
Audit Director
Office of the State Comptroller
110 State Street, 11th Floor
Albany, New York 12236

Dear Mr. Sifontes,

The University at Albany received the report from the Office of the State Comptroller's Audit of AI Governance and is pleased to be able to provide a response to the two recommendations:

Recommendation 1: Implement Policies to Create an Effective AI Governance Structure

- The University at Albany has a Presidential Taskforce on AI Policies that is set to deliver a draft policy by July 2026. The final policy is anticipated to be in place by October 2026. The taskforce is reviewing SUNY's recently adopted AI policy and aligning its policy framework with SUNY's AI policy.

Recommendation 2: Provide Guidance and Oversight as Necessary to Assist with the Governance of AI Systems

- The University will continue to provide guidance and oversight on our campus and collaborate with SUNY system administration and other campuses as appropriate to assist AI governance.

The University at Albany appreciates the importance of appropriately supporting our campus community in the use of new technologies such as AI and agrees with the two recommendations. The rapid evolution of AI technologies makes it imperative that we explore the opportunities and challenges that AI presents to our campus and establish a shared vision for how we utilize these technologies in innovative and responsible ways.

The University at Albany is in the forefront of engaging with AI in all the facets of our work in research, teaching and learning and administrative operations. AI Plus is UAlbany's holistic approach to integrating teaching and learning about artificial intelligence throughout our academics and research. It is grounded in the conviction that all students should graduate prepared to live and work in a world radically changed by technology.

As indicated above, in March of this year, President Rodriguez created a *Presidential Taskforce on AI Policies* for the University at Albany. The charge of the Taskforce is to develop a meaningful, campus-informed guide for institutional policy and practice focused on the acceptable and transparent use of AI on campus. The work will build on our existing strengths while ensuring that our policies align with our academic mission, institutional values, and obligations as a public research university.

Sincerely,

A handwritten signature in black ink, appearing to read "Todd Foreman". The signature is fluid and cursive, with the first name "Todd" written more quickly than the last name "Foreman".

Todd Foreman
Vice President, Finance & Administration

University Hall, Room 209
1400 Washington Avenue
Albany, NY 12222
PH: 518-956-8120 **FX:** 518-956-8121
www.albany.edu



Contact

Office of the New York State Comptroller
110 State Street
Albany, New York 12236

(518) 474-4044

www.osc.ny.gov

Prepared by the Division of State Government Accountability

Executive Team

Andrea C. Miller – Executive Deputy Comptroller
Tina Kim – Deputy Comptroller
Stephen C. Lynch – Assistant Comptroller

Audit Team

Kenrick Sifontes – Audit Director
David Schaeffer – Audit Manager
Daniel Zimmerman – Audit Innovation Manager
Philip Boyd – Audit Supervisor
Emily Coffin, CPA, CFE – Examiner-in-Charge
Kevin Lance – Senior Examiner
Kelly Traynor – Senior Editor



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