



High-Risk Automated Decision System Inventory

Annual Legislative Report for Program Year 2025

California Department of Technology
<https://cdt.ca.gov>

CDT REPORT
Prepared for Members and
Committees of the California State Legislature _____

Executive Summary

On October 13, 2023, Governor Newsom signed Assembly Bill 302 into law. The bill added Section 11546.45.5 to the Government Code (GC), relating to Automated Decision Systems (ADS).

The statute requires the California Department of Technology (CDT), in coordination with other interagency bodies, to conduct a comprehensive inventory of all high-risk ADS that have been proposed for use, development, or procurement by, or are being used, developed, or procured by, state agencies. On or before January 1, 2025, and annually thereafter, the statute requires CDT to submit a report of the comprehensive inventory to specified committees of the Legislature.

GC section 11546.45.5 seeks to ensure that Californians have transparency into the government's use of high-risk ADS and provide state agencies with the information to analyze their use of high-risk ADS. Additionally, the inventory is intended to help state agencies identify and minimize the risk of adverse and discriminatory impacts that result from their design and implementation of ADS.

For 2025, CDT surveyed 182 state agencies to collect the high-risk ADS inventory. CDT then interviewed agencies that reported high-risk ADS to clarify and confirm their responses. For agencies that determined that their originally submitted high-risk ADS did not meet the statutory definition, CDT provided guidance on how to amend their initial submissions. Additionally, CDT provided state agencies with the opportunity to submit a supplemental survey response to report a high-risk ADS following the initial survey deadline.

The 2025 inventory shows six in-use, one in-development, and one discontinued proof of concept high-risk ADS. Three systems assess rehabilitative needs, three are education-based, one is an unemployment insurance fraud detection system, and one is a cannabis packaging image analyzer. Six additional state agencies initially reported high-risk ADS but amended their responses after they determined their systems did not meet the statutory definition.

The four reporting state agencies have put in place governance and technical controls to help mitigate the risk associated with these high-risk ADS.

Background

Roles and Responsibilities

This section outlines the roles and responsibilities of California Department of Technology (CDT) and state agencies in contributing to the development of the comprehensive inventory of high-risk Automated Decision Systems (ADS) and the preparation of this report.

CDT Responsibilities

Government Code (GC) 11546.45.5 requires CDT to develop the comprehensive inventory of high-risk ADS “in coordination with other interagency bodies as it deems appropriate” from all state agencies as defined. To facilitate the completion of a comprehensive inventory, CDT’s activities included planning, development, communication, inventory collection, survey analysis, survey validation, verification, and report creation.

State Agency Responsibilities

State agencies are required to identify and report to CDT any high-risk ADS that meet the statutory definition for inclusion in the comprehensive inventory. Agency Information Officers (AIOs), Chief Information Officers (CIOs), or their equivalent played a significant role in identifying and reporting any high-risk ADS within their agencies, including interpreting and applying the criteria to determine if any of their systems met the statutory definition of a high-risk ADS. As defined in GC 11546.45.5, “High-risk automated decision system” means an automated decision system that is used to assist or replace human discretionary decisions that have a legal or similarly significant effect, including decisions that materially impact access to, or approval for, housing or accommodations, education, employment, credit, health care, and criminal justice. The six material impact categories do not include other areas possibly impacted by state agency high-risk ADS – for example, “tax-related” systems.

Comprehensive Inventory Approach

This section describes CDT’s approach to creating this report, which includes the traceability of decisions made by state agencies. Although CDT offers guidance, the State operates under a federated governance model, and each individual agency is responsible for making its own determinations regarding its survey submissions and any subsequent amendments through its AIO, CIO, or equivalent. Below are the activities undertaken by CDT.

Communication

Communication began with an email from CDT to all state agencies regarding their reporting obligation followed by emails containing detailed survey instructions. CDT answered state agency questions as they arose during the survey submission process and subsequent meetings. CDT monitored progress, followed up with state agencies, and addressed questions to ensure timely survey submission.

Inventory Collection and Validation

The following are the steps within the inventory collection and validation process that CDT used.

1. CDT evaluated the completeness of survey submissions in which state agencies designated their systems as high-risk ADS.
2. CDT then conducted an analysis to formulate follow-up questions for validation and verification. The following criteria derived from statutory language were used:
 - a. Are the ADS features enabled or used?
 - b. Are there “Natural Persons” that are materially impacted in a legal or similarly significant way?
 - c. What are the areas of material impact, such as, but not limited to, “housing or accommodations, education, employment, credit, health care, and criminal justice?”
 - d. Does the system produce a simplified output that was used for immediate decision making or was the output more complex and used as part of a more comprehensive review process prior to any decision-making actions?
3. CDT met with state agencies to clarify and confirm their high-risk ADS survey submissions.
4. For agencies that determined that their originally submitted high-risk ADS did not meet the statutory definition, CDT provided guidance on how to amend their initial submissions.
5. If the agency confirmed that the submitted system was high risk, CDT then added that system to the high-risk ADS inventory.

2025 High-Risk ADS Inventory

Report Summary

CDT surveyed 182 state agencies for this inventory. Of the 182 state agencies, 175 submitted surveys while seven were given an exception by CDT for submitting their surveys for reasons outlined in Appendix A. Of these agencies, four reported high-risk ADS: the California Department of Corrections and Rehabilitation (CDCR), the California State University (CSU) System, the Department of Cannabis Control (DCC), and the Employment Development Department (EDD).

The following table lists the High-Risk ADS included in the inventory:

System Status	State Agency	System Name
In use	CDCR	Correctional Offender Management Profiling for Alternative Sanctions (COMPAS)
In use	CDCR	California Static Risk Assessment (CSRA)
In use	CDCR	Parole Violation and Disposition Tracking System (PVDTS)
In use	CSU	Proctorio
In use	CSU	Turnitin Artificial Intelligence (AI) Writing Detection Tool
In use	EDD	Thomson Reuters Unemployment Insurance (UI) Fraud Detect
In development	DCC	Cannabis Product Image Analyzer (CPIA)

Discontinued Proof of Concept (POC)	CSU	Customized Generative Pre-Trained Transformer (GPT) for Employment Application Review
-------------------------------------	-----	---

In-use High-Risk ADS

Using a consistent statewide assessment process, departments assessed their system inventories to determine whether any automated decision systems met the statutory definition of High-Risk ADS.

Through this review, CDCR identified three in-use systems that were classified as high-risk due to their impact on incarcerated and supervised individuals in material-impact categories listed in GC 11546.45.5(a)(5).

Similarly, CSU determined that two in-use systems met the high-risk criteria because their automated decisions affected students' academic records and finances, which fall within the statute's defined material-impact areas.

