
AI Accountability Is Now a Board-Level Operating Issue

A strategic guide to governing AI as an enterprise risk
and scaling it with confidence.

EXPLORE
INTELLIGENCE CREATION



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HOW TO READ THE COLOR

EVIDENCE

Proof and traceability

CONTROL

Performance and value

OVERSIGHT

Authority and ownership

RISK

Exception and escalation

Why we wrote this guide



Carol Valentic

FOUNDER
& CEO

For decades, I have watched experienced professionals make consequential decisions from information that is fragmented, difficult to find or harder to trust than it should be.

AI can improve that. It can bring important information forward, reduce manual effort, and help people work faster. But its value ultimately depends on whether the people responsible for the decision can trust what they see, challenge it when necessary, and remain in control.

That is why accountability matters. Good technology should strengthen human judgment, not obscure it.



**Avinash
Boodoosingh**

PRESIDENT
& COO

The AI conversation has changed.

For the past few years, the market focused on what AI could do. Boards are now facing a harder question: can the organization prove what the AI did?

That means knowing where information originated, how performance was validated, where human authority entered the process, what changed over time, and whether a material decision can be reconstructed when someone asks.

As AI becomes part of critical operating workflows, accountability cannot be added after deployment. It has to be designed into the operating model.

This guide was created to assist boards and leadership teams in maintaining AI accountability as it becomes embedded in key operations that influence performance, risk, and trust.

WHY THIS IS NOW A BOARD ISSUE

AI has moved from experiment to operating dependency. The board question is no longer whether AI works, but whether the organization can govern what it does.

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Why accountability must come before scale

DEFINITION

Accountable AI is AI whose purpose, performance, evidence, human authority, change and ownership remain visible and governable throughout its operating life.

In workers' compensation, property and casualty insurance, and healthcare, AI-supported decisions can affect claims outcomes, service, financial exposure and trust.

AI can improve speed, capacity and consistency. It can also introduce operational, legal, regulatory and reputational exposure.

Boards are approving how AI-supported decisions will be made, challenged and defended.

Accountability should be established before scale so management can pursue value while preserving human authority, regulatory readiness and organizational control.

WHY THIS IS NOW A BOARD ISSUE

BOARD QUESTION

Can management reproduce the evidence behind a disputed AI-supported decision six months after the event?

The ability to deploy AI is not the same as the ability to govern it.

AI exposure now spans the enterprise.

As AI becomes part of material decisions, litigation is one of the risks boards need to be prepared for.

Being prepared means the organization can reconstruct what happened, show the evidence behind the decision, demonstrate where human authority entered the process and identify who remained accountable.

01 REGULATORY

Examiners expect evidence of governance, testing, oversight and third-party control.

03 OPERATIONAL

Errors and uncontrolled changes move through workflows at scale.

05 REPUTATIONAL

Decisions customers cannot understand or challenge damage trust.

02 LEGAL

AI-supported decisions must be explainable and defensible when challenged.

04 FINANCIAL

Remediation, rework and supplier dependency erode expected value.

06 THIRD-PARTY

Outsourcing technology does not outsource accountability.

When a material decision is challenged, accountability becomes evidence.

REGULATORY MOMENTUM

24 states and the District of Columbia have adopted the NAIC Model Bulletin as of August 2026, with additional oversight activity underway.

A 12-state AI Systems Evaluation Tool pilot is running in 2026, with adoption anticipated at the 2026 Fall National Meeting. Adoption is anticipated, not confirmed. Sources: NAIC Model Bulletin on the Use of Artificial Intelligence Systems by Insurers; NAIC AI Systems Evaluation Tool pilot.

A pilot tests the technology. Production tests the operating model.

Production adds volume, variation, stakeholders and consequences.

PILOT

Controlled scope

Limited users

Known documents

Manual workarounds

Demonstrated capability

PRODUCTION

Volume and variation

Multiple workflows and stakeholders

Exceptions and changing conditions

Regulatory and operational consequences

Measurable value and sustained control

WHY THIS IS NOW A BOARD ISSUE

WHAT THIS MEANS

A successful pilot does not demonstrate that the organization can govern the same workflow at production volume.

Scale compounds both value and weakness.

THE ACCOUNTABILITY MODEL

Accountability is not a governance layer bolted on after deployment. It is the record the workflow produces as the work happens.

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The decision moves forward. The operating lesson is lost.

A complex claim or authorization request arrives with records from multiple sources. AI supports the review, but accountability depends on what happens around the output and after the decision.

INFORMATION ARRIVES

A claim or authorization request and its supporting records enter the operation.

