

Modernizing Connecticut's AI Law

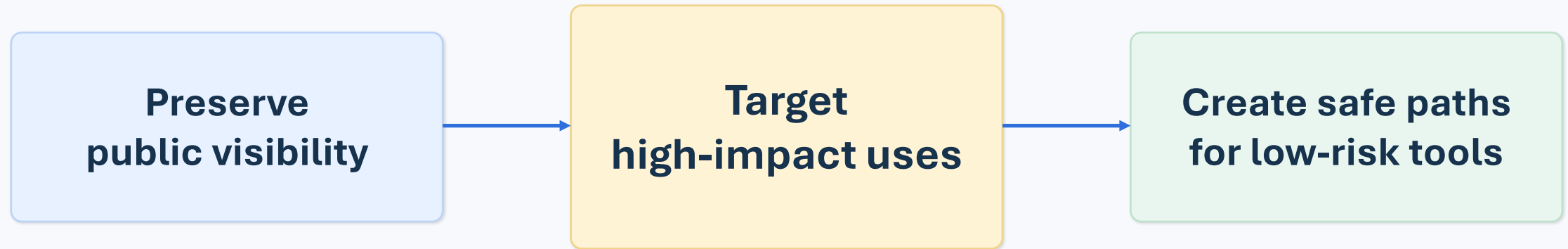
From inventory-based oversight to risk-based governance

Briefing for the Legislative AI Task Force

Chief Information Officer and Chief Data Officer
August 2026

Bottom Line Up Front

**Keep the transparency. Focus the heaviest oversight on consequential uses.
Make routine AI workable for agencies.**



Align the statutes, structure for effectiveness, reduce busywork

What PA 23-16 required of the Executive Branch

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- 1 Annual inventory**

DAS must inventory AI systems used by state agencies and publish it on the open data portal.
- 2 Statewide policies**

OPM must establish policies for development, procurement, implementation, use, and ongoing assessment.
- 3 Pre-use assessment**

Agencies cannot implement AI without an impact assessment under those policies.
- 4 Ongoing assessment**

DAS must assess systems in use to prevent unlawful discrimination or disparate impact.
- 5 Contract privacy clause**

State contracting agencies must include applicable CT Data Privacy Act compliance language.

Progress: Connecticut built the operating model

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The implementation record is stronger than the statute alone requires.

What is working

Visibility

A public inventory creates a common factual baseline for oversight.



Governance

OPM and DAS have established cross-agency advisory community and common policy, intake, and review procedures.



Awareness

Agencies now know AI must be disclosed, assessed, and procured with care.



Procurement

AI due diligence is now part of the acquisition conversation.



Result: Connecticut has moved beyond “AI policy” into a functioning governance process.

Hurdle 1: AI is also a feature, not only a product

The inventory now includes ordinary enterprise tools because vendors keep adding AI features.