Lastly, EDD identified one in-use high-risk system that materially impacted claimants' access to unemployment insurance benefits.

In-development High-Risk ADS

DCC reported one high-risk ADS in development. DCC determined this system met the statutory definition of high-risk ADS due to the impact of its automated decisions on cannabis business licensees.

Discontinued High-Risk ADS POC

CSU reported one POC high-risk ADS for assisting to identify candidates who meet minimum qualifications for advertised positions. The POC was discontinued.

Amended Survey Responses

Six state agencies, listed below, originally identified high-risk ADS but subsequently reassessed their systems and determined their systems did not meet the statutory definition of a high-risk ADS.

- California Department of Finance (DOF)
- California Department of Rehabilitation (DOR)
- California Department of Transportation (Caltrans)
- California Institute for Regenerative Medicine (CIRM)
- California Science Center (CSC)
- Health Care Access and Information (HCAI)

High-Risk ADS by System Status

Below are descriptions of the high-risk ADS included in the inventory.

CDCR – COMPAS

SYSTEM OVERVIEW:

COMPAS is the validated automated needs assessment tool being utilized by CDCR, as required by the California Code of Regulations (CCR), Title 15, Division 3, Section 3000. The tool is designed to identify criminogenic needs which are most predictive of criminal behavior and to identify a needs value that demonstrates the level of need from high to low and shall be utilized to assist in placing the incarcerated person in a rehabilitative program.

SYSTEM INFORMATION AS REPORTED BY CDCR:

NAME: CDCR – COMPAS

STATUS: In Use

MATERIAL IMPACT AREA: Education, Health Care, Criminal Justice

NATURAL PERSONS AFFECTED: Incarcerated Persons

DECISION MADE: Based on survey responses from incarcerated persons, corrective counselors and parole agents, the COMPAS assessment helps to guide CDCR in determining a rehabilitative plan designed to reduce recidivism risks. COMPAS considers the following six categories Substance Abuse, Anti-Social Personality or Temperament, Anti-Social Cognition, Reentry Financial, Employment and/or School, Reentry Residential Instability to recommend a case plan. The COMPAS Case Plan is the roadmap for rehabilitative actions. For example, if a person scores high in "Criminal Thinking" or "Substance Abuse," the system triggers a referral to a specific Cognitive Behavioral Treatment or a residential recovery program.

BENEFITS: The primary benefit of the COMPAS assessment is its ability to provide an evidence-based framework for identifying an incarcerated individual's criminogenic needs, which are factors directly linked to criminal behavior. By shifting from subjective judgment to an actuarial system, the tool helps CDCR standardize its approach to rehabilitation. Key benefits of using COMPAS include:

- **Improved Resource Allocation Targeted Treatment** – It allows CDCR to prioritize high-risk individuals for limited program space, ensuring that resources like Substance Abuse Treatment are directed to those most in need. The tool creates a COMPAS Case Plan, which streamlines the process for parole agents and counselors to identify relevant community reentry programs, such as employment training and transitional housing.
- **Recidivism Reduction Dynamic Factor Tracking** – Unlike static assessments that only look at past crimes, COMPAS measures dynamic factors (for example, current social environment, education, and attitudes) that can be changed through participation in programs.
- **Decision Support for Staff Empirical Backing** – It provides staff with data-driven support for their decisions regarding supervision levels and referrals, reducing reliance on "gut feelings." A critical benefit for practitioners is the ability to override suggested services when professional judgment or specific agency policies necessitate a different approach.
- **Comprehensive Offender Profiling Broad Scope** – COMPAS evaluates a wider range of factors than many other tools, including social isolation, family criminality, and how individuals spend their leisure time.
- **Dynamic Re-Assessment** – Unlike static records, COMPAS can be updated. As an individual completes education or vocational training, their needs score can decrease, which ideally leads to lower supervision levels and more freedom.

- **Mitigation of public safety risks for the community** – COMPAS helps mitigate risk by high-intensity supervision and early warning capabilities. Identifying "High Risk" individuals allows the state to assign them to parole agents with specialized caseloads, ensuring more frequent check-ins and better monitoring. The tool can flag "Early Warning" signs such as social isolation or sudden loss of employment that might suggest a person is at risk of a "relapse" into criminal behavior.

RESEARCH ON USE: The RAND Corporation report entitled *The Risk and Needs Assessments in Prisons: Identifying High-Priority Needs for Using Evidence-Based Practices* addresses the broader landscape of risk assessment tools, focusing on the systemic need for validation and training rather than a direct comparison of specific tools like COMPAS and CSRA. It highlights the necessity of using objective, validated tools and emphasizes that implementation quality is more critical than the specific proprietary or public-domain model selected.

ALTERNATIVES: While CDCR uses COMPAS for needs assessment, CDCR uses the CSRA as a primary risk predictor based strictly on an individual's prior criminal record (static factors) rather than interview-based dynamic factors.

RESEARCH ON ALTERNATIVES: CDCR also used *The Risk and Needs Assessments in Prisons: Identifying High-Priority Needs for Using Evidence-Based Practices* report to research alternatives.

RISK MITIGATION MEASURES:

- **Accuracy Performance Metrics** – CDCR periodically commissions independent researchers to conduct validation studies.
- **Cybersecurity Controls** – CDCR employs standard state mandated cybersecurity controls including user authentication, usage tracking, and password management within the security enclave behind the firewall.
- **Privacy Controls** – Only authorized users have access to the application using Role Based Access Control.
- **Audits for Accuracy, Bias and Discrimination** – CDCR is using several strategies to mitigate the risk of technical errors or racial bias due to the sensitive nature of the use of COMPAS.
Contestation Measure or Process – The "Human-in-the-Loop" ADS Overrides: Staff are trained never to use the score as the sole factor. If a counselor believes the score doesn't reflect the incarcerated person's true situation (for example, the score is high due to a very old crime), they can perform a professional override to manually adjust the risk level.
- **Professional Development** – CDCR employs staff training ensuring that the 74-question interview is conducted consistently (for example, if an interviewer asks questions in a biased way, the output will be biased). Continuous Inter-Rater Reliability testing ensures different staff members get the same result for the same person.
- **Other** – To mitigate the risk of relying on a single "black box" algorithm, California uses COMPAS in tandem with the CSRA. Because the CSRA uses only criminal history and not interview questions, it acts as a "second opinion" to see if the two scores align.

