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AI Data Governance Checklist

“An Implementation Guide”



Morgan signing House 2025

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AI Data Governance Checklist & Implementation Guide

Inspired by "AI Assessment & Implementation Guide" (MSH 2025) and enriched with insights from global AI governance sources including ISO/IEC 42001, EU AI Act alignment, CAISO model, and data governance frameworks for generative and agentic AI.

Introduction

In AI governance, poor data quality isn't just a technical issue, it's a business risk. Inaccurate, incomplete, or biased data can distort model predictions, erode trust, and introduce regulatory exposure. This document provides a structured AI data governance framework with a focus on ensuring high-quality data and includes an actionable checklist and deployment guide.

Section 1: Strategic Data Alignment

1.1 Mission Alignment

- Are AI data initiatives aligned with the organization's digital transformation goals?
- Have data dependences for strategic AI use cases been identified?
- Does real data exist?
- Does data collection mechanism exist in the organization?

1.2 Business Impact Mapping

- Have data-driven AI use cases been prioritized by ROI, compliance risk, or customer value?
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Section 2: AI Data Leadership & Oversight

2.1 Executive Sponsorship

- Is there a CAIO/CDO/CAISO accountable for data and AI governance?

2.2 Governance Forums

- Is a cross-functional Data & AI Governance Council in place (including Legal, Risk, IT, Ethics) to support program?
- Are policies ratified at Board or Subcommittee level?

Section 3: Data Architecture & Infrastructure Readiness

3.1 Data Ecosystem Audit

- Are all AI-relevant datasets cataloged with metadata, sensitivity, and ownership tags?
- Are data platforms aligned with FAIR principles (Findable, Accessible, Interoperable, Reusable)?

3.2 Lineage & Observability

- Are lineage tracking tools implemented (e.g., Apache Atlas, Collibra, Talend)?
- Are end-to-end lineage maps used to validate model inputs?

Section 4: AI Data Quality Governance Framework

4.1 Why Data Quality Matters

- Impacts model accuracy, fairness, and explainability.
- Influences compliance with global standards and legislation.
- Supports auditability and operational scaling.
- Enables scalable, auditable AI systems

4.2 Key Dimensions of AI Data Quality

Dimension	Description	Example Checklist Item
Accuracy	Data reflects real-world conditions	☑ Are invalid or placeholder values filtered out?
Completeness	No missing fields or critical gaps	☑ Are datasets ≥ 95% complete before training?
Consistency	Standardized schemas and units	☑ Are all fields normalized across platforms?

Timeliness	Data freshness and refresh cadence	<input checked="" type="checkbox"/> Are update intervals aligned with model expectations?
Uniqueness	Removal of duplicates and artifacts	<input checked="" type="checkbox"/> Are deduplication protocols embedded in pipelines?
Relevance	Fit-for-purpose data curation	<input checked="" type="checkbox"/> Is outdated or non-essential data pruned?

4.3 Data Profiling & Readiness Checks

- ☒ Are data profiling tools (e.g., Great Expectations) used routinely?
- ☒ Are validation rules and thresholds defined for key datasets?
- ☒ Is a retry/remediation process in place when quality drops?

4.4 Dark Data & Non-Structured Sources

- ☒ Are unstructured files mapped, OCR-processed, and classified?
- ☒ Is metadata attached for discoverability and governance?

4.5 Quality Monitoring & Metrics

Metric	Purpose
% Completeness	Ensure no field dropout
Data Drift Score	Flag distributional shifts
Timeliness Index	Assess data freshness
Validation Pass Rate	Track rule-based data fitness

4.6 Tools & Dashboards

Tool	Function
Monte Carlo	Data observability
Talend	ETL pipeline & transformation
Collibra	Governance & stewardship
SHAP/LIME	Model transparency via data

Section 5: Data Security & Classification for AI

5.1 Access Controls

- Is RBAC or ABAC enforced on all data sources for AI use?
- Are regular access reviews and entitlement audits conducted?

5.2 Sensitive Data Handling

- Is PII/PHI masked, tokenized, or anonymized prior to model training?
 - Is end-to-end encryption (TLS1.2+, AES-256) in place for data in transit and at rest?
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Section 6: Ethical Data Use & Compliance Alignment

6.1 Ethics Board Review

- Are high-risk AI use cases data subject to formal Ethics Board review?
- Are bias data audits conducted pre- and post-deployment?

6.2 Compliance Mapping

- Is each AI model mapped to applicable standards (e.g., ISO/IEC 42001, ISO/IEC 27001, GDPR, CCPA, EU AI Act)?
 - Are automated checks in place for regulatory policy triggers to check data?
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Section 7: Stewardship, Ownership & Lineage Governance

7.1 Defined Roles

- Are data owners and stewards assigned to each dataset and model?
- Are responsibilities tracked in a RACI matrix?

7.2 Auditability

- Are immutable logs retained for data access, transformation, and model output events?
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Section 8: Data Risk Management

8.1 Risk Register

- Is there a centralized register tracking data quality, privacy, lineage, and security risks?

- Are data-related risks scored, and mitigation plans documented?

8.2 Incident Readiness

- Are data-related AI breaches covered in the organization's IR playbook?
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Section 9: Model Transparency & Data Traceability

9.1 Explainability Assets

- Are Data Sheets and Model Cards available for every production model?

9.2 Traceback Protocols

- Can each model output be traced back to the data source, transformation, and version?
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Section 10: Continuous Data Governance Improvement

10.1 Lifecycle Monitoring

- Are metrics and logs continuously monitored for drift, degradation, and risk?
- Are retraining triggers based on data quality thresholds?

10.2 Policy Refresh Cadence

- Are data governance policies reviewed at least every 6 months?
 - Are updates communicated via dashboards and stakeholder briefings?
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Appendix: Maturity Markers for AI Data Governance

- Level 1: Ad Hoc – No clear ownership or governance.
 - Level 2: Defined – Basic roles and processes exist.
 - Level 3: Operationalized – Cross-functional governance in action.
 - Level 4: Measured – KPIs tracked, audits performed.
 - Level 5: Adaptive – Continuous improvement, policy agility, regulatory alignment.
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Instructions for Questionnaire Deployment

- **Question Types:** For each question, determine whether it is:
 - ✚ Yes/No (e.g., “Is there an AI Ethics Board?”),
 - ✚ Multiple Choice (e.g., “Which AI frameworks are considered? [TensorFlow, PyTorch, Scikit-Learn, Other]),
 - ✚ Rating Scale (e.g., “Rate our data quality: 1 = Poor, 5 = Excellent”), or
 - ✚ Open-Ended (e.g., “Describe the primary AI objectives for your business unit”).
 - **Question Types:** Use Yes/No, Multiple Choice, Rating Scale, or Open-Ended formats.
 - **Survey Logic:** Use skip logic (e.g., if 'No' to CAISO, skip to alternate responsibility).
 - **Required vs. Optional:** Mark sections like Data Security and Risk Governance as 'Required'.
 - **Sections & Progress Bar:** Organize by topic and display progress to respondents.
 - **Distribution:** Send to all relevant stakeholders (e.g., IT, compliance, exec sponsors).
 - **Living Document:** Revise based on responses and feedback to fill governance gaps.
- Use this questionnaire as a living document:** iterate after initial responses, refine questions to address gaps, and ensure every area—Strategy, Leadership & Governance, Technology, Data Governance, Security & Risk, Talent & Change, Pilot & MLOps, KPI Monitoring, and Board Oversight—is thoroughly covered before embarking on or scaling AI initiatives.

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