**Microsoft Office 365
productivity**

**Microsoft Teams
collaboration**

**Canva AI
communications**

**Monday.com
workflow**

**CrowdStrike
cybersecurity**

**Grammarly
writing support**

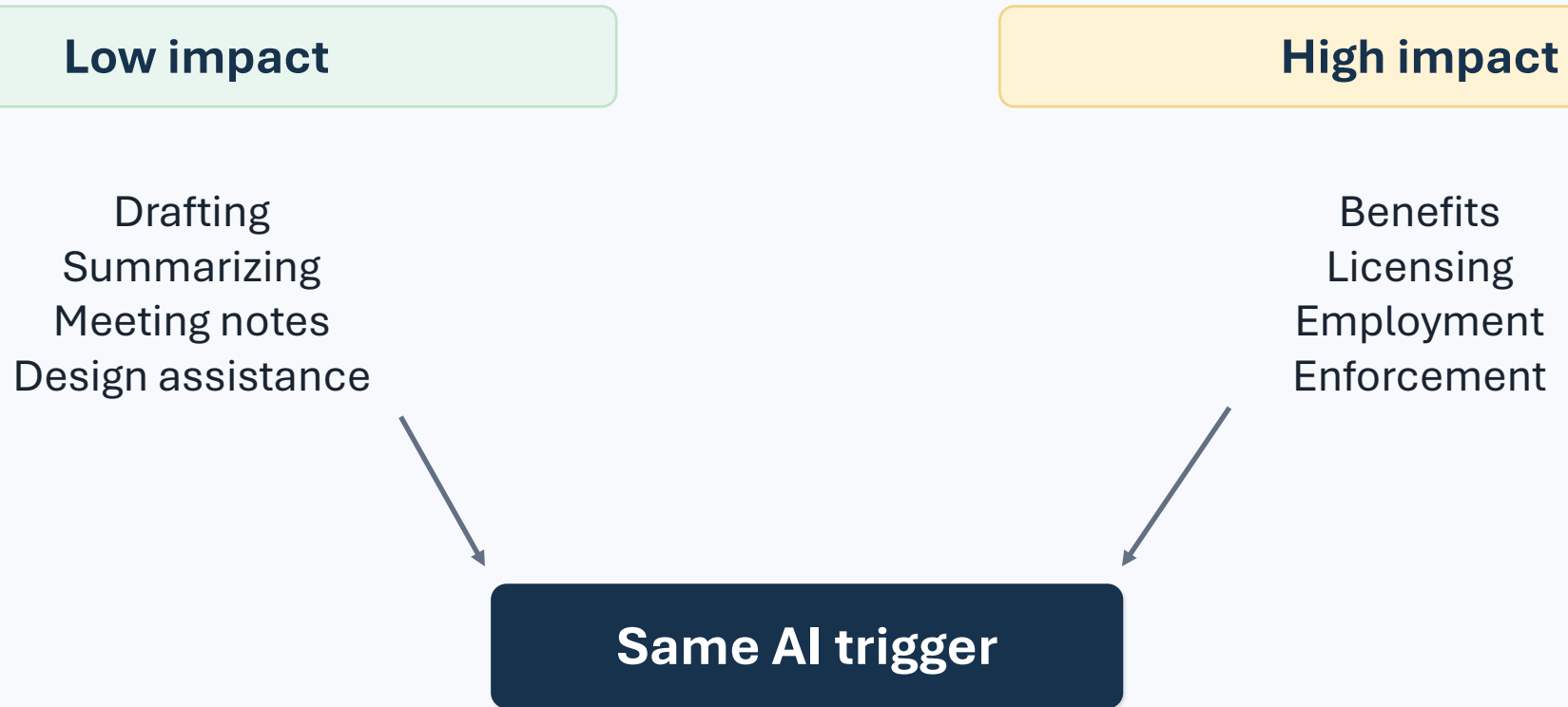
**PC Manufacturer
testing procedures**

Salesforce Assistants

Diligent Audit data analysis

If AI is becoming embedded, manual “find every AI system” processes become expensive and incomplete.

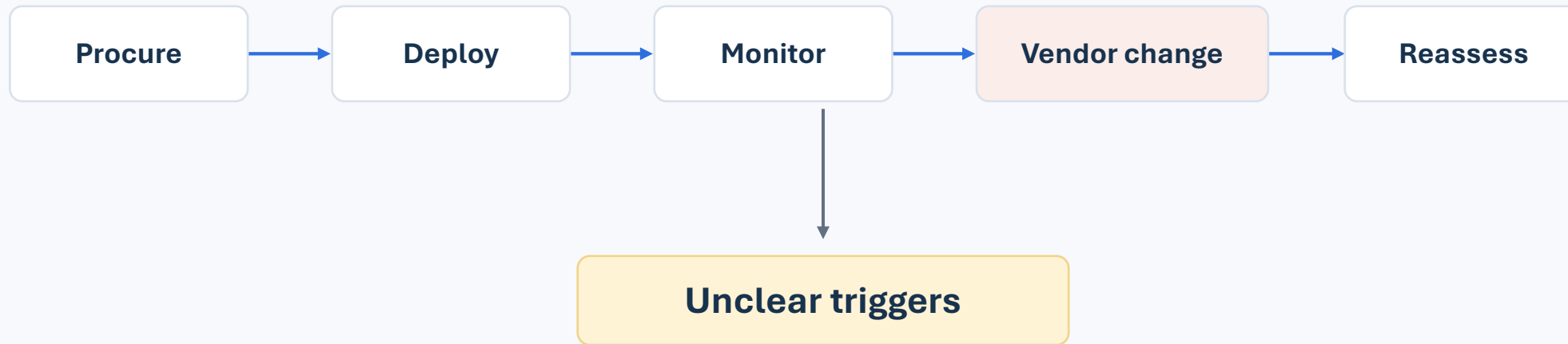
Hurdle 2: A broad definition creates uneven burden



The statute starts with technology rather than impact.