DATA CATEGORIES:

- Individual's name, address, phone number, or date of birth
- Criminal record
- Health information
- Credit or financial information

CDCR – CSRA

SYSTEM OVERVIEW:

The CSRA is a validated risk assessment tool being utilized by CDCR, as required by the CCR, Title 15, Division 3, Section 3768.1. CSRA utilizes a set of risk factors which are most predictive of recidivism. The tool produces a risk number value that will predict the likelihood that an offender will incur a felony arrest within a three-year period after release to parole. Risk factors utilized include, but are not limited to, age, gender, criminal misdemeanor and felony convictions, and sentence/supervision violations.

SYSTEM INFORMATION AS REPORTED BY CDCR:

NAME: CDCR – CSRA

STATUS: In Use

MATERIAL IMPACT AREA: Education, Criminal Justice

NATURAL PERSONS AFFECTED: Incarcerated Persons

DECISION MADE: Determination of priority placement of incarcerated persons into academic education, career technical education, and transitions. Individuals with CSRA score 5 are excluded from participation in the Male Community Reentry Program and the Female Community Reentry Program. Incarcerated individuals with CSRA score 5 are designated “High Control” for the purposes of parole supervision.

BENEFITS:

- **Standardized Risk Classification** – The CSRA analyzes "static" factors that do not change, such as age, gender, and criminal history (for example, past felony or misdemeanor convictions) to assign a risk level from 1 (Low) to 5 (High Risk Violence).
- **Evidence-Based Rehabilitation** – By identifying high-risk individuals, the CDCR can focus its limited rehabilitation resources where they are needed most to have the maximum positive impact on public safety.
- **Prioritized Program Placement** – Individuals with moderate or high CSRA scores often receive priority for enrollment in rehabilitative programs like career technical education and transitions.
- **Consistency and Speed** – As an automated tool using the Department of Justice (DOJ) Record of Arrest and Prosecution sheet, it is faster and more consistent than manual scoring, reducing human bias in risk classification.
- **Effective Supervision** – The scores help guide parole supervision decisions and treatment plans, such as determining the intensity of monitoring required after release.

RESEARCH ON USE: CDCR used the following reports for its research:

- *Development of the California Static Risk Assessment Instrument (CSRA)* by the University of California, Irvine
- *California Department of Corrections and Rehabilitation: Several Poor Administrative Practices Have Hindered Reductions in Recidivism and Denied Inmates Access to In-Prison Rehabilitation Programs* by the California State Auditor
- *Risk and Needs Assessments in Prisons: Identifying High-Priority Needs for Using Evidence-Based Practices* by the RAND Corporation

ALTERNATIVES: CDCR staff would manually perform the CSRA evaluation.

RESEARCH ON ALTERNATIVES: The CSRA process is required by Title 15. Without the CSRA system, the required process would be manually labor intensive.

RISK MITIGATION MEASURES:

- **Accuracy Performance Metrics** – As part of the validation process prior to updating the automated scoring program of CSRA, CDCR and UC Irvine would run the algorithm separately to ensure the accuracy of the output.
- **Cybersecurity Controls** – CDCR employs standard state mandated cybersecurity controls including user authentication, usage tracking, and password management within the security enclave behind the firewall.
- **Privacy Controls** – Only authorized users have access to the application using Role Based Access Control.
- **Audits for Accuracy, Bias and Discrimination** – UC Irvine completed the CSRA revalidation of the automation scoring program. CDCR will solicit future contracts to maintain ongoing revalidation.
- **Contestation Measure or Process** – If an incarcerated/supervised individual wishes to appeal an automated CSRA score, the appeal must be sent to the county that reported the criminal history information to the DOJ. CDCR cannot change automated CSRA scores. If an incarcerated/supervised individual wishes to appeal a manual score, they can utilize the current CDCR appeal process.
- **Professional Development** – CDCR staff that use CSRA are trained on where to retrieve the score. Select CDCR staff are also trained to create a manual CSRA score derived from the DOJ criminal history information when required.

DATA CATEGORIES:

- Individual's name, address, phone number, or date of birth
- Criminal record

CDCR – PVDTS

SYSTEM OVERVIEW:

The PVDTS contains the following two components that support parole administration.

The CDCR Form 1500, or the Parole Violation Decision-Making Instrument (PVDMI), is a mandatory CCR, Title 15, Division 3, Section 3000 California tool used by the Division of Adult Parole Operations (DAPO) staff to determine, recommend, and impose consistent, risk-based sanctions for parole violations. It considers offender risk-level and violation severity to guide decisions for adjudicating violations or referring them to the Board of Parole Hearings (BPH). It incorporates the CSRA and violation severity rankings.

The Parolee Dynamic Profile section of the CDCR 1502-DR (Discharge Review) Form is used in the parole and probation process, specifically for initiating a discharge review (Statutory, Earned or Early) for a supervised person. Within the Parolee Dynamic Profile section of the form, a calculation is applied using the scores for the parolee's residence, employment, general/special conditions, pro social factors, CSRA, sex offender evaluation (Static-99) and the supervision level to determine a recommendation for the discharge review (Retain on Parole or Discharge).

SYSTEM INFORMATION AS REPORTED BY CDCR:

NAME: CDCR – PVDTS

STATUS: In Use

MATERIAL IMPACT AREA: Housing or Accommodations, Education, Employment, Credit, Health Care, Criminal Justice

NATURAL PERSONS AFFECTED: Supervised Persons

DECISION MADE: PVDMI provides a “Response Level” to the Parole Agent and Unit Supervisor when recording a violation for a supervised person. Each response level has applicable “Sanctions” for a Parole Agent and/or Unit Supervisor to apply to the violation. Response levels include “Least Intensive”, “Moderately Intensive”, “Most Intensive A”, “Most Intensive B”, and “Most Intensive C”. 1502-DR (Parolee Dynamic Profile calculation) provides Parole Agents with a recommended discharge review decision. The tool is used to provide DAPO with a “Retain on Parole” or “Discharge” recommendation.

BENEFITS:

- **PVDMI benefits:**
 - A consistent application of risk-based decision-making rules when documenting violations.
 - Uniform and proportionate responses to technical and criminal parole violations.
 - A common methodology when evaluating a supervised person’s risk level and severity of violations to determine an appropriate response.
 - An evidence-based tool to pair risk-assessment factors with violation severity assessments to determine appropriate sanctions.
- **1502-DR Dynamic Profile benefits:**
 - A consistent methodology for determining a discharge review recommendation (Retain or Discharge).
 - A uniform process for evaluating stability and pro-social factors, a supervised person’s adherence to documented Conditions of Parole and the overall risk assessment (CSRA score and Supervision Level).

RESEARCH ON USE: CDCR used the *Parole Violation Decision-Making Instrument (PVDMI) Process Evaluation* report by The University of California, Irvine for its research.

ALTERNATIVES: Manual assessments by Parole Agents and/or Unit Supervisors

RESEARCH ON ALTERNATIVES: The alternative is a manual, more subjective, less evidence-based, less repeatable process.