AI SUPPORTS THE REVIEW

Relevant information is assembled, surfaced or routed for consideration.

A QUALIFIED REVIEWER DECIDES

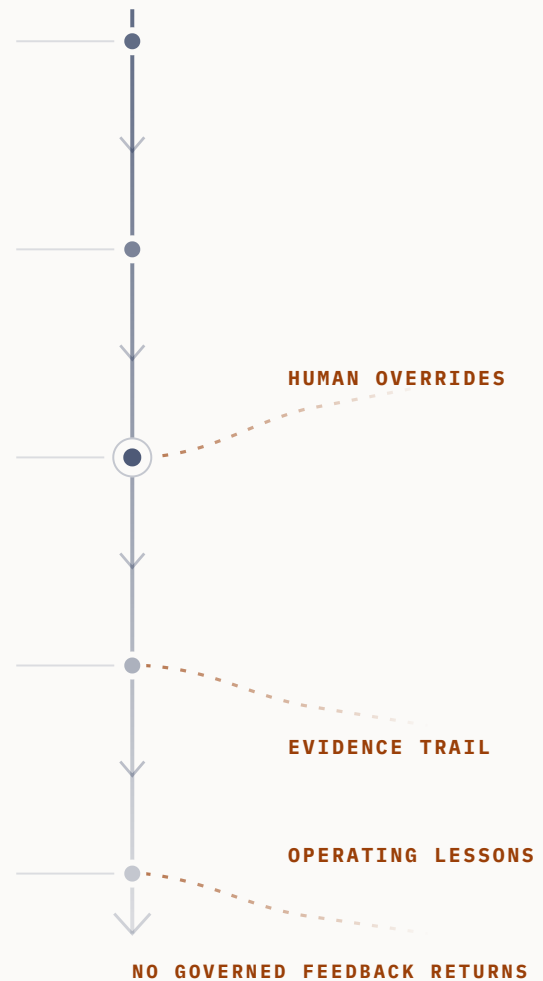
The reviewer accepts, changes or escalates the AI-supported output.

THE OUTCOME MOVES DOWNSTREAM

The claim or request proceeds. An exception, complaint or unexpected result may emerge later.

THE IMMEDIATE ISSUE IS RESOLVED

The team corrects the individual case.



The case is resolved, but its evidence, overrides and lessons do not reliably change how the next case is governed.

The evidence returns. The operating model improves through approved change.



The system does not rewrite its own rules.

Operational evidence informs approved changes to the blueprint. Source, performance, review, material changes and outcomes remain traceable as the work happens.

Accountability runs across the workflow, not beside it.

Every stage of an AI-supported workflow contributes to the record. The evidence trail is continuous, which is what allows a decision to be reconstructed later.

EVIDENCE RECORD • AUDIT TRAIL

01 SOURCE DOCUMENTS

Records arrive from multiple parties, formats and systems.

02 STRUCTURED INTELLIGENCE

Content becomes information the operation can use, with its origin retained.

03 RULES AND CONTROLS

Policy, thresholds and decision rights are applied before the output is produced.

04 AI WORKFLOW AGENT

The workflow assembles, surfaces or routes the output for consideration.

05 HUMAN REVIEW AND EXCEPTION

A qualified reviewer accepts, changes or escalates. The intervention is recorded.

06 BUSINESS ACTION

The decision is issued and moves downstream with its record intact.

THE ACCOUNTABILITY MODEL

WHAT THIS MEANS

If the evidence cannot be reproduced later, the organization may be unable to defend how the decision was reached.

The six governance domains of accountable AI

Two anchors establish direction and authority. Four operating disciplines keep the operation accountable.

TWO ORGANIZATIONAL ANCHORS

01 Business Value

The intended outcome and agreed baseline.

04 Human Authority

People with the expertise and authority to challenge or overrule.

FOUR OPERATING DISCIPLINES

02 Precision

Performance appropriate to the use case and risk.

03 Proof

Evidence that allows a decision to be reconstructed and defended.

05 Predictability

Control of exceptions, change, cost and behavior at scale.

06 Progress

Intelligence and operational value the organization owns and retains.

Business Value and Human Authority set the organizational axis. The remaining four hold the operation to it.

Four questions govern every material AI use case.

RISK

EXPOSURE

What could materially fail, and what would it cost the organization?

CONTROL

PREVENTION

Can the workflow stop, escalate or route when evidence is insufficient?

EVIDENCE

PROOF

Can the organization reconstruct where a material AI output came from?

OWNER

ACCOUNTABILITY

Who remains accountable for the business outcome when the control does not hold?