Hurdle 3: The AI lifecycle has matured

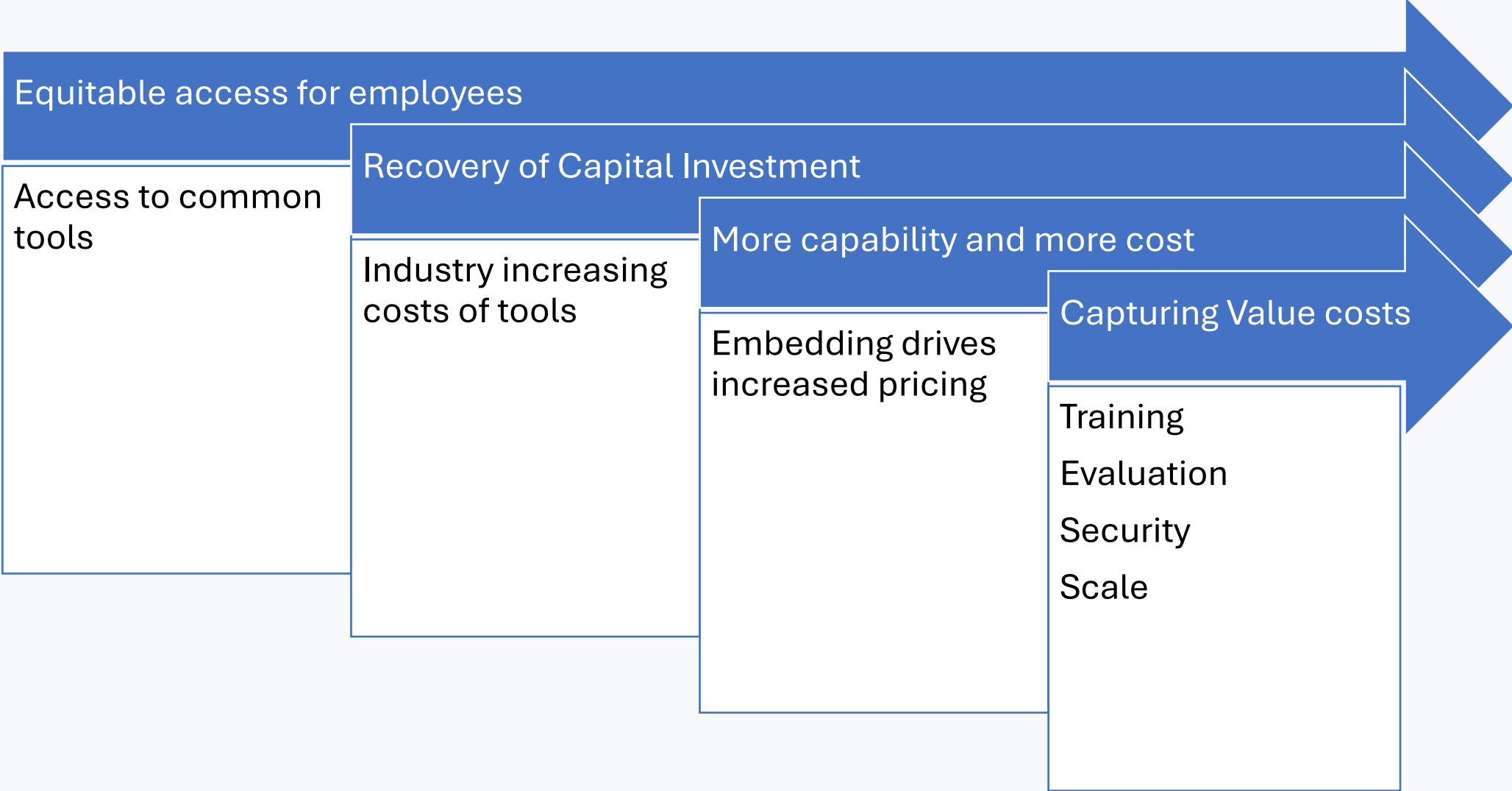
“Ongoing assessment” is needed, but the operating triggers are not clearly defined.



What counts as a material change?
How often is reassessment required?
What must vendors disclose?
Who can suspend a risky use?

Hurdle 4: Progress has been meaningful, but slow

AI investment in the marketplace is outpacing the State’s ability to remain current.



PA 26-15 impacts

The 2026 amendments begin moving from “anything with AI” toward “AI with real-world consequence.”

Increased transparency

Inventory adds impact assessment details, PII access, and known risks. Increased disclosure requirements.

Focus on impact

Targets public assistance and functions affecting rights, civil liberties, safety, or welfare.

Better definitions

Excludes cybersecurity and data analytics tools where AI is incidental and not determinative.

Common standards

Requires compliance with OPM and DAS policies and standards.

For consideration: harmonize PA 23-16 and PA 26-15 into one coherent lifecycle.

What architecture do we need to manage AI going forward?

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Use one lifecycle and risk tiers.



Minimal impact

Common productivity, drafting, summarization, design, cybersecurity where AI is not determinative

Moderate impact

Systems that advise or recommend but do not materially determine resident outcomes

High impact

Benefits, licensing, enforcement, employment, health, education, safety, civil liberties

The legal trigger should be the role AI plays in a consequential decision, not the mere presence of AI in software.

Where do we need clarity to implement AI responsibly?

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1 Define reassessment triggers

Material changes to purpose, data, model, vendor, decision role, or affected population.

2 Put duties on vendors

Disclosure of AI changes, validation evidence, known limitations, incident support, and audit cooperation.

3 Protect residents

Notice and meaningful human review for high-impact uses, aligned to existing appeal paths.

4 Create incident authority

Clear process for errors, bias, privacy, security, and temporary suspension.

5 Add safe harbors

Preapproved low-risk uses so DAS and OPM can focus on high-impact systems.

6 Measure value

Require expected outcome and post-implementation review for significant investments.

Where we are focused: consolidate and modernize

AI cannot be easily separated for compliance. Agencies, vendors, and the public need single clear framework that they can all understand.

Policy opportunity

PA 23-16 and PA 26-15 do not have a single AI lifecycle statute with clear agency authority, vendor duties, resident protections, and safe harbors.

One lifecycle

identify, classify, assess, deploy, monitor, reassess

Proportional oversight

heavy controls only where consequences justify them

Clear accountability

agency owner, vendor duties, DAS and OPM standards

Resident trust

notice, human review, incident response for high-impact uses

Connecticut can lead by showing that responsible AI oversight can be transparent, practical, and focused on residents.