RISK MITIGATION MEASURES:

- **Accuracy Performance Metrics:**
 - For the PVDMI CDCR tests to confirm that the right response level is recommended for the charge(s) noted in the violation. Testing is performed to confirm the CSRA score and Static-99 values trigger the correct response level.
 - For the 1502-DR, CDCR tests to confirm that the recommendation is correct based on the Parole Dynamic Profile ratings.
- **Cybersecurity Controls** – CDCR employs standard state mandated cybersecurity controls including user authentication, usage tracking, and password management within the security enclave behind the firewall.
- **Privacy Controls** – Only authorized users have access to the application.
- **Audits for Accuracy, Bias and Discrimination:**
 - The PVDMI Override/Underride Report is used to monitor adherence to the tool to identify trends, efficacy of decision-making, etc.
 - The 1502-DR Dynamic Profile calculation review steps are built into subsequent workflows to validate decisions that align with departmental guidelines (for example, Case Records review, BPH reviews).
- **Human Oversight:**
 - PVDMI has override capabilities built into the decision-making tool. Parole Agents can select a different response level when applicable. If they deviate from the recommendation, then “stabilizing” or “destabilizing” factors must be identified. Additional override measures are built into the tool to allow Unit Supervisors and Parole Administrators to select a different overriding response level when appropriate.

- 1502-DR Dynamic Profile calculation has override capabilities built into the application. Parole Agents can override the recommendation as necessary. If they deviate from the recommendation, then a justification must be provided in the narrative of the Parole Agent Comments/Recommendation section.
- **Professional Development** – Training is provided during the basic parole agent academy which emphasizes that the system output is solely a recommendation requiring human oversight.

DATA CATEGORIES:

- Individual's name, address, phone number, or date of birth
- Criminal record
- Health information (mental health information)

CSU – Proctorio

SYSTEM OVERVIEW: Proctorio is an ADS used to help ensure the integrity of exams and quizzes via features that allow for remote proctoring and identity verification by flagging potential cheating.

SYSTEM INFORMATION AS REPORTED BY CSU:

NAME: CSU – Proctorio

STATUS: In Use

MATERIAL IMPACT AREA: Education

NATURAL PERSONS AFFECTED: CSU Students

DECISION MADE: Helps determine whether a student is cheating using a rating of behaviors during testing

BENEFITS:

- Removes barriers for distance learning and reduces costs associated with traditional proctoring
- Supports academic integrity

RESEARCH ON USE:

- Online proctoring can eliminate travel time and costs for students.
- The proctoring system performs well at low internet speed.
- Online proctoring can easily be integrated into existing learning platforms.
- Students are generally positively disposed towards the use of online proctoring.

ALTERNATIVES: In-person and remote proctoring in other locations

RESEARCH ON ALTERNATIVES: In-person and remote proctoring in other locations is cost-prohibitive.

RISK MITIGATION MEASURES:

- **Cybersecurity Controls** – Data is encrypted in transit and at rest, access to reports and flagged submissions is limited to authorized faculty and staff.
- **Privacy Controls** – Student data use is governed by the Family Educational Rights and Privacy Act (FERPA) and institutional privacy policies. Proctorio is contractually required to adhere to campus data protection standards.
- **Contestation Processes** – There is a process to contest the automated decision. Students have the right to appeal grades and reported cheating behavior.

- **Professional Development** – Instructors are required to complete training on the use of Proctorio and they can work with information technology consultants for guidance. Students are offered and encouraged to complete a practice test to ensure they understand how Proctorio is used.

DATA CATEGORIES:

- Individual's name, address, phone number, or date of birth
- Biometric data (for example, face detection, gaze detection)
- Computer usage data (for example, mouse position, IP address, browser information)
- Audio of student environment

CSU – Turnitin

SYSTEM OVERVIEW: Turnitin is an ADS used to identify student essays or assignments that may have been generated, in whole or part, by AI writing systems. It automatically flags and quantifies the likelihood that student-submitted work was created using Generative AI (GenAI), with the intent of supporting academic integrity reviews.

SYSTEM INFORMATION AS REPORTED BY CSU:

NAME: CSU – Turnitin

STATUS: In Use

MATERIAL IMPACT AREA: Education

NATURAL PERSONS AFFECTED: CSU Students

DECISION MADE: Helps determine whether a student's essay or assignment was generated using AI writing systems

BENEFITS:

- Supports academic integrity
- Provides an automated, efficient method for screening student assignments
- Raises student and faculty awareness of responsible and ethical use of AI

RESEARCH ON USE:

- Turnitin acknowledges that detection of AI writing is an evolving and imperfect science.
- External studies have found false positive rates, especially with non-native English writing and simple, formulaic essays that could be disproportionately flagged.
- Faculty professional development is essential in helping to interpret detection tool reports.

ALTERNATIVES:

- Manual review by instructors for signs of AI-generated writing (for example, stylistic anomalies, generic prose)
- Use of other plagiarism detection tools that do not specifically identify AI-generated text
- Oral examinations or in-class writing assessments as verification measures

RESEARCH ON ALTERNATIVES:

- Manual detection is subjective and not scalable, especially in large classes
- Existing plagiarism tools do not reliably detect AI-generated text, as AI writing is often original but uncredited
- In-person assessments are resource-intensive and may not be feasible for all course formats

RISK MITIGATION MEASURES:

- **Cybersecurity Controls** – Data is encrypted in transit and at rest, access to reports and flagged submissions is limited to authorized faculty and staff.
- **Privacy Controls** – Student data use is governed by FERPA and institutional privacy policies. Turnitin is contractually required to adhere to campus data protection standards.
- **Contestation Processes** – Students have the right to challenge or appeal any academic integrity action taken based on the system’s findings. University practices require human review of all flagged submissions before disciplinary action. Formal processes are in place for students to present evidence and seek an independent review if accused.
- **Professional Development** – Faculty is trained to interpret results and integrate them into responsible teaching, including AI literacy principles and guidelines. Clear AI literacy instruction and student conduct guidelines are in place.

DATA CATEGORIES:

- Individual's name, address, phone number, or date of birth
- Student identification and assignment text and metadata

EDD – Thomson Reuters UI Fraud Detect

SYSTEM OVERVIEW: The Thomson Reuters UI Fraud Detect is comprised of fraud-detection and identity verification solutions implemented through a layered approach to ensure the selected tools meet operational, security, and program-integrity needs to improve fraud detection and case management. The system delivers identity risk analytics that cross-match with third-party data sources to produce risk scores, alerts, dashboards, and profiles that help prevent identity and other unemployment insurance fraud and support investigations based on business rules driven by the unemployment insurance code. The system generates actionable leads, triages claims by risk (high/medium/low), and provides reporting and geospatial/network analysis to improve fraud detection and case management.