Answered together, these four questions describe how a single use case is governed. Unanswered, they describe where accountability will fail.

Accountability protects value as AI deployment scales.

For workers' compensation, property and casualty insurance, and healthcare organizations, accountable AI supports faster scaling while protecting the decisions, knowledge and control the business depends on.

01

SCALE WITH CONFIDENCE

Expand successful use cases because performance, evidence and authority are defined.

02

PROTECT MARGIN

Reduce rework, disputes, remediation and uncontrolled cost.

03

STRENGTHEN RESILIENCE

Detect deterioration earlier and maintain continuity when tools or conditions change.

04

PRESERVE STRATEGIC FREEDOM

Retain portable information, decision history and operating knowledge as suppliers and circumstances evolve.

Whether AI supports claims, underwriting, member and provider operations, document-intensive workflows or customer service, accountability determines whether value remains governable at scale.

Accountability is both a control discipline and an operating advantage.

WHAT THE BOARD DOES NEXT

The remaining pages are working material: the questions to ask, the signals to watch and the cadence that keeps AI governable after approval.

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Management should be able to answer these questions at every stage.

01 BUSINESS VALUE

What outcome must improve, against what baseline, and who owns it?

03 PROOF

Can a material decision be reconstructed from source through review, intervention and final outcome?

05 PREDICTABILITY

How are exceptions, incidents, change and cost controlled at scale?

BEFORE APPROVAL

Management should resolve any material unanswered question before wider deployment.

02 PRECISION

What performance is required, and how is it validated before wider deployment?

04 HUMAN AUTHORITY

Who is accountable, and which function retains the expertise to challenge or overrule the system?

06 PROGRESS

What will the organization own, retain and be able to continue using?

IN PRODUCTION NOW

An unanswered question is a governance gap. Assign an owner, define the corrective action and set a review date.

BOARD QUESTION

Which of these six questions can management not yet answer for our largest AI use case?

AI may inform the decision.

People must retain the authority to make it.

Human authority must work in practice.

01

Authority

Who can stop, overrule or escalate the system?

02

Expertise

Who is qualified to recognize when the output is weak, incomplete or wrong?

03

Evidence

What information can reviewers inspect before making the decision?

04

Escalation

When a decision is challenged, can the organization reconstruct what happened, what was reviewed and who acted?

Human judgment requires more than an expert in the loop. It requires the authority, evidence and traceability to act, explain and defend the decision.

Operational intelligence should remain an organizational asset.

The reusable intelligence created through the operation should remain under the organization's control.

01 Usable information

Structured, current and ready for the next decision.

02 Decision and review history

What was decided, what was corrected and by whom.

03 Governance evidence

Records that support examination, audit and legal defense.

04 Operational knowledge

The operating rules, configurations and working practices established by the organization.

ORGANIZATIONAL ASSET

Owned, portable and usable as suppliers, tools and circumstances change.

What the board should see after deployment

DOMAIN	BOARD SIGNAL	ESCALATE WHEN
Business Value	Results against the agreed baseline	Value materially misses expectations
Precision	Performance and material deterioration	Quality falls outside the approved range
Proof	Evidence completeness and reconstructability	A material decision cannot be reconstructed
Human Authority	Overrides, escalations and reviewer capacity	Expertise or authority is insufficient
Predictability	Incidents, complaints, change and cost	Agreed thresholds are breached
Progress	Assets retained, portability and dependency	Exit readiness or organizational control weakens

WHAT THE BOARD DOES NEXT

BOARD QUESTION

When did this board last receive a report against each of these six signals?

Every material AI use case needs a named owner, a reporting cadence and an agreed escalation threshold.

From approval to operating discipline

01 Classify

Maintain an inventory of material AI use cases and classify each by value, impact, regulatory exposure and required human authority.

02 Assign

Name the accountable executive and establish decision rights, evidence requirements, reporting cadence and escalation thresholds.

03 Monitor

Review value, performance, exceptions, incidents, material changes, organizational capability and third-party dependency.

A material change to the use case, model, rules, supplier or regulatory environment should trigger reassessment.

THE VENDOR BOUNDARY

Outsourcing technology does not outsource accountability. Management must be able to obtain the evidence needed to govern both the supplier and the workflow.

CLOSING PERSPECTIVE

Pursue the value. Preserve the evidence, expertise, ownership and control.

Accountable AI gives leadership a disciplined way to improve operations while retaining the ability to understand, challenge and govern material decisions.

NEXT STEP

Explore Intelligence Creation

See how accountable document intelligence works in practice.

atomadvantage.ai/intelligence-creation



EXPLORE INTELLIGENCE
CREATION