

The AGENCY Framework for AI Governance



Think of AI as the most intelligent yet undisciplined employee you've ever hired. That's why onboarding new AI tools and capabilities needs to be approached with same level of intention used for integrating new employees. The following AGENCY framework is your week-by-week guide to approaching the proper governance of your new AI.

Assess AI Use

Week 1

Create an Inventory:

- What tools are being used?
- Who is using them?
- What data goes into the tools?
- What outputs come out?
- Is the use internal or client-facing?
- Is it approved, experimental, or prohibited?

Group Use Cases by Risk

Week 2

Classify AI Use As:

Examples:

- Low risk
- Medium risk
- High risk
- Prohibited
- Low risk: Drafting an internal training outline
- Medium risk: Drafting a client-facing renewal email
- High risk: Summarizing coverage forms
- Prohibited: Entering client PII into public AI

Establish Roles & Responsibilities

Week 3

Define:

Recommended Ownership:

- Who owns AI governance?
- Who approves tools?
- Who reviews vendors?
- Who trains staff?
- Who handles incidents?
- Who signs off on high-risk use cases?
- Executive sponsor
- Operations leader
- IT/cybersecurity
- Compliance or risk lead
- Department managers
- Power users / AI champions

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Name Approved Tools & Data Rules

Week 4

What to Create:

- Approved AI tool list
- Acceptable use policy
- Data classification rules
- Human review requirements
- Vendor review checklist

Control High-Risk Activities

Week 5

Require Extra Oversight For:

- Client-facing outputs
- Coverage-related summaries
- Claims-related work
- Any use involving sensitive data
- Vendor tools that process client data
- Client-facing automated workflows

Controls May Include:

- Human-in-the-loop review
- Source verification
- Documentation
- Manager approval
- Audit trail
- Limited permissions

Yearly Review & Continuous Improvement

Review

Governance is not a set-it-and-forget-it task. You must review:

- New tools
- New laws
- New carrier requirements
- Incidents
- Employee feedback
- Approved use cases
- Training needs

AI governance is about adopting AI without creating unnecessary risk for your agency. The agencies that win will be those who build enough structure to use AI confidently, safely, and responsibly.

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