SYSTEM INFORMATION AS REPORTED BY EDD:

NAME: EDD – Thomson Reuters UI Fraud Detect

STATUS: In Use

MATERIAL IMPACT AREA: Unemployment Insurance Benefits

NATURAL PERSONS AFFECTED: Claimants for Unemployment Insurance

DECISION MADE: System used to identify high-risk factors and support the need to request additional information from the claimant to help determine unemployment insurance eligibility.

BENEFITS:

- Enables faster, more accurate identity verification to prevent identity fraud schemes
- Streamlines reviews to reduce false positives and false negatives using ranked confidence scores
- Improves productivity, optimizing investigative resources to focus on complex cases
- Supports program integrity and compliance with California Unemployment Insurance Code
- Helps to safeguard the Unemployment Insurance Fund

RESEARCH ON USE: To support program integrity for unemployment insurance eligibility decisions, EDD implemented fraud-detection and identity verification solutions and a layered approach where the Thomson Reuters UI Fraud Detect output is one of many factors used to determine risk based on claimant provided information.

ALTERNATIVES: Manual or legacy labor-intensive processes (for example, individual data checks, manual cross-matching, and standard case review)

RESEARCH ON ALTERNATIVES: EDD would rely on labor intensive manual or legacy processes (for example, individual data checks, manual cross-matching, and standard case review).

RISK MITIGATION MEASURES:

- **Accuracy Performance Metrics** – EDD monitors performance through ongoing collaboration with the vendor to fine-tune models and logic. Metrics such as match quality, false positives and case resolution outcomes are used to assess accuracy and effectiveness.
- **Cybersecurity Controls** – Employees access Thomson Reuters UI Fraud Detect through internal information technology paths secured by multi-factor authentication.
- **Privacy Controls** – EDD performed a Privacy Impact Assessment / Privacy Threshold Assessment in support of Thomson Reuters UI Fraud Detect and ensured that privacy controls are in place.
- **Audits for Accuracy, Bias and Discrimination** – EDD performs internal reviews, both ongoing and as needed. If any biases were detected in the use of the application, then a thorough analysis would be performed to identify the impact and the necessary corrective actions would be taken.
- **Contestation Processes** – All ADS output is human reviewed. Claimants may provide requested documentation in support of their claim eligibility. If found not eligible, claimants may present their case to an Administrative Law Judge to overturn the decision.
- **Professional Development** – Staff receive internal and vendor training for job functions.
- **Organizational Feedback Loop** – Feedback loops are in place within EDD.

DATA CATEGORIES:

- Individual's name, address, phone number, or date of birth
- Criminal record
- Mobile device location information

DCC – CPIA

SYSTEM OVERVIEW: CPIA allows a user to upload an image of a cannabis product. OpenAI, a GenAI product, assesses the image based on a prompt created by DCC to determine whether the image is potentially in compliance or in violation of the department's regulations for packaging considered attractive to children. The prompt includes direct references to the department's regulations.

SYSTEM INFORMATION AS REPORTED BY DCC:

NAME: DCC – CPIA

STATUS: In Development

MATERIAL IMPACT AREA: Regulatory Compliance

NATURAL PERSONS AFFECTED: Business owner(s)

DECISION MADE: Can indicate potential violations of CCR sections pertaining to attractive to children packaging of cannabis products

BENEFITS:

- Provides a second point of analysis for DCC staff reviewing packages for potential packaging violations

- Will provide licensees with an assessment of uploaded packaging images allowing licensees to obtain an assessment of potential violations before investing funds in the purchase of potentially violative packaging (once made available for public use)

RESEARCH ON USE: No research was conducted related to this ADS aside from market research regarding AI products that can perform image analysis.

ALTERNATIVES: The alternative to the CPIA would be staff assigned to perform a review of each cannabis package, and to offer the licensee population an ability to submit proposed cannabis packaging for staff review. Neither of these options is feasible, given current DCC resources.

RESEARCH ON ALTERNATIVES: No alternative ADS was considered for this purpose.

RISK MITIGATION MEASURES:

- **Accuracy Performance Metrics** – DCC performed multiple rounds of testing with hundreds of images which compared the CPIA output with that of staff inspectors and found very comparable results.
- **Cybersecurity Controls** – System scans are conducted with department’s cybersecurity vulnerability software. DCC performed penetration testing to protect department data.
- **Privacy Controls** – No data is being stored including images or simplified outputs. Once browser session is closed, all information is removed.
- **Audits for Accuracy, Bias and Discrimination** – Over the next year ongoing attention including quarterly reviews for model drift and hallucinations are planned.
- **Contestation Measure or Process** – If a licensee disagrees with the decision assisted by CPIA, they can reach the DCC at the email address provided on the webpage to request a review by DCC staff.
- **Professional Development** – In-house training is provided on the use of CPIA including business processes. The department has annual internal security training including acceptable for AI.
- **Other** – DCC conducted a GenAI risk assessment, which was reviewed by CDT according to state policy.

DATA CATEGORIES: Image file

CSU – Customized GPT for Employment Application Review

SYSTEM OVERVIEW: The CSU Customized GPT for Employment Application Review was a POC being developed in the Spring of 2025 by one CSU campus to assist in talent acquisition to identify candidates who meet minimum qualifications for specific advertised job postings. CSU discontinued this POC in October 2025.

SYSTEM INFORMATION AS REPORTED BY CSU:

NAME: CSU – Customized GPT for Employment Application Review

STATUS: Discontinued

MATERIAL IMPACT AREA: Employment

NATURAL PERSONS AFFECTED: CSU Job Applicants

DECISION MADE: Assists in identifying candidates who meet minimum qualifications to help determine which candidates advance to the next stage of selection

BENEFIT: To improve efficiency, accuracy, and fairness

<p>RESEARCH ON USE: N/A – POC discontinued.</p> <p>ALTERNATIVES: Manual processes or other software</p> <p>RESEARCH ON ALTERNATIVES: N/A – POC discontinued.</p> <p>RISK MITIGATION MEASURE: Human review</p> <p>DATA CATEGORIES: Individual's name, address, phone number, or date of birth</p>

Amended Submissions

The following table lists systems that state agencies initially submitted as high-risk ADS but later determined that they did not meet the statutory definition of high-risk ADS. CDT agrees with the outcome of these reassessments, and therefore, these systems are not included in the inventory.

State Agency	System Name
Caltrans	Traffic Mobility Insights (TMI)
Caltrans	Vulnerable Roadside Users (VRU)
CIRM	SentinelOne Managed Detection & Response (MDR)
CSC	ACC7 Avigilon Control Center
DOF	Legislative Bill Analysis
DOR	Case Services Data Analytics and Modeling
HCAI	HCAI Funding Portal

Below are the state agency reassessment rationale statements.

Caltrans – TMI Reassessment

STATE AGENCY REASSESSMENT RATIONALE:

After reviewing the definition of high-risk ADS in GC 11546.45.5, and after consulting with CDT, Caltrans determined there was no natural person being materially impacted by TMI’s output. Additionally, the system output is not simplified, nor does it replace or substantially assist human discretionary decision-making. The system informs broad transportation research rather than individualized determinations. Therefore, based on analysis of GC 11546.45.5, Caltrans determined its system does not meet the statutory definition of a high-risk ADS.

Caltrans – VRU Reassessment

STATE AGENCY REASSESSMENT RATIONALE:

After reviewing the definition of high-risk ADS in GC 11546.45.5, and after consulting with CDT, Caltrans determined there was no natural person being materially impacted by VRU’s output. Additionally, the system output is not simplified, nor does it replace or assist human discretionary decision-making. The system informs broad transportation research rather than individualized determinations. Therefore, based on analysis of GC 11546.45.5, Caltrans determined its system does not meet the statutory definition of a high-risk ADS.

CIRM – SentinelOne MDR Reassessment

STATE AGENCY REASSESSMENT RATIONALE:

After reviewing the definition of high-risk ADS in GC 11546.45.5, and after consulting with CDT, CIRM determined that no natural persons are materially impacted, nor is there a simplified output that assists or replaces human decision making. SentinelOne MDR is an automated cybersecurity tool designed to enhance security monitoring and incident response.

CSC – ACC7 Reassessment

STATE AGENCY REASSESSMENT RATIONALE:

After reviewing the definition of high-risk ADS in GC 11546.45.5, and after consulting with CDT, CSC determined that no natural persons are materially impacted, nor is there a simplified output that assists or replaces human decision-making. Based on GC 11546.45.5, CSC determined its system does not meet the statutory definition of high-risk ADS. CSC confirmed with its operations management that ADS-based features are disabled and there are no plans to enable these in the future.

DOF – Legislative Bill Analysis Reassessment

STATE AGENCY REASSESSMENT RATIONALE:

After reviewing the definition of high-risk ADS in GC 11546.45.5, and after consulting with CDT, DOF determined that no natural persons are materially impacted, nor is there a simplified output that assists or replaces human decision-making. Based on GC 11546.45.5, DOF determined its system does not meet the statutory definition of high-risk ADS.

DOR – Case Services Data Analytics and Modeling Reassessment

STATE AGENCY REASSESSMENT RATIONALE:

After reviewing the definition of high-risk ADS in GC 11546.45.5, DOR determined there was no natural person being materially impacted, nor was there a simplified output that assisted or replaced human discretionary decision making. The system's processes employ only compilations of data, which are explicitly excluded by GC 11546.45.5. Therefore, based on this analysis of GC 11546.45.5, the processes do not meet the definition of high-risk ADS.

HCAI – Funding Portal Reassessment

STATE AGENCY REASSESSMENT RATIONALE:

After reviewing the definition of high-risk ADS in GC 11546.45.5, HCAI determined there was no natural person being materially impacted, nor was there a simplified output that assisted or replaced human discretionary decision making. This system does not leverage machine learning, statistical modeling, artificial intelligence or data analytics in determining eligibility. Therefore, based on this analysis of GC 11546.45.5, HCAI's system does not meet the definition of high-risk ADS.

Conclusion

The 2025 high-risk ADS inventory report is the second iteration of the legislative report and the first report with identified high-risk ADS that have been proposed for use, development, or procurement by, or are being used, developed, or procured by, state agencies. With the identification of these systems, CDT will populate and maintain the inventory of high-risk ADS to track the usage, impacts, and risk mitigation throughout the state.

The key findings of the inventory are as follows:

1. The six material-impact categories (education, health care, criminal justice, housing or accommodations, employment, credit) listed in GC 11546.45.5 are impacted. EDD identified its own category as “unemployment insurance” and DCC identified its own category, the “business licensee” category. CDT will map DCC’s impact area to “regulatory compliance” to accommodate future systems that may have similar impacts.
2. High-Risk ADS impacting CDCR Incarcerated and Supervised Persons:
 - a. Incarcerated and Supervised Persons access to education, health care, criminal justice, housing or accommodations, employment, and credit are impacted by three in-use high-risk ADS.
 - b. CDCR has measures in place to mitigate the risks of the reported high-risk ADS. These measures include independent validation studies, staff training, accuracy testing, and human oversight.
3. High-Risk ADS impacting CSU Students:
 - a. Students’ access to education is potentially impacted by two in-use high-risk ADS.
 - b. CSU has measures in place to mitigate the risks of the reported high-risk ADS. These measures include faculty and student training, as well as a process to contest results.
4. High-Risk ADS impacting Cannabis Business Licensees:
 - a. Licensees will potentially be impacted by one high-risk ADS.
 - b. DCC has measures in place to mitigate the risks of the reported high-risk ADS. These measures include testing for accuracy, planned internal agency reviews and a contestation process.
5. High-Risk ADS impacting EDD Unemployment Insurance Claimants:
 - a. Claimants are potentially impacted by one high-risk ADS.
 - b. EDD has measures in place to mitigate the risks of the reported high-risk ADS. These measures include internal agency reviews and a claimant appeals process.

The technology landscape changes rapidly. Automated decision-making capabilities are becoming more prevalent and simpler to integrate into various applications. There are well-established safeguards and policies in place to help mitigate risks associated with using ADS, such as the State Administrative Manual and Statewide Information Management Manual policies for cybersecurity, data privacy, and contract terms and conditions. CDT will continuously monitor emerging technologies and the risks that may impact Californians and

High-Risk Automated Decision Systems Report

State employees, and CDT will continue to refine policy to adapt to the changing technology landscape.

Appendix A: State Agency Reporting Compliance Summary

The following table lists state agencies for which CDT provided a reporting exception for high-risk ADS:

State Agency	Survey Exception Reason
Administrative Hearings, Office of	Included in the Department of General Services response
Center for Data Insights and Innovation	Included in the Office of Technology Solutions Integration response
Historical Records Advisory Board, California	No longer active
State Allocation Board	Included in the Department of General Services response
State Compensation Insurance Fund	Cited "GC 11548, Chapter 5.6, 'This chapter shall not apply to the State Compensation Insurance Fund, ...'"
The Governor's Office of Tribal Affairs	Included in Governor's Office response
Visit California	Not a "State agency" and not required to report

The following table lists all the state agencies required by statute to respond to the CDT's high-risk ADS survey:

State Agency
Achieving a Better Life Experience, California
Acupuncture Board, California
Administrative Law, Office of
Aging, Department of
Alcoholic Beverage Control, Department of
Apprenticeship Council, California
Arbitration Certification Program
Architects Board, California
Automotive Repair, Bureau of
Baldwin Hills Conservancy
Barbering and Cosmetology, Board of
Behavioral Sciences, Board of
Biodiversity Council, California
Board of Accountancy, California
Board of Equalization, State
Business, Consumer Services, and Housing Agency, Secretary for
California African American Museum

High-Risk Automated Decision Systems Report

California Alternative Energy & Advanced Transportation Financing Authority
California Board of Naturopathic Medicine
California Cultural and Historical Endowment
California Exposition (Exposition Park)
California Health and Human Services Agency, Secretary for
California Highway Patrol
California Housing Finance Agency
California Institute for Regenerative Medicine
California Privacy Protection Agency
California State Auditor's Office
California State Summer School for the Arts
California State University
California Surgeon General, Office of the
California Tax Credit Allocation Committee
Cannabis Control, Department of
Cemetery and Funeral Bureau
Child Support Services, Department of
Chiropractic Examiners, Board of
Civil Rights Department
Coachella Valley Mountains Conservancy
Coastal Commission, California
Colorado River Board of California
Commission on State Mandates
Community Services and Development, Department of
Conservation Corps, California
Conservation, Department of
Consumer Affairs, Department of
Contractors State License Board
Correctional Health Care Services
Corrections and Rehabilitation, Department of
Council on Criminal Justice and Behavioral Health
Courter Reporters Board of California
Covered California
Data and Innovation, California Office of
Debt and Investment Advisory Commission, California
Debt Limit Allocation Committee, California
Delta Protection Commission
Delta Stewardship Council
Dental Board of California
Dental Hygiene Board of California
Developmental Services, Department of

High-Risk Automated Decision Systems Report

Disabled Veterans Business Enterprise Advisory Council
Education Audit Appeals Panel
Education, Department of
Educational Facilities Authority, California
Emergency Medical Service Authority
Emergency Services, Governor's Office of
Employment Development Department
Employment Training Panel
Energy Infrastructure Safety, Office of
Environmental Health Hazard Assessment, Office of
Environmental Protection Agency, Secretary for
Exposition and State Fair, California
Fair Political Practices Commission
Finance, Department of
Financial Information System for California, Department of
Financial Protection and Innovation, Department of
Fish and Wildlife, Department of
Food and Agriculture, Department of
Forestry and Fire Protection, California Department of
Franchise Tax Board
General Services, Department of
Government Operations Agency, Secretary for
Governor's Office
Governor's Office of Business and Economic Development (GO-Biz)
Health Care Access and Information
Health Care Services, Department of
Health Facilities Financing Authority, California
High Speed Rail Authority
Household Goods and Services, Bureau of
Housing and Community Development, Department of
Human Resources, Department of
Industrial Relations, Department of
Infrastructure and Economic Development Bank (I-Bank)
Insurance, Department of
Justice, Department of
Labor and Workforce Development Agency, Secretary for
Land Use and Climate Innovation, Office of
Landscape Architects Technical Committee
Lieutenant Governor, Office of the
Managed Health Care, Department of
Medical Board of California

High-Risk Automated Decision Systems Report

Mental Health Services Oversight & Accountability Commission
Military Department, California
Motor Vehicles, Department of
Natural Resources Agency, Secretary of
Occupational Therapy, California Board of
Ocean Protection Council
Office of the Inspector General
Optometry, California State Board of
Osteopathic Medical Board of California
Parks and Recreation, Department of
Parole Hearings, Board of
Pesticide Regulation, Department of
Pharmacy, California State Board of
Physical Therapy Board of California
Physician Assistant Board
Podiatric Medical Board of California
Pollution Control Financing Authority, California
Pooled Money Investment Board
Prison Industry Authority
Private and Postsecondary Education, Bureau of
Professional Engineers, Land Surveyors, and Geologists, Board of
Professional Fiduciaries Bureau
Psychology, Board of
Public Employees' Retirement System, California
Public Health, California Department of
Real Estate Appraisers, Bureau of
Real Estate, Department of
Registered Nursing, California Board of
Rehabilitation, Department of
Resources Recycling and Recovery, Department of
Respiratory Care Board of California
Sacramento-San Joaquin Delta Conservancy
San Diego River Conservancy
San Francisco Bay Conservation and Development Commission
San Gabriel and Lower Los Angeles River and Mountains Conservancy
San Joaquin River Conservancy
Santa Monica Mountains Conservancy
Scholarshare Investment Board
School Finance Authority, California
Science Center, California
Secretary of State

High-Risk Automated Decision Systems Report

Security and Investigation Services, Bureau of
Sierra Nevada Conservancy
Social Services, Department of
Speech-Language Pathology and Audiology and Hearing Aid Dispensers Board
State and Community Corrections, Board of
State Athletic Commission, California
State Coastal Conservancy
State Controller's Office
State Fire Marshal, Office of the
State Hospitals, Department of
State Lands Commission, California
State Library, California
State Public Defender
State Teachers' Retirement System
State Treasurer's Office
Status of Women and Girls, Commission on
Structural Pest Control Board
System Integration, Office of
Tahoe Conservancy, California
Tax and Fee Administration, California Department of
Tax Appeals, Office of
Technology, Department of
Toxic Substances Control, Department of
Traffic Safety, Office of
Transportation Agency, Secretary for
Transportation, Department of
Uniform Construction Cost Accounting Commission, California
Veterans Affairs, Department of
Veterinary Medical Board
Victim Compensation Board, California
Vocational Nursing and Psychiatric Technicians, Board of
Water Quality Monitoring Council, California
Water Resources, Department of
Wildlife Conservation Board
Youth and Community Restoration, Office of

Appendix B: CDT Survey Screenshots

Initial Survey Screenshots

The following section contains screenshots of the survey sent to state agencies to report their inventory of high-risk ADS:



High-Risk Automated Decision System Data Collection

California Department of Technology (CDT) is mandated by [GC § 11546.45.5](#) to provide a report to the Assembly Committee on Privacy and Consumer Protection and the Senate Committee on Governmental Organization on or before January 1, 2026, of high-risk Automated Decision Systems (ADS) that have been proposed for use, development, or procurement by, or are being used, developed, or procured by any state agency.

State entities that have been identified as a "state agency", as defined in [GC § 11546.45.5](#), are mandated to report high-risk ADS information to CDT.

Refer to the definitions in [GC § 11546.45.5](#), to determine what systems are reportable as high-risk ADS.

Please note the following:

1. Only submissions from "state agency" CIOs, AIOs or the senior most Information Technology official will be accepted.
2. The data collection submission deadline for each "state agency" to report all high-risk ADS to CDT is on or before August 29, 2025.
3. After the data collection submission deadline, CDT will reach out to each "state agency" to confirm "Yes" responses of reportable high-risk ADS.
4. Even if a "state agency" does not have any planned or in use high-risk ADS, a response must be submitted.
5. Submit a separate data response for each high-risk ADS that has been proposed for use, development, or procurement, or is being used, developed, or procured.
6. Refer to your legal counsel for interpreting compliance with [GC § 11546.45.5](#).

For additional information, please see [Frequently Asked Questions](#).

Agency and Submitter Details

This group of fields is about your "state agency" and the Data Submitter.

Name *

Please provide your full name. (First Name, Middle Initial, Last Name)

Email *

Please provide your email address so that you will receive a copy of the data that you submitted for your "state agency".

Agency Name *

Please click on the + sign and select the name of your "state agency". You can also start typing in the Search box and narrow down the relevant list of names.

High-Risk Automated Decision Systems Report

High-Risk ADS Reporting Requirements per GC § 11546.45.5

Does your organization have any High-Risk ADS proposed for use, development, or procurement by, or are being used, developed, or procured?*

A "High-risk automated decision system (ADS)" means an automated decision system that is used to assist or replace human discretionary decisions that have a legal or similarly significant effect, including decisions that materially impact access to, or approval for, housing or accommodations, education, employment, credit, health care, and criminal justice. GC § 11546.45.5. (a) (4)

"Automated decision system" means a computational process derived from machine learning, statistical modeling, data analytics, or artificial intelligence that issues simplified output, including a score, classification, or recommendation, that is used to assist or replace human discretionary decision making and materially impacts natural persons. GC § 11546.45.5. (a) (1)

"Automated decision system" does not include a spam email filter, firewall, antivirus software, identity and access management tools, calculator, database, dataset, or other compilation of data. GC § 11546.45.5. (a) (1)

Yes

ADS Status*

Specify if the high-risk ADS is proposed for use or currently in use.

- 1. Proposed for use – Business & IT Leadership Discussions/Market Research
- 2. Proposed for development – IT Developers & Functional Consultants involved
- 3. Proposed for procurement – Already considered for use and development
- 4. In an active procurement
- 5. In development
- 6. In use

ADS Name*

Provide the short name of the automated decision system. In most cases this will be the name the solution owners have given (name of the tool, application, etc.) and not the software vendor's name.

ADS Description*

Provide a one to two sentence description of the ADS.

ADS Impacts Access to:*

Identify the area in which the ADS makes or supports decisions. Select all that apply.

- 1. Housing or Accommodations
- 2. Education
- 3. Employment
- 4. Credit
- 5. Health Care
- 6. Criminal Justice
- 7. Other

Other impact area(s)

If you picked 'Other' in the 'ADS Impacts Access to' field above, specify the area(s) of decisions the ADS makes or supports.

ADS Decisions*

Provide a list of descriptions of decisions the ADS can make or support.

ADS Benefits*

For each decision the ADS can make or support, list the actual or intended benefits of that use.

High-Risk Automated Decision Systems Report

Research on ADS use*

For each decision the ADS can make or support, describe the results of any research assessing the efficacy and relative benefits of that use.

ADS Alternatives*

For each decision the ADS can make or support, provide a description of the alternatives for that use.

Research on ADS Alternatives*

For each alternative to the ADS, describe the results of any research assessing the efficacy and relative benefits of that alternative.

Risk Mitigation Measures*

The measures in place, if any, to mitigate the risks, including cybersecurity risk and the risk of inaccurate, unfairly discriminatory, or biased decisions, of the automated decision system. Measures described by this paragraph may include, but are not limited to, any of the following:

- 1. Performance metrics to gauge the accuracy of the system
- 2. Cybersecurity controls
- 3. Privacy controls
- 4. Risk assessments or audits for potential risks
- 5. Measures or processes in place to contest an automated decision
- 6. Other

Mitigation Measures Description*

For each selected Risk Mitigation Measure, please provide additional details.

Categories of data used*

Select all that applies from the list.

- 1. Individual's name, address, phone number, or date of birth
- 2. Racial or ethnic origin
- 3. Criminal record
- 4. Credit or financial information
- 5. Mobile device location information
- 6. Voice or facial recognition biometrics
- 7. Health information
- 8. Other

Other data

If you picked 'Other' in the data categories above, please add details in the box below.

[Clear form](#)

Submit

Amended Response Survey Screenshots

The following are screenshots of the CDT survey completed by state agencies that reassessed their systems originally designated as high-risk ADS as not high-risk ADS, along with their reassessment rationale:



High-Risk Automated Decision System Data Collection Amended Response

California Department of Technology (CDT) is mandated by [GC § 11546.45.5](#) to provide a report to the Assembly Committee on Privacy and Consumer Protection and the Senate Committee on Governmental Organization on or before January 1, 2026, of high-risk Automated Decision Systems (ADS) that have been proposed for use, development, or procurement by, or are being used, developed, or procured by any state agency.

Refer to the definitions in [GC § 11546.45.5](#), to determine what systems are reportable as high-risk ADS.

Please note the following:

1. Only submissions from "state agency" CIOs, AIOs or the senior most Information Technology official will be accepted.
2. Submit a separate data response for each high-risk ADS that has been the was previously reported, but now is being withdrawn.
3. Refer to your legal counsel for interpreting compliance with [GC § 11546.45.5](#).

For additional information, please see [Frequently Asked Questions](#).

Name *

Please provide your full name. (First Name, Middle Initial, Last Name).

Email *

Please provide your email address so that you will receive a copy of the data that you submitted for your "state agency".

State Agency Name *

Please enter the name of your "state agency" as it appeared in the *original survey submission*.

ADS Name *

Name of high-risk ADS as it appeared in the *original survey submission*.

Agency Reassessed Not High Risk ADS *

After a further review of [GC § 11546.45.5](#), my state agency has come to the conclusion the above mentioned system is not a high-risk ADS and therefore is requesting my original submission be withdrawn.

Reassessment Rationale *

Please state justification why you no longer consider this system a high-risk ADS.

For example: After reviewing the definition of high-risk ADS in [GC § 11546.45.5](#), we determined there was no natural person being materially impacted, nor was there a simplified output that assisted or replaced human discretionary decision making. Therefore, based on our analysis of GC 11546.45.5, our system does not meet the definition of high-risk ADS.

[Clear form](#)

Submit